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1 LOVINGTON PADDOCK UNIT WELL #21 PROJECT PLAN (PJP)

This plan investigated the vertical extents of secondary injection fluid contamination, i.e., saline produced water and residual crude oil, at the Pure Resources Lovington Paddock Unit Well #21 release site approximately 7 miles south of Lovington, New Mexico. Five soil borings were advanced and discretely sampled at 5 feet below ground surface ('bgs) intervals and analyzed to identify concentration gradients for the "Constituents of Concern" (CoC), i.e., Total Petroleum Hydrocarbon using EPA Method 8015M (TPH^{8015m}), Benzene, Toluene, Ethylbenzene, m,p,o-Xylenes, and Chloride. Acceptability of the delineation concentrations are based on thresholds and protocols provided by the New Mexico Oil Conservation Division (NMOCD) guidelines.

1.1 Site Description

The site is located -7-miles south of Lovington. New Mexico on land owned by the City of Lovington. Annotated aerial and topographical maps are included in Attachment I.

1.1.1 Historical Use

This land surface is used for livestock grazing and oil and gas production facilities access roads.

1.1.2 Photographic documentation

Photographs of the site are included in Attachment II.

1.1.3 Ecological Description

The area is typical of the northern most extent of the Upper Chihuahuan Desert Biome consisting primarily of Honey Mesquite (Prosopis glandulosa) and typical desert grasses and weeds. Mammals present, include Orrd's and Merriam's Kangaroo Rat, Deer Mouse, White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit (Lepus californicus), and the occasional Pronghorn Antelope. Reptiles, Amphibians, and Birds are numerous and typical of area. While a biotic survey was not conducted, Listed, Threatened, or Endangered species are not known to exist in this immediate area.

1.1.4 Environmental Media Characterization

Chemical parameters of the soil will be characterized consistent with the New Mexico Oil Conservation Division (NMOCD) guidelines published in the following documents;

- Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- Unlined Surface Impoundment Closure Guidelines (February 1993)

Site Ranking and acceptable "Site Specific" thresholds for contaminants of concern (CoCs), i.e., soil TPH^{8015m}, Benzene, BTEX (mass sum of Benzene, Toluene, Ethyl Benzene, and m, p, and o Xylenes), and soil Chloride, will be determined based on the following;

- Depth to Ground water, i.e., distance from the lower most acceptable concentration to the ground water.
- Wellhead Protection Area, i.e., distance from fresh water supply wells.
- Distance to Surface Water Body, i.e., horizontal distance to all down gradient surface water bodies.

1.1.4.1 Ground Water Level

The New Mexico State Engineer's Office (NMSEO) and the New Mexico Tech Geo-Information system ground water level on-line databases showed five wells in the southern half of Section 36 with an average water level of 51:44.bgs.? The City of Lovington currently produce 2 wells approximately 0.5 miles northwest of the site and were drilled to a depth of 256 and 257'bgs. The water levels provided by the database are reported as the same and cannot be correct and are not used in the average calculation. A simple average of the ground water levels of the wells in Sections 36, 25, and 26 is 57.9'bgs.

Well Number	Source	Tws	Rng	Sec	Easting	Northing	Date	Well Depth	Water Level
L 01350 APPRO	Shallow	16S	36E	36	658945	3638695	1/11/1952	110	55
L 01371 APPRO	Shallow	165	36E	36	658644	3638187	2/22/1952	115	45
L 01438 APPRO	Shallow	16S	36E	36	658545	3638288	5/8/1952	110	45
L 01557 APPRO	Shallow	16S	36E	36	657836	3638176	8/25/1952	110	40
L 04058 (EXPLORE		16S	36E	36	657827	3639178		230	
L 04058 (EXPLORE)		16S	36E	36	657823	3639579		230	
L 04058 S-24	Shallow	16S	36E	36	657823	3639579	4/4/2000	257	257?
L 04058 S-25	Shallow	16S	36E	36	657827	3639178	4/10/2000	256	256?
8774		16S	36E	36			1961		72.69
8816		16S	36E	36			1961	150	70.94
L 02507 APPRO	Shallow	16S	36E	25	657705	3641089	3/8/1954	110	52
L 03031	Shallow	16S	36E	26	657415	3639772	11/23/1955	115	60
L 03627	Shallow	165	36E	26	656609	3639757	7/30/1957	98	65
8896		16S	36E	25			1961	126	65.38
8945		16S	36E	25			1961		65.95
						AVER	AGE WATER	LEVEL	57.905

1.1.4.2 Depth to Ground Water Calculation

According to the NMOCD Guidelines, depth to ground water (DtoGW) is defined as the "the vertical distance from the lowermost contaminants (LC) to the seasonal high water elevation of the ground water (WL)." TPH^{8015m} above 1000 mg/Kg was detected down to 2'bgs; therefore, the calculated depth to ground water is 55.9'bgs.

$$57.9 ft^{WL} - 2 ft^{LC} = 55.9 ft^{DioGW}$$

1.1.4.3 Ground Water Gradient

Based on available information, the gradient is to the east southeast.

1.1.4.4 Wellhead Protection Area

There are no public water supply wells located within 1,000 horizontal feet of the site. There are two City of Lovington municipal water supply wells located within 2,500 feet to the north and west of the site.

1:1.4.5 Distance to Nearest Surface Water Body

There are no naturally occurring surface water bodies located within a 1-mile radius of the site.

1.1.4.6 Soil Assessment

Soil samples were collected at 5 strategically located locations within the spill pooling areas. The sample locations are noted on the site map included in Attachment I.

1.1.4.7 Ground Water Assessment

The ground water level is conservatively estimated to occur at -58'bgs. The soil investigation did not warrant ground water assessment.

1.1.5 NMOCD Site Rank and Remedial Goals

Based on the site information, the site has a ranking of 10 points and the respective remedial goals/thresholds for the Constituents of Concern (CoCs). The Chloride remedial goal cannot

exceed a soil concentration capable of impacting ground water above the New Mexico Water Quality Control Commission (WQCC) standard of 250 mg/Liter.

1. Groun	d Water	2. We	ellhead Protection Area	3. Distance to Surface Water Body
If Depth to C feet: 20 point If Depth to C	GW 50 to		rom water source, or; private domestic water paints	<200 horizontal feet: 20 points 200-100 horizontal feet: 10
99 feet: 10 p	oints	source. 20	<i>p</i> 0 <i>t m s</i>	points
If Depth to C feet: 0 points			rom water source, or; >200' re domestic water source: 0	>1000 horizontal feet: 0 points
Ground water	Score = 10	Wellhead P	rotection Area Score= 0	Surface Water Score= 0
Site Rank (1+	(2+3) = = 1	0 points		
Total Site Ra	nking Score :	and Acceptal	ole Concentrations	
Parameter	>19(Soil	>8'bgs)	10-19(Soil from 0 to 8'bgs)	0-9 (Not Applicable)
Benzene ¹	10 p	pm	10 ppm	10 ppm
BTEX	50 p	pm	50 ppm	50 ppm
ТРН	100	ppm	1000 ppm	5000 ppm
100 ppm fiel	ld VOC head	space measur	rement may be substituted for	lab analysis

2 LOVINGTON PADDOCK UNIT WELL #21 INVESTIGATION REPORT

On November 11, 2002, Environmental Plus, Inc. (EPI) personnel, with the assistance and direction of Pure Resources, implemented the Project Plan and collected subsurface soil samples at the Lovington Paddock Unit Well #21. The Borehole Map and annotated topographical and aerial maps of the Lovington Paddock Unit Well #21 site are included in Attachment I, photographs in Attachment II, and the original analytical reports are included in Attachment III along with a data summary.

2.1 Analytical Results

The soil borings were advanced in areas considered to be the most contaminated, i.e., fluid pooling areas with the longest residence times. The results are discussed and illustrated below. The analytical reports are summarized and included in Attachment III.

2.1.1 Borehole #1 (BH1)

BH1 was advanced adjacent to the leak origin. TPH^{8015m} was monitored at 1,240 mg/Kg from 0-2 'bgs and 91.6 mg/Kg from 5-7 'bgs. Benzene and BTEX were detected but not above the NMOCD remedial goals. Chloride was monitored at 10,637 mg/Kg in the 0-2'bgs sample and 736 mg/Kg in the 5-7'bgs sample. The 10-12'bgs and 15-17'bgs samples were <100 mg/Kg.

2.1.2 Borehole #2 (BH2)

BH2 was advanced in a pooling area east of the leak origin between BH1 and BH3. TPH^{8015m} was monitored at 143 mg/Kg from 0-2'bgs and non-detectable at 5-7'bgs. Benzene and BTEX were detected but nominally. Chloride was monitored at 19,594 mg/Kg in the 0-2'bgs sample and <250 mg/Kg at the other intervals to 17'bgs.

2.1.3 Borehole #3 (BH3)

BH3 was advanced in a pooling area at the east extent of the spill area. TPH^{8015m}, Benzene, and BTEX were not detected above the instrument detection limits down to 15'bgs. The Chloride gradient was monitored at 9,917 mg/Kg in the 0-2'bgs sample, 592 mg/Kg at the 10-12'bgs interval, and at 96 mg/Kg from 15-17'bgs.

2.1.4 Borehole #4 (BH4)

BH4 was advanced midway between BH1 and BH5 in the west flowpath pooling area. Nominal detections of TPH^{8015m}, Benzene, and BTEX were monitored from 0-2'bgs and not detected at 5, 10, and 15'bgs. Chloride was monitor at 8,397 mg/Kg in the near surface, i.e., 0-2'bgs sample and <250 mg/Kg at 5, 10, and 15'bgs.

2.1.5 Borehole #5 (BH5)

BH5 was advanced in the west most pooling area of the west flow path. TPH^{8015m}, Benzene, and BTEX were not detected at the surface, 5, 10, or 15'bgs intervals. Chloride was monitored at 18,794 mg/Kg in the near surface, i.e., 0-2'bgs sample and <250 mg/Kg at 5, 10, and 15'bgs.





2.2 Discussion of Hydrocarbon Data

TPH^{8015m} in the area of the leak origin exceeds the 1,000 mg/Kg NMOCD remedial goal at the 0-2'bgs interval at BH1. Benzene and BTEX were not detected above the remedial goals, i.e., 10 mg/Kg and 50 mg/Kg, respectively.

2.3 Discussion of Chloride Data

Chloride contamination concentrations >250 mg/Kg were monitored as follows;

- BH1 5-7'bg
- BH2 0-2'bgs
- BH3 10-12'bgs
- BH4 0-2'bgs
- BH5 0-2'bgs

2.4 Conclusions

Based on the information collected during this investigation it is concluded that;

- TPH^{8015m} contamination in excess of the NMOCD Guideline remedial goal of 1,000 mg/Kg occurs in BH1, the area of the leak origin, down to 2'bgs.
- Benzene and BTEX residuals at all locations are below the remedial goals of 10 and 50 mg/Kg, respectively.
- Chloride residual in excess of 250 mg/Kg occurs from the surface to 2'bgs through out the site, from the surface to 7'bgs in the area of BH1 near the leak origin, and from the surface to 12'bgs in the area of BH3.

2.5 Remediation Proposal

It is not feasible to blend the near surface soil with clean soil to achieve the remedial goals for the TPH^{8015m} and Chloride source terms because of the extremely high Chloride concentrations and, given that the site is located within the City of Lovington's water well field, leaching or rinsing the Chloride into the subsurface to restore the surface is not feasible because of the potential to impact the ground water above the New Mexico Water Quality Control Commission standard of 250 mg/L.

It is proposed to excavate and dispose of the impacted soil down to 2'bgs. The remaining soil contaminated above the NMOCD remedial guidelines in the areas of BH1 and BH3 will be excavated and blended with local clean soil to acceptable levels and placed back into the excavated areas. Clean soil will be used to replace the hauled soil and bring the excavation to grade. After contouring the site will be reseeded.

2.6 Lovington Paddock Unit Well #21 Site Information and Metrics Summary

Sumr	nary					
Pure Resource	es	Inci	dent Date	and NMOCI	D Notifie	d?
	ion and Metrics		5-03	NMOCD r	notified in	mmediately (on call pager)
SITE: Lovi	ngton Paddock Unit	We	ll #21 Inj.	Line	Assigne	d Site Reference #: 12603
Company: 1	Pure Resources, Inc					
Street Addres	s: Hobbs Highwa	y sou	th of Lov	ington, NM		
Mailing Addr	ess: P.O. Box 609					
City, State, Z	ip: Lovington,	NM	88260			
	e: Mike Northcutt					
		5.39	6.7503			
Telephone:	5	05.3	90.1090			
P '1 1	released (bbls):	30)	Recovered (bbls): 🕻	130
> 2	released (bbls): 5 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -) ver	bally within	24 hrs and sub	mit form C	C-141 within 15 days.
	(Also appli	es to	unauthorize	d releases >500	mcf Natur	al Gas)
5-25 bbls: Sub	mit form C-141 within	15 d	ays (Also a	pplies to unaut	Wall #21	eases of 50-500 mcf Natural Gas)
	r Pit (LSP) Name:				well #21	III). Line
	tamination: Steel					
USP Dimensio	i.e., BLM, ST, Fee, ons ~70' x 410'	Oth	er: City o	or Lovington		
LSP Area:	$\frac{5 \text{ ns}}{12.286 \text{ ft}}$					
	eference Point (RP					
	ance and direction		DD			
	<u>32° 52' 45:65"N</u>		<u>K</u> r			
	1 <u>03° 18' 22.77"</u> W					
	ve mean sea level:		3,835'ams			
	th Section Line		5,655 ams			
	st Section Line					
	$\frac{\text{st Section Line}}{\text{it or }\frac{14}{4}\text{:} SW\frac{1}{4} \text{ o}}$	<u>f</u> tha	NE14		Unit I	Letter: VG
Location- Sec		1 the	IN L 74			
Location- To						
Location- Rai						
EUcation- ital	1ge. (291					
Surface water	body within 1000	rad	ius of site	: None		
	er wells within 100					
	water wells within 1					
	supply wells within					
Public water	supply wells within	100	0' radius o	of site:		· · · ·
	and surface to grou					
Depth of con	tamination (DC) –	2'bg	<u> </u>			
Depth to grou	und water (DG – D	C = 0	DtGW) -{	56'bgs		
	ound Water			ad Protection	n Area	3. Distance to Surface Water
		_				Body 200 horizontal facts 20 horizontal
If Depth to GW <5			300 from wate estic water sour	r source, or,<200' fr	om private	<200 horizontal feet: 20 points
	to 99 feet: 10 points			r source, or; >200' f	iom primte	200-100 horizontal feet: 10 points
If Depth to GW >1	00 feet: 0 points		estic water sour		rom private	>1000 horizontal feet: 0 points
Ground water Score	= 10	Well	head Protection.	Area Score= 0		Surface Water Score= 0
Site Rank (1+2+3) =						
Total Site Ra	nking Score and Ac	cept	able Conc	entrations		
Parameter	>19			10-19		0-9
Benzene	10 ppm			10 ppm		10 ppm
BTEX'	50 ppm			50 ppm		50 ppm
ТРН	100 ppm			1000 ppm		5000 ppm
100 ppm fie	d VOC headspace 1	neast	irement m	ay be substit	uted for l	ab analysis



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Attachment II: Photographs







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Attachment III: Analytical Reports

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				Lovington Pac	RESO									
					voc	GRO ³	DRO ⁴	TPH ⁵	BTEX	Benzene	Toluene	Ehtyl	m,p,o-	Chlorid
Sample	Sampling Interval	SAMPLE ID#	Sample Date	Lithology	Headspace		5.10		strument [Detection Lin	nits and Un	Benzene	Xylene	
Area	(FT. BGS ¹)	SILVIT ELS ID#	Sample Date	Littiology		10.0	10.0		r	0.005	0.005	0.005	0.025	1.0
	()				ppm	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/K
	0-2	SPRLP212703BH1-2'	2/7/2003	Tan sand/Indurated sandstone/Caliche	9.0	10	1230	1240	0.384	0.037	0.101	0.100	0.146	1063
BH1	5-7	SPRLP212703BH1-5'	2/7/2003	Tan sand/Indurated sandstone/Caliche	1.1	10	10	91.6	0.194	0.005	0.011	0.056	0.122	736
	10-12	SPRLP212703BH1-10'	2/7/2003	Tan sand/Indurated sandstone/Caliche	2.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	96
	15-17	SPRLP212703BH1-15'	2/7/2003	Tan Sand Fine	3.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	80
	0-2	SPRLP212703BH2-2'	2/7/2003	Dark Brown Clayey Loam	1.6	10	133	143	0.278	0.024	0.086	0.069	0.099	19594
BH2	5-7	SPRLP212703BH2-5'	2/7/2003	Tan sand/Indurated sandstone/Caliche	1.4	10	10	20	0.030	0.005	0.005	0.005	0.015	176
	10-12	SPRLP212703BH2-10'	2/7/2003	Tan sand/Indurated sandstone/Caliche	0.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	128
	15-17	SPRLP212703BH2-15'	2/7/2003	Tan Sand Fine	1.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	96
	0-2	SPRLP212703BH3-2'	2/7/2003	Tan sand/Indurated sandstone/Caliche	8.7	10	10	20	0.159	0.016	0.056	0.034	0.053	9917
BH3	5-7	SPRLP212703BH3-5'	2/7/2003	Tan sand/Indurated sandstone/Caliche	2.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	992
ĺ	10-12	SPRLP212703BH3-10'	2/7/2003	Tan Sand Fine	1.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	592
	15-17	SPRLP212703BH3-15'	2/7/2003	Tan Sand Fine	0.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	96
	0-2	SPRLP2121003BH4-2'	2/10/2003	Tan sand/Indurated sandstone/Caliche	6.5	10	163	173	0.134	0.031	0.053	0.021	0.029	8397
BH4	5-7	SPRLP2121003BH4-5'	2/10/2003	Tan sand/Indurated sandstone/Caliche	2.0	10	10	20	0.030	0.005	0.005	0.005	0.015	160
ſ	10-12	SPRLP2121003BH4-10'	2/10/2003	Fine Brown Sand	1.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	192
	15-17	SPRLP2121003BH4-15'	2/10/2003	Tan Sand Fine	0.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	80
	0-2	SPRLP2121003BH5-2'	2/10/2003	Tan sand/Indurated sandstone/Caliche	6.3	10	10	20	0.081	0.013	0.026	0.015	0.027	18794
BH5	5-7	SPRLP2121003BH5-5'	2/10/2003	Tan Sand Fine	3.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	128
	10-12	SPRLP2121003BH5-10'	2/10/2003	Fine Brown Sand	2.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	160
	15-17	SPRLP2121003BH5-15	2/10/2003	Tan Sand Fine	1.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	192

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E PURE



F PURE



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOB85, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO: (505) 394-2601

Receiving Date: 02/11/03 Reporting Date: 02/12/03 Project Owner: PURE RESOURCES Project Name: LOVINGTON PADDOCK WELL #21 Project Location: NOT GIVEN Sampling Date: 02/07 & 02/10/03 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC

		GRO	DRO			ETHYL	TOTAL
LAB NO.	SAMPLE ID	$(C_{6}-C_{10})$	(>C10-C28)	BENZENE	TOLUENE	BENZENE	XYLENES
		(mg/Kg)	(mg/Kg)	(m g/Kg)	(mg/K g)	(mg/Kg)	(mg/Kg)
ANALYSIS	DATE:	02/11/03	02/11/03	02/11/03	02/11/03	02/11/03	02/11/03
H7469-1	SPRLPW212703BH1-2'	<10.0	1230	0.037	0,101	0.100	0.146
H7469-2	SPRLPW212703BH1-5'	<10.0	91.6	<0.005	0.011	0.056	0.122
H7469-5	SPRLPW212703BH2-2'	<10.0	133	0.024	0.086	0.069	0.099
H7469-6	SPRLPW212703BH2-5'	<10.0	<10.0	< 0.005	<0.005	<0.005	<0.015
H7469-9	SPRLPW212703BH3-2'	<10.0	<10.0	0.016	0.056	0.034	0.053
H7469-11	SPRLPW212703BH4-2'	<10.0	163	0.031	0.053	0.021	0.029
H7469-12	SPRLPW212703BH4-5'	<10.0	<10.0	< 0.005	<0.005	<0.005	<0.015
H7469-15	SPRLPW212703BH5-2'	<10.0	<10.0	0.013	0.026	0.015	0.027
Quality Co	ntrol	834	801	0,107	0.104	0.107	0.306
True Value	QC	800	800	0.100	0.100	0.100	0.300
% Recover	γ .	104	100	107	104	107	102
Relative P	ercent Difference	4,4	2.2	2.2	3.3	2.9	3.3

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260,

alt Burgess J. A. Cooke. Ph. D.

<u>2/(2/03</u>

H7469B.XLS

PLEASE NOTE: Liability and Damages. Cardinal's lability and client's exclusive remedy for any claim assing, whether based in contract or tart, shall be limited to the amount part by direct for analyses AP clams, including those for regignence and any other cesses whetherever shall be deemed wated unders made in writing and received by Cardinal within biliny (30) days after comprehent for analyses service. In or event shall Cardinal be table to instrumentation consequentiation contract, basiness interruptions, loss of uses or loss of profile incurred by direct the subsidiariles. affliates or successors analing out of at related to the performance of services menual to gardinals whether such claim is based upon any of the assore statements.

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	. 394-3471 Fix # 505				****		مسننيه		s .:	· · · · ·		1			1	1							
ct 9:	Project Owner					107	city				[·			[
	Low Aptor Deddock US						Star			Zipc													
ct Location						······	1) () ()	B :													1	
lor Hama:	Fordly Blan					*****	Far																L
		Τ.		<u> </u>	MAT	REL			SER	SAMPLE	٩G	$ \langle \langle $	27	<i></i>								ĺ	
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Attachment IV: New Mexico Office of the State Engineer Water Level Reports

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