



REMEDIATION WORK PLAN

Property:

FAIR OIL, LTD.
Parakeet 29 Federal #1
Eddy County, New Mexico
Unit Letter "I", Section 29, Township 19 South, Range 27 East
Latitude 32.62852, Longitude -104.29493
2RP-3897

October 2016

Prepared for:

Fair Oil, LTD.
225 South College
Tyler, TX 75702
Attn: **Mr. Jay W. Bynum**

Prepared by:

Thomas Franklin
Environmental Manager

Jack Zimmerman, P.G., C.P.G
Senior Geologist

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WORK PLAN

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1.0 INTRODUCTION

1.1 Site Description & Background

American Safety Services Inc. (ASSI) has prepared this Work Plan for the Fair Oil, LTD. (Fair Oil) Parakeet 29 Federal #1 (referred to hereinafter as the "Site" or "subject Site"). This Work Plan is based upon the interpretation of the data collected by ASSI.

The Parakeet 29 Federal #1 is located in Unit Letter I, Section 29, Township 19 South, Range 27 East, Eddy County, New Mexico (GPS 32.62852, -104.29493). Fair Oil has acquired this well location and associated equipment.

Remedial actions were conducted by ASSI in accordance with New Mexico Energy, Minerals, and Natural Resources Department (EMNRD), Oil Conservation Division (NMOCD) rules (*NMAC 19.15.29 Release Notification*) and the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* as guidance.

1.2 Project Objective

The objective of the Work Plan is to present documentation of the activities that were performed to date and to request an effective means to remediate the Site.

1.3 Standard of Care

ASSI's services are performed in accordance with standards provided by a firm rendering the same or similar services in the area during the same time period. ASSI makes no warranties, express or implied, as to the services performed hereunder. Additionally, ASSI does not warranty the work of third parties supplying information used in the report (e.g. laboratories, regulatory agencies, or other third parties). This scope of services will be performed in accordance with the scope of work agreed with the client.

1.4 Reliance

This report has been prepared for the exclusive use of Fair Oil, and any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over

the Site) is prohibited without the express written authorization of Fair Oil and ASSI. Any unauthorized distribution or reuse is at the client’s sole risk. Notwithstanding the foregoing, reliance by authorized parties will be subject to the terms, conditions and limitations stated in the proposal, the report, and ASSI’s Agreement. The limitation of liability defined in the agreement is the aggregate limit of ASSI’s liability to the client.

2.0 SITE RANKING & PROPOSED REMEDIAL ACTION GOALS

The Site is subject to regulatory oversight by the NMOCD. To address activities related to releases, the NMOCD utilizes the *Guidelines for Remediation of Leaks, Spills and Releases* as guidance, in addition to the NMOCD rules, specifically NMAC 19.15.29 *Release Notification*. These documents establish investigation and abatement action requirements for sites subject to reporting and/or corrective action.

In accordance with the NMOCD’s *Guidelines for Remediation of Leaks, Spills and Releases*, Apex utilized the general site characteristics to determine the appropriate “ranking” for the Site. The ranking criteria and associated scoring are provided in the table below:

Ranking Criteria			Ranking Score
Depth to Groundwater	<50 feet	20	10
	50 to 99 feet	10	
	>100 feet	0	
Wellhead Protection Area, <1,000 feet from a water source, or; <200 feet from private domestic water source.	Yes	20	0
	No	0	
Distance to Surface Water Body	<200 feet	20	0
	200 to 1,000 feet	10	
	>1,000 feet	0	
Total Ranking Score			10

Based on Apex’s evaluation of the scoring criteria, the Site would have a Total Ranking Score of 10. This ranking is based on the following:

- The depth to the initial groundwater-bearing zone is 50 to 99 feet at the Site.
- The impacted area is greater than 200 feet from a private domestic water source.
- Distance to the nearest surface water body is greater than 1,000 ft.

Based on a Total Ranking Score of 10, cleanup goals for soils remaining in place include: 10 milligrams per kilogram (mg/Kg) for Benzene, 50 mg/Kg for Total Benzene, Toluene, Ethylbenzene and Xylene (BTEX), 1,000 mg/Kg for Total Petroleum Hydrocarbons (TPH) and 250 mg/Kg for Chloride.

3.0 INITIAL RESPONSE & TRENCHING ACTIVITIES

3.1 Initial Response

On September 21, 2016, ASSI personnel performed a site inspection at the Fair Oil Parakeet Fed 29 #1 facility. The site inspection was in response to a release directly to the ground of one hundred-fifty (150) barrels (bbls) of crude oil. None of the fluids were recovered. The release impacted approximately five thousand and sixty (5060) square feet of production pad and adjacent pasture area.

3.2 Trenching Activities

On September 26, 2016 excavation activities were conducted by ASSI using mechanical means (track hoe). Mr. Thomas Franklin, an ASSI environmental professional, was present to document on-site activities (written and photographic). Two (2) trenches, excavated each to a depth of six (6) feet below ground surface (bgs), were completed and are shown on Figure 3. Discrete samples were collected from both trenches at the following depths 1', 2', 3', 4', and 6' bgs from the bottom of the excavation during excavation activities. Collected samples were field screened for Chloride to ensure vertical delineation. While field screening for Chloride, manual titrations were completed. Bucket refusal was encountered at a depth of six (6) feet bgs thus preventing further excavation.

3.2.1 Trenching Confirmation Soil Sampling Program

Ten (10) samples were collected, five each from Trench 1 and Trench 2 during excavation activities. These samples were collected by ASSI personnel and were analyzed for BTEX, TPH and Chloride. The results of the confirmation samples were compared to the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* (Section VI A. Contaminated Soils). Analytical results show BTEX, TPH, and Chloride exceedances exist above the NMOCD clean-up goals as discussed in Section 2.0 at both trench locations. At Trench 1 Total BTEX concentration exceedances range between 101.74 and 109.68 mg/Kg from 3' to 4' bgs, TPH exceedances range between 1,170 and 13,100 mg/Kg from 1' to 4' bgs, and Chloride has a single exceedance of 2,120 mg/Kg at 1' bgs. At Trench 2 Total BTEX concentration exceedances range between 94.8 and 189.27 mg/Kg from 2' to 3' bgs, and TPH concentration exceedances ranging between 1,550 and 19,200 mg/Kg occur between 1' and 4' bgs.

4.0 LABORATORY ANALYTICAL METHODS

The samples were analyzed for TPH GRO/DRO utilizing EPA method SW-846 8015, BTEX using EPA method SW-846 8021B and chlorides utilizing EPA method SW-846 300.1. Copies of the laboratory analysis are provided in Appendix D.

Soil samples were collected and placed in laboratory prepared glassware, placed on ice in a cooler. The sample coolers and completed chain-of-custody forms were relinquished to Trace Analysis, Inc. in Midland, Texas for normal turn-around time.

Figures 3 and 4 are a Site plan that indicates the approximate location of the confirmation soil samples in relation to pertinent land features and general Site boundaries, which is included in Appendix A.

5.0 WORK PLAN

Based upon the data collected and the work completed by ASSI, the constituents of concern were vertically delineated. This delineation indicates an existing TPH problem. Furthermore, the delineation shows that Chloride is not a problem.

Fair Oil and ASSI propose to excavate the top six (6) feet of material, stockpile the material onsite, and subsequently landfarm.

During excavation activities discrete sidewall sampling will be performed at the desecration of the NMOCD for horizontal delineation purposes.

Landfarming is an ex-situ waste treatment process that is performed in the upper soil zone or in (bio-treatment cells). Impacted soil material will be transported to the landfarming location and placed in designated areas onsite. Applicability of this technique has been used for many years in the management and disposal of drill cuttings, oily sludge, and other petroleum wastes. The equipment employed in landfarming is typical of that used in agricultural operations. Once impacted material is in place, activities to cultivate (blend) using mechanical means will allow the mixture to aerate which will enhance microbial degradation of hazardous compounds present in the impacted material to begin. Over a short period of time concentration levels that were above remediation guidelines will decrease to level within remediation guidelines due to the aeration processes.

Backfilling operations will utilize the material produced by the onsite excavation activities that were landfarmed. Material will be placed into cuts and fills then contoured (graded) by mechanical means to match the surrounding land surface grade.



APPENDIX A

Figures

N

Artesia

Atoka

Parakeet Fed 29 #1

285

82

162

Carlsbad

Eddy

© 2016 Google
Image Landsa



12/31/1969 lat 32.651932° lon -104.280199°

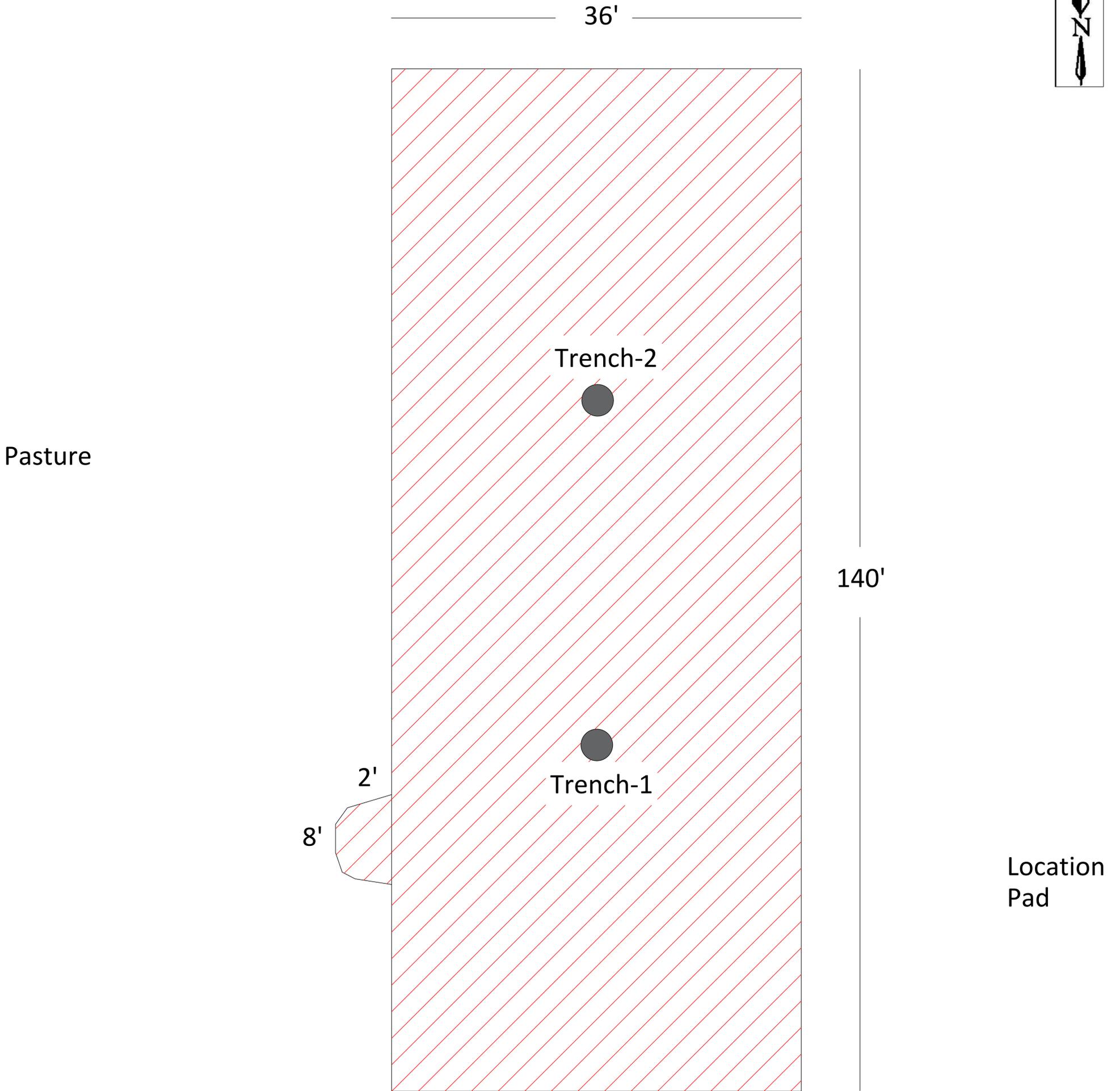
N

 Parakeet Fed 29 #1

© 2016 Google

3/12/2016 lat 32.19978672° lon -104.294772°



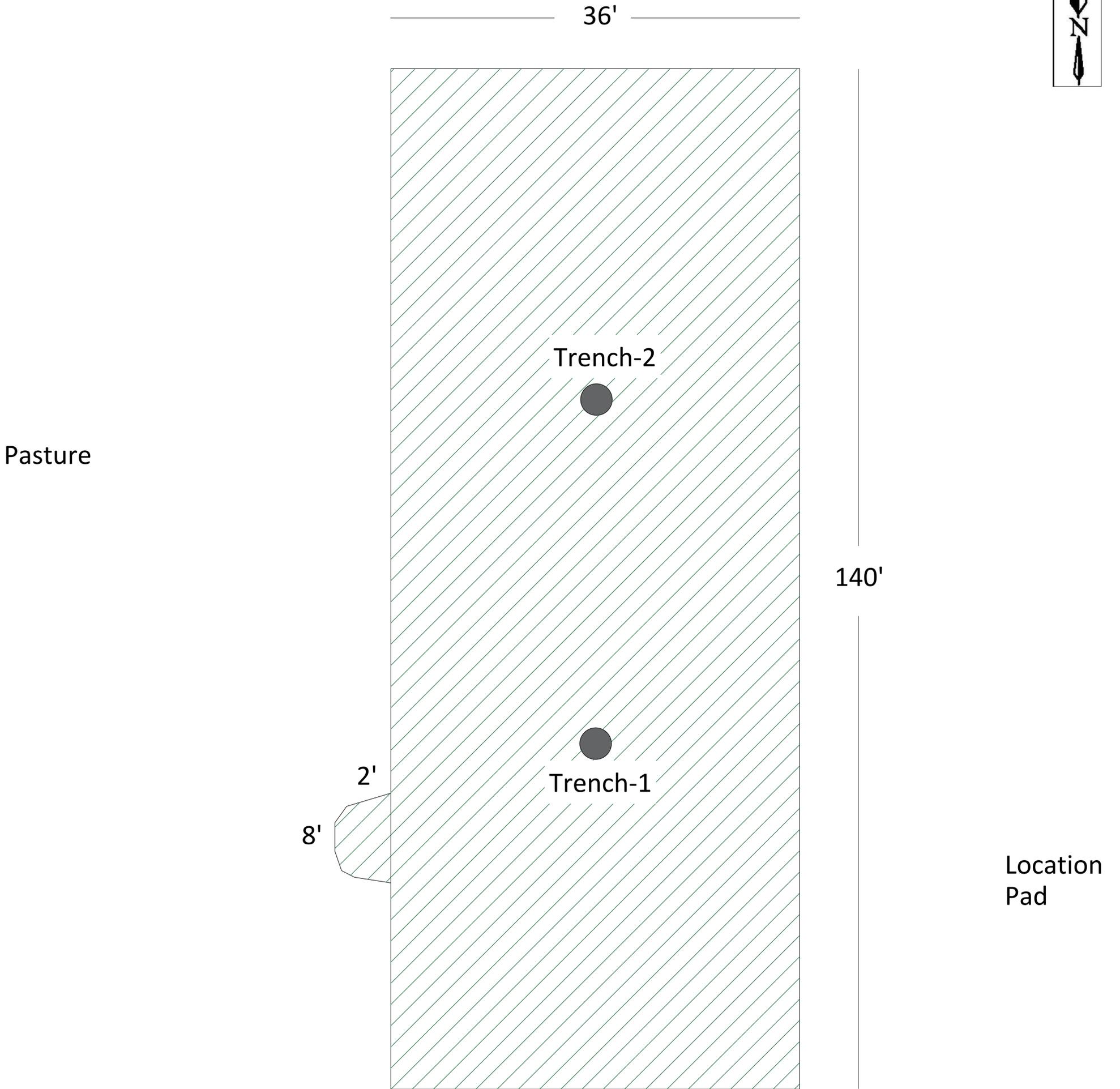
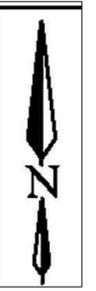


Legend
— Spill area
— Sample Point

**Fair Oil -
Parakeet Fed 29 #1**
Eddy County, New Mexico
32.62852W, -104.29493N

**AMERICAN
SAFETY
SERVICES
INC**
American Safety Services, Inc
8715 Andrews Hwy
Odessa, TX 79765
Phone: (432) 552-7625

FIGURE 3
Site Map



Legend
▨ — Excavated area (6')
● — Sample Point

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FIGURE 4
**Proposed Excavated
Depths**



APPENDIX B

Table 1

TABLE 1
 Summary of Delineation Sampling Analytical Results
 Concentrations of Benzene, BTEX, TPH & Chloride in Soil
 Fair Oil
 Parakeet Fed 29 #1
 Eddy County, New Mexico
 NMOCD REF: #2RP-3897



SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	SOIL STATUS	8021B					8015M			300.0
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	Total TPH (mg/Kg)	CHLORIDE (mg/Kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases				10	NE	NE	NE	50	NE	NE	1,000	250
Vertical Delineation Sampling												
Trench 1	1'	9/26/2016	In-Situ	0.268	0.754	1.5	7.34	9.862	398	774	1,170	2,120
Trench 1	2'	9/26/2016	In-Situ	ND	ND	0.0038	0.0195	0.0233	ND	31	ND	200
Trench 1	3'	9/26/2016	In-Situ	1.34	11.7	17.5	71.2	101.74	4,830	8,280	13,100	355
Trench 1	4'	9/26/2016	In-Situ	1.38	11.2	19.1	78	109.68	3,400	6,730	10,100	—
Trench 1	6'	9/26/2016	In-Situ	ND	ND	0.0402	0.2542	0.2944	134	624	758	—
Vertical Delineation Sampling												
Trench 2	1'	9/26/2016	In-Situ	0.233	0.937	3.22	12.39	16.78	391	1,160	1,550	35
Trench 2	2'	9/26/2016	In-Situ	2.77	18.7	35	132.8	189.27	7,550	11,700	19,200	52
Trench 2	3'	9/26/2016	In-Situ	1.5	12.6	16.6	64.1	94.8	5,810	8,620	14,400	ND
Trench 2	4'	9/26/2016	In-Situ	1.11	6.7	7.1	26.91	41.82	5,770	8,790	14,600	—
Trench 2	6'	9/26/2016	In-Situ	ND	ND	0.181	0.725	0.906	243	731	974	—

mg/Kg - milligrams per Kilogram

— = Not Established

Concentrations in **BOLD** exceed the NMOCD Guidelines



APPENDIX C

Photos



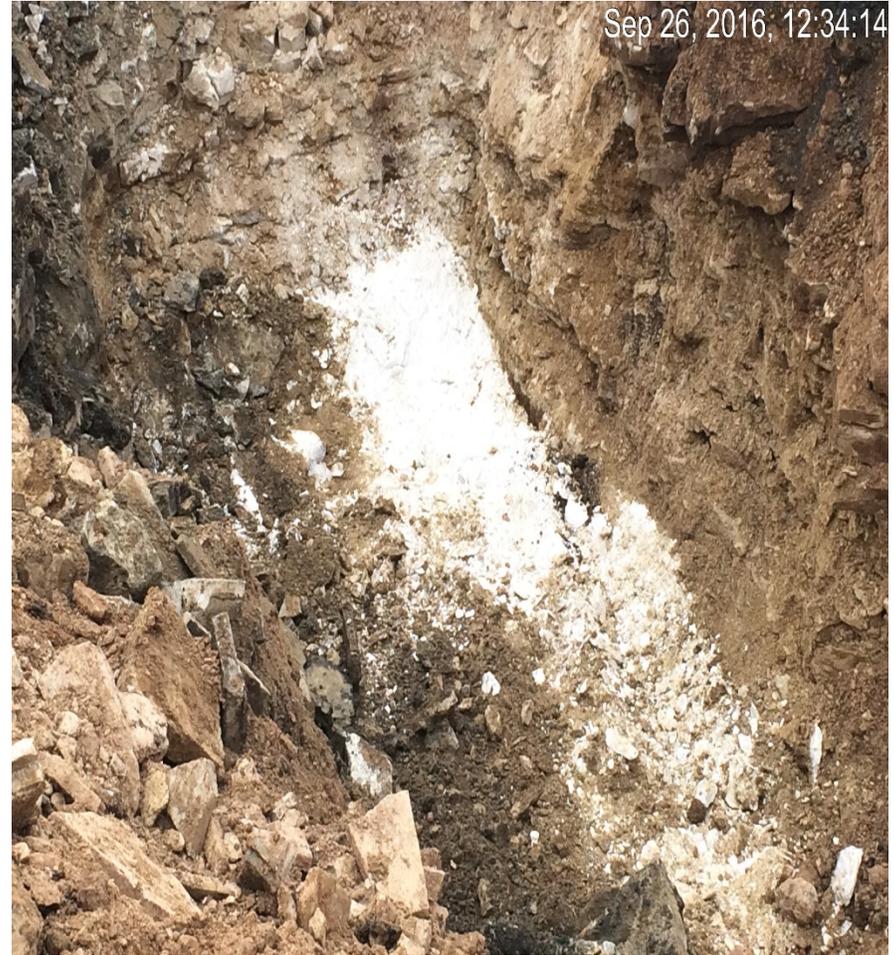
View North – Area of release inside tank battery firewalls



View South – Area of release inside tank battery firewalls



View Northwest – Area of Trench-1



View West – Bottom hole of Trench-1. Dense layer of Gypsum encountered at six feet.



View West – Area of Trench-2



View West – Bottom hole of Trench-2. Dense layer of Gypsum encountered at six feet.



APPENDIX D

Laboratory Analysis

**PERMIAN BASIN
ENVIRONMENTAL LAB, LP
1400 Rankin Hwy
Midland, TX 79701**



Analytical Report

Prepared for:

Thomas Franklin
American Safety Services, Inc
8715 Andrews Hwy
Odessa, TEXAS 79765

Project: Fair Oil Parakeet 29 #1

Project Number: [none]

Location: Eddy Co NM

Lab Order Number: 6127004



NELAP/TCEQ # T104704156-13-3

Report Date: 10/05/16

American Safety Services, Inc
8715 Andrews Hwy
Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
Project Number: [none]
Project Manager: Thomas Franklin

Fax: (432) 363-0198

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Trench 1 (1')	6127004-01	Soil	09/26/16 11:00	09-27-2016 10:50
Trench 1 (2')	6127004-02	Soil	09/26/16 11:02	09-27-2016 10:50
Trench 1 (3')	6127004-03	Soil	09/26/16 11:04	09-27-2016 10:50
Trench 1 (4')	6127004-04	Soil	09/26/16 11:06	09-27-2016 10:50
Trench 1 (6')	6127004-05	Soil	09/26/16 11:30	09-27-2016 10:50
Trench 2 (1')	6127004-06	Soil	09/26/16 12:00	09-27-2016 10:50
Trench 2 (2')	6127004-07	Soil	09/26/16 12:02	09-27-2016 10:50
Trench 2 (3')	6127004-08	Soil	09/26/16 12:04	09-27-2016 10:50
Trench 2 (4')	6127004-09	Soil	09/26/16 12:06	09-27-2016 10:50
Trench 2 (6')	6127004-10	Soil	09/26/16 12:08	09-27-2016 10:50

Trench 1 (1')
6127004-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	0.268	0.0222	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	0.754	0.0444	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	1.50	0.0222	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	5.27	0.0444	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	2.07	0.0222	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		63.2 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	S-GC
<i>Surrogate: 1,4-Difluorobenzene</i>		104 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	398	27.8	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	774	27.8	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		96.4 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		98.1 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	1170	55.6	mg/kg dry	1	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

Chloride	2120	27.8	mg/kg dry	25	P612802	09/28/16	09/30/16	EPA 300.0	
% Moisture	10.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	

American Safety Services, Inc
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 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 1 (2')
6127004-02 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	ND	0.00120	mg/kg dry	1	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	ND	0.00241	mg/kg dry	1	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	0.00380	0.00120	mg/kg dry	1	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	0.0138	0.00241	mg/kg dry	1	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	0.00570	0.00120	mg/kg dry	1	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		113 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		118 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	ND	30.1	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	31.0	30.1	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		97.5 %	70-130		P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		95.3 %	70-130		P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	ND	60.2	mg/kg dry	1	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

Chloride	200	1.20	mg/kg dry	1	P612802	09/28/16	09/30/16	EPA 300.0	
% Moisture	17.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	

Trench 1 (3')
6127004-03 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	1.34	0.109	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	11.7	0.217	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	17.5	0.109	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	51.8	0.217	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	19.4	0.109	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		99.8 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		126 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	S-GC
Gasoline Range Organics	4830	136	mg/kg dry	5	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	8280	136	mg/kg dry	5	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		101 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		80.2 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	13100	272	mg/kg dry	5	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

Chloride	355	1.09	mg/kg dry	1	P612802	09/28/16	09/30/16	EPA 300.0	
% Moisture	8.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	

American Safety Services, Inc
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 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 1 (4')
6127004-04 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	1.38	0.108	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	11.2	0.215	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	19.1	0.108	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	56.6	0.215	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	21.4	0.108	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		100 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		208 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	S-GC
Gasoline Range Organics	3400	134	mg/kg dry	5	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	6730	134	mg/kg dry	5	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		97.9 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		82.3 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	10100	269	mg/kg dry	5	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

% Moisture	7.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	
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American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 1 (6')
6127004-05 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	ND	0.0227	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	ND	0.0455	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	0.0402	0.0227	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	0.166	0.0455	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	0.0882	0.0227	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		115 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		114 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	134	28.4	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	624	28.4	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		83.4 %	70-130		P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		81.1 %	70-130		P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon	758	56.8	mg/kg dry	1	[CALC]	09/27/16	09/27/16	TPH 8015M	

GRO/DRO

General Chemistry Parameters by EPA / Standard Methods

% Moisture	12.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	
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American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 2 (1')
6127004-06 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	0.233	0.0230	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	0.937	0.0460	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	3.22	0.0230	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	8.66	0.0460	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	3.73	0.0230	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		108 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		189 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	S-GC
Gasoline Range Organics	391	28.7	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	1160	28.7	mg/kg dry	1	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		89.0 %	70-130		P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		90.6 %	70-130		P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	1550	57.5	mg/kg dry	1	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

Chloride	35.1	28.7	mg/kg dry	25	P612802	09/28/16	09/30/16	EPA 300.0	
% Moisture	13.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	

American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 2 (2')
6127004-07 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	2.77	0.281	mg/kg dry	250	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	18.7	0.562	mg/kg dry	250	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	35.0	0.281	mg/kg dry	250	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	97.6	0.562	mg/kg dry	250	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	35.2	0.281	mg/kg dry	250	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		84.2 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		113 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	7550	281	mg/kg dry	10	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	11700	281	mg/kg dry	10	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		124 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		84.8 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	19200	562	mg/kg dry	10	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

Chloride	52.2	1.12	mg/kg dry	1	P612802	09/28/16	09/30/16	EPA 300.0	
% Moisture	11.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	

American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 2 (3')
6127004-08 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	1.50	0.111	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	12.6	0.222	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	16.6	0.111	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	47.0	0.222	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	17.1	0.111	mg/kg dry	100	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		59.1 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	S-GC
<i>Surrogate: 1,4-Difluorobenzene</i>		96.7 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	5810	278	mg/kg dry	10	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	8620	278	mg/kg dry	10	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		97.8 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		79.3 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	14400	556	mg/kg dry	10	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

Chloride	ND	1.11	mg/kg dry	1	P612901	09/29/16	09/30/16	EPA 300.0	
% Moisture	10.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	

American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 2 (4')
6127004-09 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	1.11	0.0241	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	6.70	0.0482	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	7.10	0.0241	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	19.5	0.0482	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	7.41	0.0241	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		69.0 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	S-GC
<i>Surrogate: 1,4-Difluorobenzene</i>		109 %		75-125	P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	5770	151	mg/kg dry	5	P612703	09/27/16	09/27/16	EPA 8015M	
Diesel Range Organics	8790	151	mg/kg dry	5	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		107 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		83.2 %		70-130	P612703	09/27/16	09/27/16	EPA 8015M	
Total Petroleum Hydrocarbon GRO/DRO	14600	301	mg/kg dry	5	[CALC]	09/27/16	09/27/16	TPH 8015M	

General Chemistry Parameters by EPA / Standard Methods

% Moisture	17.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	
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American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Trench 2 (6')
6127004-10 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Permian Basin Environmental Lab, L.P.

Organics by GC

Benzene	ND	0.0225	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Toluene	ND	0.0449	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Ethylbenzene	0.181	0.0225	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (p/m)	0.531	0.0449	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
Xylene (o)	0.194	0.0225	mg/kg dry	20	P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 1,4-Difluorobenzene</i>		114 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
<i>Surrogate: 4-Bromofluorobenzene</i>		96.0 %	75-125		P612705	09/27/16	09/27/16	EPA 8021B	
Gasoline Range Organics	243	28.1	mg/kg dry	1	P612803	09/27/16	09/28/16	EPA 8015M	
Diesel Range Organics	731	28.1	mg/kg dry	1	P612803	09/27/16	09/28/16	EPA 8015M	
<i>Surrogate: 1-Chlorooctane</i>		80.0 %	70-130		P612803	09/27/16	09/28/16	EPA 8015M	
<i>Surrogate: o-Terphenyl</i>		80.0 %	70-130		P612803	09/27/16	09/28/16	EPA 8015M	
Total Petroleum Hydrocarbon	974	56.2	mg/kg dry	1	[CALC]	09/27/16	09/28/16	TPH 8015M	

GRO/DRO

General Chemistry Parameters by EPA / Standard Methods

% Moisture	11.0	0.1	%	1	P612801	09/28/16	09/28/16	% calculation	
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Organics by GC - Quality Control
Permian Basin Environmental Lab, L.P.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch P612705 - General Preparation (GC)

Blank (P612705-BLK1)		Prepared & Analyzed: 09/27/16								
Benzene	ND	0.00100	mg/kg wet							
Toluene	ND	0.00200	"							
Ethylbenzene	ND	0.00100	"							
Xylene (p/m)	ND	0.00200	"							
Xylene (o)	ND	0.00100	"							
Surrogate: 1,4-Difluorobenzene	0.0581		"	0.0500		116	75-125			
Surrogate: 4-Bromofluorobenzene	0.0595		"	0.0500		119	75-125			

LCS (P612705-BS1)		Prepared & Analyzed: 09/27/16								
Benzene	0.107	0.00100	mg/kg wet	0.100		107	70-130			
Toluene	0.103	0.00200	"	0.100		103	70-130			
Ethylbenzene	0.106	0.00100	"	0.100		106	70-130			
Xylene (p/m)	0.233	0.00200	"	0.200		116	70-130			
Xylene (o)	0.121	0.00100	"	0.100		121	70-130			
Surrogate: 4-Bromofluorobenzene	0.0578		"	0.0500		116	75-125			
Surrogate: 1,4-Difluorobenzene	0.0541		"	0.0500		108	75-125			

LCS Dup (P612705-BSD1)		Prepared & Analyzed: 09/27/16								
Benzene	0.117	0.00100	mg/kg wet	0.100		117	70-130	8.68	20	
Toluene	0.117	0.00200	"	0.100		117	70-130	12.3	20	
Ethylbenzene	0.117	0.00100	"	0.100		117	70-130	9.10	20	
Xylene (p/m)	0.234	0.00200	"	0.200		117	70-130	0.474	20	
Xylene (o)	0.130	0.00100	"	0.100		130	70-130	7.47	20	
Surrogate: 1,4-Difluorobenzene	0.0614		"	0.0500		123	75-125			
Surrogate: 4-Bromofluorobenzene	0.0605		"	0.0500		121	75-125			

Matrix Spike (P612705-MS1)		Source: 6127001-02		Prepared: 09/27/16		Analyzed: 09/28/16			
Benzene	0.184	0.00120	mg/kg dry	0.241	ND	76.5	80-120		QM-07
Toluene	0.175	0.00241	"	0.241	0.00124	72.2	80-120		QM-07
Ethylbenzene	0.167	0.00120	"	0.241	0.00206	68.5	80-120		QM-07
Xylene (p/m)	0.319	0.00241	"	0.482	0.00280	65.6	80-120		QM-07
Xylene (o)	0.186	0.00120	"	0.241	0.00143	76.5	80-120		QM-07
Surrogate: 1,4-Difluorobenzene	0.0603		"	0.0602		100	75-125		
Surrogate: 4-Bromofluorobenzene	0.0700		"	0.0602		116	75-125		

American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

Organics by GC - Quality Control
Permian Basin Environmental Lab, L.P.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch P6I2705 - General Preparation (GC)

Matrix Spike Dup (P6I2705-MSD1)

Source: 6I27001-02

Prepared: 09/27/16

Analyzed: 09/28/16

Benzene	0.198	0.00120	mg/kg dry	0.241	ND	82.1	80-120	7.01	20	
Toluene	0.187	0.00241	"	0.241	0.00124	77.0	80-120	6.44	20	QM-07
Ethylbenzene	0.172	0.00120	"	0.241	0.00206	70.7	80-120	3.15	20	QM-07
Xylene (p/m)	0.326	0.00241	"	0.482	0.00280	67.2	80-120	2.39	20	QM-07
Xylene (o)	0.209	0.00120	"	0.241	0.00143	86.0	80-120	11.8	20	
Surrogate: 1,4-Difluorobenzene	0.0623		"	0.0602		103	75-125			
Surrogate: 4-Bromofluorobenzene	0.0750		"	0.0602		124	75-125			

American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Permian Basin Environmental Lab, L.P.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch P6I2801 - *** DEFAULT PREP ***										
Blank (P6I2801-BLK1)	Prepared & Analyzed: 09/28/16									
% Moisture	ND	0.1	%							
Duplicate (P6I2801-DUP1)	Source: 6I27006-04 Prepared & Analyzed: 09/28/16									
% Moisture	11.0	0.1	%		11.0			0.00	20	
Duplicate (P6I2801-DUP2)	Source: 6I27015-05 Prepared & Analyzed: 09/28/16									
% Moisture	7.0	0.1	%		7.0			0.00	20	
Duplicate (P6I2801-DUP3)	Source: 6I26001-15 Prepared & Analyzed: 09/28/16									
% Moisture	12.0	0.1	%		12.0			0.00	20	
Batch P6I2802 - *** DEFAULT PREP ***										
Blank (P6I2802-BLK1)	Prepared: 09/28/16 Analyzed: 09/30/16									
Chloride	ND	1.00	mg/kg wet							
LCS (P6I2802-BS1)	Prepared: 09/28/16 Analyzed: 09/30/16									
Chloride	367	1.00	mg/kg wet	400		91.8	80-120			
LCS Dup (P6I2802-BSD1)	Prepared: 09/28/16 Analyzed: 09/30/16									
Chloride	374	1.00	mg/kg wet	400		93.4	80-120	1.69	20	
Duplicate (P6I2802-DUP1)	Source: 6I26001-15 Prepared: 09/28/16 Analyzed: 09/30/16									
Chloride	6510	28.4	mg/kg dry		6280			3.51	20	
Duplicate (P6I2802-DUP2)	Source: 6I27015-03 Prepared: 09/28/16 Analyzed: 09/30/16									
Chloride	1010	5.38	mg/kg dry		785			25.0	20	R3

American Safety Services, Inc
 8715 Andrews Hwy
 Odessa TEXAS, 79765

Project: Fair Oil Parakeet 29 #1
 Project Number: [none]
 Project Manager: Thomas Franklin

Fax: (432) 363-0198

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Permian Basin Environmental Lab, L.P.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch P6I2802 - * DEFAULT PREP *****

Matrix Spike (P6I2802-MS1)	Source: 6I26001-15			Prepared: 09/28/16 Analyzed: 09/30/16						
Chloride	8230	28.4	mg/kg dry	2270	6280	85.8	80-120			

Batch P6I2901 - * DEFAULT PREP *****

Blank (P6I2901-BLK1)	Prepared & Analyzed: 09/29/16									
Chloride	ND	1.00	mg/kg wet							

LCS (P6I2901-BS1)	Prepared & Analyzed: 09/29/16									
Chloride	418	1.00	mg/kg wet	400		104	80-120			

LCS Dup (P6I2901-BSD1)	Prepared & Analyzed: 09/29/16									
Chloride	420	1.00	mg/kg wet	400		105	80-120	0.504	20	

Duplicate (P6I2901-DUP1)	Source: 6I27004-08			Prepared: 09/29/16 Analyzed: 09/30/16						
Chloride	ND	1.11	mg/kg dry		ND				20	

Duplicate (P6I2901-DUP2)	Source: 6I28005-04			Prepared & Analyzed: 09/29/16						
Chloride	ND	11.4	mg/kg dry		ND				20	

Notes and Definitions

S-GC	Surrogate recovery outside of control limits. The data was accepted based on valid recovery of the remaining surrogate.
R3	The RPD exceeded the acceptance limit due to sample matrix effects.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By:



Date:

10/5/2016

Brent Barron, Laboratory Director/Technical Director

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-686-7235.



APPENDIX E

Initial C-141

SEP 19 2016

Form C-141
Revised August 8, 2011

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

RECEIVED appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB 1026 357136 OPERATOR Initial Report Final Report

Name of Company Fair Oil, Ltd. <u>05531</u>	Contact Rodney Thomson
Address P.O. Box 689, Tyler Texas 75710.	Telephone No. 903-510-6527
Facility Name Parakeet Federal 29	Facility Type Tank Battery
Surface Owner BLM	Mineral Owner BLM
API No. 30-015-35140	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	29	19S	27E	1535	South	662	East	Eddy

Latitude 32.628530 Longitude 104.294630

NATURE OF RELEASE

Type of Release Oil	Volume of Release 150 bbls	Volume Recovered 0
Source of Release Storage Tank	Date and Hour of Occurrence 09-18-16	Date and Hour of Discovery 9-18-16 8:00 am
Was Immediate Notice Given? Required <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not	If YES, To Whom? BLM called on 9-18-16 at 9:56 am, no answer, left voice message	
By Whom? Rodney Thomson	Date and Hour 9-18-16 9:56 am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* Hole in storage tank, all fluid contained within the firewall, switched to other production tank.		
Describe Area Affected and Cleanup Action Taken.* Area within firewall. Will consult with BLM and OCD for required cleanup action		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" 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, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <u>Rodney Thomson</u>	OIL CONSERVATION DIVISION	
Printed Name: Rodney K Thomson	Signed By: <u>White</u> Approved by Environmental Specialist	
Title: Production Manager	Approval Date: <u>9/19/16</u>	Expiration Date: <u>N/A</u>
E-mail Address: rodney.thomson@fairoil.com	Conditions of Approval: <input checked="" type="checkbox"/> Remediation per O.C.D. Rules & Guidelines <input type="checkbox"/> COMMIT REMEDIATION PROPOSAL NO	
Date: 9-19-16 Phone: 903-510-6527	ATER THAN: <u>10/20/16</u>	

* Attach Additional Sheets If Necessary

2RP-3897