March 26, 2013

Mr. Geoffrey Leking
New Mexico Oil Conservation Division
1625 N French Dr
Hobbs, NM 88240

RE: NABORS HOBBS RECLAMATION PLANT

Dear Mr. Leking,

After our discussions in February regarding the excavation and sampling completed at the Nabors Hobbs Reclamation Plant we have prepared a path forward (Plan) to address your comments and concerns at the Site. This plan should address your concerns regarding additional delineation of affected soil bound in the hard caliche bedrock at this Site. The attached figure (Figure 1) visually depicts what we are suggesting below.

The plan is as follows: Five (5) trenches will be excavated perpendicular to excavation at locations that currently have the highest TPH-DRO concentrations, ranging from 416 to 752 mg/kg. Each trench will be 10 foot long, the width of a track hoe bucket wide and approximately two feet deep. As we excavate these trenches perpendicular to the excavation, we will evaluate the soil for visual evidence that confirm we have clean soils, or proceed up to 10 feet and collect a sample. The sample from each trench will be analyzed for TPH-DRO with a 24 hour turnaround time. The sample with the highest TPH-DRO concentration will also be analyzed for Synthetic Precipitation Leaching Procedure (SPLP) TPH and TX 1006 to allow us to determine the risk from the hydrocarbon that may leach out or to determine the distribution and concentration of hydrocarbons in the aliphatic and aromatic fractions of TPH constituents that make up the TPH-DRO concentration. This process should allow us to better understand the risk associated with the lower soil concentrations and to delineate a perimeter around the excavation that already presents minimal or no risk from the affected soil, as it is bound in the hard caliche bedrock.

Once we have received the analytical data and a perimeter has been delineated, we will discuss the data and the remedial approach with you. Our current approach is to address areas that present a risk. This may include either removal of the affected soil that exhibit potential risk or treat with a solution of hydrocarbon consuming bacteria such as Microblaze. If treated, we can sample the treated soil two months later to show the effect of treatment. We are confident this plan will delineate the affected soil and minimize if not eliminate any risk from these affected soils that are bound up in the hard caliche bedrock.

Please respond back to me at darrell.moore@entechservice.com or at 432-266-8375 with your questions or comments on our plan, or approval to proceed.

Regards,

Darrell Moore

Darrell Moore
EnTech Consulting Corporation