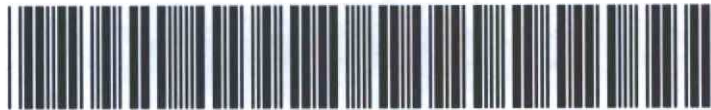




# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pLWJ1030950457

**1RP - 2395**

**OXY USA INC**



**CONESTOGA-ROVERS  
& ASSOCIATES**

2135 S. Loop 250 West

Midland, Texas 79705

Telephone: (432) 686-0086

Fax: (432) 686-0186

<http://www.craworld.com>

**RECEIVED**

DEC 30 2009

**HOBBSOCD**

December 29, 2009

Reference No. 058373

Mr. Larry Johnson  
New Mexico Oil Conservation Division  
District I Office - 1625 N. French Drive  
Hobbs, NM 88240

**Certified USPS 420 88240 9410 8036 9930 0002 7437 23**

Re: Corrective Action Plan (Initial)  
Oxy USA/#11 MLMU (API#30-025-09424)  
(Unit Letter B) of Section 25, Township 23 South, Range 36 East  
Lea County, New Mexico

Dear Mr. Johnson:

Conestoga-Rovers and Associates (CRA) herewith submits this initial Corrective Action Plan (CAP) on behalf of Oxy USA, Inc. (Oxy) to the New Mexico Oil Conservation Division (OCD) regarding the abandonment of the above referenced wellsite location.

#### **PROJECT INFORMATION**

The subject wellsite is located within the Myers Langlie Mattix Unit (MLMU) situated between Jal and Eunice, New Mexico. The legal description of the Site is the NW/4 of the NE/4, Section 25, T-23-S, R-36-E with GPS coordinates 32° 16' 50.88" N and 103° 13' 01.45" W (FIGURE 1). CRA understands the surface property is owned by the Myers Family. Depth to groundwater in the vicinity of the subject property is reported by the United States Geological Survey (USGS) to be greater than 100 feet below ground surface (bgs).

Tanks and ancillary surface equipment have been removed from the wellsite. A dry hole marker is present on the location. Residual soil staining from historic releases in the area of (former) location facilities have been identified (FIGURE 2). The volume of the releases are unknown. An Initial Report version of OCD Form C-141, Release Notification and Corrective Action for the MLMU #11 wellsite is included as an enclosure to this correspondence.

#### **REGULATORY FRAMEWORK**

The OCD has regulatory jurisdiction over oil and gas production operations including pipeline spill/closure in the State of New Mexico. This project will be conducted under the regulatory jurisdiction of the OCD, which requires that soil impacted by a crude oil spill be remediated in such a manner that the potential for future affects to groundwater or the environment are minimized. The OCD hydrocarbon remediation levels are determined by ranking criteria on a site-by-site basis, which is outlined in the OCD *Guidelines for Remediation of Spills, Leaks, and Releases*, dated August 13, 1993. The ranking criteria are

Equal  
Employment Opportunity  
Employer

2395



**CONESTOGA-ROVERS  
& ASSOCIATES**

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based on three site characteristics: depth to groundwater, wellhead protection and distance to surface water.

Based on these Site characteristics and associated OCD ranking criteria presented in the table below, the following hydrocarbon recommended remediation action levels (RRALs) apply at the Site: benzene- 10 ppm, Total BTEX- 50 ppm and TPH- 5,000 ppm.

CHARACTERISTIC	SELECTION	SCORE
Depth to Groundwater	> 100 feet	0
Wellhead Protection Area	>1,000 feet	0
Distance to Surface Water	>1,000 feet	0

**Total Ranking Score = 0**

## **PROPOSED ACTIVITIES**

### **Soil Investigation**

CRA proposes to install an estimated five to six hand auger borings at the release site (see FIGURE 2) to evaluate the horizontal and vertical extent of hydrocarbon and chloride-impacted soils. If hand augering is not a feasible approach for soil sample collection, a backhoe or air rotary drilling rig will be utilized to obtain the subsurface soil samples.

Prior to mobilizing the heavy and/or drilling equipment to the Site (if warranted), the boring location areas will be marked and a utility notification will be made at least 48-hour prior to mobilization. A post-hole digger or similar tool will be utilized to clear each boring location to a depth of approximately 5-feet below ground surface (bgs) and approximately 10-inches in diameter.

An air-rotary rig, operated by a State of New Mexico licensed water well driller, will be utilized (as appropriate) to advance the proposed borings to appropriate depths (estimated at approximately 2-feet to 30-feet bgs) to assess the nature and extent of hydrocarbon and chloride-impacted soils at the release site. The soil sampling plan for this project will generally include the collection of soil samples in one to five-foot intervals. Soil samples will be field screened with a photo-ionization detector (PID) or organic vapor meter (OVM) to measure the relative concentration of volatile organic compounds (VOCs) of the samples using the "heated headspace method." Soil samples collected for laboratory analysis will be based on physical observations and field VOC measurements. A geologist will record the subsurface lithology and sample data on soil boring logs. Selected soil samples from each boring will be analyzed for total petroleum hydrocarbons by (TPH) diesel-range organics (DRO) and gasoline-range organics (GRO) by EPA Method 8015 modified, analysis of benzene, toluene, ethylbenzene and xylene (BTEX) by EPA Method 8021B and chloride analysis by EPA Method 300.





### **Soil Remediation**

The information from the soil investigation will be evaluated to develop an excavation approach to remove hydrocarbon and chloride-affected soils from the release area that exhibit concentrations above regulatory levels. Hydrocarbon and chloride-impacted soils associated with the #11 MLMU location will be excavated and staged onsite by Oxy designated subcontractors and delineated using heavy equipment. The vertical and horizontal extents of the excavation will be assessed by field personnel using OCD procedures for headspace analysis of soil samples. Confirmation soil samples will be collected for determination of the final soil contaminant concentrations pursuant to section VI.A of the *OCD Guidelines for Remediation of Spills, Leaks, and Releases*, dated August 13, 1993.

Soil samples collected from the remedial excavation and staging areas at the site will be placed into a laboratory-supplied soil jars equipped with a Teflon-lined lid and placed on ice in an insulated cooler. These samples will be submitted to TraceAnalysis, Inc. (Trace) in Lubbock, Texas for analysis of total petroleum hydrocarbons (TPH) diesel-range organics (DRO) and gasoline-range organics (GRO) by EPA Method 8015 modified, analysis of benzene, toluene, ethylbenzene and xylene (BTEX) by EPA Method 8021B and chlorides by EPA Method 300. The submitted coolers will be sealed for shipment and proper chain-of-custody documentation will accompany the samples to the laboratory.

Soil management options for this site include offsite disposal or land treatment at an OCD approved/permitted facility. Other options such as onsite landfarming, in-situ soil treatment or alternative methods may also be employed. Equivalent volumes of clean soils (to any impacted volumes hauled offsite) will be brought into the remedial excavations to bring the excavations to the existing ground surface. The source of the clean soils most likely will come from a proximate location on the property owner's land. The ground surface of the remediated area will then be contoured to match the natural topography. Other reclamation activities, such as re-seeding, will also be performed in coordination with the landowner.

### **Reporting**

The District 1 OCD office will be notified prior to soil sampling activities. After remedial actions have been performed, a final report version of OCD Form C-141 will be prepared and submitted to the OCD District I office for review and acceptance. The final report will document assessment activities and corrective actions performed at the site and including field procedures implemented, analytical summaries and data, and other pertinent information.

If you have any questions or comments with regards to this Corrective Action Plan please call do not hesitate to contact our Midland office at (432) 686-0086. Your timely response to this correspondence is appreciated.



**CONESTOGA-ROVERS  
& ASSOCIATES**

December 29, 2009

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Reference No. 058373

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas C. Larson  
Operations Manager

Enclosures:

Site Location Map  
Proposed Soil Boring Location Map  
OCD Initial Report Form C-141

c.c.: Mr. Damian Reed, Glenn Springs Holding, Inc.  
CRA - Midland File



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report

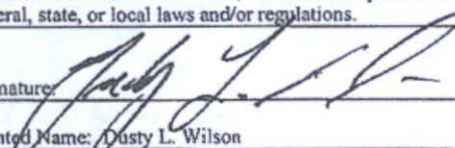
Name of Company	Oxy USA Incorporated	Contact	Dusty Wilson
Address	4008 Grimes PMB 269, Hobbs, NM 88240	Telephone No.	575-441-7189
Facility Name	#11 Myers Langlie Mattix Unit (MLMU)	Facility Type	Oil and Gas
Surface Owner	Myers	Mineral Owner	Unitized
		Lease No.	30-025-09424

**LOCATION OF RELEASE**

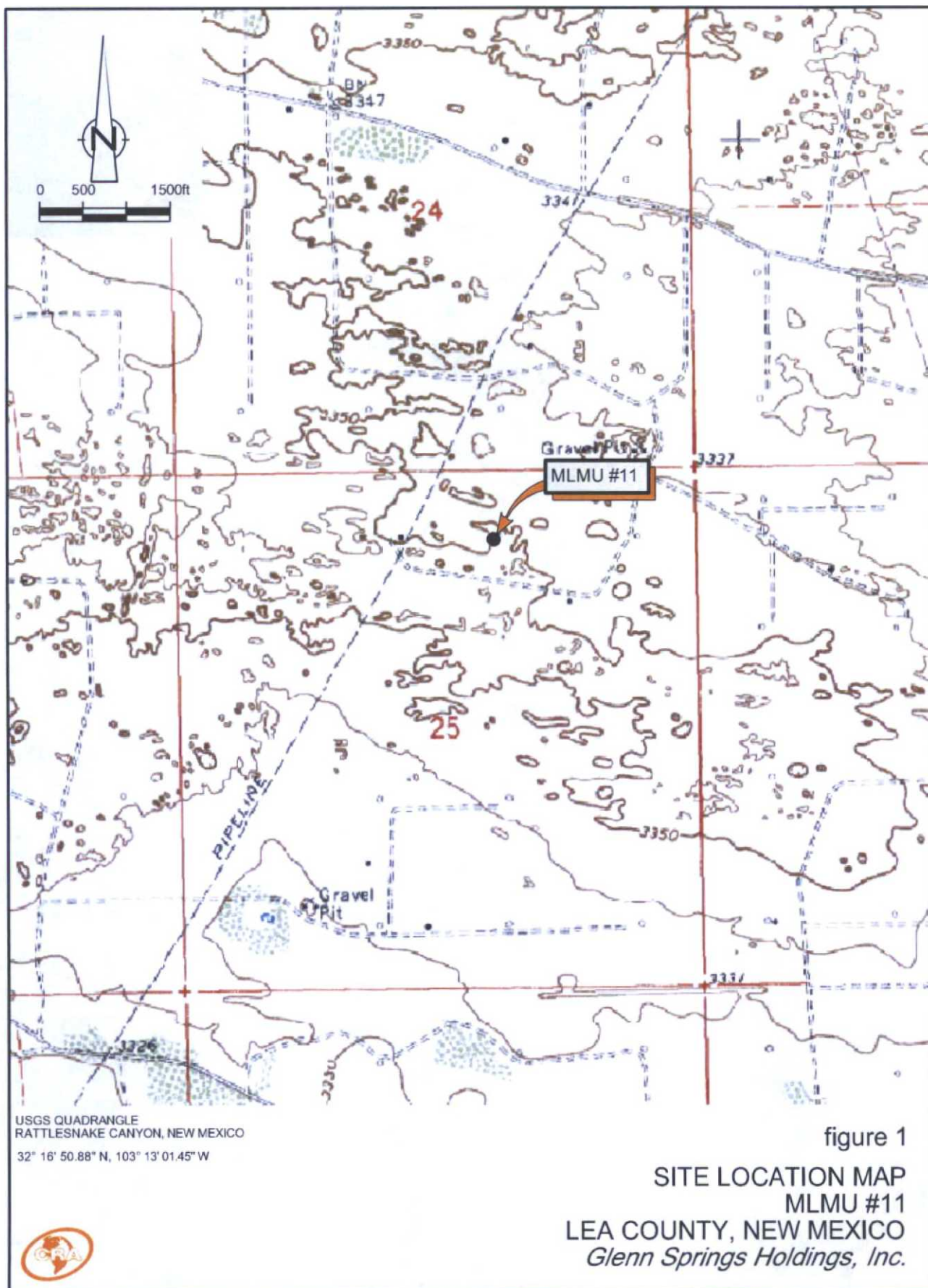
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	25	23S	36E	660'	North	1980 .	East	Lea

Latitude 32° 16' 50.88" N Longitude 103° 13' 01.45" W

**NATURE OF RELEASE**

Type of Release	Hydrocarbon and Produced Water	Volume of Release	unknown	Volume Recovered	none
Source of Release	Facility tank valves, lines and wellhead locations. Also projected discharges over time due to unknown causes which distributed hydrocarbon and produced water liquids around facility.	Date and Hour of Occurrence	unknown	Date and Hour of Discovery	3/8/08
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No XX Not Required	If YES, To Whom?			
By Whom?		Date and Hour			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A			
If a Watercourse was Impacted, Describe Fully.* N/A					
Describe Cause of Problem and Remedial Action Taken.* Historical release areas were discovered subsequent to well site abandonment activities. Hydrocarbon and produced water-impacted soils located in the area of well site facilities were identified for removal to disposal. Samples will be collected and analyzed to verify contaminate levels for NMOCD and delineated targets for excavation purposes. A Corrective Action Plan (CAP) will be prepared for this well site.					
Describe Area Affected and Cleanup Action Taken.* Affected areas will be investigated and remediated in accordance to CAP submitted to OCD District I office dated December 29, 2009 A FINAL REPORT, detailing assessment and remedial actions undertaken at the site, will subsequently be prepared and submitted to OCD District I office for review and acceptance.					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.					
Signature: 		<b>OIL CONSERVATION DIVISION</b>			
Printed Name: Dusty L. Wilson		Approved by District Supervisor:			
Title: HES Specialist		Approval Date:		Expiration Date:	
E-mail Address: dusty_wilson@oxy.com		Conditions of Approval:		Attached <input type="checkbox"/>	
Date: 12/22/2009		Phone: (575) 441-7189			

\* Attach Additional Sheets If Necessary

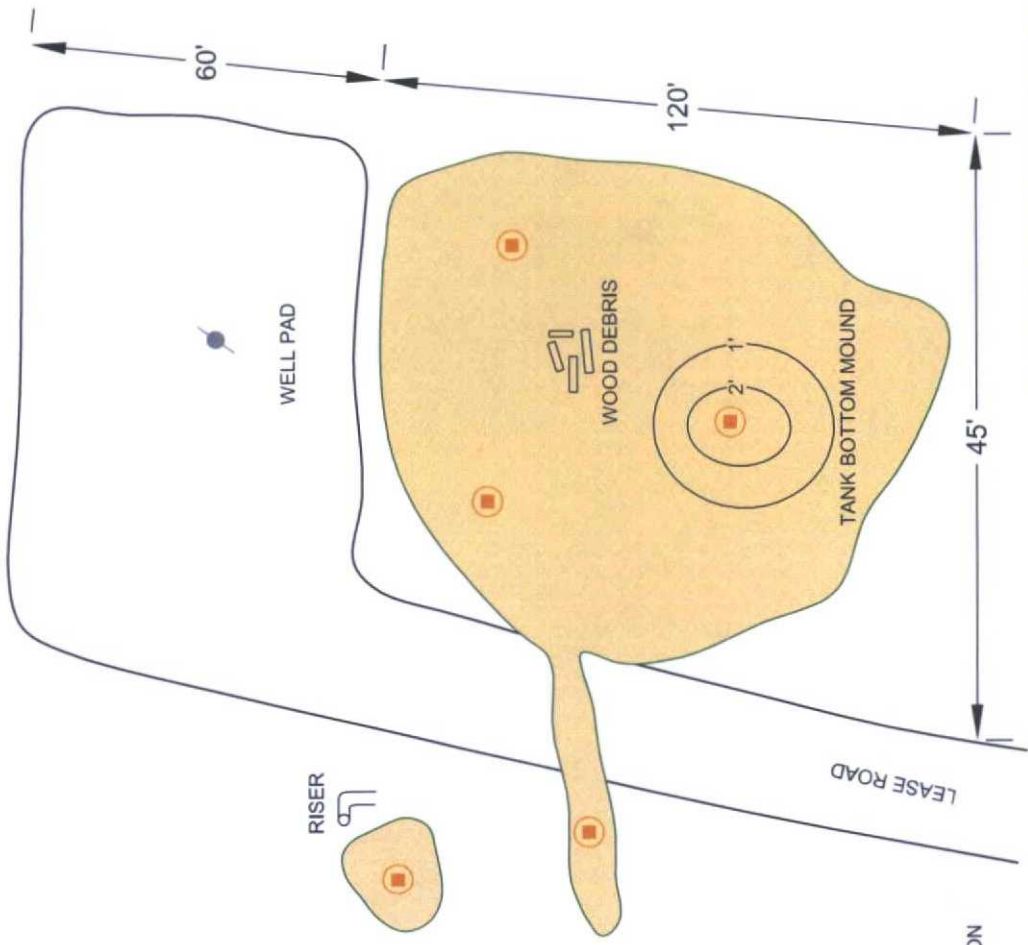






NOT TO SCALE

32° 16' 50.88" N, 103° 13' 01.45" W



- LEGEND**
- STAINED SOIL AREA
  - PROPOSED SOIL BORING LOCATION
  - DRY HOLE MARKER

figure 2  
PROPOSED SOIL BORING LOCATION MAP  
MLMU #11  
LEA COUNTY, NEW MEXICO  
Glenn Springs Holdings, Inc.

