

MARTIN YATES, III  
1912-1985

FRANK W. YATES  
1936-1986

S.P. YATES  
1914-2008



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June 24, 2016

Mr. Mike Bratcher or Ms. Heather Patterson  
NMOCD District II  
811 South First  
Artesia, NM 88210

RE: Donahue Federal SWD #1  
30-015-00087  
Section 10, T20S-R24E  
Eddy County, New Mexico

Mr. Bratcher or Ms. Patterson,

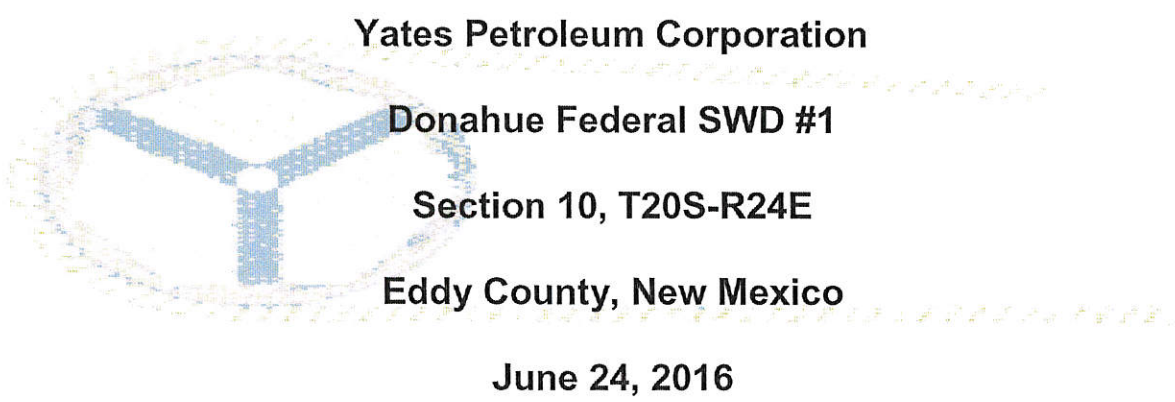
Yates Petroleum Corporation would like to submit the following plan of work to you regarding the release that occurred at the above mentioned facility on June 1, 2016 (2RP-3737). The release was 6 barrels of produced water with 5 barrels of produced water recovered.

With NMOCD approval of this work plan, Yates will hold a bid meeting allowing several contractors the opportunity to submit bids on this remediation project. Bids that are received will be forwarded to Yates Management for review. Once Yates Management reviews the bids and gives approval, the remediation project will be awarded to a contractor for work to commence.

If you have any questions or concerns, I can be reached at (575) 748-4111 or by email at [agriffin@yatespetroleum.com](mailto:agriffin@yatespetroleum.com).

Thank You,

Amber Griffin  
Environmental Regulatory Agent  
Yates Petroleum Corporation



**Yates Petroleum Corporation**

**Donahue Federal SWD #1**

**Section 10, T20S-R24E**

**Eddy County, New Mexico**

**June 24, 2016**

## **I. Location**

Travel south of Artesia to Rock Daisy Road. Turn right and go approximately 8.5 miles to the curve and continue south on pavement for approximately 2 miles. Turn right on a lease road and go approximately 1.5 miles to location.

## **II. Background**

On June 1, 2016, Yates had a release of 6 barrels produced water with 5 barrels produced water recovered. The area affected from this release was on the south, west and north sides of the pump house on location. The pump house also has a berm around it, which prevented the released fluids from spreading horizontally. An initial Form C-141 was submitted, via e-mail, to the NMOCD District II on June 10, 2016.

On June 13, 2016 Yates visited the site and collected soil samples from the release area. The release area was split into three sections – Section 1 (south), Section 2 (west) and Section 3 (north) from around the pump house. The soil samples were sent to an approved NMOCD laboratory and tested for BTEX 8021B, TPH 8015M, and Chlorides 300.0. Yates received the analytical results on June 23, 2016 (Report 1606762 attached to this work plan).

- Section 1 samples were taken from the surface and from the depths of 1' – 5' below the surface level. Analytical results show that both TPH and BTEX are at levels below NMOCD RRAL's. Chloride levels are shown to be fully delineated.
- Section 2 samples were taken only from the surface. An impenetrable rock layer was encountered and the backhoe, after many attempts, was unable to break through the naturally occurring barrier. Analytical results show that both TPH and BTEX are at levels below NMOCD RRAL's. Chloride levels are elevated, but further delineation is impracticable due to the solid rock that layer that was encountered.
- Section 3 samples were taken from the surface and from the depths of 1' – 3' below the surface level. A solid rock layer was encountered and the backhoe, after many attempts, was unable to break through the naturally occurring barrier. Analytical results show that both TPH and BTEX are at levels below NMOCD RRAL's. Chloride levels are shown to be decreasing with a result of 1,800 ppm at 3' below the surface level, just prior to encountering the impenetrable rock layer.

## **III. Surface and Ground Water**

Area surface geology is Cenozoic. The ChevronTexaco depth to ground water map shows the depth to groundwater to be approximately 225' feet making the site ranking for this site a zero (0). Watercourses in the area are dry except for infrequent flows in response to major precipitation events.

The ranking for this site is zero (0) based on the following:

Depth to ground water	>100'
Wellhead Protection Area	> 1000'

Distance to surface water body > 1000'

#### **IV. Soils**

The area consists of soils that are rock.

#### **V. Scope of Work**

Based on the enclosed analytical reports and an impermeable rock layer, Yates proposes the following excavation work:

- Section 1 – Excavate 4' of soils and backfill with caliche.
- Section 2 – Excavate all soils above the rock layer. The solid rock layer at this location has served, and will serve as a natural barrier to any future releases that may occur.
- Section 3 – Excavate 3' of soils and backfill with caliche. The solid rock layer at this location has served, and will serve as a natural barrier to any future releases that may occur.
- Contaminated soils that are excavated will be hauled to a NMOCD approved disposal facility.
- Once all excavation and backfill work is complete, Yates will submit a Final Form C-141 to NMOCD requesting closure of this release.