



# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pGRL0913530430

**1RP - 2179**

**JOHN H HENDRIX CORP**



May 12, 2009

Mr. Geoffrey Leking  
New Mexico Oil Conservation Division, Environmental Bureau  
1625 N. French Drive  
Hobbs, Mexico 88240

**RE: Work Plan for Removal of Historically-Impacted Soil  
Brunson C Battery  
Township 22 South, Range 37 East, Section 3  
Lea County, New Mexico**

Mr. Leking:

John H. Hendrix Corporation (JHHC) has retained Trident Environmental to address historical impact located east-northeast of the Brunson C Battery which is also surrounded by both abandoned and active oil/gas transportation pipelines of multiple ownership. JHHC is voluntarily performing this housekeeping action to return the surface to productive capacity.

#### BACKGROUND

The Brunson C Battery is located at township 22 south, range 37 east, section 3, unit letter P approximately one mile southeast of Eunice, New Mexico, as shown on the attached Site Location Map (Figure 1). Land in the site area is primarily utilized for natural oil and gas production and pasture land for cattle grazing.

Groundwater in the site area occurs within the High Plains aquifer under water table (unconfined) conditions (Hart and McAda, 1985) at a depth of approximately 75 to 94 feet below ground surface (USGS and NMOSE online databases).

#### PREVIOUS WORK

The initial Form C-141 was submitted to the District 1 NMOCD office on December, 3, 2008. The layer of impacted hardpan pasture land has been excavated and transported to the centralized surface waste management facility managed by JHHC (NM-02-0021). Clean soil and reseeding will restore the pasture land to productive vegetative capacity. Mr. Greg Holt, leaseholder for the landowner, has been informed.

RECOMMENDATION FOR FURTHER ACTIONS

Removal of the hardpan indicates a localized area of deeper impact. This identified area will be delineated during the course of excavation to a depth not to exceed 12-feet (reach of the backhoe). Excavation delineation will be performed visually and by use of an organic vapor meter (OVM), which will be calibrated to assume a benzene response factor.

CW's Backhoe Service (Eunice, NM) will perform the soil excavation and transport soil to the JHHC Centralized Surface Waste Management Facility. Trident Environmental personnel will collect soil samples to characterize the extent of hydrocarbon-impact and advise JHHC when cleanup target levels have been achieved where practicable.

Target concentrations for closure and sample collection will be as follows:

- 1,000 mg/kg TPH
- 100 ppm OVM, and/or 10 mg/kg benzene, and 50 mg/kg BTEX (EPA Method 8021B).
- One sample consisting of a composite from a grab sample collected along each wall (north, south, east and west sides).
- One five-point composite sample from the floor of the excavation.

Clean soils purchased from the landowner will be used as backfill. The area will then be re-seeded to achieve productive capacity.

Should impact extend below 12-feet, the site will be re-evaluated for further proposed actions and submitted to OCD for approval.

A Final C-141 form will be prepared by Trident Environmental describing the excavation procedures, sample methods, analytical results, and supporting documentation (site map, laboratory analytical reports, and photodocumentation) and submitted to the District 1 OCD office in Hobbs.

We appreciate the opportunity to work with you on this project. Please feel free to call me at 432-638-8740 or Carolyn Haynes at 575-390-9689, if you have any questions.

Sincerely,



Gilbert J. Van Deventer, REM, PG  
Trident Environmental - Project Manager

cc: Carolyn Haynes (JHHC)

*enclosures: site location map*

Brunson C Facility Historical Site November 2008, before clean-up



Brunson C Facility Historical Site November 2008, before clean-up

