

## **Corrective Action Plan**

May 23, 2016

*Re: Lee Federal 94 API# 30-015-43365 Case # 2R-3378* 

To: Mike Bratcher

Environmental Specialist-New Mexico Oil Conservation Division Energy, Minerals and Natural Resources Department 811 S. First Street Artesia, NM 88260

## **Background Information**

On 10/29/2015 a release was discovered associated with drilling activities. The site is located east of Loco Hills, NM in UL M, Section 17, T17S, and R31E. An initial C-141 was submitted on November 6, 2015 and approved on November 10, 2015. The release is in area of no groundwater.

On November 30, 2015 four verticals were installed to delineate the site. All Clean field samples were submitted to a commercial laboratory for analysis for CI-, TPH, and Btex. On December 3 and 4 2015 two more verticals were installed to further delineate the site. All clean field samples were submitted to a commercial laboratory for CI-, TPH, and Btex. On April 4, 2016 soil samples were collected in the pasture to re-evaluate the CI- concentration in the vadose zone. All field samples with a chloride value less than 1,000 were submitted to a commercial laboratory for analysis of CI-, TPH, and Btex.

## **Corrective Action Proposal**

Due to the absence of groundwater Apache Corporation proposes to remove the surface in the area associated with sample point 6 and sample point 7 due to the high TPH levels at the surface and collect a sample from each area and submit to a commercial laboratory for analysis for TPH. Due to the low concentrations of CI- in the vadose zone Apache Corporation proposes to reseed the area and monitor to ensure vegetation is reestablished. If the vegetation visually appears to be stress or no growth the vadose zone will be re-sample for Ch-and a new plan will be submitted if necessary to address the issue.

To address the pad area Apache Corporation proposes that the pad be scraped to a depth of 6 inches and the area to the south associated with interim reclamation be scraped to a depth of 1 foot. All contaminated soil will be disposed of at an NMOCD approved facility and the pad will be backfilled with caliche from interim reclamation.

Enclosed: Initial C-141, Maps, Laboratory Results

Submitted by;

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