

1R - 415

WORKPLANS

DATE:

12-8-09



RECEIVED

2009 DEC 10 PM 2 53 December 8, 2009

7700 San Felipe, Suite 485
Houston, Texas 77063
Phone: (832) 327-2255
Fax : (832) 327-2260
www.vnrllc.com

Edward J. Hansen
NMOCD
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Abo 1-G Release Site, Unit G, Section 1, 17S, 36E ; NMOCD case # 1R 0415

Dear Mr. Hansen,

The purpose of this letter is to propose a work plan for a soil boring at the Abo SWD G-1 site near Lovington, New Mexico in response to your communication of November, 30, 2009. Vanguard has scheduled a drilling rig for December 14th in anticipation of your approval. The boring will be located between SB-1 (drilled October 2003) and the Confirmatory Boring (drilled October 2006). See attached figure 1 for location of the boring. The boring will be drilled as requested by NMOCD as outlined below:

Based on field titrations, the boring will be terminated when three consecutive samples have chloride concentrations less than 250 mg/kg and a depth of at least 50 feet has been attained. Samples will be collected at 5 foot intervals and will be obtained by use of a split spoon tool if possible. Selected samples will be submitted to the laboratory for analysis. Upon receiving results from the laboratory, a comparison of chloride concentration with depth will be made with data obtained from the adjacent deep borings at the site (SB-1 and the Confirmatory Boring).

Vanguard requests termination of the regulatory file by NMOCD if this new soil data shows a consistency with existing data which supports the conclusion that the release at Lovington Abo 1G is not the source of ground water impact. Your approval of this work plan confirms NMOCD's intention to close the regulatory file if data confirms our conclusions. Upon closure of the file, Vanguard will plug and abandon the monitor well on site.

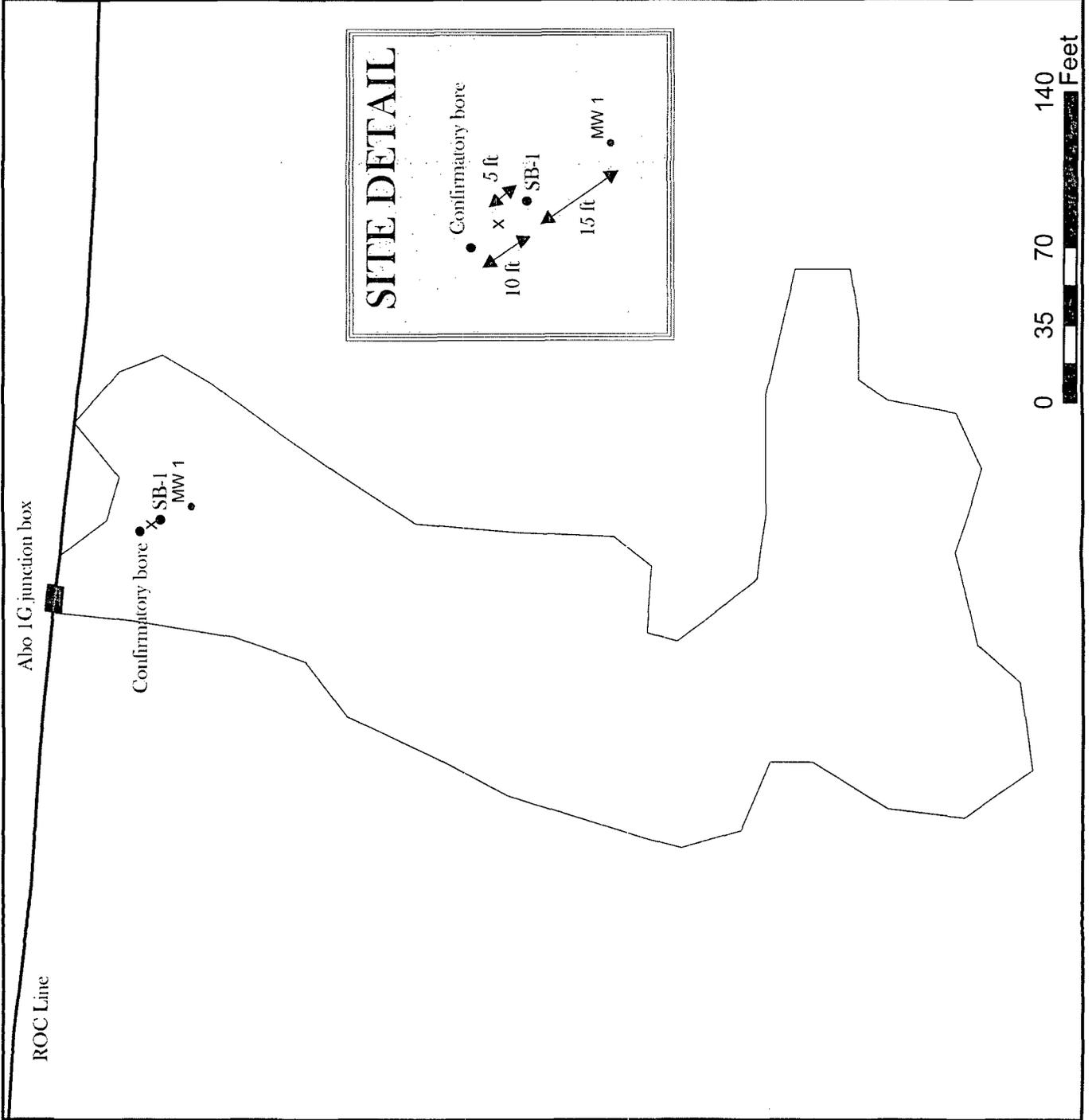
Thank you for your consideration concerning this work plan request. If you have any questions, do not hesitate to contact me at (832)327-2252.

Sincerely,

Britt Pence
Vice President

ATTACHMENT: FIGURE 1

Location of soil bores



122 W. Taylor
Hobbs, NM 88240
Phone (575) 393-9174
Fax (575) 397-1471

Abo 1G

Legals: UL/G sec.1 T17S R36E
NMOCD Case #: 1R 0415
Owner: Vanguard

- Leak extent
- X Proposed bore

Drawing date: 12-8-09
Revision date:
Drafted by: Lara Weinheimer

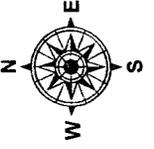


FIGURE 1

Hansen, Edward J., EMNRD

From: Pence, Britt [bpence@vnrllc.com]
Sent: Tuesday, December 08, 2009 10:28 AM
To: Hansen, Edward J., EMNRD
Cc: Painter, Newt
Subject: RE: Remediation Plan (1R415) Further Delineation - Vanguard Abo SWD G-1 Site
Attachments: Britt Pence.vcf; Abo 1G.PDF; info@vnrllc.com_20091208_111046.pdf

Dear Mr. Hansen,

Attached (and original mailed) is a proposed plan for the boring that is recommended. Please, review this proposal and let me know if you are in agreement.

Thanks,

Britt Pence



From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Monday, November 30, 2009 11:12 AM
To: Pence, Britt
Cc: Patrick McMahon; Leking, Geoffrey R, EMNRD
Subject: RE: Remediation Plan (1R415) Further Delineation - Vanguard Abo SWD G-1 Site

Dear Mr. Pence:

There is another option the New Mexico Oil Conservation Division (OCD) could consider for the below-referenced site to demonstrate that there has been no impact to groundwater. In lieu of the option below, Vanguard may install one boring between the Confirmatory boring of 2006 and SB-1. The soils of the boring must be sampled and tested for chloride in five-foot intervals to a depth of at least 50 feet or when three consecutive samples are at 250 mg/Kg or less, whichever is deeper. Vanguard would then submit the results to the OCD for possible site closure determination. However, if groundwater is encountered, then Vanguard must install a groundwater monitoring well.

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

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Hansen, Edward J., EMNRD
Sent: Monday, January 12, 2009 4:25 PM
To: 'Hack Conder'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Katie Lee'; 'Patrick McMahon'
Subject: Remediation Plan (1R415) Further Delineation



7700 San Felipe, Suite 485
Houston, Texas 77063
Phone: (832) 327-2255
Fax : (832) 327-2260
www.vnrllc.com

December 8, 2009

Edward J. Hansen
NMOCD
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Abo 1-G Release Site, Unit G, Section 1, 17S, 36E ; NMOCD case # 1R 0415

Dear Mr. Hansen,

The purpose of this letter is to propose a work plan for a soil boring at the Abo SWD G-1 site near Lovington, New Mexico in response to your communication of November, 30, 2009. Vanguard has scheduled a drilling rig for December 14th in anticipation of your approval. The boring will be located between SB-1 (drilled October 2003) and the Confirmatory Boring (drilled October 2006). See attached figure 1 for location of the boring. The boring will be drilled as requested by NMOCD as outlined below:

Based on field titrations, the boring will be terminated when three consecutive samples have chloride concentrations less than 250 mg/kg and a depth of at least 50 feet has been attained. Samples will be collected at 5 foot intervals and will be obtained by use of a split spoon tool if possible. Selected samples will be submitted to the laboratory for analysis. Upon receiving results from the laboratory, a comparison of chloride concentration with depth will be made with data obtained from the adjacent deep borings at the site (SB-1 and the Confirmatory Boring).

Vanguard requests termination of the regulatory file by NMOCD if this new soil data shows a consistency with existing data which supports the conclusion that the release at Lovington Abo 1G is not the source of ground water impact. Your approval of this work plan confirms NMOCD's intention to close the regulatory file if data confirms our conclusions. Upon closure of the file, Vanguard will plug and abandon the monitor well on site.

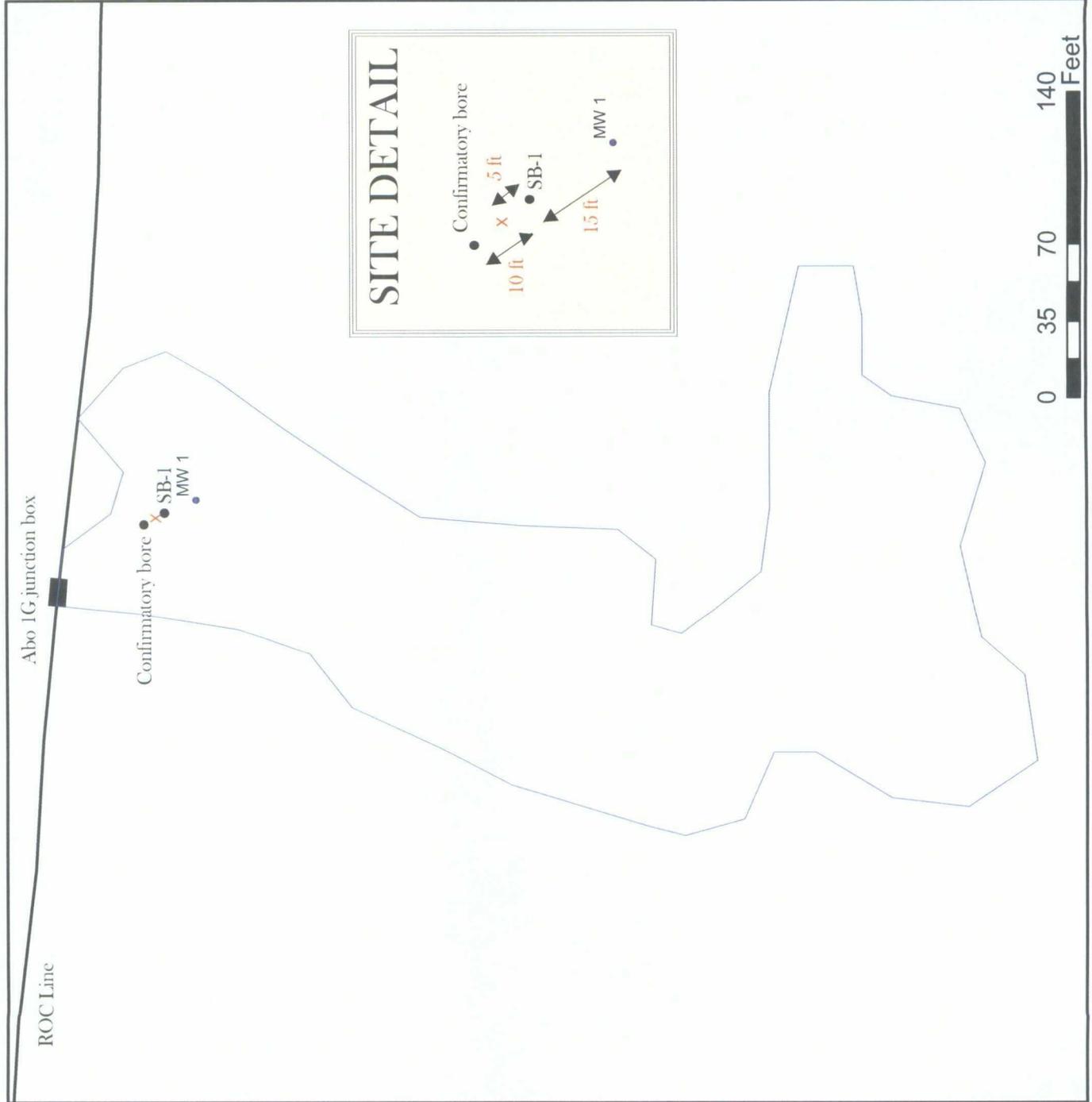
Thank you for your consideration concerning this work plan request. If you have any questions, do not hesitate to contact me at (832)327-2252.

Sincerely,

Britt Pence
Vice President

ATTACHMENT: FIGURE 1

Location of soil bores



122 W. Taylor
Hobbs, NM 88240
Phone (575) 393-9174
Fax (575) 397-1471

Abo 1G

Legals: UL/G sec.1 T17S R36E
NMOCD Case #: 1R 0415
Owner: Vanguard

- Leak extent
- X Proposed bore

Drawing date: 12-8-09
Revision date:
Drafted by: Lara Weinheimer

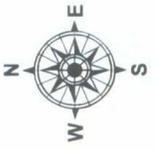


FIGURE 1