

**Bratcher, Mike, EMNRD**

30-005-64041

**From:** Cindy Crain [cindy.crain@gmail.com]  
**Sent:** Tuesday, September 15, 2009 1:47 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** mymerch@penrocoil.com  
**Subject:** Alternate Plan of Closure - McKay Lookout C Federal #8  
**Attachments:** Closure Plan.doc

Mike,

With regard to our conversation earlier today regarding closure of the McKay Lookout C Federal #8 reserve pit, alternate closure methods of waste excavation and removal will be utilized for the final closure of the pit.

The site is located in Unit Letter H, Section 9, Township 6 South, Range 22 East, Chaves County, New Mexico. The API # is 30-005-64041.

Attached please find a CLOSURE PLAN for WASTE EXCAVATION AND REMOVAL, that outlines the Protocols and Procedures for Sampling, Disposal, Soil Backfill and Site Reclamation.

Ocotillo Environmental plans to begin excavation and disposal of the pit contents on Monday, September 21, 2009.

If you have any questions or need additional information please let me know.

Thank you,

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Cindy Crain  
Environmental Manager

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McKAY OIL CORPORATION

LOOKOUT C FEDERAL #8

CLOSURE PLAN – WASTE EXCAVATION AND REMOVAL

**Protocols and Procedures, Sampling, Disposal, Soil Backfill and Site Reclamation**

The reserve drilling pit at the McKay Oil Corporation, Lookout C Federal #8 site, will be closed by waste excavation and removal methods. The bottom of the pit is at a depth of approximately seven (7) feet below ground surface. Depth to groundwater at the site is approximately 350 feet, and the surface is Federally owned.


The contents of the drilling pit and the pit liner will be removed from the site and taken to disposal at Gandy-Marley (Permit Number: NM-711-01-0020).

A five-point composite sample will be collected from the bottom of the pit, below the liner, and submitted to an NMOCD approved laboratory for analysis of BTEX, TPH and chlorides. Upon receipt of laboratory confirmation from the soil sample that benzene is less than 0.2 mg/kg, total BTEX is less than 50 mg/kg, TPH is less than 2500 mg/kg, GRO and DRO is less than 500 mg/kg, and chloride is less than 3000 mg/kg, the pit will be backfilled with clean soil from the original pit excavation.

If the composite sample reports BTEX, TPH or chloride concentrations above the NMOCD clean up requirements, additional soil will be removed from the bottom of the pit until a laboratory sample confirms that BTEX, TPH and chloride concentrations are below the State requirements.

The pit will be backfilled to a depth of approximately one (1) foot below ground surface and compacted. One (1) foot of topsoil will be placed above the compacted soil and contoured to surface grade. The entire area will be re-seeded with a native grass seed mixture (per BLM specifications).

A final report will be submitted to the NMOCD within 60 days of completion of closure activities.

 **NOTE:** Reporting requirements for chloride levels is 1000 mg/kg. In the event the pit bottom sample exceeds this number, a form C-141 is to be submitted to the District Office.

*Mike Bratcher*  
*NMOCD District 2*