

NM2 - _____ 04 _____

**APPROVED
BACKGROUND
SAMPLING
PLAN**

_____ Nov. 20, 2014 _____

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Thursday, November 20, 2014 2:43 PM
To: 'Zach Stradling'
Cc: Elizabeth McNally
Subject: RE: Benson-Montin-Greer Drilling Corp. - Proposed Background Soil Sampling Plan
Attachments: 2014 1120 Background Sampling Plan approval.pdf

Zach,

The Oil Conservation Division (OCD) has reviewed the sampling proposal and has determined that the background sampling plan is adequate. Please see the attached approval letter. A hardcopy has been placed in the mail. Please provide OCD a copy of the background testing analytical results for the facility permit administrative record. If you have any questions regarding this matter, please do not hesitate to contact me.

Brad

Brad A. Jones
Environmental Engineer
EMNRD Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Zach Stradling [<mailto:zstradling@bmgdrilling.com>]
Sent: Thursday, November 20, 2014 1:26 PM
To: Jones, Brad A., EMNRD
Cc: Elizabeth McNally
Subject: Benson-Montin-Greer Drilling Corp. - Proposed Background Soil Sampling Plan

Mr. Jones:

Please find the attached Proposed Background Soil Sampling Plan for BMG's Centralized Surface Waste Management Facility. Please contact me at (505) 325-8874 with any questions. Thank you,

Zach

Zach Stradling
Benson-Montin-Greer Drilling Corp.
4900 College Blvd.
Farmington, NM 87402
Office: (505) 324-5074
Cell: (505) 330-9486
Fax: (505) 327-9207

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division



November 20, 2014

Mr. Zach Stradling
Benson-Montin-Greer Drilling Corp.
4900 College Boulevard
Farmington, New Mexico 87402

**Re: Background Sampling Plan Review
Benson-Montin-Greer Drilling Corp.
Permit NM2-004 Centralized Surface Waste Management Facility
Location: NW/4, NW/4 of Section 20, Township 25 North, Range 1 East, NMPM
Rio Arriba County, New Mexico**

Dear Mr. Stradling:

The Oil Conservation Division (OCD) has completed the review of Benson-Montin-Greer Drilling Corp.'s (BMG) submittal, dated and received by OCD via email on November 20, 2014, which proposes a background sampling plan to re-establish a new facility background and PQLs in order to compare to the vadose zone monitoring results to determine if a release had occurred and if follow-up actions of 19.15.36.15.E.(5) NMAC are required to be completed.

Based on the information provided in the request, the background sampling plan is hereby approved with the following understandings and conditions:

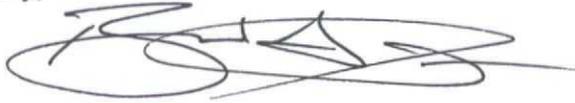
1. BMG shall comply with all applicable requirements of the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978), and all conditions specified in this approval and shall operate in accordance with the November 20, 2014 submittal; and
2. BMG shall obtain written approval from OCD prior to implementing any changes to the November 20, 2014 background sampling plan.

Please be advised that approval of this request does not relieve BMG of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve BMG of its responsibility to comply with any other applicable governmental authority's rules and regulations.

Benson-Montin-Greer Drilling Corp.
Permit NM2-004
November 20, 2014
Page 2 of 2

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad A. Jones', written over a circular scribble.

Brad A. Jones
Environmental Engineer

BAJ/baj

Cc: OCD District III Office, Aztec

Jones, Brad A., EMNRD

From: Zach Stradling <zstradling@bmgdrilling.com>
Sent: Thursday, November 20, 2014 1:26 PM
To: Jones, Brad A., EMNRD
Cc: Elizabeth McNally
Subject: Benson-Montin-Greer Drilling Corp. - Proposed Background Soil Sampling Plan
Attachments: Proposed Background Soil Sampling Plan.pdf

Mr. Jones:

Please find the attached Proposed Background Soil Sampling Plan for BMG's Centralized Surface Waste Management Facility. Please contact me at (505) 325-8874 with any questions. Thank you,

Zach

Zach Stradling

Benson-Montin-Greer Drilling Corp.
4900 College Blvd.
Farmington, NM 87402
Office: (505) 324-5074
Cell: (505) 330-9486
Fax: (505) 327-9207

November 20, 2014

Brad Jones

Via email with delivery confirmation receipt to:

brad.a.jones@state.nm.us

New Mexico Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

**RE: Proposed Background Soil Sampling Plan
BMG's Centralized Surface Waste Management Facility
Rio Arriba County, New Mexico
Permit # NM-02-0004.**

Dear Mr. Jones:

As part of addressing issues with the existing New Mexico Oil Conservation Division (NMOCD) permit for our Centralized Surface Waste Management Facility (Permit # NM-02-0004) near Lindrith, New Mexico, Benson Montin Greer Drilling Corp (BMG) would like to propose a background soil sampling plan. Based on communication between NMOCD and our consultant, Animas Environmental Services, LLC (AES), it was confirmed (according to available records) that no background soils were either submitted to NMOCD when original permit was obtained; or if they were submitted, the samples were not approved by NMOCD. Therefore, in order to move forward, BMG would like to propose the following for collecting background soil samples at the BMG Landfarm:

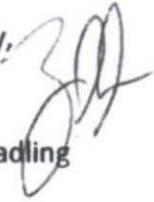
- Collect 3 composite samples from undisturbed ground near the Landfarm (on property owned by BMG). Each composite sample would be comprised of five discrete samples, each collected from 2 to 3 ft bgs (as noted within existing Landfarm permit), with decontaminated hand augers and stainless steel sample collection equipment. The five discrete samples would be carefully composited and submitted for lab analysis. The proposed sample locations are shown on the attached figure. Note that the property due west and north of the Landfarm are National Forest and private property, respectively (and BMG is not proposing to collect samples beyond our property boundary).
- The list of proposed sample parameters (in accordance with NMAC 19.15.36.15B), along with sample methods and PQLs confirmed by the analytical laboratory, Hall Environmental Analysis Laboratory in Albuquerque, New Mexico, are attached. Sample parameters include total petroleum hydrocarbons (TPH),

benzene, toluene, ethylbenzene and xylene (BTEX), chlorides, and A&B list (see attached).

Once approved by NMOCD, BMG will arrange for AES to complete the field work as soon as conditions allow (i.e. ground not frozen).

If you have any questions regarding the proposed background soil sampling, please do not hesitate to contact me at (505) 325-8874.

Sincerely,



Zach Stradling

Attachments:

Proposed Background Soil Sampling Locations
Proposed Laboratory Parameters, Sample Methods, and PQLs

cc: Elizabeth McNally
via email: emcnally@animasenvironmental.com
Animas Environmental Services, LLC
604 W. Pinon St.
Farmington NM 87401



Parameter	USEPA Method	PQL (mg/kg)
TPH	418.1	20
Benzene	8260	0.05
Toluene	8260	0.05
Ethylbenzene	8260	0.05
Xylenes (OMP)	8260	0.05
Chlorides	300.0	1.5
NMAC 20.6.2.3103 (A and B)		
Arsenic	6010B	2.5
Barium	6010B	0.1
Cadmium	6010B	0.1
Chromium	6010B	0.3
Cyanide	EPA Method 9012B	2.5
Fluoride	300.0	0.3
Lead	6010B	0.25
Total Mercury	7471	0.03
Nitrate (NO3 as N)	300.0	0.3
Selenium	6010B	2.5
Silver	6010B	0.25
Uranium	6010B	2
Radioactivity (Combined Radium 226&228)	EPA Method 901.1 Gamma Spec.	1.0 pCi/g
PCBs	EPA Method 8082	0.1
Carbon Tetrachloride	8260	0.05
1,2-dichloroethane (EDC)	8260	0.05
1,1-dichloroethylene (1,1-DCE)	8260	0.05
1,1,2,2-tetrachloroethylene (PCE)	8260	0.05
1,1,2-trichloroethylene (TCE)	8260	0.05
Methylene chloride (chloromethane)	8260	0.15
Chloroform	8260	0.05
1,1-dichloroethane	8260	0.05
Ethylene dibromide (EDB)	8260	0.05
1,1,1-trichloroethane	8260	0.05
1,1,2-trichloroethane	8260	0.05
1,1,2,2-tetrachloroethane	8260	0.05
Vinyl chloride	8260	0.05
Total naphthalene	8260	0.1
1-methylnaphthalene	8260	0.2
2-methylnaphthalene	8260	0.2
Benzo-a-pyrene	8310	0.01
Copper	6010B	0.3
Iron	6010B	2.5
Manganese	6010B	0.1
Phenols	EPA Method 9066	0.67
Sulfate	300.0	1.5
Total Dissolved Solids (TDS)	Cannot be performed on soil	na
Zinc	6010B	2.5
pH	SM4500 H+B	na



Forest Service

private

Forest Service

Background #3

Background #2

Background #1

private