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NMOCD ARTESIA

April 19, 2012

Mr. Mike Bratcher
Environmental Engineer Specialist
Oil Conservation Division, District 2
1301 West Grand Avenue
Artesia, New Mexico 88210

Proposal to delineate

Re: Initial Work Plan for the Alamo Permian Resources, LLC., State 32 Tank Battery, Unit J, Section 32, Township 17 South, Range 28 East, Eddy County, New Mexico.

Mr. Bratcher:

Tetra Tech, Inc. (Tetra Tech) was contacted by Alamo Permian Resources, LLC., (Alamo) to assess a spill from the State 32 Tank Battery, Unit J, Section 32, Township 17 South, Range 28 East, Eddy County, New Mexico (Site). The spill site coordinates are N 32 ° 47′ 25″, W 104° 11′ 43″. The site location is shown on Figures 1 and 2.

Background

According to the State of New Mexico C-141 Initial Report, the leak was discovered on March 15, 2012, and released approximately one hundred and thirty (130) barrels of crude oil due to a hole in the oil tank. The spill was contained inside the facility berms and approximately 52.5 barrels of oil was recovered. The initial C-141 form is enclosed in Appendix A.

Groundwater

According to the USGS data, one well is located in Section 22, Township 17 South, Range 28 East, with a reported groundwater depth of 79' below surface. According to the NMOCD groundwater map and data, the groundwater depth in the area is approximately 125' below surface. The closest wells are located in Section 19, Township 17 South, Range 28 East and Section 4, Township 18 South, Range 28 East, with reported depths of 191' and 108', respectively. The groundwater data is shown in Appendix B.

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Regulatory

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine recommended remedial action levels (RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX. Based upon the depth to groundwater, the proposed RRAL for TPH is 5,000 mg/kg.

Assessment Work Plan

Tetra Tech personnel will inspect the spill area and collect soil samples using a stainless steel, bucket type hand auger to evaluate the extent of subsurface impact at this site. If a dense formation is encountered and deeper samples cannot be collected, backhoe trenches will be installed to attempt to define the vertical extents for delineation. If the soil impact cannot be defined, boreholes will be installed using an air rotary rig.

Soil samples will be collected at selected depth intervals for field screening and sampling. A head space gas survey will be performed by collecting discrete soil samples and placing a portion of the sample in a clean plastic sample bag and measuring organic vapors using an Organic Vapor Meter (OVM). If utilized, all down hole equipment (i.e., drill rods, drill bits, etc.) will thoroughly decontaminated between each borehole with a high-pressure hot water wash and rinse. Soil cuttings from drilling will be stockpiled adjacent to the well until disposal is arranged.

The samples selected for analysis will be determined from field observation and data. All samples will be collected and preserved in laboratory prepared sample containers with standard QA/QC procedures. All samples will be shipped under proper chain-of-custody control and analyzed within the standard holding times. The soil samples will be analyzed for Total Petroleum Hydrocarbon (TPH) by method 8015 DRO/GRO, Benzene, Toluene, Ethyl benzene, and Xylene (BTEX) by method EPA Method 8021B and chloride by method EPA method 300.

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Once the analytical data has been received and reviewed, a remediation work plan will be prepared and submitted to the NMOCD for approval. If you have any questions or comments concerning the proposed work plan, please call me at (432) 682-4559.

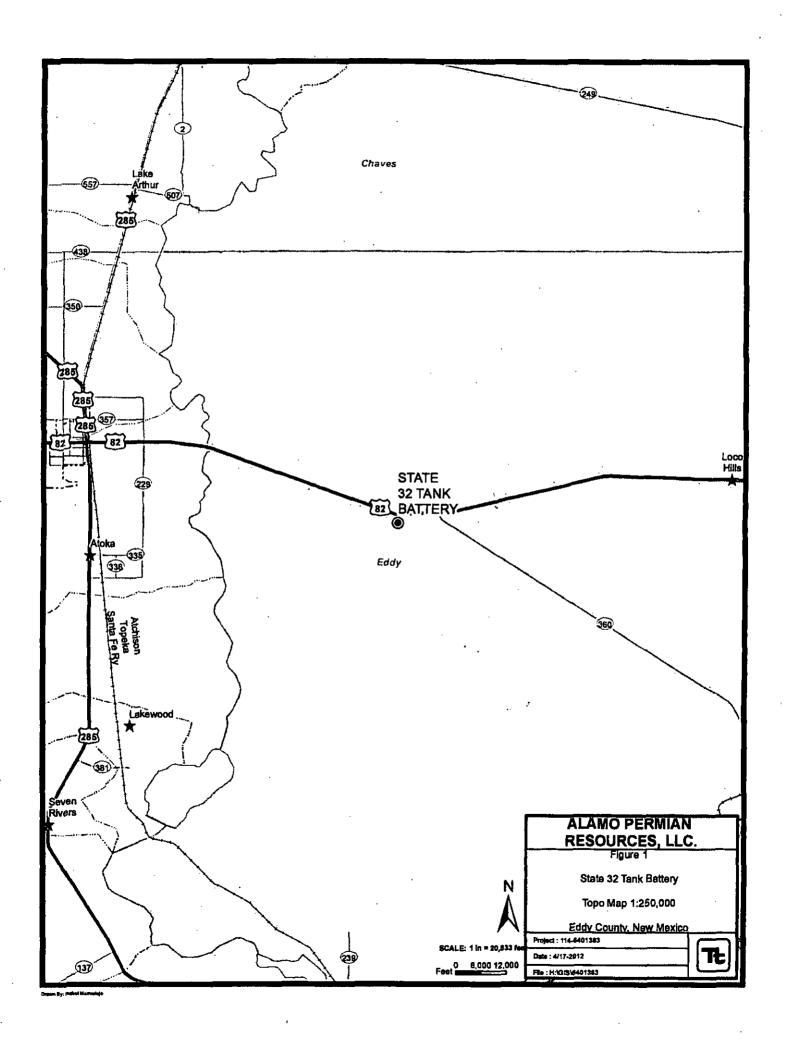
Respectfully submitted, TETRA TECH

Ike Tavarez , PG Sr. Project Manager

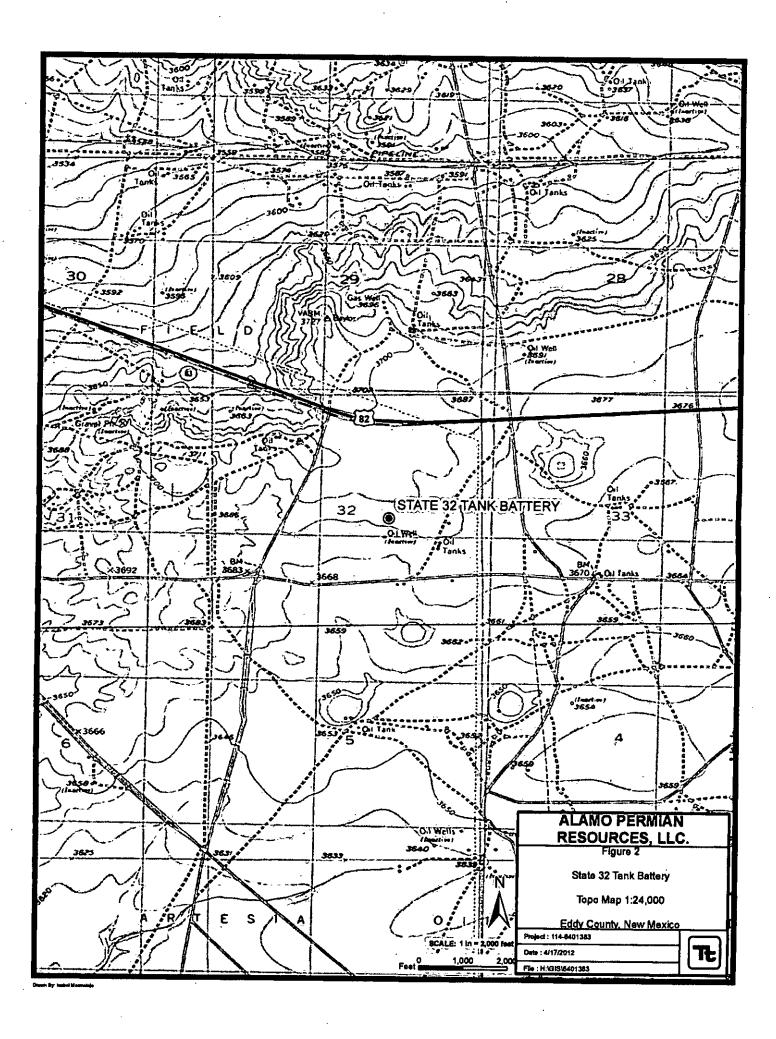
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Appendix A

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Appendix B

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Water Well Data Average Depth to Groundwater (ft) State 32 Tank Battery Eddy County, New Mexico

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- 88 New Mexico State Engineers Well Reports .
- 105 USGS Well Reports
- 90 Geology and Groundwater Conditions in Southern Lea, County, NM (Report 6) Geology and Groundwater Resources of Eddy County, NM (Report 3)
- 34 NMOCD Groundwater Data
- 123 Tetra Tech installed temporary wells and field water level
- 143 NMOCD Groundwater map well location



USGS Home Contact USGS Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category: Groundwater

Geographic Area: New Mexico

GO

News updated March, 2012

Groundwater levels for New Mexico

Search Results -- 1 sites found

Search Criteria

site no list =

• 324855104093101

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

Available data for this site

USGS 324855104093101 17S.28E.22.34242

Groundwater: Field measurements ☐ GO Eddy County, New Mexico **Output formats** Hydrologic Unit Code 13060011 Table of data Latitude 32°48'55", Longitude 104°09'31" NAD27 Tab-separated data Land-surface elevation 3,578 feet above NGVD29 The depth of the well is 95.00 feet below land surface. Graph of data This well is completed in the Alluvium, Bolson Deposits and Other Surface Reselect period Deposits (110AVMB) local aquifer. USGS 324855184893181 175,28E,22,34242 3594.0 74.0 75.0 below 9509.0 level, fest 76.8 3502.0 77.0 3591.0 water 3 78.0 3590.0 1999 1994 1986 1992 1998 1998 2888 --- Provisional Data Subject to Revision --Breaks in the plot represent a gap of at least one year between field measurements. Download a presentation-quality graph

Questions about sites/data?

Data Tips

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(quarters are 1=NW 2=NE 3=SW 4=SE)
(quarters are smallest to largest) (NAD83 UTM in meters)
No records found.

PLSS Search:

Township: 17S

Range: 28E

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

4/16/12 8:43 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

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(R=POD has been replaced,

O=orphaned, C-the lile le

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Record Count: 3

PLSS Search:

Township: 18S

Range: 28E

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, retiability, usability for any particular purpose of the data.

4/16/12 8:39 AM

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(R=POD has been replaced, O=orphaned,

C=the file is

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(in feet)

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FIA 04048			LE	1	4	4	14	185	27E	570841	3623030°	2096		
RA 04211			СН		3	1	28	185	27E	588512	3620562*	120	100	20
FIA 04298			ED		1	2	19	185	27E	564082	3622523°	92		
RA 05524		•	ED		2	4	33	185	27E	587721	3618532*	90	49	41
RA 05860			ED		3	4	31	18S	27E	564094	3618090*	305	65	240
RA 05664			ED		4	1	33	18S	27E	566914	3616936*	,	145	
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Minimum Depth: 17 feet

Maximum Depth: 145 feet

Record Count: 9

PLSS Search:

Township: 18S Range: 27E

*UTM location was derived from PLSS - see Help

The data is turnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reflability, usability, or suitability for any particular purpose of the data.

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(R=POD has been replaced, O∞orphaned,

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quarters are smallest to largest) (NAD83

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RA 02966			ED	4	4	4	05	175	27E	566117	3635707*	80	30	50
PA 03279			ED		3	2	07	175	27E	564020	3635011*	250	14	236
PA 03681			€D	3	2	3	32	178	27E	565186	3626038*	330	140	190
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FA 03816			CH			4	17	178	27E	565854	3632721	945	931	14
FA 04114			LE	4	4	3	16	175	27E	566953	3832420*	1042	260	782
FIA 04153			CH	4	4	3	16	17\$	27E	566953	3632420*	1220	175	1045
HA 04320			ED			3	17	17\$	27E	565053	3632719"	120	50	70
FIA 04554			ED			1	23	175	27E	569859	3631947*	220	40	180
FIA 04561			ED		4	2	26	178	27E	570871	3630142*	250		
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<u>FIA 06635</u>	-		ED	2	2	2	18	175	27E	564531	3833852*	325	60	265
RA 07774			ED	3	2	1	11	178	27E	569933	3635251*	100	50	50
FIA 07844			ED	3	4	3	16	17S	27E	566753	3632420*	1300	180	1120
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Record Count: 23

PLSS Search:

Township: 17S Range: 27E

*UTM location was derived from PLSS - see Help

The data is lumished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, complateness, reliability, usability, or suitability for any particular purpose of the data.

4/16/12 8:42 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

Maximum Depth: 931 feet

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<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District III

1000 Rio Biazos Road, Aztec, NM 87410

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resource

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505



Form C-141 evised August 8, 2011

Releas	e Notificatio	on and Co	orrective A	ction		
nMLB1208654631	274841	OPERA'	ror	■ Initi	al Report	Final Repor
Name of Company ALAMO PERMIAN RESC	DUCES, LLC	Contact ST	EVEN MASTI	4		
Address 415 W. WALL ST. SUITE 500		Telephone l	No. 432 557 584	17		
Facility Name STATE 32 BATTERY		Facility Typ	e BATTERY			
Surface Owner STATE	Mineral Owner	STATE		API No	. 30-015-0165	55; 30-015-01656
	LOCATIO	ON OF REI	LEASE	5+ 32 4	2 015	-01656
Unit Letter Section Township Range Fe	et from the Nort	h/South Line	Feet from the	East/West Line	County	
J 32 17S 28E	1980	S	1980	Е	EDDY	
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Latitude 32.77894	00 Longitude -104.1792300							
NATURE OF RELEASE								
Type of Release: OIL	Volume of Release: EST 124 bbls Volume Recovered: 52 bbls OIL.							
Source of Release: TANK	Date and Hour of Occurrence: Date and Hour of Discovery							
Was Immediate Notice Given? ☑ Yes ☐ No ☐ Not Required	If YES, To Whom? NHOCO NOTIFIED 3/15/12 @ .	2:19 PM						
By Whom? RICKY RODRIGUEZ	Date and Hour 3/15/12 1:00 P.M.							
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.							
If a Watercourse was Impacted, Describe Fully.*								
Describe Cause of Problem and Remedial Action Taken.*								
Cause of problem: HOLE IN TANK 66012 Remedial Action Taken: VAC TRUCK DISBATCHED TO LOCATION	N TO RECOVER AS MUCH OF THE SPILL AS POSSIBLE							
Describe Area Affected and Cleanup Action Taken.* THE SPILL WAS CONTAINED WITHIN THE BERM; 52 BBLS OF C	DIL WAS RECOVERED							
regulations all operators are required to report and/or file certain release public health or the environment. The acceptance of a C-141 report by the should their operations have failed to adequately investigate and remediate.	the best of my knowledge and understand that pursuant to NMOCD rules a notifications and perform corrective actions for releases which may endang he NMOCD marked as "Final Report" does not relieve the operator of liabilite contamination that pose a threat to ground water, surface water, human liddes not relieve the operator of responsibility for compliance with any other	ger lity health						
C C C	OIL CONSERVATION DIVISION							
Signature: (ana Italian	Signed By Mily Benning							
Printed Name: CARIE STOKER	Approved by Environmental Specialist:							
Title, REGULATORY COORDINATOR	Approval Date: Expiration Date:							
E-mail Address: cstoker@alamoresources.com	Conditions of Approval:							
Date: 03/16/2012 Phone: 432 664 7659	Remediation per OCD Rules & Attached							
Attach Additional Sheets If Necessary	Remediation per Guidelines. SUBMIT REMEDIATION PROPOSAL NOT LATER THAN: 4/26/20/2	9						

SITE INFORMATION Report Type: Initial Work Plan General Site Information: State 32 Tank Battery Site: Alamo Permian Resources, LLC. Company: Section, Township and Range Section 32 T17S **R28E** Lease Number: API-30-015-00169 **Eddy County** County: 104° 11' 43" GPS: 32° 47′ 25″ Surface Owner: State Mineral Owner: Fron intersection of Highway 82 and Illinios Camp Road, go south 0.3 miles on Illinios Camp Directions: Road, turn left (east) into lease road and go 0.1 miles and turn right (south), go 0.1 miles to tank battery Release Data: 3/15/2012 Date Released: Type Release: crude oil Source of Contamination: hole in tank Fluid Released: 130 barrels Fluids Recovered: 52.5 barrels Official Communication: Name: Steven Mastin lke Tavarez Company: Alamo Permian Resources, LLC. Tetra Tech Address: 415 W. Wall St. Suite 500 1910 N. Big Spring P.O. Box Midland Texas City: Midland, Texas Phone number: (432) 557-5847 (432) 682-4559 Fax: Email: ike.tavarez@tetratech.com Ranking Criteria Depth to Groundwater: Ranking Score Site Data <50 ft 20 50-99 ft 10 >100 ft. >100 WellHead Protection: Ranking Score Site Data Water Source <1,000 ft., Private <200 ft. 20 Water Source >1,000 ft., Private >200 ft. 0 0 Surface Body of Water: Ranking Score Site Data ∠200 ft. 20 200 ft - 1,000 ft. 10 >1.000 ft. ō 0 Total Ranking Score: 0 Acceptable Soil RRAL (mg/kg) Total BTEX Benzene TPH 10 50 5,000

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