

August 15, 2016



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

**Any field samples, chloride or TPH, over RRAL
should be sent to a lab for confirmation.**

Transmitted vial email to Jamie.keyes@state.nm.us

Re: Submittal of Work Plan for Additional Soil Delineation at the Harris Federal #1 Lease, Section 5, T-22-S, R-34-E, 600 FSL and 1980 FEL, Lea County, New Mexico (1RP-1335 and 1RP-1741)

Dear Mr. Keyes:

Atkins Engineering Associates, Inc. (AEA) on behalf of Trainer Partners LTD (Trainer) is pleased to provide this work plan for additional soil delineation at the Harris Federal #1 Lease (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 observations by a New Mexico Oil Conservation Division Inspector of an unlined, unfence and unregistered pit containing crude oil, a Letter of Violation (LOV) was issued on February 23, 2007 (NMOCD, 2007).

Sport Environmental (Sport) on behalf of C.W. Trainer conducted an initial site reconnaissance in April 2007, to ascertain impact to the Site. NMOCD approved a *Sampling Plan* submitted by Sport (Sport, 2007A) on May 10, 2007; results of the investigation were presented in the *Soil Investigation Results* report and submitted to the NMOCD on October 9, 2007 (Sport, 2007B). Soil Investigation results reported total petroleum hydrocarbon hydrocarbons (TPH) above 100 mg/Kg and chlorides above 250 mg/Kg were reported in SB-2, SB-3 and SB-4.

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 a 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).

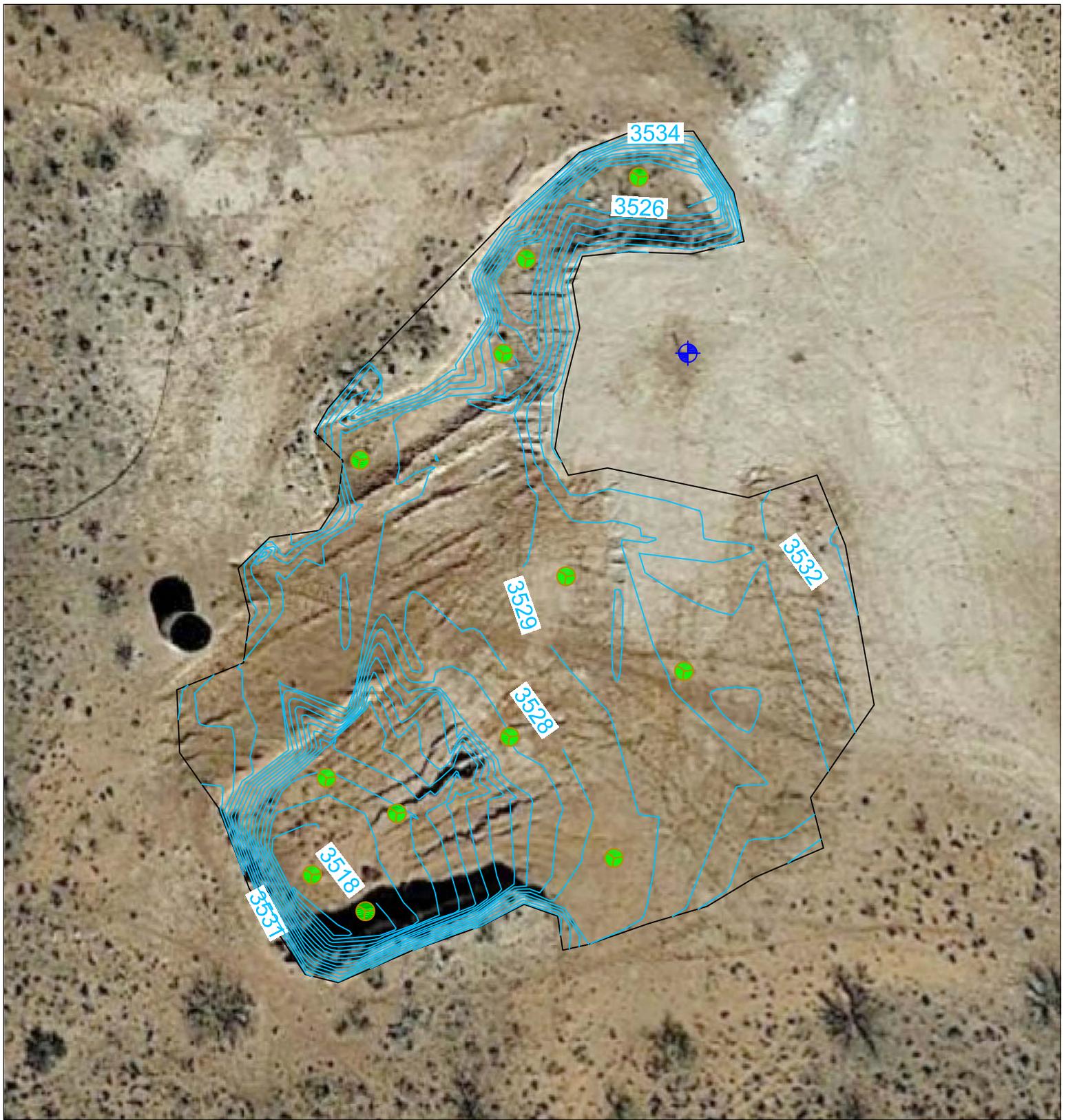
Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Jim Coburn P.E.
Consulting Engineer
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New Mexico Registration #18098

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Legend

-  Contour Line
-  Proposed Soil Boring Location
-  Harris Federal #1 Lease Wellhead

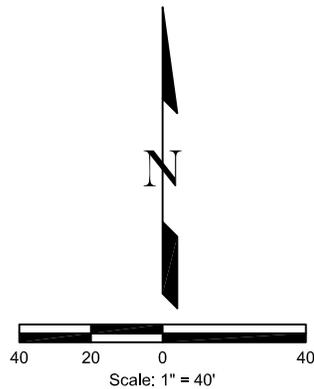


Figure 1.
Proposed Soil Boring Locations
Harris Federal #1 Lease

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|-------------------------|---------------|
| SCALE 1" = 40' | July 18, 2016 |
| JOB NO.: TPLHARR.ENV.15 | |



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