1R - 474

GENERAL CORRESPONDENCE

2007

From:

Randall Hicks [R@rthicksconsult.com]

Sent:

Thursday, August 16, 2007 1:23 PM

To:

VonGonten, Glenn, EMNRD

Cc:

'Scott Rose'; 'Floyd Steed'; mmeyer@slo.state.nm.us

Subject:

Samson BD-04

Flag Status:

Red

Follow Up Flag: Follow up

Attachments:

august update.pdf

Glenn

That hearing went for so long that I forgot to send this to you last week!

Randall Hicks Tel: 505-266-5004 Cell 505-238-9515

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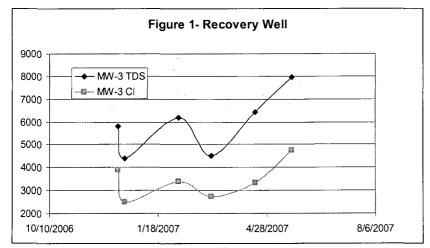
August 16, 2007

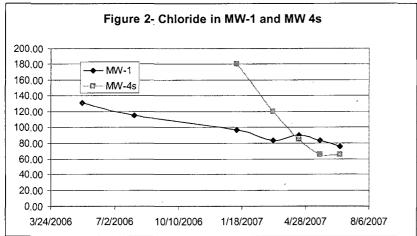
Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Samson BD-04, T12S-R33E-Section 2, Unit Letter H, 1R0474

Dear Mr. von Gonten:

Chloride and TDS concentrations from the source removal well, MW-3s, have not declined over the past few months despite continual pumping (see Figure 1). Figure 2 shows that the chloride concentrations in MW-1 and MW-4s remain well below WQCC Standards.





Within this source area (the former reserve pit), salinity will vary because the aquifer below liner tears or below zones of highly fractured caliche will exhibit higher salt fluxes (from the

pit to ground water) than areas where caliche is less fractured or where the liner remained intact. Therefore, variations of salinity in the pumping well must be expected. We had hypothesized that the salt load would be sufficiently low that 3-6 months of pumping would remove the majority of the salt in the aquifer beneath the pit. The data do not appear to support this hypothesis.

Although pumping at MW-3 has not caused a material decline in the salinity of the aquifer beneath the former pit, pumping has caused a significant decline in chloride at MW-4s (see Figure 2). However, the observed rate of decline in salinity at MW-4s now appears to be similar to the rate of decline at MW-1 prior to pumping, which is the rate of decline caused by natural restoration of the aquifer (dilution and dispersion).

If the pump-and-dispose source removal strategy is not superior to natural restoration, then we must strongly consider moving to the pump-and-use strategy proposed in our earlier communications with NMOCD despite the fact that the TDS of MW-3s is higher than 3,000 mg/L. Continuing the pump-and-dispose source removal strategy may simply be wasting the resource.

To compare the efficacy of the pump-and-dispose source removal program to a natural restoration strategy (which preserves the ground water resource), we ceased source removal pumping in late June. We propose to sample all wells in August and September, evaluate the results and determine if we should re-start the source removal pumping or convert the site to a pump-and-use ground water restoration strategy. We respectfully request a postponement of our scheduled August report to late September.

Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

Principal

Copy: Samson Resources, Scott Rose

New Mexico State Land Office

From:

Randall Hicks [R@rthicksconsult.com]

Sent:

Wednesday, November 07, 2007 10:47 AM

To:

VonGonten, Glenn, EMNRD; 'Kostrubala, Thaddeus'; Gum, Tim, EMNRD

Cc:

'Scott Rose'; 'Dale Littlejohn'; 'Floyd Steed'

Subject:

Samson State BD-04

Follow Up Flag: Follow up

- allow up

Flag Status:

Red

Attachments:

november update.pdf

Glenn

Hard copy in snail mail to NMOCD Santa Fe office only.

Randall Hicks Tel: 505-266-5004 Cell 505-238-9515

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November 7, 2007

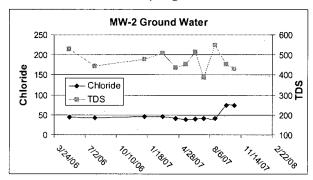
Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

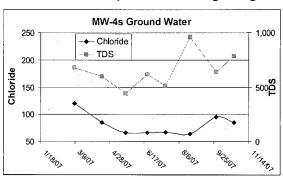
RE: Samson BD-04, T12S-R33E-Section 2, Unit Letter H,

NMOCD #1R0474

Dear Mr. von Gonten:

Below are two plots of water quality in MW-4s and MW-2 showing all data up to October 24, the most recent sampling event. MW-1 and MW-4d follow a similar pattern showing a slight





increase in chloride concentrations after cessation of source removal pumping. Table 1 presents all the ground water data. All samples from monitored wells remain below WQCC standards for chloride and TDS. With the October sampling event we are ceasing monthly sampling. The next sampling events will be January, April, July and October 2008. We will submit an annual monitoring report in December of 2008.

Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

Principal

Copy: Samson Resources, Scott Rose

New Mexico State Land Office

NMOCD District II

Table 1
Laboratory Results Summary - Groundwater Samples

4,233.23 51,22006	Monitor Well TOC Elev.	Sample Date	Water Depth	Water Elevation	pH (unitless)	Cond. (uS/cm)	Chloride (mg/L)	TDS (mg/L)	% CI of TDS
4,233.23 51,22006	MW-1	5/11/2006	41 18	4 192 05	7 41	1 17			
101172006	4,233.23						131	838	16%
12/12/2006	1		41.22	4,192.01	7.07	0.99	115	648	18%
1/9/2007	1								
26/2007 41.32 4191.91 41.55 4191.91 41.55 4191.91 41.57 4191.86 30/2007 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39 4191.84 41.39	1						0.7		
2/6/2007 41.25 41.91.98 3/9/2007 41.39 41.91.86 3/9/2007 41.39 41.91.86 3/9/2007 41.39 41.91.87	1						97		
216/2007	1								
3/13/2007 41.36 4.191.87 1.025 89.6 674 13%	1					0.985			
MATOR MATO	1						83	620	13%
S\(21\)\(2				,					
6-71/2007	1								
- 7/18/2007 41.05 4.192.18 7.50 0.80 102 650 16% 82/2007 40.94 4.192.29 7.62 0.86 88.0 672 13% 672/2007 40.94 4.192.29 7.62 0.94 122 606 20% 10/24/2007 41 4.192.23 7.75 0.93 117 710 16% 672/2006 41.86 4.191.99 7.50 0.50 44.5 530 8% 672/2006 14.88 4.191.99 7.38 0.67 42.2 444 10% 672/2006 14.88 4.191.99 7.38 0.67 42.2 444 10% 672/2006 14.89 4.191.90 7.38 0.67 42.2 444 10% 672/2006 14.89 4.191.90 7.38 0.67 42.2 444 10% 672/2006 14.89 4.191.90 7.38 0.67 42.2 444 10% 672/2007 41.53 4.191.90 7.38 0.67 42.2 444 10% 672/2007 41.93 4.191.90 7.38 0.67 42.2 444 10% 672/2007 41.93 4.191.90 7.38 0.67 42.2 444 10% 672/2007 41.93 4.191.90 7.38 0.67 42.2 444 10% 672/2007 41.93 4.191.90 7.26/2007 41.98 4.191.90 7.26/2007 41.98 4.191.90 7.26/2007 41.98 4.191.90 7.26/2007 41.98 4.191.90 7.26/2007 41.98 4.191.90 7.26/2007 41.91 4.192.06 7.93 0.65 41.5 436 10% 672/2007 41.73 4.192.16 7.72 0.57 39.7 516 88 40.9 172 4.192.17 4.192.20 7.84 0.73 7.74 4.30 7.70 5.6% 4.192.17 4.192.00 7.27 4.192.00 3.28 4.192.17 4.192.17 4.192.00 7.27 4.192.00 3.28 4.192.17 4.192.17 4.192.00 7.27 4.192.00 3.28 4.192.17 4.192.17 4.192.00 7.27 4.192.00 3.28 4.192.17 4.192.17 4.192.00 7.27 4.192.00 3.27 4.192.20 7.26/2007 42.41 4.182.11 10.06 4.192.17 4.192.17 4.192.00 7.27 4.192.00 5.28 4.192.20 7.28 5.00 7.45 5.00 5.6% 5.20 5.5% 5.20 5.5% 5.20 5.5% 5.20 5.5% 5.20 5.20 5.20 5.20 5.20 5.20 5.20 5.20	1								
	1 -			,					
MW-2 10/24/2007 41 4,192.23 7,75 0,93 117 710 16% MW-2 5/11/2006 41.88 4,191.99 7,50 0,80 44.5 530 8% MW-2 6/12/2006 41.88 4,191.99 7,50 0,80 44.5 530 8% MW-2 6/12/2006 41.88 4,191.99 7,50 0,80 44.5 530 8% MW-2 6/12/2006 41.88 4,191.99 7,38 0,67 42.2 444 10% MW-2 6/12/2007 41.93 4,192.15	i	8/22/2007		4,192.27		0.86	88.0	672	13%
MW-2									
4,233.87 5112/2006	MANA CO						117	710	16%
8/2/2006							44.5	530	8%
10/17/2006 41.77 4192.10 1/19/2007 41.75 4192.10 1/19/2007 41.75 4192.10 1/19/2007 41.89 4191.99 2/16/2007 41.93 4191.99 2/16/2007 41.93 4191.99 2/16/2007 41.93 4191.94 3/19/2007 41.99 4199.84 3/19/2007 41.99 4199.84 3/19/2007 41.99 4199.84 3/19/2007 41.99 4199.84 8.31 0.683 41.5 436 10% 6/21/2007 41.73 4192.14 7.72 0.57 39.7 516 8% 6/21/2007 41.73 4192.14 7.72 0.57 39.7 516 8% 47/18/2007 41.66 4192.21 7.60 0.68 40.9 550 7% 9/28/2007 41.66 4192.21 7.60 0.68 40.9 550 7% 9/28/2007 41.66 4192.22 7.82 0.66 74.4 452 16% 10/24/2007 41.66 4192.21 7.60 0.68 74.4 452 16% 10/24/2007 41.66 4192.22 7.82 0.66 74.4 452 16% 10/24/2007 41.66 4192.22 7.82 0.66 74.4 452 16% 10/24/2007 41.67 4192.06 7.84 0.73 74.4 430 17% 10/24/2007 41.67 4192.06 7.84 0.73 74.4 430 17% 10/24/2007 41.67 4192.06 7.84 0.73 74.4 430 17% 10/24/2007 41.67 4192.20 7.64 0.73 74.4 430 17% 10/24/2007 42.41 41.91.71 10.06 10.24 0.73 74.4 430 17% 10/24/2007 42.41 41.91.71 10.06 10.24 0.73 74.4 430 17% 10/24/2007 42.41 41.91.71 10.06 10.24 0.73 74.4 430 17% 10/24/2007 42.41 41.91.71 10.06 10.24 0.73 74.4 430 17% 10/24/2007 42.41 41.91.71 10.06 10.24 0.73 74.4 430 17% 10/24/2007 42.41 41.91.71 10.06 10.24 0.73 10.24 0.	1,200.07								
12/12/2006						5.57			.,,,
2/16/2007		12/12/2006	41.77	4,192.10					
26/2007							46.0		
2/16/2007									
3/8/2007						0.924			
3/13/2007						0.52	45	510	9%
5/21/2007		3/13/2007	41.99	4,191.88			_]
6/21/2007	Į .								
8/2/2/007	1								
9/28/2007 41.65 4.192.22 7.82 0.66 74.4 452 16% 10/24/2007 41.67 4.192.20 7.64 0.73 74.4 430 17% 430 430 17% 4									
MW-3 (Deep) 12/18/2006									
4,224.52			41.67	4,192.20	7.64				
MW-3 (RW) 12/12/2006 32.81 4.191.71 3.900 5,800 67%									
MW-3 (RW) 12/12/2006 32.81 4,191.71 3,900 5,800 67% 12/18/2006 32.82 4,191.70 32.82 4,191.70 32.82 4,191.82 2,500 4,400 57% 2,66/2007 44.45 4,180.05 8.71 3,400 6,200 55% 3/13/2007 42.41 4,182.11 10.27 4/17/2007 42 4,182.52 8.08 7.45 2,730 4,520 60% 5/21/2007 42 4,182.52 8.08 7.45 2,730 4,520 60% 6/21/2007 42 4,182.52 8.08 7.45 2,730 4,520 60% 6/21/2007 42 4,182.52 7.78 10.24 4,750 7,960 60% 6/21/2007 42 4,182.52 7.78 10.24 4,750 7,960 60% 6/21/2007 32.24 4,192.04 7.45 10.24 5,730 8,730 66% 6/21/2007 32.24 4,192.04 7.45 10.24 5,730 8,730 66% 8/22/2007 32.24 4,192.28	4,224.52			4 182 11			3,500	6,200	56%
4,224.52	MW-3 (RW)					10.00			
Pump On	4,224.52						3,900	5,800	67%
Pemp On 2/6/2007									
2/16/2007	Ouma On						2.500	4.400	E70/
3/8/2007 40.12 4,184.40 10.31 3,400 6,200 55%	rump On					Ω 71	2,500	4,400	5/%
3/13/2007							3,400	6.200	55%
Fump Off		3/13/2007	42.41	4,182.11					
Flump Off									
Fump Off 8/22/2007 32.24 4,192.28									
8/22/2007 32.22 4,192.30	Pumo Off								
MW-4(D)									
MW-4(D)			32.24	4,192.28					
4,233.38				4,192.17					
2/6/2007				 4 101 77			100		
2/16/2007	7,200.00								
3/13/2007	1	2/16/2007	41.64			0.95			
A 17/2007							52.0	550	9%
5/21/2007					7 97		45.7	562	go/.
6/21/2007	[
7/18/2007	1								
9/28/2007	j i	7/18/2007	41.34	4,192.04	7.93	0.62	48.2	508	
10/24/2007									
MW-4(S) 1/9/2007 41.73 4,191.79 180 180 41.91.72 2/16/2007 41.80 4,191.72 2/16/2007 41.84 4,191.68 0.98 3/8/2007 41.85 4,191.67 0.988 41.87 41.91.90 41.81 41.91.91 7.78 0.79 84.8 598 14% 5/21/2007 41.50 4,192.02 8.16 0.73 65.7 442 15% 6/21/2007 41.50 4,192.01 7.79 0.65 65.8 618 11% 7/18/2007 41.54 4,191.98 7.81 0.68 67.5 514 13% 8/22/2007 41.44 4,192.08 7.46 0.78 64.0 960 7% 9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%									
4,233.52 2/6/2007 41.73 4,191.79 2/6/2007 41.80 4,191.79 2/16/2007 41.84 4,191.68 0.98 3/8/2007 41.85 4,191.67 120 680 3/13/2007 41.82 4,191.70 0.988 4/17/2007 41.61 4,191.91 7.78 0.79 84.8 598 14% 5/2/12007 41.50 4,192.02 8.16 0.73 65.7 442 15% 6/21/2007 41.51 4,192.01 7.79 0.65 65.8 618 11% 7/18/2007 41.54 4,191.98 7.81 0.68 67.5 514 13% 8/22/2007 41.44 4,192.08 7.46 0.78 64.0 960 7% 9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%	MW-4(S)		71.23	, : J£.03	1.54	0.07		550	1 7 70
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3/8/2007									
3/13/2007						0.98	120	680	1.99/
4/17/2007 41.61 4,191.91 7.78 0.79 84.8 598 14% 5/21/2007 41.50 4,192.02 8.16 0.73 65.7 442 15% 6/21/2007 41.51 4,192.01 7.79 0.65 65.8 618 11% 7/18/2007 41.54 4,191.98 7.81 0.68 67.5 514 13% 8/2/2007 41.44 4,192.08 7.46 0.78 64.0 960 7% 9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%						0 988	120	000	1076
5/21/2007 41.50 4,192.02 8.16 0.73 65.7 442 15% 6/2/1/2007 41.51 4,192.01 7.79 0.65 65.8 618 11% 7/18/2007 41.54 4,191.98 7.81 0.68 67.5 514 13% 8/2/2007 41.44 4,192.08 7.46 0.78 64.0 960 7% 9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%					7.78		84.8	598	14%
7/18/2007 41.54 4,191.98 7.81 0.68 67.5 514 13% 8/22/2007 41.44 4,192.08 7.46 0.78 64.0 960 7% 9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%			41.50	4,192.02	8.16		65.7	442	15%
8/22/2007 41.44 4,192.08 7.46 0.78 64.0 960 7% 9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%		6/21/2007	41.51	4,192.01		0.65			
9/28/2007 41.43 4,192.09 7.89 0.77 95.7 640 15%									
	j j								
1 10/24/2007 41.48 4.192.04 7.97 0.84 85.1 786 1.1%		10/24/2007	41.43	4,192.09	7.89	0.77	95.7 85.1	786	11%

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

April 2, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Samson BD-04, T12S-R33E-Section 2, Unit Letter H, 1R0474

Dear Mr. von Gonten:

On behalf of Samson Resources, R.T. Hicks Consultants is pleased to submit this progress report for the above-referenced site. The report and accompanying CD will be mailed to your office this week. Currently the report is available on our ftp site. To access our FTP, please see the setup instructions at the end of this letter.

In response to recent NMOCD comments regarding the level of detail contained in our reports, we have modified our format and approach in this submission. We appreciate not only your evaluation of the data, conclusions and path forward, but also your comments on the readability and level of detail contained in the report.

Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

Principal

Copy:

To access our FTP site, perform the following. If you already have a FTP program installed, enter your FTP setting (user name, password etc) provided at the end of the instructions and skip the following setup details.

The setup process is as follows:

- 1. Download FileZilla (if you have Filezilla already installed, proceed to Step E)
- 2. Download the attached file (via email) to your Desktop.
- 3. Connect to our FTP site.

Setup Details (you only need to do this once):

- a) Download the latest FileZilla Source Code for Windows: http://downloads.sourceforge.net/filezilla/FileZilla 2 2 31 setup.exe?modtime=117 2667588&big mirror=0
- b) Run the setup accepting the default install options.
- c) Copy the attached NMOCD.xml file to your desktop. This file contains the setup parameters (usename, password, etc)
- d) Start FileZilla
- e) Open the Site Manager (File>Site Manager) or press the icon directly below the FILE header.
- f) In the Site Manager, select file import. Then import the NMOCD.xml file.
- g) Then Connect.

It is now safe to delete the NMOCD.xml file from you desktop.

To connect at a later time, open Filezilla, then the Site Manager, then connect to NMOCD under ftp.rthicksconsult.com.

NOTE: I have the FTP server to log you off after 2 minutes of inactivity.

Your ftp settings are:

Username: N3wMex0CD (for "New Mexico OCD")
Password: O1Lc0nDiv (for "Oil Conservation Division")

Port: 21 Passive Mode

If you have problems connecting to our FTP site, please contact Andrew Parker at our Albuquerque office.

From:

Andrew Parker [andrew@rthicksconsult.com]

Sent:

Monday, April 02, 2007 1:56 PM

To:

VonGonten, Glenn, EMNRD

Subject:

Samson BD-04 March Progress Repot

Follow Up Flag: Follow up

Flag Status:

Red

Attachments:

Samson BD-04 March Report Transmittal Letter.pdf; NMOCD.xml

Glenn

Attached is the Transmittal Letter for the above referenced site. We will mail you a hard copy this week. The report is available for download from our FTP site. Instructions to access our ftp (includes initial setup details) are described in the transmittal letter and repeated below.

Andrew Parker R.T. Hicks Consultants Cell: 505-350-5535

To access our FTP site, perform the following. If you already have a FTP program installed, enter your FTP setting (user name, password etc) provided at the end of the instructions and skip the following setup details.

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NOTE: I have the FTP server to log you off after 2 minutes of inactivity.

Username: N3wMex0CD (for "New Mexico OCD")
Password: O1Lc0nDiv (for "Oil Conservation Division")

Port: 21 Passive Mode

If you have problems connecting to our FTP site, please contact Andrew Parker at our Albuquerque office.

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1R 0474

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

March 15, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 RECEIVED

MAR 19 2007

Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

RE:

Samson BD-04, T12S-R33E-Section 2, Unit Letter H

1R0474

Dear Mr. von Gonten:

We collected ground water samples at all wells on March 8, 2007. Laboratory results will be available on or about March 18. Our March report, which we hoped to submit on or before March 15, will be delivered to NMOCD before the end of the month.

Source removal pumping at a rate of about 5 gpm began in early February and continues at this time of writing. We have been in contact with the State Land Office and the Office of the State Engineer regarding other required permits.

Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

Principal

Copy:

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

March 15, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

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Samson BD-04, T12S-R33E-Section 2, Unit Letter H

1R0474

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Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

Principal

Copy:

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

March 15, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE:

Samson BD-04, T12S-R33E-Section 2, Unit Letter H

1R0474

Dear Mr. von Gonten:

We collected ground water samples at all wells on March 8, 2007. Laboratory results will be available on or about March 18. Our March report, which we hoped to submit on or before March 15, will be delivered to NMOCD before the end of the month.

Source removal pumping at a rate of about 5 gpm began in early February and continues at this time of writing. We have been in contact with the State Land Office and the Office of the State Engineer regarding other required permits.

Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

Principal

Copy:

From:

Randall Hicks [R@rthicksconsult.com]

Sent:

Wednesday, March 14, 2007 2:38 PM

To:

mmeyer@slo.state.nm.us; VonGonten, Glenn, EMNRD

Cc:

'Scott Rose'; 'Andrew Parker'

Subject:

BD-04

Follow Up Flag: Follow up

-- - -

Flag Status:

Red

Attachments:

March 12 07 letter.pdf

ΑII

As soon as we complete the report referenced in this letter, we will begin the paperwork associated with monitoring wells and other issues associated with this action on State Land.

Ms. Meyers – if you do not have the previous submittals sent to the SLO (Santa Fe), please contact Andrew Parker of my staff and we will forward electronic copies to you.

Randall Hicks Tel: 505-266-5004 Cell 505-238-9515

This inbound email has been scanned by the MessageLabs Email Security System.

From: Randall Hicks [R@rthicksconsult.com]

Sent: Thursday, February 01, 2007 2:08 PM

To: VonGonten, Glenn, EMNRD

Cc: 'Scott Rose'; 'Mark Sikelianos'; fsteed@samson.com; Caperton, Patricia, EMNRD; 'Dale Littlejohn'

Subject: BD-04

Glenn

Weather permitting; we plan to commence the source removal pumping at the BD-04 site next Tuesday.

After we confirm that the pumping system is working correctly at BD-04, we plan to turn our attention to the Livestock site. As you may remember, we have been pumping at Livestock since December. In our last submission to NMOCD (December, 2006), we committed to provide NMOCD with a plan for a more complete characterization of the site. We anticipate submission of this plan and a summary of data by the end of this month or early March. NMOCD may wish to delay responding to our Abatement Plan until you have an opportunity to review this next submission.

If you have any questions, you may contact Scott Rose of Samson.

Randy Hicks

From: randall hicks [r@rthicksconsult.com]

Sent: Thursday, February 01, 2007 2:06 PM

To: VonGonten, Glenn, EMNRD

Cc: 'Scott Rose'; 'Mark Sikelianos'; fsteed@samson.com; Caperton, Patricia, EMNRD; 'Dale Littlejohn'

Subject: BD-04

Glenn

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If you have any questions, you may contact Scott Rose of Samson.

Randy Hicks

From:

VonGonten, Glenn, EMNRD

Sent:

Thursday, March 15, 2007 10:33 AM

To:

Price, Wayne, EMNRD

Subject:

FW: BD-04

Follow Up Flag: Follow up

. ... 22 0 1

Flag Status:

Red

Attachments:

March 12 07 letter.pdf

From: Randall Hicks [mailto:R@rthicksconsult.com]

Sent: Wednesday, March 14, 2007 1:38 PM

To: mmeyer@slo.state.nm.us; VonGonten, Glenn, EMNRD

Cc: 'Scott Rose'; 'Andrew Parker'

Subject: BD-04

ΑII

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Randall Hicks Tel: 505-266-5004

Cell 505-238-9515

This inbound email has been scanned by the MessageLabs Email Security System.

From:

Randall Hicks [R@rthicksconsult.com]

Sent:

Thursday, January 25, 2007 5:41 PM

To:

VonGonten, Glenn, EMNRD; srose@samson.com; Floyd Steed; Mark Sikelianos; Caperton,

Patricia, EMNRD

Subject:

BD-04

Attachments:

jan 30 07 report.pdf



jan 30 07 ∍port.pdf (255 KE

Glenn

As stated in the letter, the freeze is delaying our proposed pumping. We hope to begin next week and we will keep you posted.

This letter asks that NMOCD forego any formal review of the actions at this site until we submit a report on our findings in March. We would like to pump for 30-days, see how the aquifer responds, then evaluate the data and submit the report.

Original letter via snail mail - sent today.

Randy

1R0474

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

January 25, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Samson BD-04, T12S-R33E-Section 2, Unit Letter H, 1R0474

Dear Mr. von Gonten:

On behalf of Samson Resources, R.T. Hicks Consultants presents this Letter Report in accordance with the commitments made in the January 3, 2007 Revision to the December 13 Remediation Plan. Because freezing weather prevented the mid-January commencement of ground water restoration pumping, we respectfully request delaying submission of our proposed report scheduled for the end of February. Please expect the report 40-days after we begin the ground water restoration strategy. We hope to begin pumping next week, which would mean submission of a report on or before March 15 that:

- 1. Describes the field programs and discusses any variation from the protocols outlined in previous submittals to NMOCD.
- 2. Describes the final grading and installation of the ET infiltration barrier
- 3. Presents the results of vadose zone sampling to
 - a. define the magnitude and extent of salt impact to the vadose zone, and
 - b. measure the moisture content below the infiltration barrier
- 4. Presents the results of the investigation of the saturated zone and includes
 - a. Potentiometric surface maps
 - b. Interpretation of the planned 4-day pumping test
 - c. Tables and graphs of ground water analyses for each well
 - d. Interpretation of the magnitude and extent of chloride impact
 - e. A hydrogeologic cross-section of the site area
 - f. Tables and graphs showing the hydraulic effect of the first 30-days of the source removal pumping program (described below)
- 5. Presents the results of numerical modeling of the fate and transport of the chloride introduced to the saturated zone
 - a. During source removal pumping phase of the remedy and
 - b. During the pump-and-use ground water restoration phase
- 6. Proposes a site monitoring plan and proposed criteria for closure of the regulatory file based upon the results of the monitoring

Source Removal Pumping

Current data suggests that MW-3 can produce about 5 gallons/minute from the upper screened interval (see Appendix A for a description of the pumping system). Ground water

produced from MW-3 will discharge to a 500-barrel storage tank at the site. From the storage tank, the water flows to the Samson injection well located about 500 feet south of the site. Although we believe that most of the pumped water will flow to the Samson disposal well during this phase of the ground water remedy, we are negotiating with several oilfield service companies to take the water for use in oil and gas well drilling programs.

We anticipate that this aggressive source removal pumping will continue for 30 to 90 days. During this phase of the remedy we will:

- monitor the volume of pumped ground water with a totalizing flow meter
- coordinate water rights permitting with the office of the State Engineer
- routinely measure ground water levels of on-site wells
- routinely measure field conductance of pumped water
- measure the volume of water flowing to the disposal well
- measure the volume of water used in oil and gas drilling operations

Proposed Pump-and-Use Ground Water Restoration

When the TDS concentration of pumped water from MW-3 declines from the current level of about 5000 mg/L to 3000 mg/L, we will transition from source removal pumping to the pump-and-use strategy. According to New Mexico State University (http://cahe.nmsu.edu/pubs/m/m-112.html) water with a TDS of 3000 mg/L or less is "Very satisfactory for all classes of livestock and poultry". Therefore, the ground water remedy calls for supplying the surface leaseholder with a water source for cattle since this area of the state lease does not have a water source for stock. Additionally, we anticipate that oilfield service companies will periodically take water from the stock tank for use in nearby oil and gas well drilling operations.

We also request that NMOCD forego any formal evaluation of the site activities until we have submitted the March report. Please contact Mr. Scott Rose of Samson if you have any questions or concerns regarding this plan as he has reviewed and approved this submission.

Sincerely,

R.T. Hicks Consultants, Ltd.

Randall T. Hicks

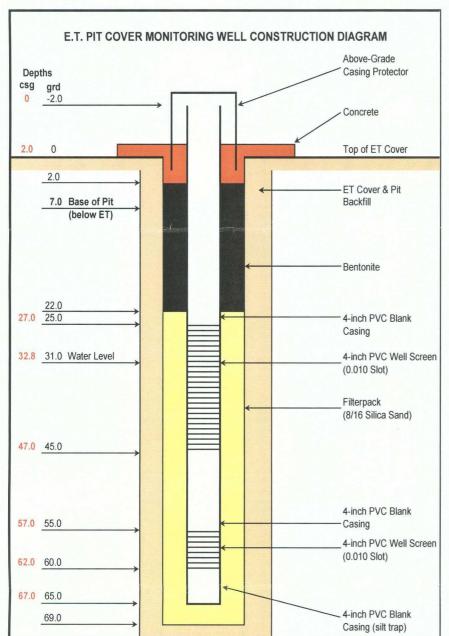
Principal

Copy:

Appendix A – Pump and Packer System for MW-3



- 1) milled redwood plug
- 2) 1/4 in stainless steel tube
- 3) submersible pump motor
- 4) liquid pump end discharging to 1 in schedule 80 pvc column pipe
- 5) bushing from 1/4 in ss tube to 1/2 in sch 40 pvc riser tube
- 6) disposable bailer to bail through 1/2 in riser tube



The milled redwood plug is placed at 50-feet below ground surface, within the blank casing. This plug focuses water withdrawal from the upper screen.

During pumping, water enters the well from the upper screen and a small bailer lowered into the well can obtain a sample of ground water produced from the upper screen.

Because the redwood plug only restricts flow from the lower screen, water enters the well through the lower screen but at a low rate.

The ¼ inch tube connects the ½ inch riser to the area of the well below the packer. When the well is pumping, a small bailer can draw a discrete sample from the lower well screen

Discrete water level measurements may be obtained using the same protocol as that described for sampling

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

January 25, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

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Sincerely,

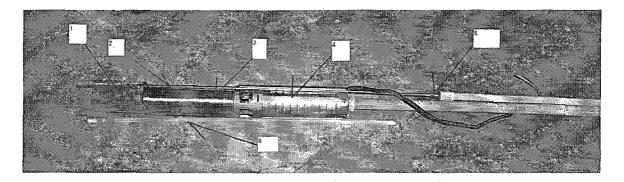
R.T. Hicks Consultants, Ltd.

Randall T. Hicks

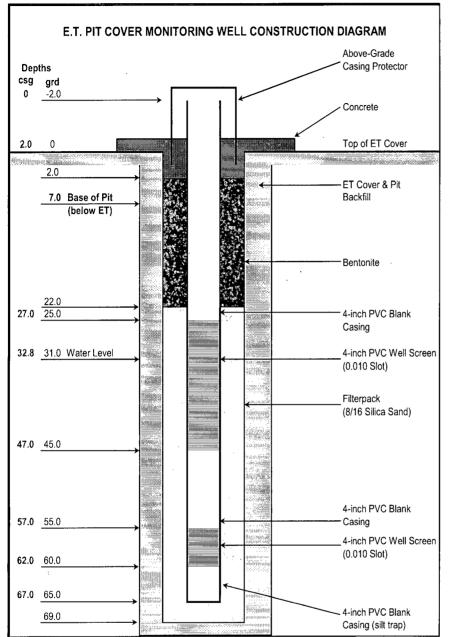
Principal

Copy:

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Discrete water level measurements may be obtained using the same protocol as that described for sampling

From:

Randall Hicks [R@rthicksconsult.com]

Sent:

Wednesday, January 03, 2007 3:35 PM

To:

Dale Littleiohn

Cc:

VonGonten, Glenn, EMNRD; 'Scott Rose'; Mark Sikelianos

Subject:

BD-04 site

Attachments:

BD-04Investigation Plan2.pdf



BD-04Investigati on Plan2.pdf (...

On Monday January 8 (about 10 am), we will begin drilling the proposed boring/well cluster at the eastern edge of the former pit. We hope to finish this well on Monday and complete the two proposed soil borings on Tuesday. If you find time on your way to Artesia for the Pit Meeting please stop in. I will be there from about 10 am to noon leaving Mark Sikelianos in charge of the project for the afternoon.

The ground water sampling results show impairment above WQCC Standards. As the attached letter states, we plan to focus our efforts over the next few months on source removal and data collection.

As I am in Artesia overnight, I may drop into the pit public meeting.

Happy New Year.

Randy Hicks

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

January 3, 2007

Mr. Glenn von Gonten New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE:

Samson BD-04, T12S-R33E-Section 2, Unit Letter H

1R0474

Dear Mr. von Gonten:

Enclosed are the results of the December 2006 field program at the BD-04 site. The most important result of the investigation is the determination of the salt concentration in water below the pit.

		TDS mg/L	CI mg/L
MW-3 Upper	12/18/2006	5800	3900
MW-3 Lower	12/18/2006	2000	3700

As shown in the attached lithologic log and completion diagrams, the upper screen obtains a sample from the uppermost 15 feet of the saturated zone (30-feet to 45-feet below ground surface) and the lower screen samples the screened interval from 55-60 feet below ground surface (about 63-68 feet below the natural ground surface.

As expected, these findings have caused some minor changes to the characterization plan submitted to NMOCD in December. These changes are:

- 1. Some final grading of the site will cause an expansion of the excavation to the south and possibly to the east to eliminate the small escarpment caused by the installation of the ET infiltration barrier. As a result, the proposed boring and well near the eastern edge of the former pit may need to be relocated 10-15 feet east of the location shown in the December plan.
- 2. Sloughing sand in the uppermost aquifer will prevent effective sampling below the water table, which we planned to use to guide the placement of the lower well screen. The uppermost well in the cluster proposed for east of the former pit will be completed with about 10-feet of screen in the uppermost saturated zone and 5-feet of screen above the water table. The deeper well in the cluster will be placed 10-feet below the screened interval of MW-3, which we believe will be from 75-80 feet below ground surface at the proposed location.
- 3. Because chloride and TDS concentrations are above WQCC Standards in MW-3, we plan to implement a pump-and-use ground water remedy in January. In order to monitor the efficacy of this pump-and-use program,

the well cluster described above may become a permanent well location and we will construct it as such.

- 4. In January, we will install a pump and packer at MW-3 that will cause withdrawal of ground water from primarily the uppermost screen. We hope to use recovered water for drilling fluids at nearby oil and gas exploration or production wells. Initially, recovered water will be discharged to a nearby Class II injection well. NMOCD can expect correspondence from us during the month of January regarding the implementation of this proposed remedy.
- 5. Implementing and monitoring the pump-and-use ground water restoration strategy will provide very useful data that can assist in determining the most appropriate location for other down gradient monitoring wells. Therefore, we plan to delay installation of the three down gradient monitoring wells proposed in the December investigation plan until we have three months of data from the pump-and-use strategy (May 2007).

NMOCD can expect a progress report on or before January 30th that summarizes the results of the work planned for early January. NMOCD can expect monthly reports on the progress of the pump-and-use or pump-and-dispose remedy. As stated in our December investigation plan, characterization of ground water is an iterative process. Each step in the process is based upon the data collected during the previous step. Samson is committed to:

- complying with NMOCD Rules,
- applying sound science to the problem at hand and
- protecting fresh water, public health and the environment

Please contact Mr. Scott Rose of Samson if you have any questions or concerns regarding this plan as he has reviewed and approved this submission.

Sincerely,

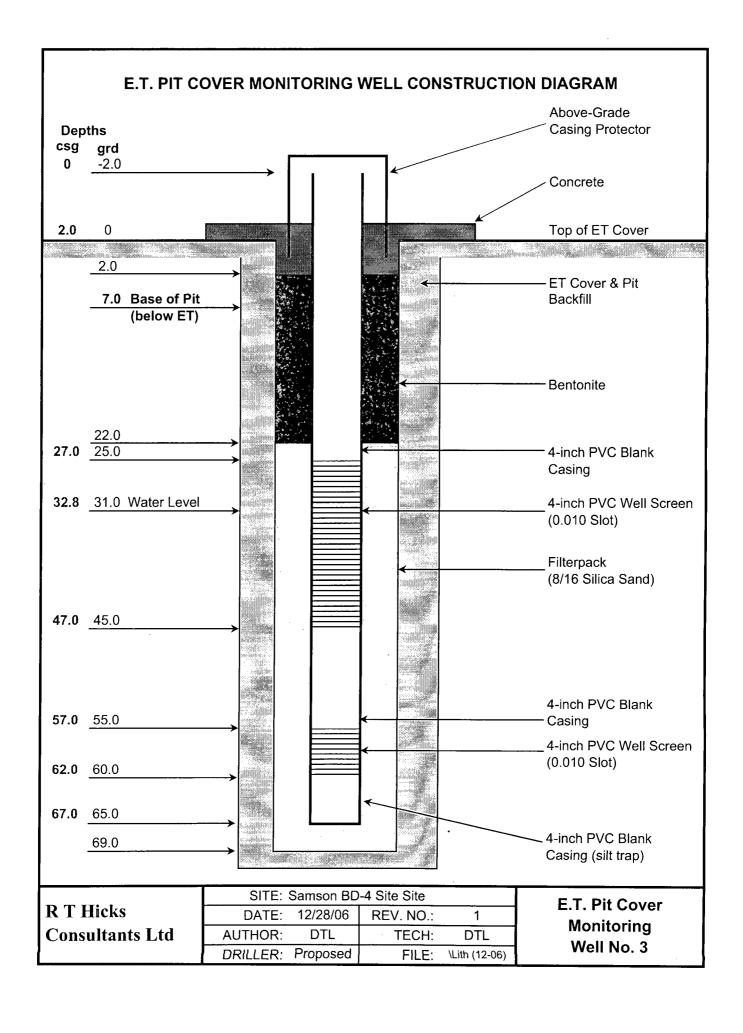
R.T. Hicks Consultants, Ltd.

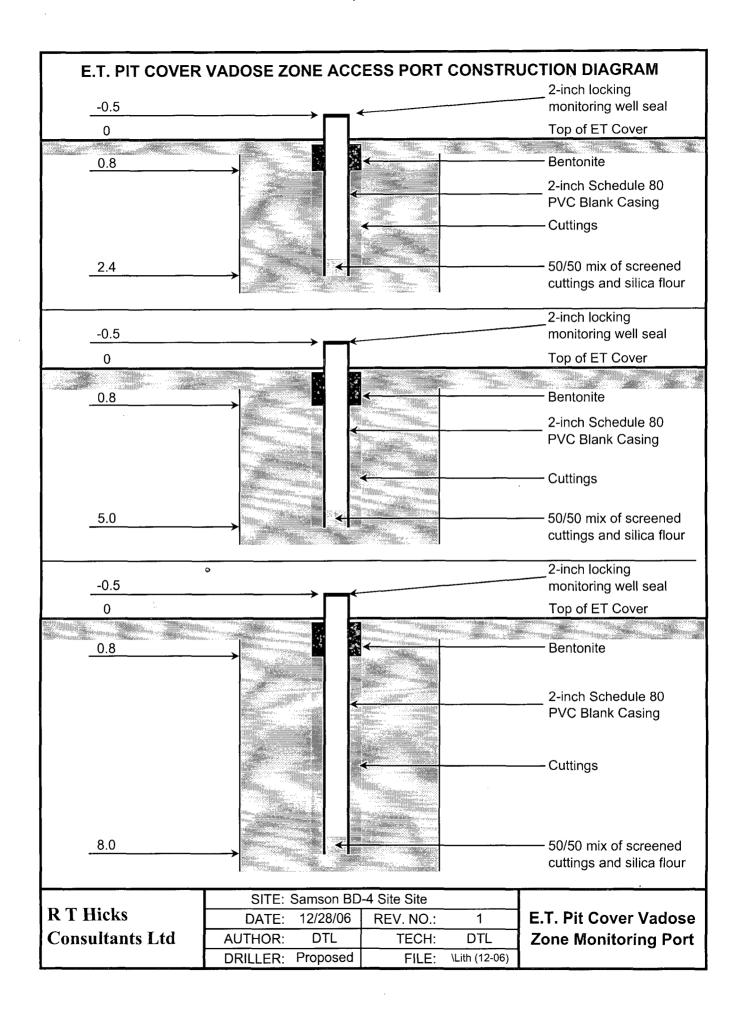
Randall T. Hicks

Principal

Copy:

LITHOLOGIC LOG (MONITORING WELL) R T Hicks MONITOR WELL NO.: MW-3 TOTAL DEPTH: 69.0 Ft SITE ID: Samson State BD No. 4 CLIENT: Samson Investment Co. Consultants Ltd COUNTY: Lea County SURFACE ELEVATION: Csg = 4,224.48 STATE: New Mexico CONTRACTOR: Atkins Engineering LOCATION: T-12-S, R-33-E, Sec. 2 (H) DRILLING METHOD: Hollow-Stem P O Box 7624 FIELD REP .: Dale Littlejohn Midland, TX 79708 INSTALLATION DATE: 12/11/06 (432) 528-3878 WELL PLACEMENT: Center of Former Res. Pit FILE NAME: \BD-4\Lithlogs (12-06) COMMENTS: Lat. 32º 18' 35.0" North, Long. 103° 34' 39.2" West DEPTH LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SAMPLE DATA Lithology SIZE, SORTING, ROUNDING, CONSOL., DIST. DEATURES PHOTO DEPTH % REC PID CI (Lab) SILTY CLAY dark brown (top soil) with some caliche CALICHE light grayish brown with some fine grain sand (10% gradient to 25% with depth). Very difficult to determine _ the base of former excavation. _ ___ Possible base of original excavation _ __ 10 ___ _ _ _ __ __ _ 15 5,740 14-16 20% <1 ppm mg/kg SAND light brown, fine grain, sub-rounded, poorly sorted, with some caliche. 5,320 20 19-21 20% <1 ppm mg/kg 25 5,7402 <1 ppm 24-26 30% mg/kg SAND light to medium brown, medium grain size, sub-30 rounded, poorly sorted with some clay. 936 29-31 20% <1 ppm 4" PVC SLOTTED SCREEN (0.010") mg/kg Moist Formation at 30 - 31 feet SAND AND CLAY light reddish brown, very fine grain sand wet, no 34-36 10% <1 ppm sample with 50 to 60% clay. Saturated formation (no returns) below 39 feet. 40 8/16 SAND FILTERPACK 45 4" PVC BLANK CASING No Sample Recovery 50 55 SLOTS (0.010") 60 **BLANK CSG** 65 TD = 69 Feet







COVER LETTER

Thursday, December 21, 2006

Randall Hicks Atkins Engineering Associates 2904 West Second Street Roswell, NM 88201

TEL: (505) 624-2420 FAX (505) 624-2421

RE: Samson State BD-04 Samples

Dear Randall Hicks:

Hall Environmental Analysis Laboratory, Inc. received 2 sample(s) on 12/20/2006 for the analyses presented in the following report.

Order No.: 0612227

These were analyzed according to EPA procedures or equivalent.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Business Manager Nancy McDuffie, Laboratory Manager

NM Lab # NM9425 AZ license # AZ0682 ORELAP Lab # NM100001



Hall Environmental Analysis Laboratory, Inc.

Date: 21-Dec-06

CLIENT:

Atkins Engineering Associates

Lab Order:

0612227

Project:

Samson State BD-04 Samples

Lab ID:

0612227-01

Client Sample ID: 4" Monitor Well Lower

Collection Date: 12/18/2006 12:00:00 PM

Date Received: 12/20/2006

Matrix: AQUEOUS

Lab 10. 0012227-01									
Analyses	Result	esult PQL Qual Units		DF	Date Analyzed				
EPA METHOD 300.0: ANIONS Chloride	2000	10	mg/L	100	Analyst: TES 12/21/2006				
EPA METHOD 160.1: TDS Total Dissolved Solids	3700	20	mg/L	1	Analyst: KS 12/20/2006				

Qualifiers:

Value exceeds Maximum Contaminant Level

E Value above quantitation range

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

atory, Inc. Date: 21-Dec-06

CLIENT:

Atkins Engineering Associates

Lab Order:

0612227

Project:

Samson State BD-04 Samples

Lab ID:

0612227-02

Client Sample ID: 4" Monitor Well Upper

Collection Date: 12/18/2006 12:15:00 PM

Date Received: 12/20/2006

Matrix: AQUEOUS

Analyses	Result	PQL Qua	al Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	3900	10	mg/L	100	Analyst: TES 12/20/2006 3:09:42 PM
EPA METHOD 160.1; TDS Total Dissolved Solids	5800	20	mg/L	1	Алаlyst: KS 12/20/2006

Value exceeds Maximum Contaminant Level

E Value above quantitation range

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QA/QC SUMMARY REPORT

Client:

Atkins Engineering Associates

Project:

Samson State BD-04 Samples

Work Order:

Date: 21-Dec-06

0612227

Analyte	Result	Units	PQL	%Rec	LowLimit Hi	ghLimit	%RPD RPDLimit Qual				
Method: E300 Sample ID: MBLK	- Maria de la companya del companya de la companya del companya de la companya de	MBLK		<u> </u>	Batch ID:	R21895	Analysis Date:	12/20/2006 12:33:03 PM			
Chloride	N/C		0.40		pater ib.	K21095	Analysis Date.	12/20/2000 12.33.03 F W			
Sample ID: MBLK	NĎ	mg/L <i>MBLK</i>	0.10		Batch ID:	R21901	Analysis Date:	12/21/2006 8:18:18 AM			
Chloride	ND	mg/L	0.10								
Sample ID: LCS ST300-06026		LCS			Batch ID:	R21895	Analysis Date:	12/20/2006 12:50:27 PM			
Chloride	4.780	mg/L	0.10	95.6	90 1	110					
Method: E160.1											
Sample ID: MB-12010		MBLK			Batch ID:	12010	Analysis Date:	12/20/2006			
Total Dissolved Solids	ND	mg/L	20								
Sample ID: LCS-12010		LCS			Batch ID:	12010	Analysis Date:	12/20/2006			
Total Dissolved Solids	977.0	mg/L	20	97.7	80 1	120		i			

R RPD outside accepted recovery limits

S Spike recovery outside accepted recovery limits

E Value above quantitation range

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H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name ATK		Date and Time	Received:	12/20/2006		
Work Order Number 0612227	\bigcap_{i}			Received by	AT	
Checklist completed by Signature	The		Date 2	120/06	9	
Matrix	Carrier name	<u>Grey</u>	hound			
Shipping container/cooler in good condition?		Yes	V	No 🗀	Not Present	
Custody seals intact on shipping container/coole	r?	Yes	V	No 🗆	Not Present	☐ Not Shipped ☐
Custody seals intact on sample bottles?		Yes		No 🗹	N/A	
Chain of custody present?		Yes	\checkmark	No 🗆		
Chain of custody signed when relinquished and r	eceived?	Yes	V	No 🗆		
Chain of custody agrees with sample labels?		Yes	✓	מא 🗆		
Samples in proper container/bottle?		Yes	V	No 🗀		
Sample containers intact?		Yes	✓	No 🗆		
Sufficient sample volume for indicated test?		Yes	\checkmark	No 🗆		
All samples received within holding time?		Yes	\checkmark	No 🗆		
Water - VOA vials have zero headspace?	No VOA vials subn	nitted	\checkmark	Yes 🗆	No 🗆	
Water - pH acceptable upon receipt?		Yes		No 🗀	N/A 🗹	
Container/Temp Blank temperature?				4° C ± 2 Acceptai		
COMMENTS:						
Client contacted	Date contacted:			Perso	on contacted	
Contacted by:	Regarding					
Comments:						
					V 19 19 24 Additional Association	
Corrective Action					······································	
COLLECTIVE VCROLL						

Metals Metals	ARORA > 82608						Turn Around 6	sto Randall Hicks S
### Page 19 Pa	- X3T8 N H9T N H9T N B03 N B03						Remarks 74- hour	Send Results OPT Hicks
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CHAIN-OF-CUSTODY RECORD Client: Atlyins Engineening Associates, Inc. Address: 2904 Nest Second St. Roswell, NM 88201 Phone #: 505.624.2420 Fax #: 505.624.2420	Date Time Matrix Sample 1.D. No.	1215 V 4"Manteralell Upper					Date: Oo G:30 Relinquished By: (Signature)	Тте: Relinquished By: (Signature)