Atkins
ENGINEERING ASSOCIATES INC.

2904 W 2nd St.
Roswell, NM 88201
voice: 575.624.2420
fax: 575.624.2421
www.atkinseng.com

Conditionally
APPROVED

All field samples over RRAL should be sent to a lab for confirmation.

August 15, 2016

Mr. Jamie Keyes
Environmental Supervisor
New Mexico Oil Conservation Division
District 1 - Hobbs
1625 N. French Drive
Hobbs, New Mexico 88240

Re: Submittal of Work Plan for Additional Soil Delineation at the Lea DS State No. 001, Unit E, Section 36, T-19-S, R-34-E, Lea County, New Mexico (1RP-1607)

Dear Mr. Keyes:

Atkins Engineering Associates, Inc. (AEA) on behalf of Trainer Partners L.P (Trainer) is pleased to provide this work plan for additional soil delineation at the Lea DS State No. 001(Site). The purpose of this work plan is to describe proposed methodologies for additional soil delineation activities at the Site in order to fully characterize impacted soils.

Background

Based on a routine site inspection, conducted on August 9, 2007, the New Mexico Oil Conservation Division Inspector issued a Letter of Violation (NMOCD, 2007) which included the following observations "*oil leak at the heater, oil spray on the heater and ground and oil puddles around the heater*".

Sport Environmental (Sport) on behalf of C.W. Trainer submitted a Preliminary Investigation to the NMOCE on September 13, 2007 (Sport, 2007). Soil Investigation results reported total petroleum hydrocarbon hydrocarbons (TPH) above 100 mg/Kg and chlorides above 250 mg/Kg in trench locations T-4, T-8, T-9, T-10, T-11, T-12 and T-13. All soil samples were collected from the bottom of the trenches, approximately three (3) feet below ground surface.

Based on the results of the soil investigation, Sport conducted excavation activities in October 2007. Site activities ceased shortly thereafter due to billing and invoicing inconsistencies. AEA was subsequently contacted by Trainer to prepare this work plan and pursue a path toward Site closure. AEA proposes to install soil borings within the footprint of the excavations to confirm impacted soils have been removed.

Task 1 – Additional Soil Delineation

Health and Safety - AEA will develop a site specific Health and Safety Plan (HSP) for the performance of the activities discussed below. Personal Protective Equipment (PPE) will be Level D: hard hat, safety glasses, steel toes boots, hearing protection, FR and H2S meters, and gloves (work, nitrile). AEA plans to self-perform all drilling activities and will be directed by AEA

personnel onsite; it is anticipated two (2) days of field work will be required to complete the soil borings.

NM 811 - Prior to mobilization AEA will "whiteline" the proposed soil borings with lathe and white marking tape or white pin flags. AEA will place a New Mexico 811 at least 48 hours prior to the commencement of soil boring investigation activities.

Soil Investigation - The soil delineation is being performed to confirm all impacted soil has been removed from the site during 2007 excavation activities. AEA proposes to advance up to twelve (12) soil borings to an approximate depth of fifteen (15) feet below land surface (bls) utilizing an Ingersoll 300 hollow stem auger drill rig. Groundwater is estimated to be greater than fifty (50) feet bls. The proposed locations will be focused within the footprint of the 2007 excavation and are shown on the attached site map, **Figure 1**. Prior to drilling activities, an access ramp will be constructed to allow the drilling rig to access the bottom of the deepest part of the excavation.

Twelve (12) soil borings will be advanced to approximately 15 feet bls will be advanced utilizing an Ingersoll 300 Hollow Stem Auger (HSA) drilling rig with an inside diameter of 3.25 inches. Prior to drilling activities and between borings, drill tooling will be scrubbed with an Alconox water mixture. Each of the boreholes will be logged using the Universal Soil Classification System (USCS) method. Field assessment of soil samples will be accomplished by the headspace method with use of an photo ionization detector (PID) calibrated with 100-ppm isobutylene. Soil samples will also be field screened for chlorides using a Hach screening kit. Field screening will be performed on samples at discreet five (5) foot intervals. The soil bores will be plugged to surface with bentonite pellets.

One (1) soil sample will be collected for laboratory analysis from each of the borings. The soil sample exhibiting the highest PID measurement will be collected for laboratory submission. A total of twelve (12) soil samples will be collected and submitted for laboratory analysis. Soil samples will be analyzed for BTEX by EPA Method 8021B, total petroleum hydrocarbons (TPH) - GRO/DRO/ORO by EPA Method 8015B and chloride by EPA Method 300/300.1. All soil samples will be placed in a cooler on ice and shipped with the appropriate chain of custody documentation to Hall Environmental Analysis Laboratory located in Albuquerque, New Mexico for laboratory analyses.

All decontamination water and drill cuttings generated during this investigation will be collected and stored in either the designated stockpile or labeled DOT-approved 55-gallon steel drums on-site.

Reporting

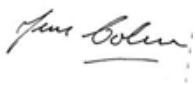
Data collected from event will be presented in a report which will discuss all field activities. The following will be included in the summary report:

- Site Map – illustrating the site layout including soil boring and monitor well locations and limits of the excavation.
- Soil Bore Lithologic Logs
- Soil Analytical Results – including sample dates, analytical results.

- Excavation Plan with proposed volume of soil to be removed, disposition of soil, and backfill operations (if necessary).

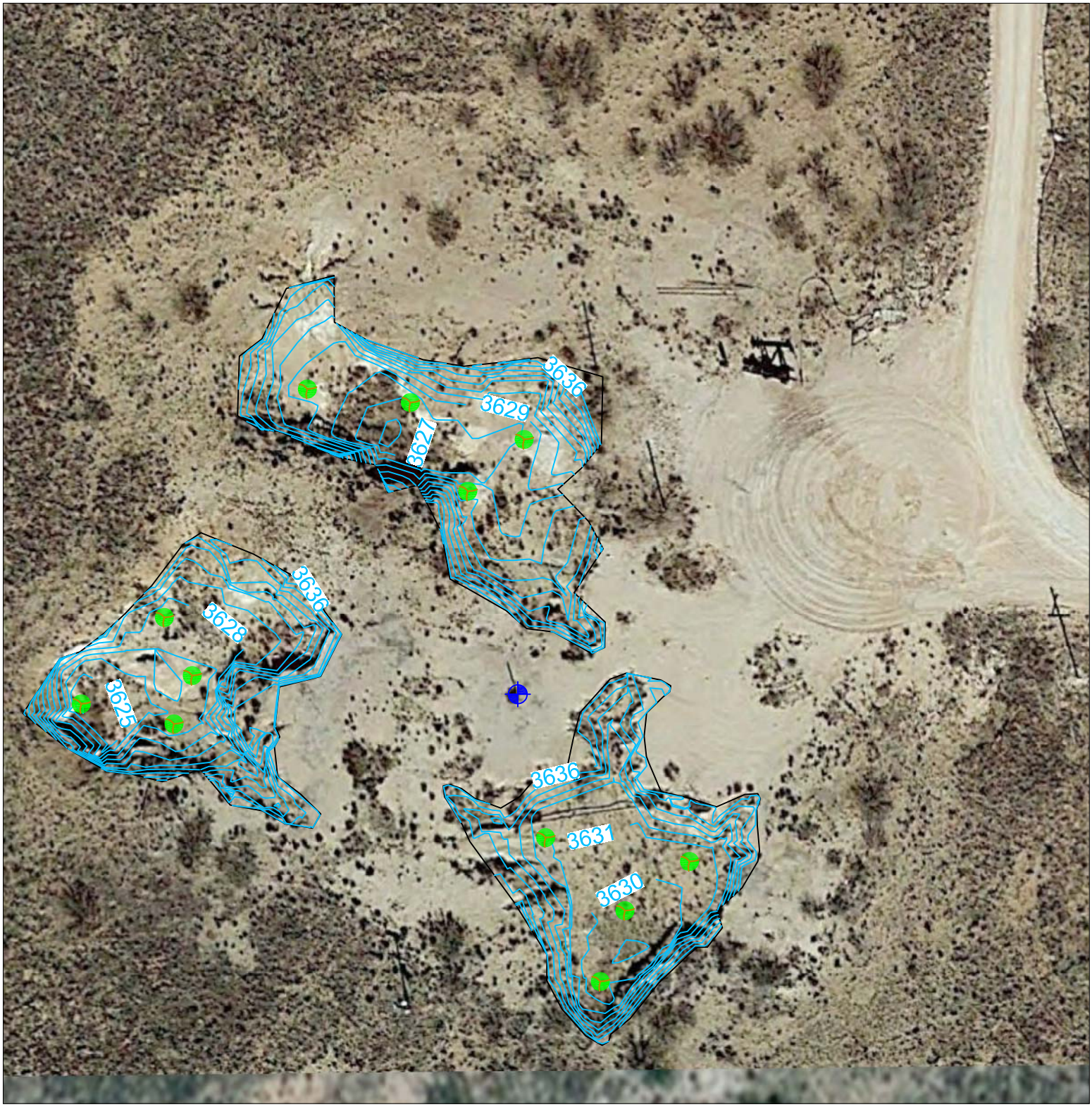
Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Jim Coburn P.E.
Consulting Engineer
jim.coburn@atkinseng.com
New Mexico Registration #18098

Cc: Tomáš 'Doc' Oberding PhD, EMNRD-OCD tomas.oberding@state.nm.us
Kristin Lynch, EMNRD-OCD, kristen.lynch@state.nm.us
Amber Groves,State Land Office, agroves@slo.state.nm.us
Randall Mark Trainer, Trainer Partner LTD, randall@zia.st
Christopher Cortez, Atkins Engineering Associates Inc., chris@atkinseng.com



Legend

- Contour Line
- Proposed Soil Boring Location
- Lea DS State No. 001 Wellhead

N

50 25 0 50

Scale: 1" = 50'

Figure 1.
Proposed Soil Boring Locations
Lea DS State No. 001

SCALE 1" = 50'

July 18, 2016

JOB NO. TPLLEAD.ENV.15

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