

Rice Environmental Consulting & Safety

P.O. Box 2948, Hobbs, NM 88241
Phone 575.393.2967

December 4th, 2013

Ms. Jennifer E. Van Curen

Environmental Protection Specialist
BLM
320 E. Greene St.
Carlsbad, New Mexico 88220

RE: Corrective Action Plan

GPII Energy – Littlefield BO Federal #2 Battery (2RP-1738)

UL/A sec. 34 T26S R29E

API No. 30-015-24529

Ms. Van Curen:

GPII Energy (GPII) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 32.6 miles southeast of Carlsbad, New Mexico at UL/A sec. 34 T26S R29E. BLM records indicate that groundwater will likely be encountered at a depth of approximately 58 +/- feet.

On July 15th, 2013, GPII received a Letter of Violation from EMNRD for the Littlefield BO Federal #2 Battery (Appendix A). During a routine inspection, hydrocarbon staining was discovered at the well head, which extended out onto the well pad. In addition, the southwest corner of the bermed battery area had standing oil. GPII filed an initial C-141 for the site, which was approved by NMOCD on July 23rd, 2013 (Appendix B). The initial C-141 stated that the power switched off on the transfer pump and caused the water storage tank to overflow. A total of approximately 12 – 15 barrels of produced water and oil were released at the site and 8 – 10 barrels of this fluid was recovered.

RECS personnel were on site beginning on September 6th, 2013 to assess the site. The stained area on the pad was scraped down to a depth of 1 foot and a 5 point composite of the bottom of the scrape was taken to a commercial laboratory for analysis (Figure 1 and Appendix C). The 5 point composite returned a laboratory chloride reading of 848 mg/kg and Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings of non-detect. Vertical installation was attempted within the bermed battery area but had to be abandoned once an unmarked PVC pipe was discovered. Two samples were taken prior to the vertical being abandoned. The 4 ft sample returned a field chloride result of 12,497 mg/kg and the 5 ft sample returned a field chloride result of 2,100 mg/kg.

Photo documentation of these activities can be found in Appendix D.

Corrective Action Plan

The scrape on the pad returned a bottom composite laboratory chloride reading less than 1,000 mg/kg and GRO, DRO and BTEX levels of non-detect. Therefore, the scrape will be backfilled with clean, imported caliche and then contoured to the surrounding location.

The southwest corner of the bermed battery still needs to be delineated. Another vertical will be installed in the southwest corner of the battery to a depth where laboratory chloride readings are below 250 mg/kg. Once this has been achieved, a 20-mil reinforced poly liner will be installed across the southwest corner of the battery at 2 ft bgs (Figure 2). The liner will inhibit the downward migration of constituents to groundwater and provide a barrier for any future releases. The excavated soil will be disposed of at a NMOCD approved facility. The liner will be padded with 6 inches of clean, imported soil to protect the liner from punctures and then the liner will be topped with clean, imported caliche.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,



Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

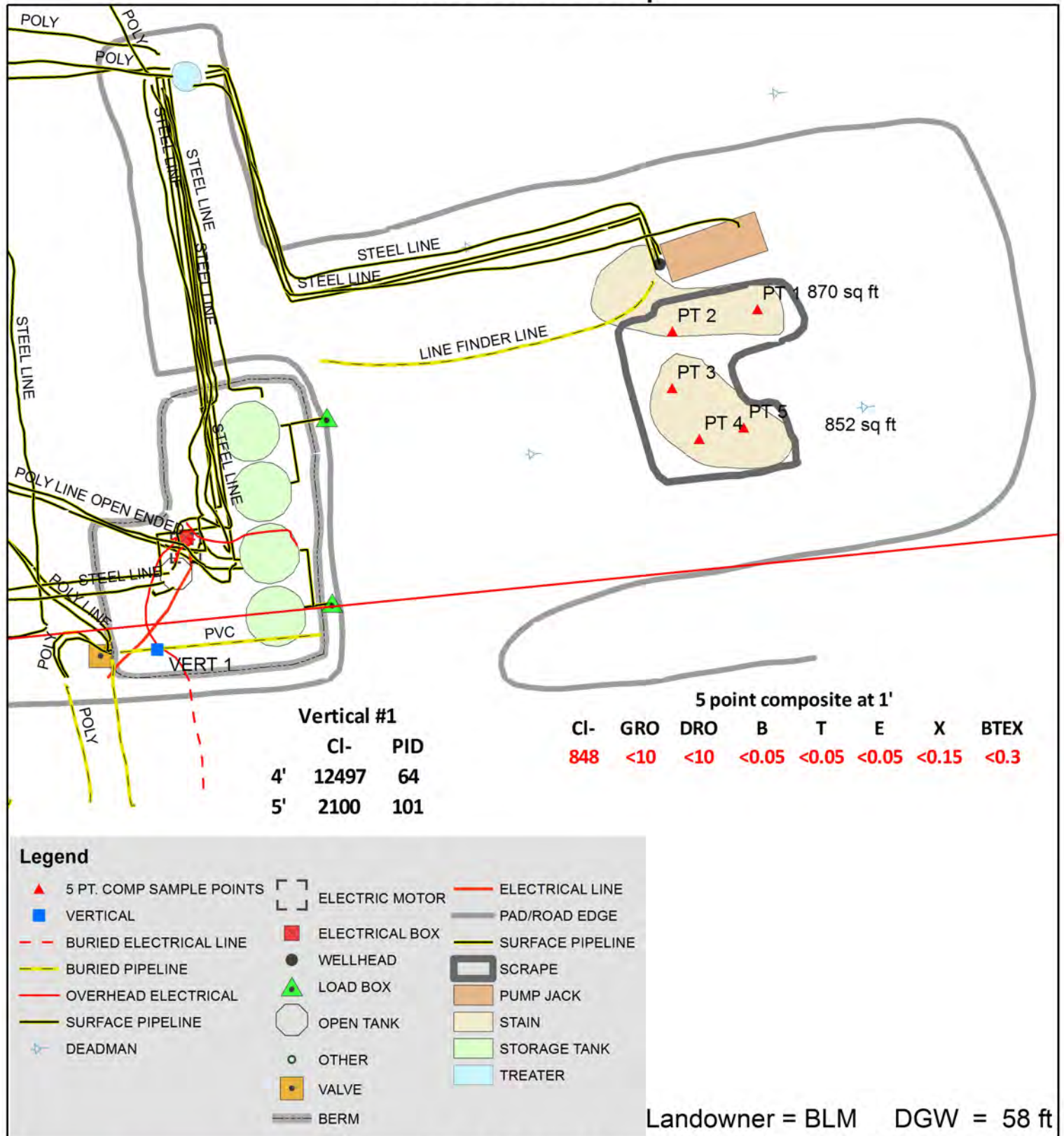
cc. Mike Bratcher, NMOCD

Attachments:

- Figure 1 – Excavation Map
- Figure 2 – Proposed Liner Map
- Appendix A – Letter of Violation
- Appendix B – Initial C-141
- Appendix C – Laboratory Analyses
- Appendix D – Photo Documentation

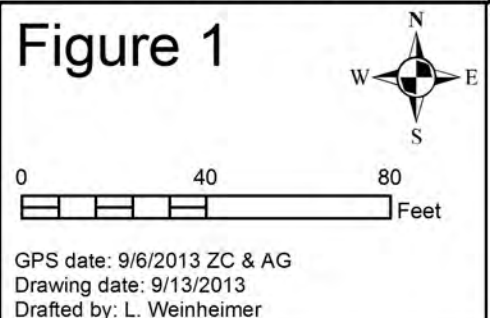
Figures

Excavation Map

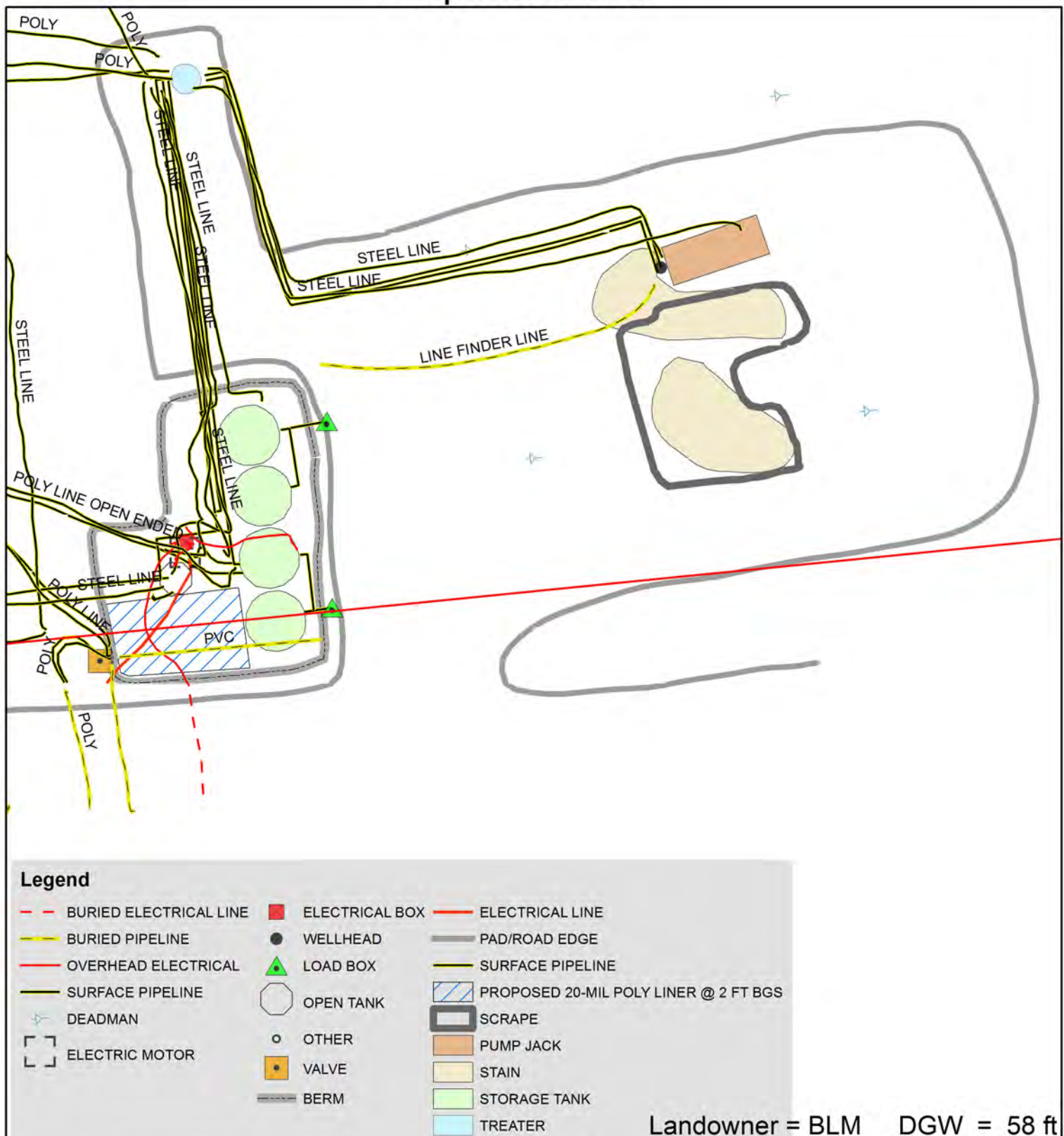


**GP II ENERGY
LITTLEFIELD BO
FEDERAL #2 BATTERY
(2RP-1738)**
LEGALS: UL/A Sec. 34
T26S - R29E
EDDY COUNTY, NM

Figure 1

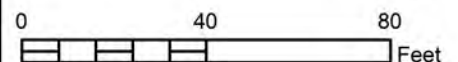


Proposed Liner



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Figure 2



GPS date: 9/6/2013 ZC & AG
Drawing date: 12/4/13
Drafted by: L. Weinheimer