GW - 203

WORK PLANS

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

November 18, 2004

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

Mr. David Munzenmaier
Baker Petrolite Corporation
12645 West Airport Boulevard
Sugar Land, Texas 77478

RE: Subsurface Investigation and Soil Sampling
Hobbs Facility – GW-203
Lea County, New Mexico

Dear Mr. Munzenmaier:

The New Mexico Oil Conservation Division (OCD) is in receipt of the report submitted by your consultant, Llano-Permian Environmental, summarizing the results of a workplan approved August 2, 2000 for a subsurface soil investigation at the Baker Petrolite Corporation Hobbs Service facility located in the NE/4 of Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico.

The results of the investigation indicates there were no elevated levels of TPH, other hydrocarbon or listed metal constituents that were above action levels that required remediation work and no further work is necessary. The OCD would like to commend Baker Petrolite Corporation for their efforts to address potential pollution problems prior to any existing at the facility.

Sincerely,

W. Jack Ford, C.P.G.
Environmental Bureau
Oil Conservation Division

cc: OCD Hobbs District Office

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 14, 2003

Ms. Ann Potten
Baker Petrolite Corporation
12645 West Airport Boulevard
Sugar Land, Texas 77478

RE: Subsurface Investigation and Soil Sampling
Hobbs Facility – GW-203
Lea County, New Mexico

Dear Ms. Potten:

The New Mexico Oil Conservation Division (OCD) is in receipt of the report submitted by your consultant, Llano-Permian Environmental, summarizing the results of a workplan approved August 2, 2000 for a subsurface soil investigation at the Baker Petrolite Corporation Hobbs Service facility located in the NE/4 of Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico.

The results of the investigation indicates that there were elevated levels of TPH concentrations around SB-13 which requires remediation. In addition, there were elevated concentrations of Chromium in SB-2, SB-15 and SB-16 above NMOCD Guidelines. A request for a workplan to address the remediation of these areas was requested via e-mail on January 29, 2001. To date the OCD has not received a workplan to address these deficiencies. A workplan shall be submitted to the OCD, Santa Fe office by July 1, 2003. If these areas have been remediated a report of the work and results of the remediation should be submitted to the OCD. Furnish one copy of either the report or workplan to the Hobbs District Office.

Sincerely,

W. Jack Ford, C.P.G.
Environmental Bureau
Oil Conservation Division

cc: OCD Hobbs District Office

Ford, Jack

From: Potten, Ann M.[SMTP:Ann.Parks@bakerpetrolite.com]
Sent: Tuesday, February 06, 2001 11:53 AM
To: Ford, Jack
Subject: RE: BPC Hobbs Facility

Jack,
We have already excavated the impacted soils (around SB-13) at the Hobbs facility and replaced with clean soils. We are expecting a letter report on this work and will forward it to you upon receipt.

I am not sure what you mean by 'developing a metals background' as stated below. Could you explain the justification for a 'metals background workplan'? 10mg/kg was reported in the soil sample collected from SB-2, which was compared to the TCLP criterion, 5.0 mg/L. Using the 'divisible by 20' rule, the chromium detected in this soil sample, would not likely be leachable and is also less than the regulatory criteria. Metals are typically found in southern NM/west Texas soils due to natural geologic formations. In addition, chromium is not an element typically used in BPC products.

Please feel free to call me if you have any questions.
Thank you,
Ann Potten, CHMM
Environmental Programs
Baker Petrolite Corporation
phone (281) 275-7396

-----Original Message-----
From: Ford, Jack [mailto:JWFORD@state.nm.us]
Sent: Monday, January 29, 2001 12:23 PM
To: 'Ann.Parks@bakerpetrolite.com'
Subject: BPC Hobbs Facility

Ann
After review of the soil investigation report on the Hobbs facility the OCD has the following requirements:

1. Submit a workplan for the remediation of the elevated TPH concentrations around SB-13.

2. Submit a workplan for developing a metals background for the Hobbs facility site.

These workplans can be combined or separate. Please submit these workplans by March 1, 2001 for review and approval.

If you have any questions contact me via e-mail or call (505) 476-3489.

Sincerely,

/s/

Jack Ford
Oil Conservation Division

Ann. called 2/20/01 - asking for answer to above -

BAKER HUGHES

Baker Petrolite

12645 West Airport Boulevard
Sugar Land, Texas 77478

February 27, 2001

Mr. Jack Ford
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87504

RE: Excavation Report at Baker Petrolite Corporation (BPC) property at 5624 Lovington Highway, Hobbs, NM

Mr. Ford,

BPC has completed the surface soil excavation at the above-referenced property. The procedures and results are discussed in the enclosed report. If you have any questions, please feel free to call me at 281/275-7396 or email at Ann.Potten@Bakerpetrolite.com.

Sincerely,

Ann Potten, CHMM
Environmental Specialist
Baker Petrolite Corporation

Amarillo:
4104 West 33rd Street
Amarillo, Texas 79109
(806) 467-0607
Fax (806) 467-0622

Midland:
1031 Andrews Highway, Suite 115
Midland, Texas 79701
(915) 522-2133
Fax (915) 522-2180

Llano -Permian Environmental

Baker Petrolite Corporation

Soils Removal Project

Report

Baker Petrolite Chemical Facility
Hobbs, N.M.

February 21, 2001

Terry James, Principal

Bo Vizcaino, Sr. Project Manager

Llano-Permian Environmental
1031 Andrews Highway, Suite 115
Midland, TX 79701
(915) 522-2133

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY

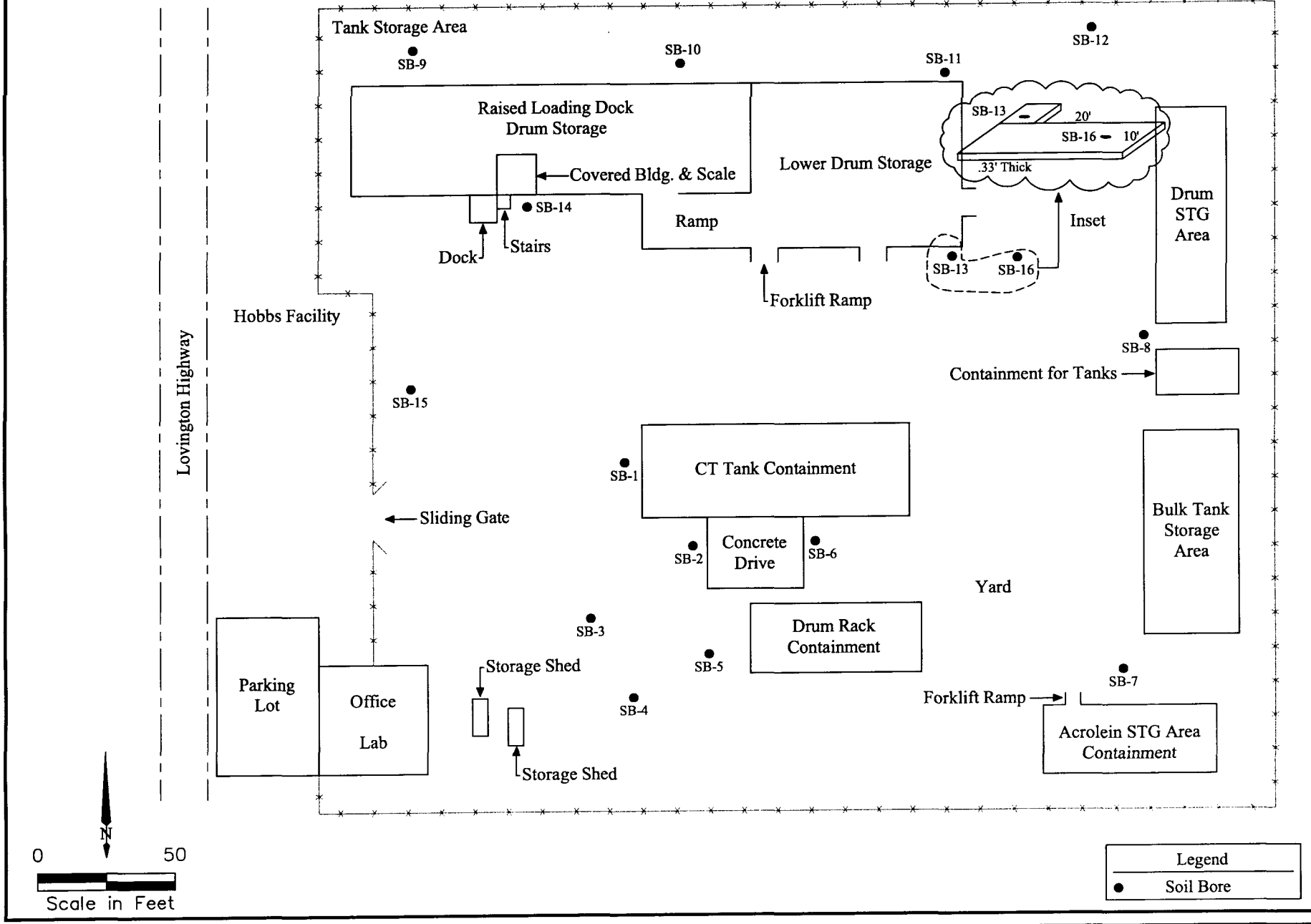
The soils removal project at the Baker Petrolite facility in Hobbs, N.M. was completed on January 4, 2001. A total of three cubic yards of soils were excavated and removed from the area of SB-13 and SB-16, sites that indicated the presence of total petroleum hydrocarbons above the 1,000 ppm action level for sites with ground water between 50 feet (bgs) and 100 feet (bgs). The soils were identified during the subsurface investigation completed on August 16, 2000, where a one-inch to two-inch layer of dry, hardened asphaltic-type material was encountered at the soil surface. Below the hard, brownish layer of hydrocarbon contaminated soil, a clean, tan caliche layer was encountered. All visually contaminated soils were removed to the tan caliche layer. Since all visual contamination was removed, no confirmation samples were obtained from the bottom of three-inch-deep excavation. The soils were transported and disposed of at Controlled Recovery Inc. near Hobbs, New Mexico. The excavation was backfilled with 4 cubic yards of clean caliche. Four drums of clean drill cuttings from the August core boring were also incorporated into the pit. The soils were spread and compacted using the weight of the backhoe to tamp the soils. No other work was performed at the site.

2.0 WASTE MANAGEMENT AND DISPOSAL

Approximately three cubic yards of non-hazardous total petroleum hydrocarbon-contaminated soils were disposed of at Controlled Recovery Inc. The soil analyses data from the initial subsurface investigation were submitted to the NMOCD for approval and subsequent disposal at CRI. The NMOCD accepted the submittal and approved the waste stream for disposal at CRI. No RCRA waste manifest was required for this waste stream. A copy of the approval form from NMOCD is attached. A weight ticket from CRI indicating the amount of material accepted at their facility is also attached.

3.0 CONCLUSIONS

The soils removal project was completed on January 4, 2001. A total of three cubic yards of soils were excavated and removed from the area of SB-13 and SB-16. All surficial hydrocarbon-stained soils were removed. No other visibly-stained surface soils were noted once the top 3-inch layer of soils was excavated. Four cubic yards of backfill materials were imported to the site. The soils were spread and compacted using the weight of the backhoe as a tamper.



Llano-Permian Environmental Services

Date: 01/07/01

Drawing: Bak001rem1

By: PMJ

BAKER PETROLITE - FIGURE 1

5624 Lovington Hwy., Hobbs, New Mexico

Soil Removal Project

Site Map

Controlled Recovery, Inc.
P.O. Box 388 Hobbs, NM 88241
Phone: (505)393-1079 Fax: (505)393-3615

CRI

To:	BO VIZCAINO	**From:**	CARMELLA VAN MAANEN
Fax:	(915) 522-2180	**Pages:**	2, INCLUDING COVER
Phone:		**Date:**	12-18-00
Re:	COPY OF APPROVAL	**CC:**	

PROJECT # BAK. 005. REM

- ☒ CORRESPONDENCE
- ☐ REPORTS
- ☐ FIELD NOTES
- ☐ ANALYTICAL
- ☐ DRAWINGS
- ☐ INVOICES

☐ **Urgent** X **For Review** ☐ **Please Comment** **Please Reply** ☐ **Please Recycle**

• **Comments:**

Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
DEC 13 2000
Environmental Bureau
Oil Conservation Division

Originat

Submit
Plu
to ap
Distri

393-3615

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Baker Petrolite
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site 1030 Andrews H
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Walton Constructio
3. Address of Facility Operator P.O. Box 388, Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 5624 Lovington Highway	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

12-001

Contaminated soil generated by oilfield ground spill.

I am enclosing a certificate of waste status, analytical, chain of custody, and process of knowledge letter.

Estimated Volume 1.5 cubic yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Carmella Van Maanen TITLE: Bookkeeper DATE: 12-06-00
Waste Management Facility/Authorized Agent

TYPE OR PRINT NAME: Carmella Van Maanen TELEPHONE NO. (505) 393-1079

(This space for State Use)

APPROVED BY: Donna Williams TITLE: Environ. Engineer Specialist DATE: 12-7-00

APPROVED BY: Martyne J. Kieling TITLE: Environmental Engineer DATE: 12-13-00

CONTROLLED RECOVERY, INC.

P.O. Box 388 • Hobbs, New Mexico 88241-0388
(505) 393-1079

Bill to Llano Permian Environmental

Address

Company/Generator Baker Petrolite

Lease Name Hobbs Y-1

Trucking Company	Walton	Vehicle Number	424	Driver (Print)	Steve Martin
Date	1 / 4 / 01	Time	1100	a.m. / p.m.	

Type of Material

- ☐ Exempt
- ☐ Non-Exempt
- C138 _____
- ☐ Tank Bottoms
- C117 _____
- ☐ Soils
- ☐ Fluids
- ☐ Other Material
- List Description Below

OCD

DESCRIPTION

Volume of Material ☐ Bbls. _____ ☒ Yard 3 ☐ Gallons _____

☐ Wash Out ☐ Call Out ☐ After Hours ☐ Debris Charge

This statement applicable to exempt waste only.
I represent and warrant that the wastes are: generated from oil and gas exploration and production operations: exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent _____ (Signature)

CRI Representative _____ (Signature)

TANK BOTTOMS

	Feet	Inches				
1st Gauge			BBLS Received		BS&W	%
2nd Gauge			Free Water			
Received			Total Received			

№ 33000

White - CRI Canary - CRI Accounting Pink - CRI Plant Gold - Transporter

Ford, Jack

From: Ford, Jack
Sent: Monday, January 29, 2001 11:22 AM
To: 'Ann.Parks@bakerpetrolite.com'
Subject: BPC Hobbs Facility

Ann
After review of the soil investigation report on the Hobbs facility the OCD has the following requirements:

1. Submit a workplan for the remediation of the elevated TPH concentrations around SB-13.

2. Submit a workplan for developing a metals background for the Hobbs facility site.

These workplans can be combined or separate. Please submit these workplans by March 1, 2001 for review and approval.

If you have any questions contact me via e-mail or call (505) 476-3489.

Sincerely,

/s/

Jack Ford
Oil Conservation Division

Ford, Jack

From: Potten, Ann M.[SMTP:Ann.Parks@bakerpetrolite.com]
Sent: Monday, November 20, 2000 10:11 AM
To: jwford@state.nm.us
Subject: BPC Hobbs Environmental Work

Jack,
Per our conversation last week regarding the site assessment and remediation at the BPC Hobbs facility, I have discussed the possible existence of an on-site well with other BPC personnel. No other BPC personnel at the site, district office, or corporate office are aware of any wells at the Hobbs facility, specifically no wells related to the laboratory. In addition, I have reviewed our files and have not found any documentation related to the installation, maintenance, and/or closure of any wells on the Hobbs property. I have also reviewed a listing of water wells in the area, none of which were listed for the BPC Hobbs property. If you have reason to believe there is a well on the BPC property, please let me know as soon as possible.

I have also reviewed the Chromium results in SB-2. 10mg/kg was reported in the soil sample collected from SB-2, which was compared to the TCLP criterion, 5.0 mg/L. Using the 'divisible by 20' rule, the chromium detected in this soil sample, would not likely be leachable and is also less than the regulatory criteria. Metals are typically found in southern NM/west Texas soils due to natural geologic formations. In addition, chromium is not an element typically used in BPC products.

If you have any questions or comments, please feel free to email or call me.
Thank you,

Ann Potten, CHMM
Environmental Programs
Baker Petrolite Corporation
phone (281) 275-7396

BAKER HUGHES

Baker Petrolite

NOV - 9 2000

12645 West Airport Boulevard
Sugar Land, Texas 77478

November 7, 2000

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

RE: Subsurface Investigation at Baker Petrolite Corporation (BPC) properties at Hobbs and Artesia

Mr. Ford,

BPC has completed a subsurface investigation at the above-referenced properties. The procedures and results are discussed in the enclosed reports. All work was conducted in accordance with the Workplan previously submitted to your office. Groundwater was not encountered nor sampled during the subsurface investigations.

The investigation at the Artesia facility indicated that all results were below regulatory criteria. However, there appears to be a localized area with some impact to surface soil (top one foot) above regulatory criteria at the Hobbs facility. It is BPC's intention to remediate this area via excavation.

Copies of these reports have also been sent to Donna Williams, NMOCD Hobbs Office and Mike Stubblefield, NMOCD Artesia Office. If you have any questions, please feel free to call me at 281/275-7396 or email at Ann.Potten@Bakerpetrolite.com.

Sincerely,

Ann Potten, CHMM
Environmental Specialist
Baker Petrolite Corporation

Encl: Subsurface Investigation Report, Hobbs, NM
Subsurface Investigation Report, Artesia, NM

BAKER HUGHES

Baker Petrolite

12645 West Airport Boulevard
Sugar Land, Texas 77478

November 7, 2000

Ms. Donna Williams
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, NM 88240

RE: Subsurface Investigation at Baker Petrolite Corporation (BPC) property at 5624 Lovington Highway, Hobbs, NM

Ms. Williams,

BPC has completed a subsurface investigation at the above-referenced property. The procedures and results are discussed in the enclosed report. There appears to be a localized area with some impact to surface soil (top one foot) above regulatory criteria. It is BPC's intention to remediate this area via excavation. Groundwater was not encountered nor sampled during the subsurface investigation.

A copy of the report has also been sent to Jack Ford, NMOCD Santa Fe Office. If you have any questions, please feel free to call me at 281/275-7396 or email at Ann.Potten@Bakerpetrolite.com.

Sincerely,

Ann Potten, CHMM
Environmental Specialist
Baker Petrolite Corporation

cc: Jack Ford, NMOCD Santa Fe Office

BAKER HUGHES

Baker Petrolite

Health, Safety, Environmental
Quality & Regulatory Affairs
12645 West Airport Boulevard
Sugar Land, TX 77478
Tel. 281-276-5400
Fax 281-275-7385
Web site: www.bakerhughes.com/bapt

FAX TRANSMISSION

To: Jack Ford

Company: NMOCD

Fax #: 505-827-8177

Date: 8/7/00

Pages: 4

From: Ann Potten (phone: 281/275-7396)

RE: BPC Environmental work

MESSAGE:

Mr. Ford,
The Final Workplan describing the environmental work at the BPC Hobbs and Artesia sites is enclosed. The Final Workplan states that air rotary drilling will be used rather than direct push, which would be incompatible with the geology. The work is still scheduled to begin at the Hobbs facility on August 15th. Please feel free to call me at 281/275-7396 if you have any questions or comments.

Regards,
Ann Potten, CHMM

PROPOSED
FACILITY SUBSURFACE INVESTIGATIVE WORKPLAN

FOR THE

BAKER PETROLITE

HOBBS and ARTESIA

NEW MEXICO FACILITIES

Prepared for:
Baker Petrolite

JULY 2000

Prepared by

LLANO-PERMIAN ENVIRONMENTAL
1031 ANDREWS HIGHWAY, SUITE 115
MIDLAND, TX 79701
915 522-2133

INTRODUCTION

Llano Permian Environmental Services proposes to conduct a series of soil borings at two of the Baker Petrolite Corporation (BPC) facilities in New Mexico. The following work plan details the proposed activities in completing the work. The purpose of the subsurface investigation is to determine what contamination, if any, exists at the sites. On the basis of the known geology of the area, an air rotary drilling rig will be used to conduct the borings. Decontaminating the drilling equipment after each sample is taken, as applicable, will minimize possible cross-contamination.

WORKPLAN

Baker Petrolite requested from Llano-Permian a work plan for conducting the core borings at the facilities in New Mexico. Llano-Permian will follow the guidelines outlined in the work plan at each BPC location.

L-P will mobilize personnel and equipment to conduct the soil borings at the Hobbs facility first. A utility line location procedure will precede the subsurface investigation. All applicable utilities will be notified prior to start of work and all applicable procedures will be followed to prevent damage and/or injury. The site-specific conditions will dictate what proper personnel protective equipment to be used at each location. BPC personnel will determine the locations of all on-site soil borings.

A decontamination area will be set up to clean the drilling bits and stems, as warranted. The decon water will be collected to prevent any possible contaminants from being released during the process. The rinse water will be collected and drummed.

A total of 15 and 10 soil borings are proposed for the Hobbs and Artesia facilities, respectively. The soil borings will be completed to a depth of 20 feet at each location using an air rotary drilling rig. A BPC representative will decide the actual location for each soil boring on site.

The whole investigative process is anticipated to take three days per site, unless the geology of the area limits the production rate for the drilling rig. Soil samples from various elevations will be collected and, using a photoionization detector, a quick analysis of each sample will be performed. The samples with the highest concentrations of volatile organic compounds will be submitted to the lab for quantitation. Two samples from each core bore will be taken – one soil sample with the highest OVM reading and one at the terminal depth – and sent to the lab. A total of 30 samples will be collected. EPA Methods 8260, 8270, and 6010a will be used for Volatile Organic Content (VOC), Semi-volatile Organic Content (SVOCs), and total RCRA metals. EPA Method 8021b and EPA 8015 will be used for BTEX and TPH analyses, respectively, at both facilities. BPC personnel will determine actual sample selection criteria. All wastes generated from this investigation will be drummed, characterized, and disposed according to local, state, and federal guidelines. The same procedures will be followed at the Artesia site.

Additional samples will be submitted to the laboratory for analyses, depending on PID readings and visual observations. A report will be issued upon receipt of the sampling results.

All equipment used in the soil boring process will be decontaminated using approved methods after each soil boring is completed to prevent cross-contamination. Samples will be collected in laboratory-supplied containers, packaged in ice, placed into insulated containers, and shipped to the laboratory for analyses. A chain of custody order will accompany each shipment.

The soil cuttings will be collected in 55-gallon drums and stored on-site until the analytical results are received to determine the proper disposal method. Under no circumstances will any materials associated with the soil boring activities be removed without proper manifesting. The resulting wastes and or cuttings will be transported to an approved disposal site or spread on-site should contaminant not be encountered.

PERSONNEL

Llano Permian will utilize the services of Straub Corporation for the soil boring activities. Analytical services will be provided by Trace Analyses in Lubbock, Texas. The final disposition of wastes generated during the soil boring activities will depend on the nature of the contaminants found, if any. Llano Permian will serve as the general contractor and provide all project coordination under direction of BPC personnel at each facility.

BPCNMWPLAN1.DOC

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

August 2, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9849

Ms. Ann Potten, CHMM
Baker Petrolite
12645 West Airport Boulevard
Sugar Land, TX 77487

RE: Investigation Workplan - Approval
Baker Petrolite
Discharge Plan (GW-203) "Hobbs Facility", Lea County, New Mexico
Discharge Plan (GW-204) "Artesia Facility", Eddy County, New Mexico

Dear Ms. Potten:

The New Mexico Oil Conservation Division (OCD) has received and reviewed the soil investigation plan, dated July, 2000, prepared by your consultant, Llano-Permian Environmental. Based upon the content of the workplan **the OCD hereby approves of the investigation workplan with the following stipulations:**

1. All soil borings will be plugged from total depth to surface with a cement slurry having an approximate 3% bentonite content.

2. A 72 hour notice prior to commencement of activities at the Hobbs Facility will be given to Ms. Donna Williams, OCD Hobbs District Office, (505) 393-6161, Extension 113.

3. A 72 hour notice prior to commencement of activities at the Artesia Facility will be given to Mr. Mike Stubblefield, OCD Artesia District Office, (505) 748-1283.

4. Any and all wastes that are generated with the investigation of this facility must be properly disposed of in an OCD approved disposal facility if appropriate.

5. Any spills that occur during the investigation process will be reported pursuant to WQCC 1203 and OCD Rule 116 to the appropriate OCD district office.

6. A final report of the results of the investigation will be supplied to the appropriate OCD District office and one copy for each facility to the OCD Santa Fe office.

Please note, OCD approval does not relieve Baker Petrolite from compliance with any other federal, state, and local rules and regulations that may apply.

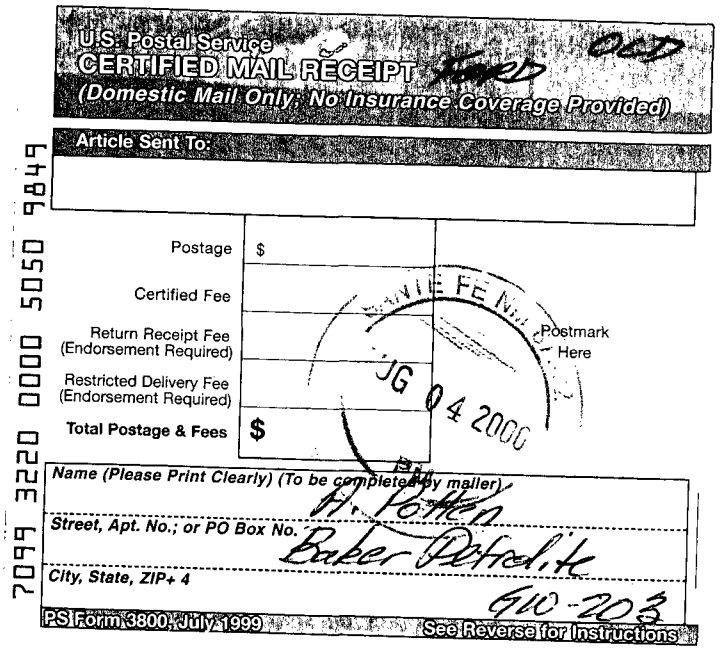
If you have any questions please contact me at (505) 827-7152 or W. Jack Ford at (505)-827-7156.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/wjf

cc: OCD Hobbs District Office
OCD Artesia District Office



BAKER HUGHES

Baker Petrolite

Health, Safety, Environmental
Quality & Regulatory Affairs
12645 West Airport Boulevard
Sugar Land, TX 77478
Tel. 281-276-5400
Fax 281-275-7385
Web site: www.bakerhughes.com/bapt

FAX TRANSMISSION

To: Jack Ford

Company: NMOCD

Fax #: 505-827-8177

Date: 7/31/00

Pages: 4

From: Ann Potten (phone: 281/275-7396)

RE: BPC Environmental work

MESSAGE:

Mr. Ford,
As part of our proactive environmental work, BPC wishes to perform a subsurface investigation at our Hobbs and Artesia facilities to determine if there have been any subsurface impacts due to previous operations. A brief workplan describing the work is enclosed. Please feel free to call me at 281/275-7396 if you have any questions or comments.

Regards,
Ann Potten, CHMM

PROPOSED
FACILITY SUBSURFACE INVESTIGATIVE WORKPLAN

FOR THE

BAKER PETROLITE

HOBBS and ARTESIA

NEW MEXICO FACILITIES

Prepared for:
Baker Petrolite

JULY 2000

Prepared by

LLANO-PERMIAN ENVIRONMENTAL
1031 ANDREWS HIGHWAY, SUITE 115
MIDLAND, TX 79701
915 522-2133

INTRODUCTION

Llano Permian Environmental Services proposes to conduct a series of soil borings at two of the Baker Petrolite facilities in New Mexico. The following work plan details the proposed activities in completing the work. The Baker Hughes facilities in Hobbs and Artesia, New Mexico will conduct subsurface soil investigations to determine what, if any, contamination exists at the Baker Petrolite facilities. A total of 15 soil borings proposed for the Hobbs facility and 10 soil borings are proposed for the Artesia facility. The soil borings will be completed to a depth of 20 feet at each location. The actual location for each soil boring will be decided on site by Baker personnel. The work will be completed within three days of mobilization onto each site, unless the geology of the area limits the production rates for each soil boring. Analytical soil samples will be collected at varying elevations as decided by Baker Petrolite and Llano Permian personnel and submitted to the laboratory for analyses. A report will be issued upon receipt of the sampling results.

WORKPLAN

Baker Petrolite requested that Llano-Permian create a work plan for the facilities in New Mexico. Llano-Permian will provide the following Work Plan at each BPC location:

L-P will mobilize personnel and equipment to conduct the soil borings at the Hobbs facility first. A utilities locate process will be conducted prior to starting the on-site subsurface investigation. The site-specific conditions will dictate the appropriate personnel protective equipment to be used at each location. All applicable regulatory agencies will be notified prior to start of on-site activities. BPC personnel will determine the locations of all on-site soil borings. The following will be conducted at each location:

BPC Hobbs, NM Facility

- **15 soil borings (preferably via Direct Push Technology (DPT) method unless local geology requires otherwise) to a depth of 20 feet (or until groundwater is encountered);**
- **Continuous sampling; collect and analyze two (2) soil samples from each borehole (30 soil samples total); one soil sample with the highest OVM reading and one soil sample at the terminal depth;**
- **7 of the 30 samples should be analyzed for VOCs, SVOCs, TPH, and metals; the remaining 23 soil samples should be analyzed for BTEX and TPH, as dictated by Baker Hughes personnel. EPA Methods 8260, 8270, and 6010a will be used for VOCs, SVOCs, and metals. EPA Method 8021d and Method 418.1 or EPA 8050 will be used for TPH, depending on which method the NMCOD will allow for this facility. Actual sample selection criteria will be determined by Baker Hughes personnel.**
- **If groundwater is encountered, three (3) samples should be collected (via Hydropunch method or similar) and analyzed for VOCs, SVOCs, and**

metals. EPA Methods 8260, 8270, and 6010a will be used for VOCs, SVOCs, and metals.

- **Disposal of IDW (what is IDW?) at approved facilities once the analytical data is received, evaluated and the waste is classified.**

BPC Artesia, NM Facility

- **10 soil borings (preferably via DPT method unless local geology requires otherwise) to a depth of 20 feet or until groundwater is encountered;**
- **Continuous sampling; collect and analyze two (2) soil samples from each boring (20 soil samples total); one soil sample exhibiting the highest OVM reading and one sample at the terminal depth;**
- **5 of the 20 samples should be analyzed for VOCs, SVOCs, TPH, and metals; the remaining 15 soil samples should be analyzed for BTEX and TPH. EPA Methods 8260, 8270, and 6010a will be used for VOCs, SVOCs, and metals. EPA Method 8021d and Method 418.1 or EPA 8050 will be used for TPH, depending on which method the NMCOD will allow for this facility. Actual sample selection criteria will be determined by Baker Hughes personnel.**
- **If groundwater is encountered, three (3) samples should be collected (via Hydropunch method or similar) and analyzed for VOCs, SVOCs, and metals. Methods 8260, 8270, and 6010a will be used for VOCs, SVOCs, and metals.**
- **Disposal of IDW at approved facilities once the analytical data is received, evaluated and the waste is classified.**

All equipment used in the soil boring process will be decontaminated using approved methods after each soil boring is completed to prevent cross-contamination. Samples will be collected in laboratory supplied containers and selected samples will be shipped to the laboratory for analyses. The soil cuttings will be collected in 55-gallon drums and stored on-site until the analytical results are received to determine the proper disposal method. Under no circumstances will any materials associated with the soil boring activities be removed without proper manifesting. The resulting wastes and or cuttings will be transported to an approved disposal site or spread on-site should no contamination be encountered.

PERSONNEL

Llano Permian will utilize the services of Straub Corporation for the soil boring activities. Analytical services will be provided by Trace Analyses in Lubbock, Texas. The final disposition of wastes generated during the soil boring activities will depend on the nature of the contaminants found, if any. Llano Permian will serve as the general contractor and provide all project coordination. Baker Petrolite personnel will be on hand to determine the course of action at each facility. Regulatory agency personnel are allowed on-site to observe project activities, if desired.

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, NM 87505
(505) 827-7133
Fax: (505) 827-8177

(PLEASE DELIVER THIS FAX)

To: Tina Proctor

From: Jack - NMOCD

Date: May 8, 2000

Number of Pages (Includes Cover Sheet) 9

Message: FYI - Hobbs Site ONLY

Telephone: 281-276-5400

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