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March 24, 2017

APPROVED
By Olivia Yu at 11:38 am, Mar 28, 2017

Ms. Olivia Yu
Environmental Specialist
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 Harris Federal #1 Lease, Section 5, T-22-S, R-34-E, 600 FSL and 1980 FEL, Lea County, New Mexico

Dear Ms. Yu:

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 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

AEA submitted a summary of additional investigation activities (***Report of Additional Soil Delineation at the Harris Federal #1 Lease, Unit O Section 5, T-22-S, R-34-E, Lea County, New Mexico (1RP-1335 and 1RP 1741)*** to the New Mexico Oil Conservation Division (NMOCD) in a report dated February 22, 2017. The additional investigation did not reveal any petroleum hydrocarbon impacted soil in any of the twelve (12) soil borings installed at the Site. However, chloride impacted soil was observed, above the 250 mg/Kg standard, in three soil borings (SB-9, SB-10 and SB-11) at approximately 14-16 feet below land surface (BLS).

Based on discussions with the NMOCD on March 21, 2017, AEA is submitting this work plan for additional soil delineation at the Site. AEA proposes to install one soil boring (SB-13) to vertically define the chloride impacted soils.

Task 1 – Additional Soil Delineation

Health and Safety - AEA will use the existing 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, 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 one-half day of field work will be required to complete the soil borings.

NM 811 - Prior to mobilization 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 either removed from the site during 2007 excavation activities, or vertically delineated. AEA proposes to advance up to one (1) additional soil boring to an approximate depth of twenty-five to thirty (30) feet BLS utilizing a hollow stem auger drill rig. Groundwater is estimated to be approximately seventy (70) feet BLS. The proposed location will be focused in the area of the soil borings that reported chloride concentrations above the 250 mg/Kg standard, as shown on the attached site map, **Figure 1**.

The soil boring will be advanced to approximately 25-30 feet BLS will be advanced using Hollow Stem Auger (HSA) with an inside diameter of 3.25 inches. Prior to drilling activities, drill tooling will be pressure washed and scrubbed with an Alconox water mixture. The soil from the borehole will be logged using the Universal Soil Classification System (USCS) method. Soil samples will be field screened for chlorides at discreet five (5) foot intervals. The soil bores will be plugged with backfill and the top ten feet to surface with hydrated bentonite pellets.

Soil samples will be collected continuously from five (5) foot intervals to an approximate depth of 25-30 feet BLS, or until the chloride impacted soils are reported below the 250 mg/Kg standard. Soil samples will be analyzed for 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 Log
- Soil Analytical Results – including sample dates, analytical results.
- Backfill Plan with proposed revegetation

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

Sincerely,

Jim Coburn P.E.
Consulting Engineer
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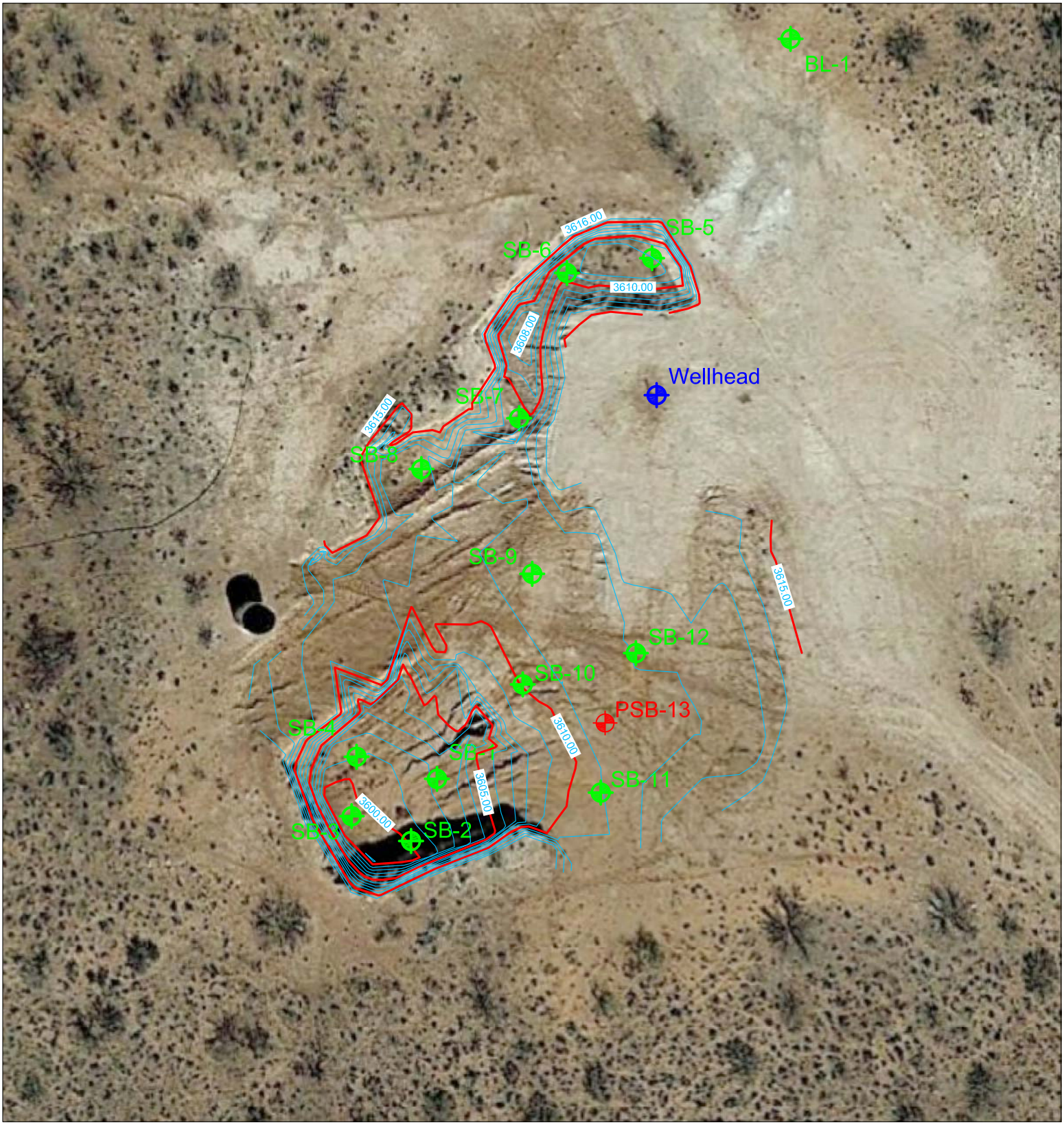

Legend

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

N

50 25 0 50

Scale: 1" = 50'

Figure 1.
Soil Boring Locations
Harris Federal #1 Lease

SCALE 1" = 50' | March 2017

JOB NO. TPLHARR.ENV.16

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