Bonham, Sherry, EMNRD

From: Sent: To: Subject: Attachments:	Bratcher, Mike, EMNRD Monday, September 08, 2008 7:14 AM Bonham, Sherry, EMNRD FW: Inbounds Remedial Action Plan INBOUNDS #1Y Remdedial Action Plan.doc
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Mike: Please see at	tached for your review. If you have a concern or changes need to be made please contact me.
Thanks, Pam Corbett CHI Operating, Inc. 432-685-5001	
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CHI OPERATING, INC. Remedial Action Plan for InBounds Com #1Y

COI 08-08-1002

Prepared for:

CHI OPERATING, INC. 212 N. Main St., Ste 200 Midland, Texas 79701-5231

By:

Tripp Construction, Inc. P.O. Box 1711 Odessa, TX 79760 (432) 381-2440

August 20, 2008

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Figure 1 -- Site Map

I. Purpose

The purpose of this report is to provide a remedial action plan on the InBounds Com #1Y site for the cleanup of the area impacted by the spillage of production fluids from the tank battery at the site in Eddy County, New Mexico. Samples will be submitted for analyses to Environmental Labs of Texas (ELOT). This report details all the events pursuant to delineation of the site in such a manner that protects the population, environment, and groundwater in the area.

II. Background

Tripp Construction, Inc. (TCI) was contacted by Chi Operating, Inc. (COI) to delineate the area impacted at the tank battery leak in Section 9, Township 22S, Range 25E, Unit K of Eddy County, New Mexico and is identified as InBounds Com #1Y. Anthony Sanchez (Environmental Field Supervisor) with TCI met with Jordan with COI to do a site walk through and determine the course of action. The impacted area appears to be inside the location boundaries.

III. Size of Leak

The entire impacted area appears to be inside the location boundaries at the site. All samples will be sent to ELOT for analysis. The impacted area resulted from a tank over flow at the site.

IV. Vertical and Horizontal Extent of Contamination

Vertical and horizontal extent of the impacted area will be delineated by TCI. Previous sampling results dated 7-17-08 and 7-31-08 show several elevated Chloride readings and one elevated Total Petroleum Hydrocarbon (TPH) reading. BTEX samples were below acceptable limits.

Based on New Mexico Oil Conservation Division standards the site will meet the remediation levels of:

Total Petroleum Hydrocarbons 500 ppm Chloride 200 ppm

Groundwater is not expected to be affected by the site remediation.

V. Methodology

Tripp Constuction, Inc. will delineate the extent of the impacted area by:

- 1. Sampling the area and performing field analysis for chlorides and TPH.
- 2. Elevated sample areas will be excavated until acceptable sample results are obtained.
- 3. Impacted soil will be hauled to CRI for disposal.
- **4.** Fresh soil will be brought in to replace the excavated material.
- **5.** A final report will be submitted to Chi Operating and the OCD upon completion of the work.

V. Limitations

Tripp Construction, Inc. has prepared this Remedial Action Plan to the best of its ability. No other warranty, expressed or implied, is made or intended.

Tripp has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. Tripp has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. Tripp has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Tripp also notes that the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of CHI OPERATING, INC. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express written consent of Tripp, and CHI OPERATING, INC.

VI. Conclusions

Based on the analytical data, the North side of the site and the area near the separator needs to be delineated and remediated. TCI recommends delineating the extent of impacted soil at the time of remediation. Clearance levels can be reached for slightly impacted soil by turning and mixing the soil with ambient soil at the site. All impacted soil above OCD approved limits will be hauled to CRI for disposal.