



Electronic Correspondence

August 12, 2014

Dr. Tomas Oberding
State of New Mexico
Oil Conservation Division
1625 N. French Dr,
Hobbs, New Mexico 88240
tomas.oberding@state.nm.us

Re: Corrective Action Plan
LINN Energy, Sinagua 18 Fed #2
API No.: 30-025-32694
Legal: Unit J – Sec 18 – T20S – R34E – 2041 FSL, 2171 FEL - Lea Co., NM
GPS: 32.5714830169451, -103.598153358334

Dear Tomas:

Etech Environmental & Safety Solutions, Inc. (Etech) is pleased to submit the following corrective action plan on the aforementioned site for your review and approval.

Scope of Work

The scope of this project is for the remediation of a produced water/hydrocarbon impact. Completion of remediation will involve the following actions:

1. Placement of a one-call for utility location.
2. Excavation of impacted soils as far as practicable or until the chloride levels are less than 1,000 mg/kg and/or hydrocarbon levels of less than 5,000 mg/kg are reached. Preliminary assessment data indicated the chlorides exceeded regulatory threshold levels to a depth of 6 feet where refusal was encountered. Please note: The delineation data was collected from the lowest point in the impacted area where it was evident liquids had pooled. The assessment map includes the delineation data and the sampling points (SP's) that will be used to determine that the excavation has reached remediation objectives.
3. During the course of excavation soil samples will be screened on site to determine the progress of the remediation. Screening is achieved using a YSI chloride meter with a tolerance of +/- 6% which is the same tolerance as laboratory titration methods.
4. Once the screening determines the remediation objectives have been reached, confirmation samples will be collected from the bottom of the excavation to confirm that remediation goals have been reached. If the excavation depth is greater than 2 feet vertical, side wall samples will be collected as well.
5. If the results of analysis determine that the chloride levels are above regulatory threshold levels, additional excavation will be performed until the remediation objectives are met. It should be noted that due to the depth of the impact from the delineation, there may be

circumstance that arise where additional excavation is not practical. This includes reaching the limits of excavation with chlorides that are close to objective levels, safety issues such as the close proximity of equipment, or other site specific issues. In this event, it will be likely to install a liner or a layer of gypsum at the bottom of the excavation before backfilling.

6. Backfilling of the excavated area(s) will be achieved by placing clean fill similar to the existing material from the site to within 2 foot of the surface. The last two feet will be backfilled with top soil of similar configuration to the surrounding area and contoured to match the existing grade.
7. Where pad areas or interior areas of tank batteries are excavated, they will be backfilled to within 6 inches of surface then backfilled to grade with compacted caliche. Any firewalls or containment berms removed during remediation will be reinstalled.
8. The site will be seeded with a 50/50 mixture of BLM #2 and #4 seed. Seeding will take place when the seasonal conditions are conducive to maximizing the potential for seed germination. Actual seeding will be accomplished by broadcast or drilling; whichever is the most practical for the site.

Notifications and Special Conditions

1. The OCD and BLM will be notified prior to the commencement of on-site operations.
2. The OCD and BLM will be notified prior to each sampling event to allow the opportunity to witness the sampling events. Splits will be made available if requested.
3. The OCD and BLM (if applicable) will be notified when the site is closed for final inspection prior to seeding.
4. A final report documenting the closure of the site will be submitted along with a final C-141.

Thank you for your assistance on this matter. Should you have any questions, require additional information, or have any additional stipulations for this site, please contact Mr. Brian Wall at (575) 738-1739 (Office) or via email at bwall@linenergy.com or myself at (432) 563-2200 (office) or via email at Kit@etechnv.com.

Respectfully:



Kit Prichard
Environmental Professional

cc: Jeffery Robertson, BLM Carlsbad District Office

June 05, 2014

KIT PRICHARD

ETECH Environmental & Safety Solutions, Inc.

P. O. BOX 8469

MIDLAND, TX 79708

RE: SINAGUA 18 FED COM #2

Enclosed are the results of analyses for samples received by the laboratory on 05/29/14 16:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

ETECH Environmental & Safety Solutions, Inc.
KIT PRICHARD
P. O. BOX 8469
MIDLAND TX, 79708
Fax To: (432) 563-2213

Received:	05/29/2014	Sampling Date:	05/29/2014
Reported:	06/05/2014	Sampling Type:	Soil
Project Name:	SINAGUA 18 FED COM #2	Sampling Condition:	** (See Notes)
Project Number:	253-5063-000	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

Sample ID: SP 1 5-6' (H401656-03)

BTX 8021B			mg/L		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/05/2014	ND	1.98	98.9	2.00	1.28	
Toluene*	<0.050	0.050	06/05/2014	ND	2.15	108	2.00	3.58	
Ethylbenzene*	<0.050	0.050	06/05/2014	ND	1.94	97.0	2.00	2.80	
Total Xylenes*	<0.150	0.150	06/05/2014	ND	6.09	101	6.00	4.91	
Total BTX	<0.300	0.300	06/05/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 89.5-126

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	06/02/2014	ND	464	116	400	10.9	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/03/2014	ND	187	93.4	200	0.381	
DRO >C10-C28	21.9	10.0	06/03/2014	ND	205	103	200	1.81	

Surrogate: 1-Chlorooctane 126 % 65.2-140

Surrogate: 1-Chlorooctadecane 124 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

ETECH Environmental & Safety Solutions, Inc.
KIT PRICHARD
P. O. BOX 8469
MIDLAND TX, 79708
Fax To: (432) 563-2213

Received: 05/29/2014
Reported: 06/05/2014
Project Name: SINAGUA 18 FED COM #2
Project Number: 253-5063-000
Project Location: LEA COUNTY, NM

Sampling Date: 05/29/2014
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Jodi Henson

Sample ID: SP 2 5-6' (H401656-06)

BTX 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	1.50	0.500	06/05/2014	ND	1.98	98.9	2.00	1.28	
Toluene*	20.1	0.500	06/05/2014	ND	2.15	108	2.00	3.58	
Ethylbenzene*	33.7	0.500	06/05/2014	ND	1.94	97.0	2.00	2.80	
Total Xylenes*	90.6	1.50	06/05/2014	ND	6.09	101	6.00	4.91	
Total BTX	146	3.00	06/05/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.0 % 89.5-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	06/02/2014	ND	464	116	400	10.9		

TPH 8015M		mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	4960	100	06/03/2014	ND	187	93.4	200	0.381		
DRO >C10-C28	13500	100	06/03/2014	ND	205	103	200	1.81		

Surrogate: 1-Chlorooctane 204 % 65.2-140

Surrogate: 1-Chlorooctadecane 260 % 63.6-154

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 KIT PRICHARD
 P. O. BOX 8469
 MIDLAND TX, 79708
 Fax To: (432) 563-2213

Received:	05/29/2014	Sampling Date:	05/29/2014
Reported:	06/05/2014	Sampling Type:	Soil
Project Name:	SINAGUA 18 FED COM #2	Sampling Condition:	** (See Notes)
Project Number:	253-5063-000	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

Sample ID: SP 3 5-6' (H401656-09)

BTX 8021B		mg/L		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/05/2014	ND	1.98	98.9	2.00	1.28		
Toluene*	<0.050	0.050	06/05/2014	ND	2.15	108	2.00	3.58		
Ethylbenzene*	0.145	0.050	06/05/2014	ND	1.94	97.0	2.00	2.80		
Total Xylenes*	0.326	0.150	06/05/2014	ND	6.09	101	6.00	4.91		
Total BTX	0.471	0.300	06/05/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 118 % 89.5-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	144	16.0	06/02/2014	ND	464	116	400	10.9		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	24.7	10.0	06/03/2014	ND	187	93.4	200	0.381		
DRO >C10-C28	618	10.0	06/03/2014	ND	205	103	200	1.81		

Surrogate: 1-Chlorooctane 121 % 65.2-140

Surrogate: 1-Chlorooctadecane 121 % 63.6-154

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KIT PRICHARD
P. O. BOX 8469
MIDLAND TX, 79708
Fax To: (432) 563-2213

Received: 05/29/2014
Reported: 06/05/2014
Project Name: SINAGUA 18 FED COM #2
Project Number: 253-5063-000
Project Location: LEA COUNTY, NM

Sampling Date: 05/29/2014
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Jodi Henson

Sample ID: SP 4 5-6' (H401656-12)

BTX 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/05/2014	ND	1.98	98.9	2.00	1.28	
Toluene*	<0.050	0.050	06/05/2014	ND	2.15	108	2.00	3.58	
Ethylbenzene*	<0.050	0.050	06/05/2014	ND	1.94	97.0	2.00	2.80	
Total Xylenes*	<0.150	0.150	06/05/2014	ND	6.09	101	6.00	4.91	
Total BTX	<0.300	0.300	06/05/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 89.5-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	4640	16.0	06/02/2014	ND	464	116	400	10.9		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/03/2014	ND	187	93.4	200	0.381	
DRO >C10-C28	60.7	10.0	06/03/2014	ND	205	103	200	1.81	

Surrogate: 1-Chlorooctane 118 % 65.2-140

Surrogate: 1-Chlorooctadecane 119 % 63.6-154

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Analytical Results For:

ETECH Environmental & Safety Solutions, Inc.
KIT PRICHARD
P. O. BOX 8469
MIDLAND TX, 79708
Fax To: (432) 563-2213

Received:	05/29/2014	Sampling Date:	05/29/2014
Reported:	06/05/2014	Sampling Type:	Soil
Project Name:	SINAGUA 18 FED COM #2	Sampling Condition:	** (See Notes)
Project Number:	253-5063-000	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

Sample ID: SP 5 5-6' (H401656-15)

BTX 8021B		mg/L		Analyzed By: MS				S-04		
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/05/2014	ND	1.98	98.9	2.00	1.28		
Toluene*	<0.050	0.050	06/05/2014	ND	2.15	108	2.00	3.58		
Ethylbenzene*	0.244	0.050	06/05/2014	ND	1.94	97.0	2.00	2.80		
Total Xylenes*	0.787	0.150	06/05/2014	ND	6.09	101	6.00	4.91		
Total BTX	1.03	0.300	06/05/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 151 % 89.5-126

Chloride, SM4500CI-B			mg/kg					Analyzed By: AP			
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Chloride	1580	16.0	06/02/2014	ND	464	116	400	10.9			

TPH 8015M			mg/kg					Analyzed By: MS			
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
GRO C6-C10	87.7	10.0	06/04/2014	ND	187	93.4	200	0.381			
DRO >C10-C28	1600	10.0	06/04/2014	ND	205	103	200	1.81			

Surrogate: 1-Chlorooctane 124 % 65.2-140

Surrogate: 1-Chlorooctadecane 121 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: Etech

Project Manager: Kit Pritchard

Address:

City:

State:

Zip:

Attn:

Address:

City:

State:

Zip:

Phone #:

Fax #:

Project #:

Project Owner:

Project Name: Sinaqua 18 Fed com #2

Project Location: Lea county

Sampler Name: Terry Osborn

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

(G)RAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE

TIME

1

SP1

1-2'

✓

5-29-14

12:00

Chlorides

TPH

BTEX

2

SP1

3-4'

✓

3

SP1

5-6'

✓

4

SP2

1-2'

✓

5

SP2

3-4'

✓

6

SP2

5-6'

✓

7

SP3

1-2'

✓

8

SP3

3-4'

✓

9

SP3

5-6'

✓

10

SP4

1-2'

✓

Relinquished By: 105 DZ

Date: 5-29-14

Time: 4:50pm

Relinquished By:

Received By: Scott Osborn

Date:

Time:

Delivered By: (Circle One) 170

Sample Condition

Cool

Intact

Yes

No

Yes

No

Checked By: [Signature]

Phone Result:

Phone #:

Fax Result:

Fax #:

REMARKS:

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BILL TO

P.O. #: 253-5063-000

Company:

Attn:

Address:

City:

State:

Zip:

Phone #:

Fax #:

ANALYSIS REQUEST

P91



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

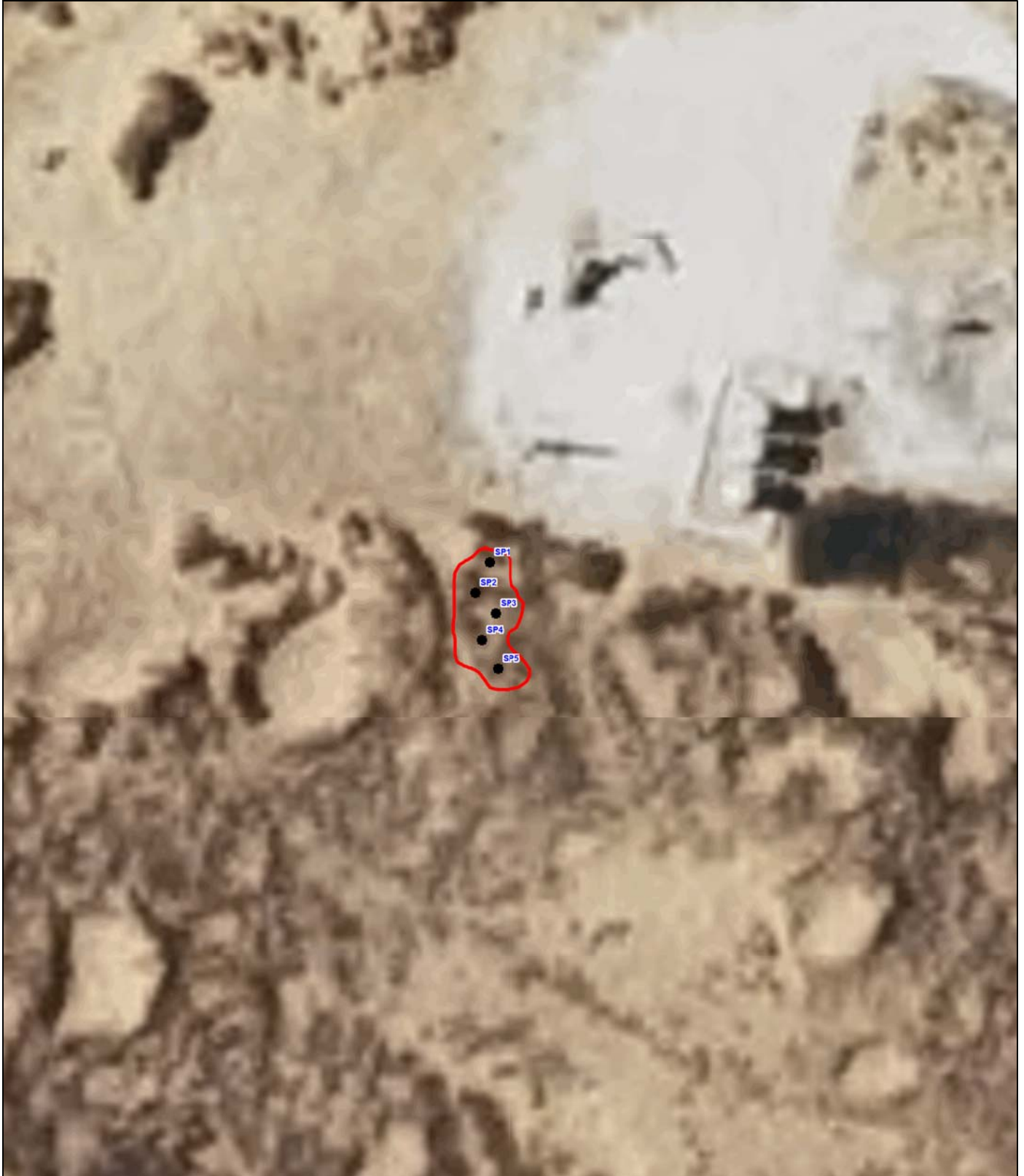
Day 7

(575) 393-2326 FAX (575) 393-2476

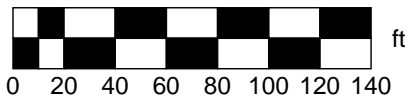
Company Name: Etech		BILL TO	
Project Manager: Kit Pritchard		P.O. #: 253-5063-000	
Address:		Company:	
City:	State:	Attn:	Address:
Phone #:	Fax #:	City:	State:
Project #: 253-5063-000 Project Owner:		City:	State:
Project Name: Singua 18 Fed com #2		Phone #:	Zip:
Project Location: Lea County		Fax #:	Zip:
Sampler Name: Terry Osborn		PRESERV:	SAMPLING:
FOR LAB USE ONLY			
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER :	DATE TIME
11 12 13 14 15	SP4 3-4) SP4 5-6) SP5 1-2) SP5 3-4) SP5 5-6)	✓ ✓ ✓ ✓ ✓	5-29-14 3:30
Relinquished By: Tech Over		Received By: Kit Pritchard	
Date: 5-20-14 Time: 4:50	Date:	Time:	Time:
Relinquished By:	Received By:	Date:	Time:
Delivered By: (Circle One) 17c	Sample Condition <input type="checkbox"/> Cool <input checked="" type="checkbox"/> Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CHECKED BY: [Signature]	REMARKS:
Sampler - UPS - Bus - Other:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
REMARKS:			

* Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

#54



Scale 1:900



1" = 75.0 ft

Data Zoom 17-7

LINN Energy
Sinagua 18 Fed #2
Sample Points Map



MN (7.3° E)

Data use subject to license.

© DeLorme. XMap® 8.

www.delorme.com

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

Form C-141
Revised October 10, 2003

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Linn Operating	Contact: Brian Wall	
Address: 2130 W. Bender Hobbs, NM 88240	Telephone No.: 575-738-1739	
Facility Name: Sinagua 18 Fed #2	Facility Type: Oil	
Surface Owner: Federal	Mineral Owner:	API No.: 30-025-32694

LOCATION OF RELEASE

Unit Letter J	Section 18	Township 20S	Range 34E	Feet from the 2041	North/South Line South	Feet from the 2171	East/West Line East	County Lea
------------------	---------------	-----------------	--------------	-----------------------	---------------------------	-----------------------	------------------------	---------------

Latitude: 32.5714830169451 **Longitude:** -103.598153358334

NATURE OF RELEASE


Type of Release: Oil / Produced Water	Volume of Release: 20 bbls / 2 bbls	Volume Recovered: 0 / 0
Source of Release: Heater Treater	Date and Hour of Occurrence: 03/22/2014	Date and Hour of Discovery: 03/22/2014 0930
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher- BLM Geoffrey Leking- NM OCD	
By Whom? Brian Wall	Date and Hour 03/24/2014	
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.*: When arriving to location on Saturday 3/22/2014. I noticed the vent was flowing oil out of gas vent. When I was looking at heater treater I noticed the balon valves on the oil and water lines were closed. I opened the valves to dump the fluid down in heater treater. then the oil that was in the vent pipe quit flowing.

Describe Area Affected and Cleanup Action Taken.* : Delineate site. Send in CAP to BLM and OCD for approval. Remove contaminates and haul to approved disposal site. Replace with clean soil and fill void. Return to natural terrian and reseed.

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>OIL CONSERVATION DIVISION</u>		
Printed Name: Brian Wall	Approved by District Supervisor:		
Title: Construction Foreman II	Approval Date:	Expiration Date:	
E-mail Address: bwall@linenergy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 03/24/2014	Phone: 806-367-0645		

* Attach Additional Sheets If Necessary