

**3R - 131**

**WORKPLANS**

**08/14/2006**



Lodestar Services, Inc.

P.O. Box 3861, Farmington, NM 87499-3861, 505-334-2791

3R0131

August 14, 2006

Mr. Glenn Von Gonten  
New Mexico Oil Conservation Division  
1220 South Francis Drive  
Santa Fe, New Mexico 87505

**CERTIFIED MAIL: 7004 1160 0007 4952 1500**

**RE: Sullivan Gas Com D #1**

Dear Mr. Von Gonten,

On behalf of XTO Energy, Inc. (XTO), Lodestar Services, Incorporated (Lodestar) is pleased to present this work plan for installation of oxygenate up-gradient of groundwater monitoring well MW-1R at the Sullivan Gas Com D #1. The site is located in Unit B of Section 26 of Township 29N, Range 11W and includes five groundwater monitoring wells. Attached for your review is the annual report submitted to you in January 2006 showing locations of the monitoring wells and an outline of the former separator pit. A northern groundwater flow direction is also shown.

MW-1 and replacement well MW-1R have been sampled annually and analytical results show above standards concentrations of benzene in the groundwater. Most recent analytical results from sampling MW-2, MW-3, MW-4 and MW-5 showed low, beneath standards, to non-detectable concentrations of benzene, toluene, ethyl benzene and xylenes (BTEX) in the extracted groundwater.

To reduce concentrations of BTEX, XTO proposes to install three temporary oxygen release compound (ORC) source wells immediately up-gradient of MW-1R as shown on Figure 1. The wells will be two inches in diameter and set a minimum of two feet into the water table using a hand powered auger. Magnesium peroxide socks supplied by Regenesis will be placed throughout the water column to supply oxygen for aerobic degradation of the hydrocarbons. Dissolved oxygen will be monitored in MW-1R quarterly. MW-1R will continue to be sampled on an annual basis to verify effectiveness of the added nutrients. Once the dissolved oxygen concentration in MW-1R shows a significant increase, ground water samples will be collected quarterly. The ORC will be replaced annually as necessary. When concentrations of BTEX are beneath New Mexico Water Quality Control Standards the ORC will be removed and quarterly sampling will continue for four consecutive quarters. Following four consecutive quarters of clean analytical results below standards XTO will submit a closure report for the site. Results will be submitted with XTO's annual report.

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XTO will proceed with the above proposed scope of work unless otherwise notified by your office. Should you have any questions or require additional information, please do not hesitate to contact Lisa Winn of XTO at (505) 324-1090 or you can call me at (505) 334 2791.

Sincerely,  
**LODESTAR SERVICES, INC**



Martin Nee

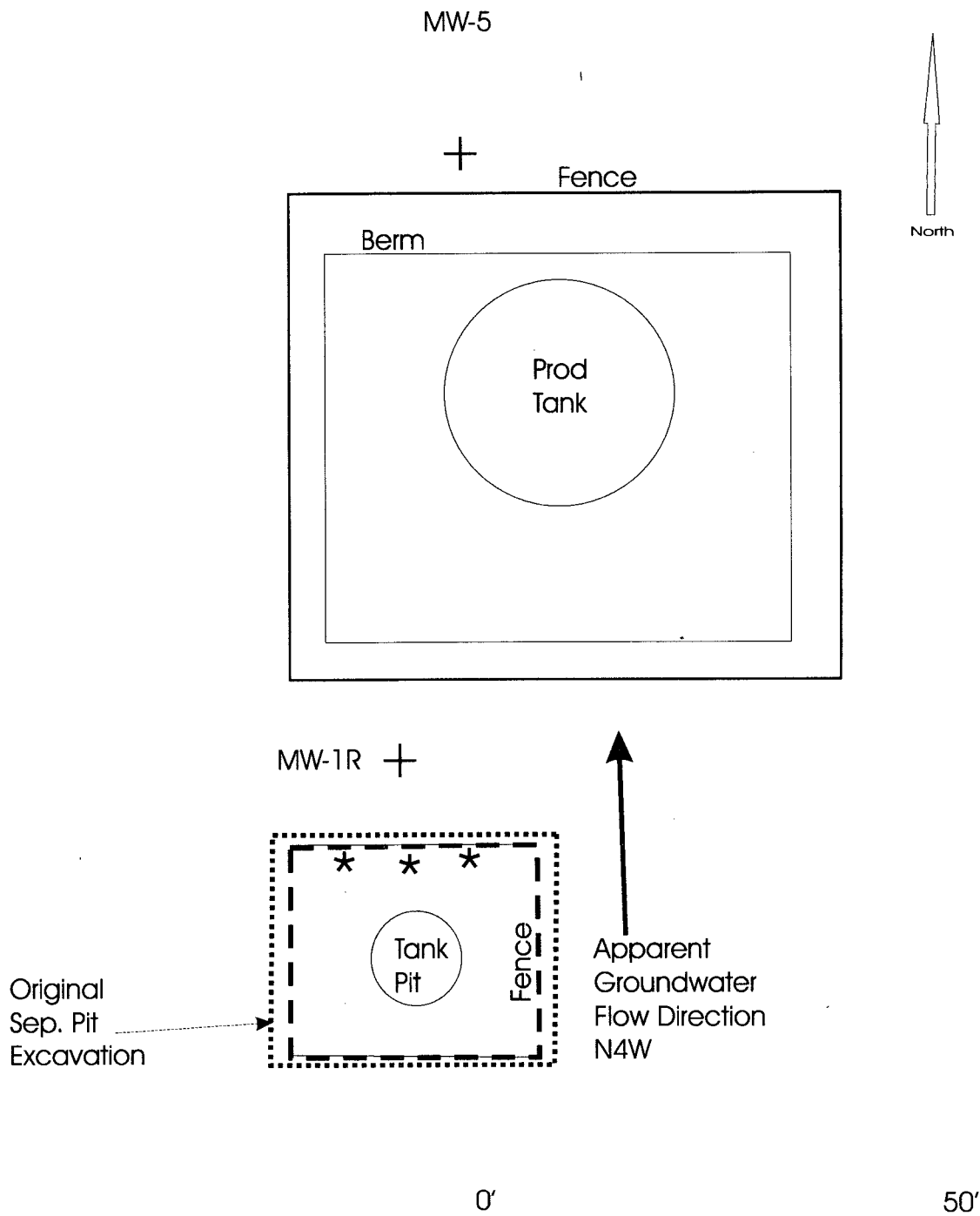
Cc: Lisa Winn, XTO, w/o attachment  
Kim Champlin, XTO, w/o attachment  
Ashley Ager, LSI, w/o attachment  
File

Attachments: Annual Report




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NW/4 Ne4 Sec. 26, T29N, R11W, NMPM  
San Juan County, New Mexico

+ Monitoring Well  
\* Proposed ORC Injection Point

 Lodestar Services, Inc  
PO Box 3861  
Farmington, NM 87499

**Site Diagram**  
Sullivan GC D #1

**Figure 1**  
Drawn By MJN 8/07/06