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**August 22, 2017**

Mike Bratcher & Crystal Weaver  
NMOCD District 2  
811 S 1<sup>ST</sup> Street  
Hobbs, NM 88210

**Dear Mike Bratcher:**

RXSoil, Inc. on behalf of Apache Corp., is pleased to submit the attached Amended Corrective Action Work Plan summarizing the planned on-site soil remediation of produced water impacted and crude oil distressed soil at the EAU Emulsion Line located in Eddy County, New Mexico. The purpose of this work plan is to obtain approval from the New Mexico Oil Conservation Division (NMOCD) for remediation of the release that occurred on February 25, 2016.

Apache Corp responded to assess and delineate the production fluids release associated with the EAU Emulsion Line. The release was initially reported to the NMOCD by Bruce Baker on February 25, 2016 and was a result of a clamp failure. Result of the assessment and delineation was submitted to NMOCD with the original corrective action plan.

Submitted by: RXSoil, Inc.

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**Apache Corp**

2RP-3572

API: 30-15-22834

32°46'4.99"N, 104°15'4.02"W

**Action Plan Proposal**

EAU Emulsion Line  
Unit Letter C, Section 11, Township 18S, Range 27E

**August 22, 2017**

**Prepared for:**

**Mike Bratcher and Crystal Weaver**

Oil Conservation Division – District II 811 S 1ST Street  
Artesia, New Mexico 88210

**Prepared by: RXSoil, Inc.**

The logo for RXSOIL, Inc. features the letters 'RX' in a bold, blue, sans-serif font, followed by 'SOIL' in a bold, green, sans-serif font. The letters are slightly shadowed, giving them a 3D appearance.

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## **I. Amended Soil Remediation Work Plan**

On site remediation will be used to address the site contamination. RXSoil will supervise the excavation of affected soils with approval from area utilities owners via 811 and NMOCD. RXSoil will continuously guide the excavation process to a depth of 3' unless a more shallow depth is dictated by data.

The impacted soil will be placed into an RXSoil proprietary engineered containment infrastructure and cleaned utilizing specialized delivery systems to effectively treat the soil. No harmful or hazardous chemicals are used in the RXSoil process. Estimated water usage will be less than ~5,000 bbl of fresh water or grey water, provided by the city of Hobbs, will be used throughout the entire process. Leachate recovered from the treatment process will be pumped to an above ground holding tank for proper disposal at an NMOCD approved SWD or sold to other operators for a secondary industrial use in their Drilling and/or Frac Operations.

Final soil samples will be collected and tested at the end of treatment to confirm impacted soil has been remediated to required chloride and TPH concentrations. After remediation, closure samples will be taken. The discrete soil samples will be taken from various rows, columns, and different depths within the grid creating a 3D representation of the profile. Each row will be collected separately then sent to Cardinal laboratories and tested for Chlorides using the Method SM4500Cl-B and TPH (total petroleum hydrocarbons) including GRO (6-10), DRO (10-28), MRO (28-36). Final closure samples will include Method 300.0, per request NMOCD. Once soil health is restored, the soil will be placed back into excavated area and the site will be returned to its natural vegetative state.

**FIGURE 1**  
**Vicinity Map**



**FIGURE 2**  
**Site Map**

stake at end of flow path



S-4

S-3

S-5

S-2

S-1

Source



Google earth

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400 ft

