

30-015-33720

KAISER-FRANCIS OIL COMPANY

P. O. BOX 21468

TULSA, OKLAHOMA 74121-1468

6733 South Yale Avenue, 74136  
(918) 494-0000

August 7, 2006

Mr. Mike Bratcher  
State of New Mexico  
Oil Conservation Division  
1301 W. Grand Ave.  
Artesia, NM 88210

**AUG - 9 2006**

Re: Addendum to Form C-144 Closure Plan  
Mesa 11 Grande # 2  
Unit L, Sec 11-T22S-R26E  
Eddy County, NM

Dear Mr. Bratcher:

Thank you for taking the time to meet with us to discuss the closure of the pit on the referenced lease. I am attaching the Closure Plan Addendum and a site diagram showing the lab results from the samples taken in the bottom of the pit.

Should you have any questions about the addendum or the site diagram please feel free to call me at 918-491-4337.

Sincerely,



Charles W. Lock  
Safety & Environmental Coordinator  
Kaiser-Francis Oil Company

Attachments

cc: D. Tyler

F: Odessa NMOCD

ADDENDUM TO CLOSURE PLAN  
MESA 11 GRANDE # 2  
DRILLING PIT

UNIT L, SECTION 11-T22S-R23E  
EDDY COUNTY, NM

The trench discussed in the original closure plan was not large enough to hold all of the material therefore it will be closed in accordance with the original plan.

We propose to handle the remaining soil by excavating one half of the pit down to rock, which we estimate to be approximately 15 to 20 feet below existing surface and place this material temporarily on the other half of the pit. We will take several samples of the bottom if possible to determine if we have reached a chloride concentration of 1000 ppm as we agreed upon during our site visit.

We will then line the excavated half of the pit with 20-mil liner. Once that half is lined we will then move the excavated soil onto the lined half of the pit and continue excavating the second half until we reach rock and place all of this material on the lined half of the pit.

Once we have excavated to rock on the second half of the pit we will again sample the bottom. We will then line the second half of the pit so that the entire pit bottom will be lined.

The soil will then be distributed evenly across the lined pit and 20-mil liner placed over the top of the soil.

A minimum of three (3) feet of topsoil will be placed over the liner to bring the pit back to existing grade.

However, there could be the potential as can be seen in the sample results we currently have that any leached chlorides have pooled at the rock/soil interface which could give a reading above 1000 ppm. We would propose that if we do reach the soil/rock interface and have a sample result that is above 1000 ppm that we be allowed to place the liner without having to try and excavate any rock.

ID# 072606 NWT  
64ppm

ID# 072606 NET  
272ppm

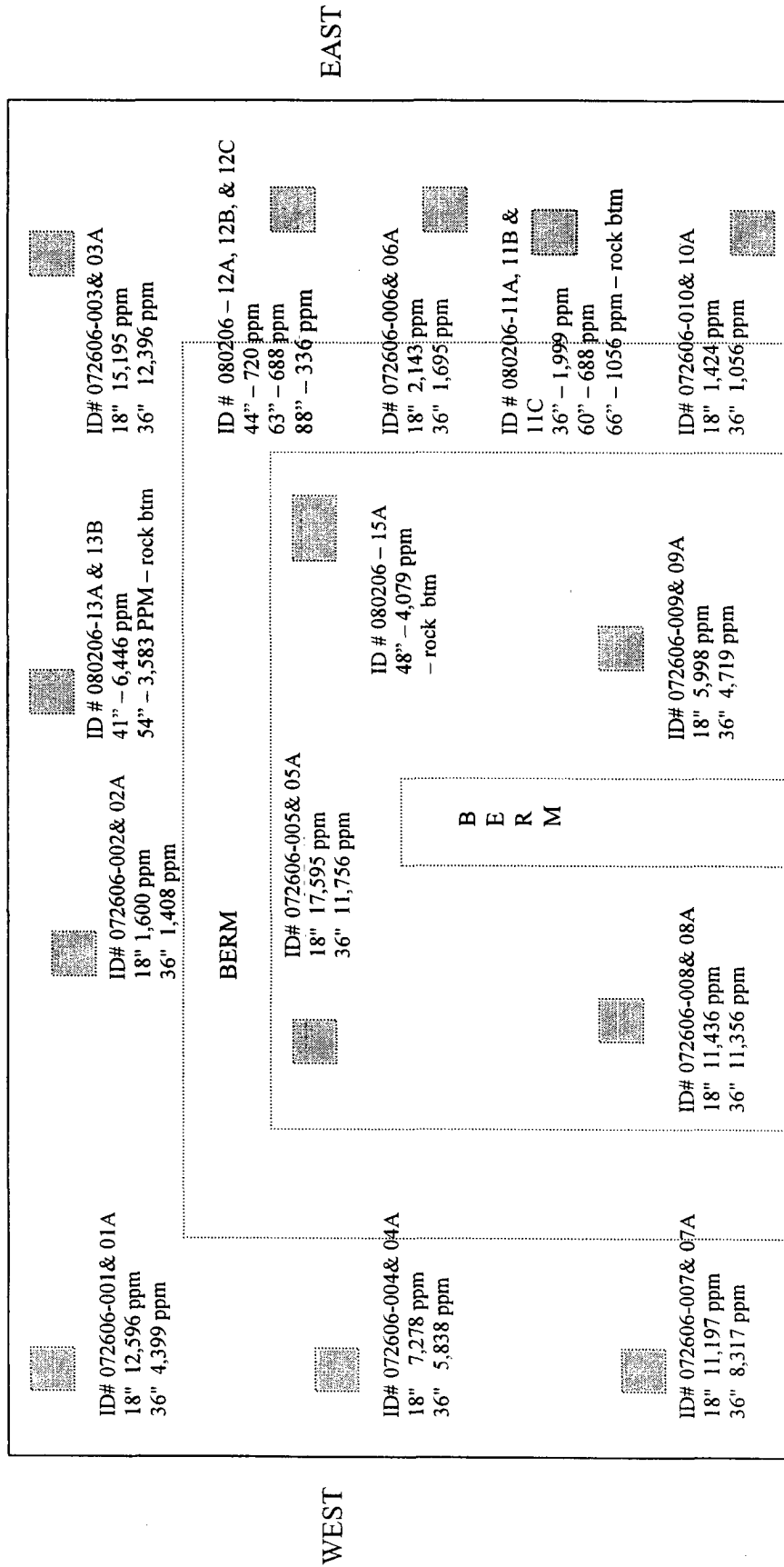
# MESA 11 GRANDE # 2

## Drilling Pit

### Sample Results for Chlorides

Sample Depths are from Pit Bottom not from Existing Ground Surface

NORTH



**Bratcher, Mike, EMNRD**

30-015-33720

**From:** Bratcher, Mike, EMNRD  
**Sent:** Monday, August 14, 2006 9:20 AM  
**To:** 'Charles Lock'  
**Subject:** RE: Mesa 11 Grande 2

Mr. Lock,

The addendum to the C-144 closure plan for the Mesa 11 Grande 2, dated August 7, 2006, is approved as submitted. Please notify the OCD District 2 Office 24 hours prior to obtaining samples where analyses of samples obtained are to be submitted to the OCD. This gives OCD the opportunity to witness samples if deemed necessary. Also, please provide 24 hour notification prior to installation of liner. Visual observations made by me at our last visit to the site would indicate a confining barrier to be present under the pit. This determination was made due to the sample point excavations retaining rain waters from the previous day.

Please be advised that approval by OCD 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, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If I can be of assistance please contact me.

Sincerely,

Mike Bratcher  
NMOCD District 2  
1301 W. Grand Ave.  
Artesia, NM 88210  
(505) 748-1283 Ext. 108  
(505) 626-0857  
[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)

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**From:** Charles Lock [mailto:CharlesL@kfoc.net]  
**Sent:** Monday, August 14, 2006 6:38 AM  
**To:** Bratcher, Mike, EMNRD  
**Subject:** Mesa 11 Grande 2

Mike, I just wanted to check and see if you had approved the addendum to our work plan for the pit closure on the Mesa 11 Grande 2.

Charles Lock  
Kaiser-Francis Oil Company  
Safety & Environmental Coordinator  
918-491-4337