



December 10, 2014

AMARILLO
921 North Bivins
Amarillo, Texas 79107
Phone 806.467.0607
Fax 806.467.0622

Mr. Mike Bratcher
NMOCD District 2
811 S. 1st Street
Artesia, NM 88210

ARTESIA
408 West Texas Ave.
Artesia, New Mexico 88210
Phone 575.746.8768
Fax 575.746.8905

Subject: **Remediation and Closure Report**
Judah Oil, LLC
Oxy T-Bone Federal #1 SWD
API # 30-015-32122

HOBBS
318 East Taylor Street
Hobbs, New Mexico 88240
Phone 575.393.4261
Fax 575.393.4658

Dear Mr. Bratcher,

Judah Oil, LLC had contracted Talon/LPE (Talon) to perform soil assessment and remediation services for the Oxy T-Bone Federal #1 SWD. The results of our soil assessment, completed remediation activities and closure request are submitted herein.

MIDLAND
2901 State Hwy 349
Midland, Texas 79706
Phone 432.522.2133
Fax 432.522.2180

Background Information

The Oxy T-Bone Federal #1 SWD is located approximately thirty (30) miles southeast of Carlsbad, New Mexico. The legal location for the site is Section 33, Township 18 South and Range 33 East in Eddy County, New Mexico. More specifically, the latitude and longitude for the location are 32.709438 North and -103.876617 West.

OKLAHOMA CITY
7700 North Hudson Avenue
Suite 10
Oklahoma City, Oklahoma 73116
Phone 405.486.7030
Fax 806.467.0622

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soil in this area is made up of Berino complex with 0 to 3 percent slopes. Per the New Mexico Bureau of Geology and Mineral Resources, the local surface and shallow geology is Quaternary in age and is comprised of eolian sands and piedmont deposits which include silty soils underlain with sandy clay loam and hard caliche. Drainage courses in this area are normally dry. According to the Texaco/Chevron Eddy County Water Trend Data Map (2005), the depth to groundwater is approximately 325-feet deep.

SAN ANTONIO
13111 Lookout Way
San Antonio, Texas 78233
Phone 210.265.8025
Fax 210.568.2191

The ranking for this site is 0 based on the as following:

Depth to ground water	>100'
Wellhead Protection Area	>1000'
Distance to surface water body	>1000'

ENVIRONMENTAL CONSULTING
ENGINEERING
DRILLING
CONSTRUCTION
SPILL MANAGEMENT
GENERAL CONTRACTING

Toll Free: 866.742.0742
www.talonlpe.com

Remedial Actions Taken

The tank battery area was excavated to a depth of 8-feet deep. The excavated area was then backfilled to a depth of 4-feet deep and a 40 mil liner was installed. A layer of sand was placed on the liner to protect its structural integrity before the tanks were set. The bottom of the battery was constructed with a slight slope to facilitate drainage.

Lined berms were constructed around the battery following the installation of the storage tanks. The liner was extended eastward to the truck load outs over a slight swale created on the location which will collect future releases from truck loading/unloading operations. A copy of BLM construction recommendations is attached. This liner was placed 1-foot below the surface, capped with 6-inches of clay and 6-inches of caliche. Additional lined berms were constructed on the north and south sides of the lined collection area for containment. BLM chloride remediation standard was set at 2,000 mg/kg. See attached.

The impacted area on the location in the vicinity of test pit sample location TP-1 and sample location TP-4 were excavated to a depth of 4-feet deep. The impacted area in the vicinity of test pit sample locations TP-2 and TP-3 was excavated to a depth of 1-foot deep.

The impacted area in the vicinity of TP-5 was excavated to a depth of 3-feet deep.

All excavated soil was transported to a NMOCD approved solid waste disposal facility, Lea Land, LLC.

All work was completed per NMOCD and BLM approved work plan. The excavated areas on location were backfilled to grade using new material transported from a local borrow pit and contoured to match the surrounding location.

Closure

On behalf of Judah Oil, we respectfully request that no further actions be required and that closure be granted. A Final C-141 is also attached.

If we can provide additional information or be of further assistance please contact our office at 575.746.8768.

Respectfully submitted,

TALON/LPE



Kimberly M. Wilson
Project Manager



David J. Adkins
District Manager

David Adkins

From: Van Curen, Jennifer [jvancure@blm.gov]
Sent: Tuesday, January 28, 2014 10:11 AM
To: David Adkins
Subject: Re: work plan, notice to proceed, Judah Oil T-Bone Fed 1
Attachments: DOC008.PDF

David,

This is going to be an extensive cleanup, so I would like to add a couple of steps to prevent this event in the future. I have attached a hand drawn sketch. The step is not going to cost much more, but will save from the cost of this clean up from happening again. If bottom samples come back less than 2500 at 8' with cls not increasing below that point, I do not see the point of placing a liner. I will require a liner at surface for the facility. I will also require the liner be protected from puncture from beneath or on top. The tanks will need to be placed on something other than gravel to protect the liner. I will also require the pumps and other leak potential equipment to be inside the lined secondary containment.

For the exterior, if you get the cls below 2000 at 3' or deeper and the cls at lower depths do not rise above that, I will not require a liner. I would recommend the liner at 1' below surface. I would then place 6" of clay and then 6" of caliche. Yes the liner is there, but by having the caliche first, this could prevent hydrocarbons from being any more than a scrape of pad. If there is only PW, you know that the most you will have is the 6" due to the fact that PW alone is held very well by clay as long as hydrocarbons do not exist. Again this is a step of prevention from digging and hauling large amounts of contaminants. Even though the liner is at 1', wildlife will still need to be protected from any contaminants on the surface. And scraping is much more economical. I hope this is explained well enough. Again, I don't feel that there will be any more expense since most of the contaminants should be clean enough without a liner at the lower depth.

Let me know what you think.

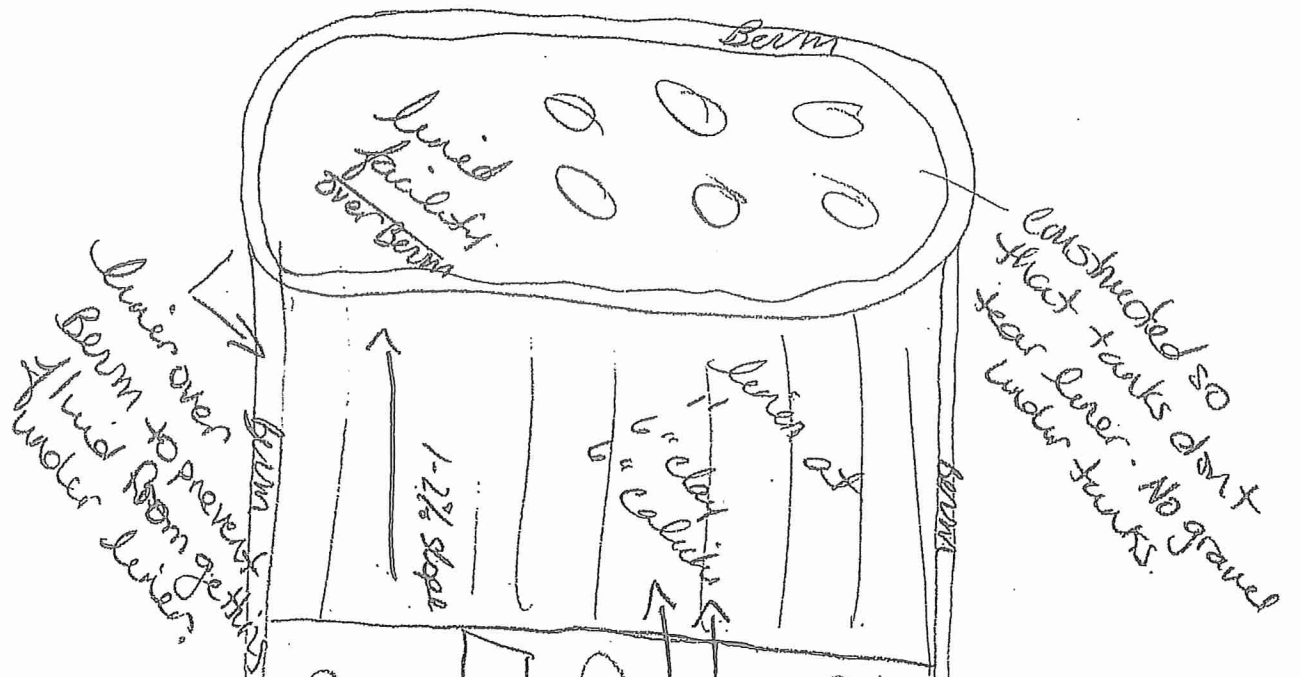
JENNIFER E VAN CUREN
ENVIRONMENTAL PROTECTION SPECIALIST
DOI-BLM-CARLSBAD FIELD OFFICE
320 E GREENE ST. CARLSBAD, NM 88220
OFFICE- 575-234-5905
CELL - 575-361-0042
FAX - 575-234-5927

On Mon, Jan 27, 2014 at 2:37 PM, David Adkins <dadkins@talonlpe.com> wrote:

Hi Jennifer,

Attached please find the work plan for Judah Oil, Oxy T Bone Fed 1 SWD. We have given OCD notice that we are proceeding this week. Please let us know if you have any stipulations or objections. Thank you.

Respectfully,



Constructed so that tanks don't tear liner. No gravel under tanks.

Liner over berm to prevent fluid from getting under liner.

check dam to hold leachate
leachate collection system
Top
Bottom

leachate collection system
gravel area

All surrounding should include in lined area
be in secondary containment
No pits