

On July 8, 1999, Mr. Trujillo and a crew from Consolidated Contractors to began the construction of the landfarm and the excavation of the petroleum contaminated soil (PCS) from the containment area surrounding the production and produced water tanks.

The site for the landfarm was established along the southern berm of the location. Excavation efforts were started on the western side of the produced water tank. The soil was removed to an approximate depth of 2 feet. Near the southeast corner of the pad of the produced water tank, PCS was encountered to a depth of approximately 8 feet.

After excavation had started, Mr. Slaughter informed Mr. Trujillo that the produced water tank was full. Mr. Trujillo stopped the excavation effort in this area to prevent the collapse of the tank into the excavation. Mr. Foust of NMOCD was notified of the problem.

The excavation was continued in the area between the two tanks and outward to the southeast corner of the containment. Excavation between the tanks was discontinued when Mr. Slaughter informed Mr. Trujillo that the production tank was also full.

After discussions with NMOCD, it was decided that the tanks would need to be emptied, the wells shut in and the tanks relocated. The area of concern would have to be excavated, the contaminated soil removed and clean uncontaminated soil brought in from off site to backfill the excavation. All excavation efforts were discontinued until the expense of the tank relocation was approved. Mr. Slaughter was to shut in the wells and have liquids removed from tanks.

On July 31, 1999, Mr. Trujillo and a crew from L & R Oilfield Service Company began to relocate the two tanks. Mr. Trujillo conducted a tailgate safety meeting. Topics of the meeting included tank movement awareness, hand and foot safety, and personal protective equipment requirements.

Prior to the work beginning, Mr. Trujillo discovered that liquid was flowing into the separator tank. Further investigation revealed that approximately 3 feet of product was still in the production tank and approximately 80 barrels of water was still in the produced water tank. Mr. Trujillo telephoned Three Rivers Trucking and requested a vacuum truck to remove the liquids from the tanks so that the tanks could be moved.

Mr. Trujillo called Mr. Lane of *On Site* to come to the location and verify that the wells were shut in properly. Mr. Lane arrived on the location and shut in the well located to the east of the tanks. The well located to the south of the tanks proved to be shut in properly.

The separator tank was isolated from the other tanks and the piping removed. An area to the west of the separator tank was leveled and prepared for the placement of the two other tanks. A firewall would be built around all three (3) tanks. The tanks would be placed on plastic pit liners and the piping reinstalled. Refer to Tank Relocation map.

Three Rivers Trucking arrived and the liquids were removed from the production tank and held until the production tank was moved to its new location. The area for the production tank was leveled using a backhoe and shovels. The plastic liner was placed on the leveled area and the concrete pads that had been under the production tank were moved, and leveled. The production tank was placed on the pads. The liquid was placed back into the production tank.