

MARTIN YATES, III
1912-1985

FRANK W. YATES
1936-1986

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April 28, 2016

Mr. Mike Bratcher or Ms. Heather Patterson
NMOCD District II
811 South First
Artesia, NM 88210

RE: Aparejo APA Battery
30-015-28327
Section 16, T19S-R25E
Eddy County, New Mexico

Mr. Bratcher or Ms. Patterson,

Yates Petroleum Corporation would like to submit the following plan of work to you regarding the releases that occurred at the above mentioned facility.

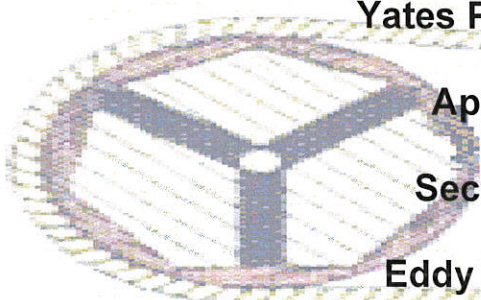
- May 20, 2015 (2RP-3035) – 33 barrels of crude oil released with 27 barrels of crude oil recovered.
- July 23, 2015 (2RP-3184) – 60 barrels of crude oil released with 50 barrels of crude oil recovered.
- August 11, 2015 (2RP-3216) – 18 barrels of crude oil release with 17 barrels of crude oil recovered.
- September 9, 2015 (2RP-3276) – 60 barrels of produced water with 58 barrels produced water recovered.

With NMOCD approval of this work plan, Yates will hold a bid meeting allowing several contractors the opportunity to submit bids on this remediation project. Bids that are received will be forwarded to Yates Management for review. Once Yates Management reviews the bids and gives approval, the remediation project will be awarded to a contractor for work to commence.

If you have any questions or concerns, I can be reached at (575) 748-4111 or by email at agriffin@yatespetroleum.com.

Thank You,

Amber Griffin
Environmental Regulatory Agent
Yates Petroleum Corporation



Yates Petroleum Corporation

Aparejo APA Battery

Section 16, T19S-R25E

Eddy County, New Mexico

April 28, 2016

I. Location

The release area is located south of Artesia off Rocking R Red Road. Turn west for 7 miles then turn north through a cattle guard and gate. Go north for approximately 1.2 miles. Turn northeast for 0.4 miles. Turn east for 0.2 miles then continue south for to Roy #5 location. Road starts here for 0.5 miles to location.

II. Background

May 20, 2015 – First release occurred.

July 15, 2015 – Initial sampling was conducted. Soil samples were sent to an approved NMOCD approved facility. The analytical results were received on July 23, 2015 (Report 1507796). Analytical results showed that TPH and BTEX were below RRAL's in both Sections 1 and 4 of the release area. TPH levels were above RRAL's on the surface and at 1' below the surface level in Sections 2 and 3 of the release area. TPH levels clean-up and are under the RRAL's at 2' below the surface level in both of these sections. BTEX levels were above RRAL's at 1' below the surface level in Section 2. BTEX levels clean-up and are under the RRAL's at 2' below the surface level in this section.

July 23, 2015 – Second release occurred.

August 11, 2015 – Work plan submitted to NMOCD to excavate 1.5' from Sections 2 and 3 of the release area and haul the contaminated soils to a NMOCD approved facility and take confirmation samples to ensure that the second release did not create further contamination. Also on this date the third release occurred.

August 14, 2015 – NMOCD approved work plan proposal. Yates moved forward with excavating the 1.5' of soils from Sections 2 and 3 of the release area.

September 16, 2015 – Yates was about to pull confirmation samples from the excavated release area when the fourth release occurred. The fourth release covered Sections 2, 3, and 4 as noted on the attached site diagram.

September 16, 2015 – As a result of the fourth release, personnel returned to the site to re-sample Sections 2, 3, and 4 for TPH, BTEX and Chlorides.

October 28, 2015 – Yates had to return again to the site for further delineation of Sections 2 and 4.

Sections 2 and 3 are currently at a depth of approximately 2.5' below the surface level. Section 4 is still even with the surface level.

III. Surface and Ground Water

Area surface geology is Cenozoic. The ChevronTexaco depth to ground water map shows the depth to groundwater to be approximately 75' feet making the site ranking for this site a ten (10). Watercourses in the area are dry except for infrequent flows in response to major precipitation events.

The ranking for this site is ten (10) based on the following:

Depth to ground water 50-99'
Wellhead Protection Area > 1000'
Distance to surface water body > 1000'

IV. Soils

The area consists of soils that are caliche and clay seams.

V. Scope of Work

Yates proposes the following work:

- No excavation work to occur in Section 1. Section 1 was only affected from the May 20, 2015 release and sampling showed TPH and BTEX to be below NMOCD RRAL's.
- Section 2 and 3 – Remove an additional 2' of soils (getting the excavation to 4.5-5' below the surface level) and backfill the excavation with clean caliche.
- Section 4 – Remove 4' of soils, lay a 20 mil synthetic liner in the bottom of the excavation, and backfill the excavation with caliche. Complete vertical delineation was impracticable in this section due to the tight space behind the battery. The tight space led to safety concerns for personnel and also prevented Yates from being able to collect clean, discrete samples from the section at deeper depths. Chloride levels are shown to be decreasing in the section.

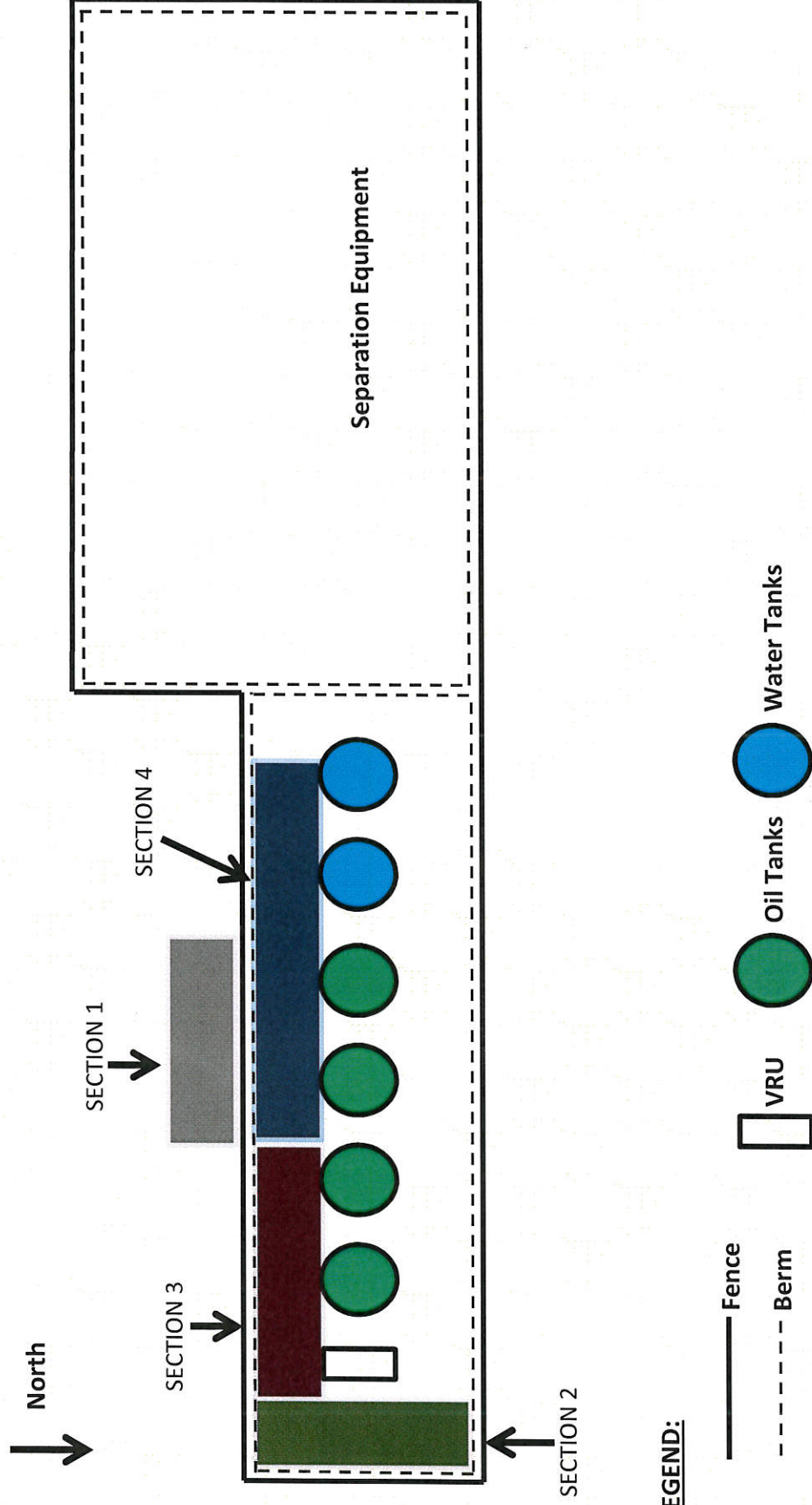
Contaminated soils that are excavated will be hauled to a NMOCD approved disposal facility.

Once all excavation and backfill work is complete, Yates will submit a Final Form C-141 to NMOCD requesting closure of this release.

Yates Petroleum Corporation
Amber Griffin

Aparejo APA Battery
16-19S-25E, Eddy County

2RP-3035; 5/20/2015
2RP-3184; 7/23/2015
2RP-3216; 8/11/2015
2RP-3276; 9/9/2015



LEGEND:

— Fence
--- Berm

VRU

Oil Tanks

Water Tanks

DRAWING NOT TO SCALE

Aparejo APA Battery

Hall Environmental

	Sample Area	Sample Date	Analytical Report	Sample Type	Depth (BSL)	B	T	E	X	BTEX	GRO	DRO	TOTAL	Chlorides
APA 1 - Surface	Release Area	7/15/2015	1507796	Grab/Auger	Surface	ND	ND	ND	ND	ND	ND	ND	ND	-
APA 1 - 1'	Release Area	7/15/2015	1507796	Grab/Auger	1'	ND	ND	ND	ND	ND	ND	ND	ND	-
APA 1 - 2'	Release Area	7/15/2015	1507796	Grab/Auger	2'	ND	ND	ND	ND	ND	ND	ND	ND	-
APA 2 - Surface	Release Area	7/15/2015	1507796	Grab/Auger	Surface	ND	ND	ND	ND	ND	ND	5,300	5,300	-
APA 2 - 1'	Release Area	7/15/2015	1507796	Grab/Auger	1'	0.31	7.8	8.7	16	32.81	310	2,000	2,310	-
APA 2 - 2'	Release Area	7/15/2015	1507796	Grab/Auger	2'	ND	0.39	0.6	0.86	1.85	26	67	93	-
APA 3 - Surface	Release Area	7/15/2015	1507796	Grab/Auger	Surface	ND	ND	ND	0.53	0.53	60	5,700	5,760	-
APA 3 - 1'	Release Area	7/15/2015	1507796	Grab/Auger	1'	ND	ND	ND	ND	ND	13	1,400	1,413	-
APA 3 - 2'	Release Area	7/15/2015	1507796	Grab/Auger	2'	ND	ND	ND	ND	ND	ND	220	220	-
APA 4 - Surface	Release Area	7/15/2015	1507796	Grab/Auger	Surface	ND	ND	ND	ND	ND	ND	980	980	-
APA 4 - 1'	Release Area	7/15/2015	1507796	Grab/Auger	1'	ND	ND	ND	ND	ND	ND	9.8	9.8	-
APA 4 - 2'	Release Area	7/15/2015	1507796	Grab/Auger	2'	ND	ND	ND	ND	ND	ND	58	58	-
	Sample Area	Sample Date	Analytical Report	Sample Type	Depth (BSL)	B	T	E	X	BTEX	GRO	DRO	TOTAL	Chlorides
2 - 1'	Release Area	9/16/2015	1509898	Grab/Backhoe	3'	0.16	3.8	3.6	6.5	14.06	170	230	400	5,800
2 - 2'	Release Area	9/16/2015	1509898	Grab/Backhoe	4'	ND	0.069	ND	0.14	0.209	ND	230	230	3,600
2 - 3'	Release Area	9/16/2015	1509898	Grab/Backhoe	5'	0.16	0.24	ND	ND	0.4	ND	ND	ND	2,300
2 - 4'	Release Area	9/16/2015	1509898	Grab/Backhoe	6'	0.18	0.18	ND	ND	0.36	ND	ND	ND	1,100
2 - 5'	Release Area	9/16/2015	1509898	Grab/Backhoe	7'	0.27	0.64	0.34	0.46	1.71	12	45	57	990
2 - 6'	Release Area	10/28/2015	1510E64	Grab/Backhoe	8'	-	-	-	-	-	-	-	-	840
2 - 7'	Release Area	10/28/2015	1510E64	Grab/Backhoe	9'	-	-	-	-	-	-	-	-	190
2 - 8'	Release Area	10/28/2015	1510E64	Grab/Backhoe	10'	-	-	-	-	-	-	-	-	330
2 - 9'	Release Area	10/28/2015	1510E64	Grab/Backhoe	11'	-	-	-	-	-	-	-	-	170
2 - 10'	Release Area	10/28/2015	1510E64	Grab/Backhoe	12'	-	-	-	-	-	-	-	-	190
3 - 1'	Release Area	9/16/2015	1509898	Grab/Backhoe	3'	ND	ND	ND	ND	ND	ND	ND	ND	1,100
3 - 2'	Release Area	9/16/2015	1509898	Grab/Backhoe	4'	ND	ND	ND	ND	ND	ND	ND	ND	270
3 - 3'	Release Area	9/16/2015	1509898	Grab/Backhoe	5'	ND	ND	ND	ND	ND	ND	ND	ND	70
3 - 4'	Release Area	9/16/2015	1509898	Grab/Backhoe	6'	ND	ND	ND	ND	ND	ND	ND	ND	230
3 - 5'	Release Area	9/16/2015	1509898	Grab/Backhoe	7'	ND	ND	ND	ND	ND	ND	ND	ND	230
4 - 1'	Release Area	9/16/2015	1509898	Grab/Backhoe	1'	1.3	7	5	5.9	19.2	130	200	330	9,600
4 - 2'	Release Area	9/16/2015	1509898	Grab/Backhoe	2'	2.2	0.54	3.9	ND	6.64	170	3,100	3,270	5,300
4 - 3'	Release Area	9/16/2015	1509898	Grab/Backhoe	3'	1.8	0.77	2	0.5	5.07	190	3,300	3,490	3,500
4 - 4'	Release Area	9/16/2015	1509898	Grab/Backhoe	4'	2	ND	2	ND	4	77	770	847	2,900
4 - 5'	Release Area	9/16/2015	1509898	Grab/Backhoe	5'	ND	ND	0.87	ND	0.87	590	4,400	4,990	370
4 - 6'	Release Area	10/28/2015	1510E63	Grab/Backhoe	6'	-	-	-	-	-	ND	ND	ND	4,200
4 - 7'	Release Area	10/28/2015	1510E63	Grab/Backhoe	7'	-	-	-	-	-	ND	ND	ND	3,400
4 - 8'	Release Area	10/28/2015	1510E63	Grab/Backhoe	8'	-	-	-	-	-	ND	ND	ND	1,800

Site Ranking is Ten (10). Depth to Ground Water 50-99' (approx. 75', per Chevron/Texaco Trend Map).

All results are ppm.

Released: 33 B/O; Recovered: 27 B/O. Release Date: 5/20/2015. 2RP-3035

Released: 60 B/O; Recovered: 50 B/O. Release Date: 7/23/2015. 2RP-3184

Released: 18 B/O; Recovered: 17 B/O. Release Date: 8/11/2015. 2RP-3216

Released: 60 B/PW; Recovered: 58 B/PW. Release Date: 9/9/2015. 2RP-3276