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Report Description

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App Number: pGRL0935754494

1RP - 2366

PURVIS OIL CORP

Purvis Operating Co.

3101 N. Pecos Street - 79705

Email: eng@purvisop.com
PO Box 51990
Midland, TX 79710-1990
432-682-7346

RECEIVED

FEB 11 2010

HOBBSOCD

Via E-Mail and US Mail

February 10, 2010

Mr. Geoffrey Leking
Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

RE: Gladiola SWD Section 26 Release Site T-12-S R-37-E Section 26
Unit Letter J, NMOCD # 09-16-2366

02/12/10
DIGEST
WANT TO
HAVE MTG
W/ THEM &
L.J.

Mr. Leking:

Purvis Operating (Purvis) is submitting this modification to the September 25, 2009 investigation proposal for the above referenced site. Please note, Purvis has resigned as the operator of the Gladiola Salt Water Disposal System. The new operator will be contacting you to take over this project within the next few weeks

To augment existing data and to address the most recent release (see attached Plat), we propose the installation of up to five 4-inch monitoring wells and four additional soil borings at the locations shown. For borings and wells, soil samples will be recovered at 5-foot intervals with the first sample at 1-foot below ground surface. Samples will be field screened for hydrocarbon vapors (PID) and chloride (field titration). Laboratory analysis of TPH and BTEX will be performed on all soil samples that contain hydrocarbon concentrations of 100 ppm PID or more. Laboratory chloride analysis will be performed on a representative number of soil samples to verify the field screening results. All borings will reach a total depth of at least 16 feet or until

- 3 consecutive samples permit a determination that the vertical extent of impact is defined or
- The boring encounters saturated soil due to perched ground water.

If the borings encounter perched ground water, four perched zone 4-inch monitoring wells will be completed with five feet of PVC screen to a depth such that the confining layer underlying the "perched" ground water zone is not compromised. One 4-inch monitoring well, located to the southeast, will penetrate the regional aquifer and completion will follow state guidance with PVC screen placed about 5 feet above and 15 feet below the static water level. Field conditions may cause a slight variation of screen placement. A background monitoring well into the regional aquifer may be installed next to the perched zone background well if the field geologist determines that such a well is useful.

RE: Gladiola SWD Section 26 Release Site T-12-S R-37-E Section 26
Unit Letter J, NMOCD # 09-16-2366

Following completion, each of the monitoring wells will be surveyed and properly developed prior to the recovery of ground water laboratory samples. Each ground water sample will be analyzed in the manner prescribed in a recent communication from Ed Hansen (see attached), however, TPH (both soil and ground water) will be analyzed using EPA method 8015 (GRO / DRO) instead of EPA method 418.1.

Once the field activities and laboratory work are completed, a report will provide the results of the field investigation and recommendations for additional work.

Please contact me if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Donnie Brown". The signature is written in a cursive style and is underlined with a single horizontal line.

Donnie Brown
Purvis Operating Co.

Attachments

c: Mr. Dean Kinsolving
Mr. Patrick B. McMahon, Esq.
Mr. Robert Lang, Chaparral Operating

Betty Oxford

From: DONNIE BROWN [eng@purvisop.com]
Sent: Wednesday, February 10, 2010 9:14 AM
To: 'Betty Oxford'
Subject: FW: Remediation Plan (1R-498) Further Delineation Required

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FEB 11 2010

HOBBSOCD

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Wednesday, January 20, 2010 6:38 PM
To: eng@purvisop.com
Cc: Johnson, Larry, EMNRD; Patrick McMahon
Subject: Remediation Plan (1R-498) Further Delineation Required

**RE: "Corrective Action Proposal"
for the Purvis Operating Company's
Gladiola NE Pipeline Release Site
Unit Letter O, Section 18, T12S, R38E, NMPM, Lea County, New Mexico
Remediation Plan (1R-498) Further Delineation Required**

Dear Mr. Brown:

The New Mexico Oil Conservation Division (OCD) has received the corrective action proposal for the Gladiola NE Pipeline Release Site, dated September 12, 2008, and has conducted a review of the proposal. The proposal, submitted for the above-referenced site, indicates that the Purvis Operating Company (Purvis) has not completed the delineation requirements in accordance with 19.15.29 NMAC (Part 29, formerly, Rule 116). Therefore, the OCD cannot approve the corrective action proposal as submitted. The OCD recommends the following:

1. Purvis shall install a sufficient number of ground water monitoring wells (at least 4 inches in diameter) at the site to delineate possible release to ground water. (This would include the "perched" water zone, which is considered to be ground water.) The well installations shall include samples of soils at 5-foot intervals starting at a depth of 6 to 12 inches bgs. The soil samples shall be analyzed for chloride. Also, respective soil samples shall be analyzed for TPH and BTEX if a there is a detection of hydrocarbons with a PID of 100 ppm or more. (Additional borings may be required if the chloride concentration of 250 mg/Kg is exceeded or the TPH concentration of 100 mg/Kg is exceeded.) The well locations shall be approved by the OCD prior to installation. (Additional monitoring wells may be required if any WQCC standard is exceeded.) The ground water must be analyzed for chloride, TDS, TPH and BTEX.
2. Purvis shall obtain soil samples at 5-foot intervals starting at a depth of 6 to 12 inches bgs to a total depth of 16 feet bgs from sufficient amount of additional borings at or beyond the perimeter of the apparent release boundary. The soil samples shall be analyzed for chloride. Also, respective soil samples shall be analyzed for TPH and BTEX if a there is a detection of hydrocarbons with a PID of 100 ppm or more. (Additional borings may be required if the chloride concentration of 250 mg/Kg is exceeded or the TPH concentration of 100 mg/Kg is exceeded.) The boring locations

2/10/2010

shall be approved by the OCD prior to installation.

3. Purvis shall submit a report to the OCD with the results of the delineation within 90 days of completion of the first sampling event. The first sampling event (including the soil and ground water samples) shall commence within 90 days. The report must include a cross-section(s) of the site with the contaminate concentrations indicated in the vadose zone and ground water.
4. Purvis shall use the following analytical methods, unless otherwise approved by the OCD:

Chloride (EPA Method 300.0),
TDS (Standard Method 2540C),
TPH (EPA Method 418.1) and
BTEX (EPA SW-846 Method 8021B or 8260B).

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please use the OCD case #, **1R-498**, on future correspondence regarding this site.

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Betty Oxford

From: DONNIE BROWN [eng@purvisop.com]
Sent: Wednesday, February 10, 2010 9:15 AM
To: 'Betty Oxford'
Subject: FW: Remediation Plan (1R-1739) Further Delineation Required

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Wednesday, January 20, 2010 6:38 PM
To: eng@purvisop.com
Cc: Johnson, Larry, EMNRD; Patrick McMahon
Subject: Remediation Plan (1R-1739) Further Delineation Required

**RE: "Corrective Action Proposal"
for the Purvis Operating Company's
Gladiola SWD Pipeline Release Site
Unit Letter A, Section 25, T12S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R-1739) Further Delineation Required**

Dear Mr. Brown:

The New Mexico Oil Conservation Division (OCD) has received the corrective action proposal for the Gladiola SWD Pipeline Release Site, dated September 12, 2008, and has conducted a review of the proposal. The proposal, submitted for the above-referenced site, indicates that the Purvis Operating Company (Purvis) has not completed the delineation requirements in accordance with 19.15.29 NMAC (Part 29, formerly, Rule 116). Therefore, the OCD cannot approve the corrective action proposal as submitted. The OCD recommends the following:

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2. Purvis shall obtain soil samples at 5-foot intervals starting at a depth of 6 to 12 inches bgs to a total depth of 21 feet bgs from sufficient amount of additional borings at or beyond the perimeter of the apparent release boundary. The soil samples shall be analyzed for chloride. Also, respective soil samples shall be analyzed for TPH and BTEX if a there is a detection of hydrocarbons with a PID of 100 ppm or more. (Additional borings may be required if the chloride concentration of 250 mg/Kg is exceeded or the TPH concentration of 100 mg/Kg is exceeded.) The boring locations

2/10/2010

shall be approved by the OCD prior to installation.

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BTEX (EPA SW-846 Method 8021B or 8260B).

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Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please use the OCD case #, **1R-1739**, on future correspondence regarding this site.

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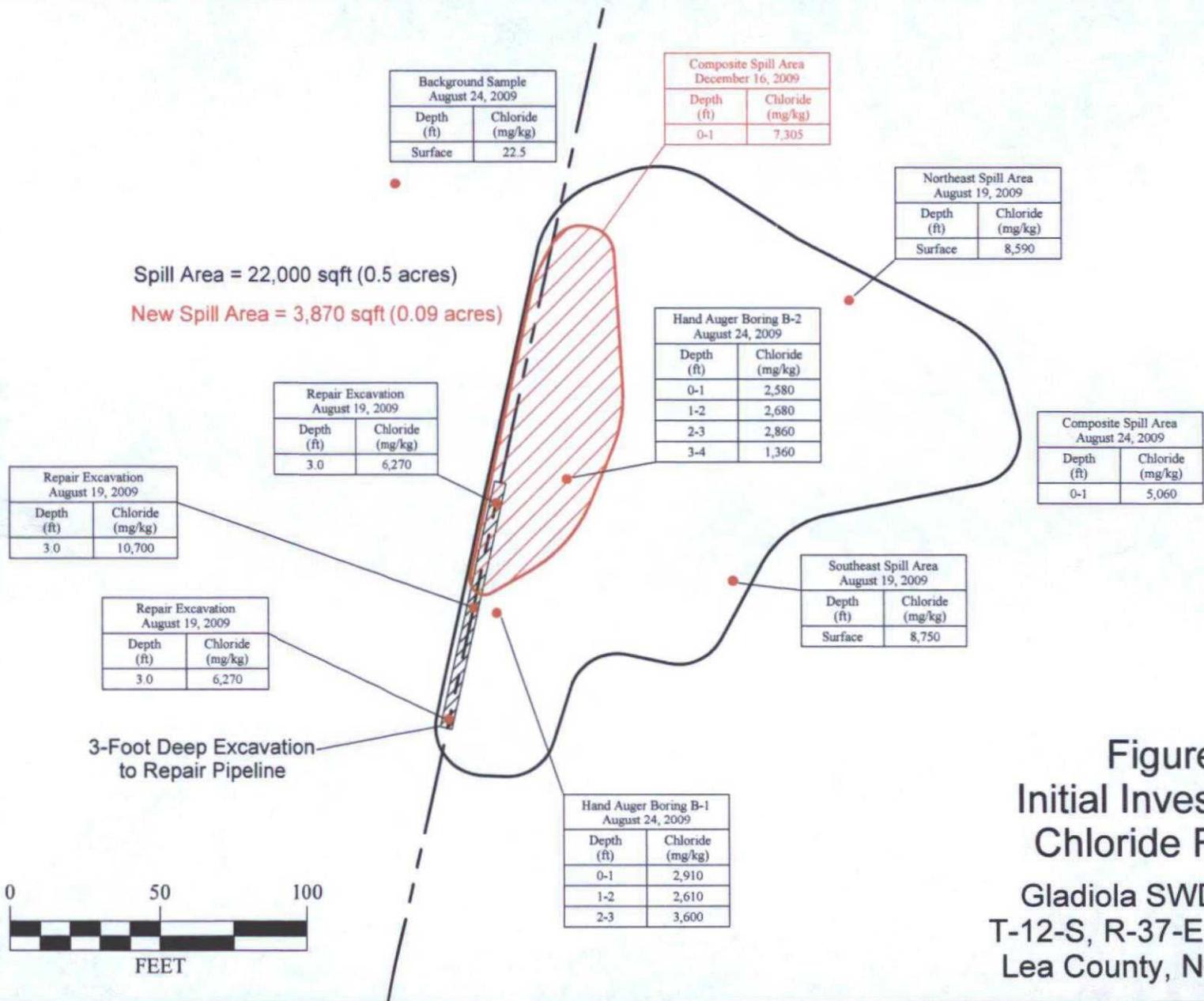


Figure 4
Initial Investigation
Chloride Results
Gladiola SWD System
T-12-S, R-37-E, Sec 26 (J)
Lea County, New Mexico