



Mr. Glenn Von Gonten

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Subject:

State M-1 AP-072
Stage 2 Abatement Plan

Dear Mr. Von Gonten:

On behalf of Chesapeake Energy Corporation, ARCCADIS U.S. Inc. respectfully submits the enclosed Stage 2 Abatement plan for the State M-1 site (AP-072). A Stage 1 Abatement Plan Report was submitted on March 20, 2012. Your review and approval of this Abatement Plan will be appreciated. The landowner, Darr Angell, is anxious for us to complete soil remediation at this site.

If you have any questions please do not hesitate to contact Bradley Blevins at (575) 391-1462 or via e-mail at bblevins@chkenergy or me at (432) 687-5400, e-mail address shall@aracdis-us.com.

Sincerely,

ARCADIS U.S., Inc.

Sharon E. Hall
Associate Vice President

Copies:

Bradley Blevins- Chesapeake, Hobbs

ARCADIS U.S., Inc.
1004 North Big Spring Street
Suite 300
Midland
Texas 79701
Tel 432 687 5400
Fax 432 687 5401
www.arcadis-us.com

ENVIRONMENT

Date:

March 27, 2012

Contact:

Sharon Hall

Phone:

432 687-5400

Email:

shall@aracdis-us.com

Our ref:

MT001088

ARCADIS U.S., Inc.
TX Engineering License # F-533

Imagine the result

Chesapeake Energy Corporation

**State M-1 AP-072
Stage 2 Abatement
Plan Proposal**

Hobbs, New Mexico

March 27, 2012



Sharon Hall
Associate Vice President

State M-1 AP-072

**Stage 2 Abatement
Plan Proposal**

Prepared for:
Chesapeake Energy
Corporation
Hobbs, New Mexico

Prepared by:
ARCADIS U.S., Inc.
1004 North Big Spring Street
Suite 300
Midland
Texas 79701
Tel 432 687 5400
Fax 432 687 5401

Our Ref.:
MT001088.0001.00001

Date:
March 27, 2012

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1. INTRODUCTION

The subject site is a former tank battery site located east of Buckeye, New Mexico. The site was purchased by Chesapeake Energy Corporation (Chesapeake) in April 2004. Chesapeake did not operate the tank battery or the associated well field and began the process of facility abandonment in 2007.

Seven monitor wells and nine soil borings have been drilled at the site. Elevated chloride concentrations and limited hydrocarbon compounds were detected in soil samples collected from soil borings and monitoring wells. Elevated chlorides were detected in the down gradient monitor wells and light non-aqueous phase liquid (LNAPL) occurs in monitoring well MW-1. LNAPL recovery activities have been piloted at the site and will commence again upon completion of surface reclamation activities.

2. SUMMARY OF STAGE 1 ABATEMENT ACTIVITIES

Initial site investigation activities were conducted in May of 2007 following abandonment of the tank battery. Stage 1 Abatement activities were conducted during the period of May 2007 through September 2011. Stage 1 Abatement activities included drilling and soil sampling of nine boreholes, drilling and sampling of seven monitor wells, EM 31 and EM 34 surveys, conversion of one monitoring well into a recovery well and recovery of phase-separated hydrocarbons from the recovery well.

New Mexico Oil Conservation Division (NMOCD) was notified of impacts to groundwater at the site via e-mail on May 30, 2007. NMOCD notified Chesapeake in a letter dated June 19, 2007 that a Stage 1 Abatement Plan was required for the site in accordance with Rule 19.

The Stage 1 Abatement Plan was submitted to NMOCD on August 22, 2007. The plan summarized site activities taken to date. The plan proposed the drilling and sampling of a minimum of three additional soil borings and installation and sampling of nine groundwater monitoring wells.

BBC contacted NMOCD via email on April 24, 2010 to inquire about the status of the Stage 1 Abatement Plan approval and Chesapeake's desire to conduct the proposed Stage 1 Abatement Plan activities. On May 27, 2010, NMOCD responded via email that the State was not staffed to review the Abatement Plans (APs) in a timely manner. On June 23, 2010, BBC contacted NMOCD via email to request a waiver of the Public Notice requirement and inform NMOCD that Chesapeake and the landowner were



anxious to move forward with the proposed AP activities. NMOCD replied via email on June 23, 2010 stating they were still understaffed to review the AP and could not waive the Public Notice requirement. They advised BBC that Chesapeake could proceed "at risk." On July 12, 2010 BBC informed NMOCD by registered letter that Chesapeake was planning to start the Stage 1 Assessment on or about August 23, 2010. They further informed NMOCD they would be submitting the required Public Notices, a copy of which was attached to the letter. NMOCD did not respond to the registered letter.

The public notices were published in the Hobbs News-Sun and Lovington Leader on July 22, 2010 and the Albuquerque Journal on July 24, 2010. No comments were received from the public or NMOCD during the 30-day comment period and Chesapeake proceeded with the proposed Stage 1 Abatement Plan activities on August 26, 2010. Copies of correspondence and Public Notice are included in Appendix A.

A detailed description of site activities and results can be found in the report submitted to NMOCD dated March 20, 2012 entitled State M-1 AP-072, Stage 1 Abatement Report (Site Assessment Investigation). Analytical results for soil and groundwater sampling are summarized on Figure 1.

3. STAGE 2 ABATEMENT PLAN PROPOSAL

After review of various remedial options, we propose the following Stage 2 Abatement Plan. The plan addresses soil and groundwater remediation.

3.1 Soil Remediation

The selected remedial option will be the excavation of near-surface soils and installation of clay liners. The anticipated extent and depth of excavation is based on assessment activities (laboratory analysis and visual observation) and is shown in Figure 2. Near surface soils (to a depth of 5 feet below ground surface) with chloride concentrations in excess of 1,000 milligrams per kilogram (mg/kg) and a Total Petroleum Hydrocarbons (TPH) concentration in excess of 1,000 mg/kg will be excavated and disposed. Excavated soils will be disposed at Lea Land Landfill.

Areas where chloride or TPH concentrations are expected to exceed 1,000 mg/kg at depths greater than 5 feet below ground surface soils will be excavated to a depth of 5



feet below ground surface. Soils will be screened in the field for chlorides using chloride field test kits and for TPH using a photoionization. Critical samples (samples used to delineate the excavations) will be submitted for laboratory analysis of chlorides and/or TPH. Following excavation, a 12-inch compacted clay layer that meets or exceeds a permeability of equal to or less than 1×10^{-8} centimeters per second will be installed in the excavations. The lined excavations will be backfilled with four feet of locally obtained native soil. All of the excavated areas will be re-seeded with native vegetation. Areas that are supporting vegetation will not be disturbed.

Use of the USEPA Multi-Med model demonstrates that the clay liners will mitigate the leaching of chlorides to groundwater. The model predicts that after 7000 years of infiltration through the liner the maximum concentration of chlorides in groundwater will be 221.8 milligrams per liter (mg/L). The Multi-Med inputs and outputs are included in Appendix A.

3.2 Groundwater Remediation and Monitoring

One additional groundwater monitoring well will be installed downgradient of the site. The monitoring well will be designated MW-8.

Groundwater samples will be collected from all of the monitoring wells and analyzed for chlorides using USEPA method 9056 for each of four quarters. Based on sample results for one year (four quarters), sampling frequency will be reviewed and may be revised.

Sampling will be discontinued when eight quarters of sample results indicate chloride concentrations are below New Mexico Water Quality Control Commission, Title 20, Chapter 6, Part 2 standards. Sample results will be submitted to the NMOCD annually on June 15.

Following removal of LNAPL from MW-1, groundwater samples will be collected from MW-1 and analyzed for benzene, toluene ethylbenzene and xylenes (BTEX) using USEPA method 8260B for each of four quarters. Based on sample results for one year (four quarters), sampling frequency will be reviewed and may be revised.

Sampling of MW-1 for BTEX will be discontinued when eight quarters of sample results indicate BTEX concentrations are below New Mexico Water Quality Control Commission, Title 20, Chapter 6, Part 2 standards. Sample results will be submitted to

the NMOCD annually on June 15. Proposed groundwater remediation is presented in Sections 3.2.1 and 3.2.2.

3.2.1 Chlorides

Chloride concentrations in groundwater exceed New Mexico Water Quality Control Commission standards in two wells (MW-1 411mg/L and MW-4 472mg/L).

Removal of near-surface soils that are a potential source of chlorides and BTEX in groundwater and lining of excavations with chloride and TPH concentrations in excess of 1,000 mg/kg will mitigate leaching of chlorides to groundwater. Considering the relatively low concentrations of chlorides in groundwater and the fact that soil removal and clay liner infiltration barrier installation will be conducted at this site, we propose monitoring the site for a period of two years before considering pumping of groundwater at this site. With the proposed source removal and mitigation and the severe drought conditions being experienced in this area, we believe it prudent to evaluate if chloride mass removal by pumping is warranted at this site.

3.2.2 Hydrocarbons

A pilot LNAPL recovery test will take place over a three week period and will be used to develop long-term recovery procedures. LNAPL will be recovered from MW-1 and disposed in a NMOCD approved facility. Additionally, two soil vent borings equipped with wind turbines will be installed in the area near MW-1.

4. PUBLIC NOTIFICATION

Written notification of submittal of the Stage 2 Abatement Plan Proposal and site activities will be sent to all surface owners of record within a one-mile radius of the site. NMOCD will be supplied with a list of parties to be notified. Publication of notice of activities will be published in a state-wide circulated newspaper, the Albuquerque Journal, and two county newspapers, the Hobbs-Daily News Sun and the Lovington Leader.

5. REMEDIATION WORK SCHEDULE

Soil remediation activities are expected to be completed in 15 working days (Monday through Friday). Groundwater remediation activities will be ongoing. An estimated completion date for groundwater remediation is not available.



6. REFERENCES

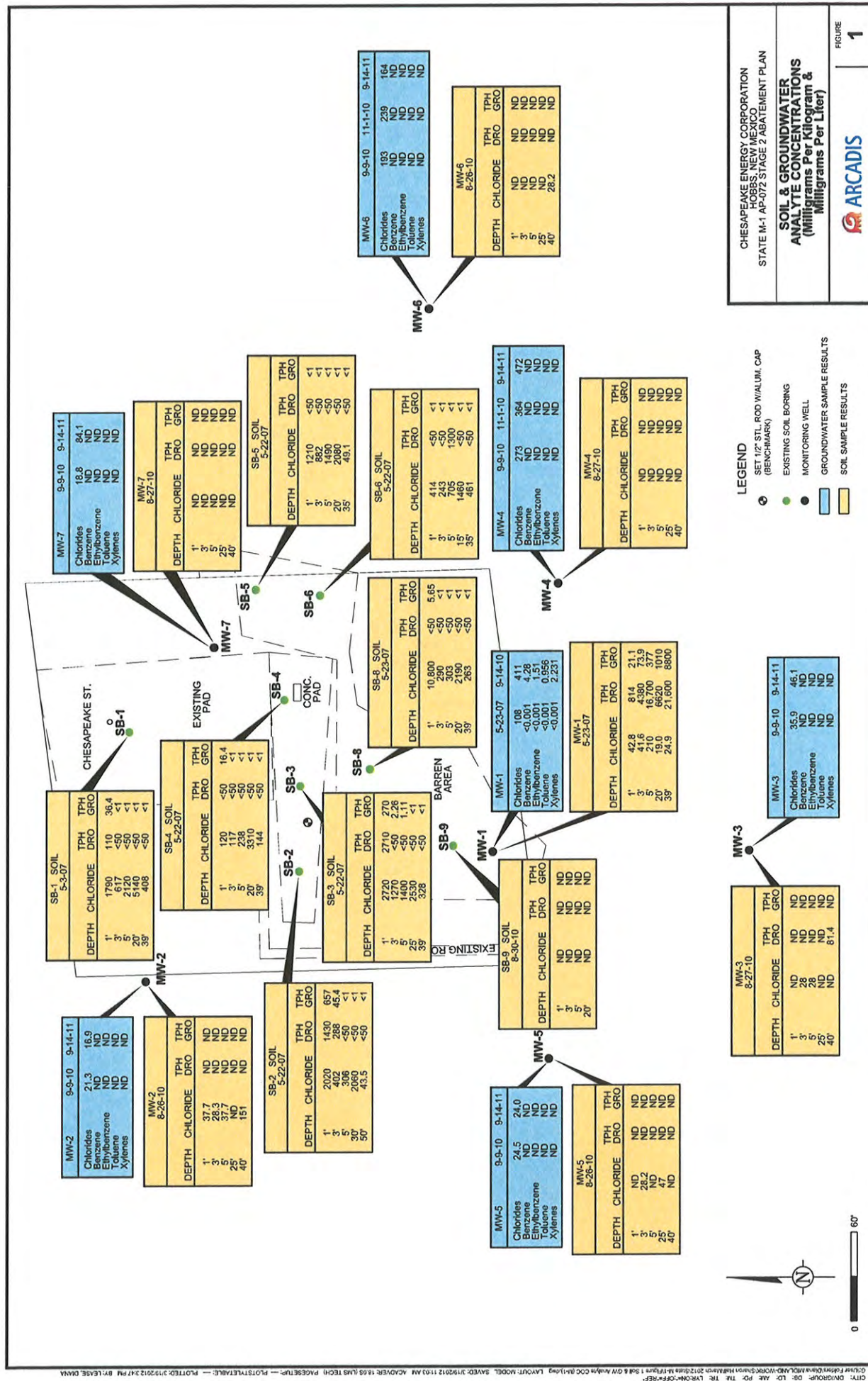
Groundwater Handbook; United States Environmental Protection Agency, Office of Research and Development, Center for Environmental Research Information; 1992

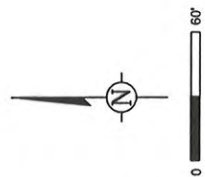
New Mexico Water Quality Control Commission, Title 20 Chapter 6, Part 2, Subpart I

State M-1 AP-072 Stage 1 Abatement Report (Site Assessment Investigation);
ARCADIS; March 2012

State M-1 Salt Water Disposal Tank Battery, Stage 1 Abatement Plan (Ap-072), BBC International; August 2007

New Mexico Water Quality Control Commission, Title 20 Chapter 6, Part 2, Subpart I





LEGEND

- SET 1/2" STL ROD W/ALUM. CAP (BENCHMARK)
- EXISTING SOIL BORING
- MONITORING WELL
- SURFACE
- 2' FEET
- 5' FEET

MW-3

MW-4

MW-5

MW-6

**PROPOSED
EXCAVATION MAP**

CHESAPEAKE ENERGY CORPORATION
HOBBS, NEW MEXICO
STATE M-1 AP-072 STAGE 2 ABATEMENT PLAN



FIGURE 2

Appendix A

Multi-Med Model Inputs and Outputs

Chesapeake State M-1
Chesapeake Energy Corporation
Buckeye, Lea County, New Mexico
Multimed Model Input and Output (With Liner)

MODEL INPUT AND OUTPUT						MODEL RANGE	
INPUT PARAMETERS						Minimum	Maximum
Unsaturated Zone Flow Parameters							
Depth of Unsaturated Zone	m	45	feet	13.7	m	0.000000001	None
Hydraulic Conductivity	cm/hr	2	ft/day	2.54	cm/hr	0.00000000001	10,000
Unsaturated Zone Porosity	fraction	0.05	fraction	0.05	fraction	0.000000001	0.99
Residual Water Content	fraction	0.01	fraction	0.010	fraction	0.000000001	1
Unsaturated Zone Transport Parameters							
Thickness of Layer	m	45	feet	13.7	m	0.000000001	None
Percent of Organic Matter	%	2.6	%	2.6	%	0	100
Bulk Density	g/cm ³	1.35	g/cm ³	1.35	g/cm ³	0.01	5
Biological Decay Coefficient	1/yr	0	1/yr	0	1/yr	0	None
Aquifer Parameters							
Aquifer Porosity	fraction	0.25	fraction	0.25	fraction	0.000000001	0.99
Bulk Density	g/cm ³	1.35	g/cm ³	1.35	g/cm ³	0.01	5
Aquifer Thickness	m	50	ft	15.24	m	0.000000001	100,000
Hydraulic Conductivity	m/yr	2	ft/day	223	m/yr	0.0000001	100,000,000
Hydraulic Gradient	m/m	0.007	m/m	0.007	m/m	0.00000001	None
Organic Carbon Content	fraction	0.00315	fraction	0.00315	fraction	0.000001	1
Temperature of Aquifer	°C	14.4	°C	14.4	°C	0.00000001	None
pH		6.2		6.2		0.3	14
x-distance Radial Distance from Site to Receptor	m	1	m	1	m	1	None
Source Parameters							
Infiltration Rate from the Facility	m/yr	0.124	in/yr	0.00315	m/yr	0.0000000001	10,000,000,000
Area of Waste Disposal Unit	m ²	46,800	ft ²	4348	m ²	0.01	None
Length Scale of Facility	m	240	feet	73.2	m	0.000000001	10,000,000,000
Width Scale of Facility	m	195	feet	59.4	m	0.000000001	10,000,000,000
Recharge Rate into the Plume	m/yr	16.71	in/yr	0.4244	m/yr	0	10,000,000,000
Duration of Pulse	yr	8,000	yr	8000	yr	0.000000001	None
Initial Concentration at Landfill	mg/L	6,000	mg/L	6,000	mg/L	0	None
Additional Parameters							
Method	Gaussian			Gaussian		Gaussian	Patch
Name of Chemical Specified	Chloride						

MODEL OUTPUT		
Final Concentration at Landfill	mg/L	221.8 mg/L

MODEL OUTPUT			
Concentration at Landfill	0.0	mg/L	Time
	0.0	mg/L	1 yr
	0.0	mg/L	10 yr
	0.0	mg/L	20 yr
	18.9	mg/L	50 yr
	36.6	mg/L	70 yr
	45.4	mg/L	80 yr
	61.8	mg/L	100 yr
	123.4	mg/L	200 yr
	154.1	mg/L	300 yr
	166.3	mg/L	400 yr
	178.5	mg/L	500 yr
	190.7	mg/L	600 yr
	204.8	mg/L	800 yr
	211.1	mg/L	1,000 yr
	220.4	mg/L	2,000 yr
	221.6	mg/L	3,000 yr
	221.8	mg/L	4,000 yr
	221.8	mg/L	5,000 yr
	221.8	mg/L	6,000 yr
	221.8	mg/L	7,000 yr

Chesapeake State M-1
Chesapeake Energy Corporation
Buckeye, Lea County, New Mexico

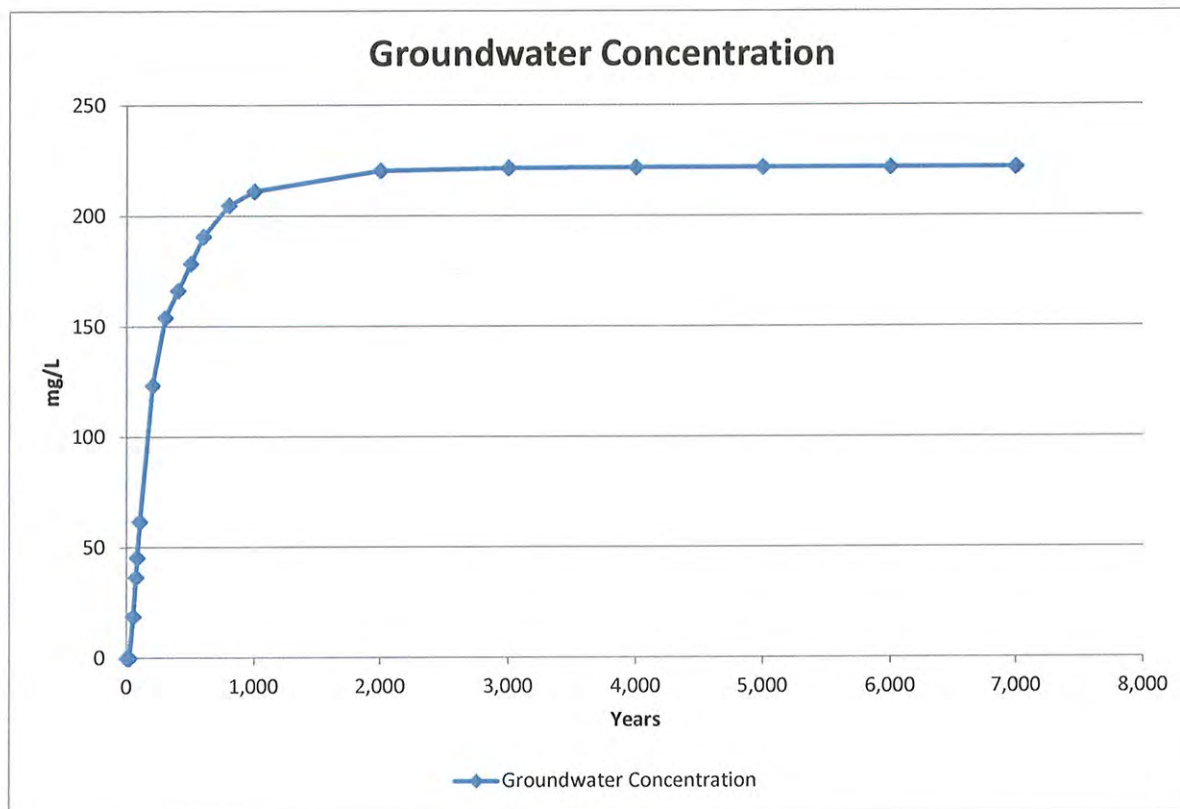


TABLE 6-3. TOTAL POROSITY OF VARIOUS MATERIALS

Material	No. of Analyses	Range	Arithmetic Mean
Igneous Rocks			
Weathered granite	8	0.34-0.57	0.45
Weathered gabbro	4	0.42-0.45	0.43
Basalt	94	0.03-0.35	0.17
Sedimentary Materials			
Sandstone	65	0.14-0.49	0.34
Siltstone	7	0.21-0.41	0.35
Sand (fine)	243	0.26-0.53	0.43
Sand (coarse)	26	0.31-0.46	0.39
Gravel (fine)	38	0.25-0.38	0.34
Gravel (coarse)	15	0.24-0.36	0.28
Silt	281	0.34-0.61	0.46
Clay	74	0.34-0.57	0.42
Limestone	74	0.07-0.56	0.3
Metamorphic Rocks			
Schist	18	0.04-0.49	0.38

Sources: From Mercer et al. (1982),
 McWhorter and Sunada (1977),
 Original reference Morris and Johnson, (1967).

Texture	Bulk Density g/cm ³	Average Wilting Point	Plant Available Water Inches/Ft
Sandy loam	1.6	0.057	1.66
Silt Loam	1.45	0.119	2
Loam	1.5	0.097	2.4
Sandy clay loam	1.45	0.137	1.66
Clay loam	1.45	0.157	1.9

TABLE 6-8. MEAN BULK DENSITY (g/cm³) FOR FIVE SOIL TEXTURAL CLASSIFICATIONS^{a,b}

Soil Texture	Mean Value	Range Reported
Silt Loams	1.32	0.86 - 1.67
Clay and Clay Loams	1.3	0.94 - 1.54
Sandy Loams	1.49	1.25 - 1.76
Gravelly Silt Loams	1.22	1.02 - 1.58
Loams	1.42	1.16 - 1.58
All Soils	1.35	0.86 - 1.76

^a Baes, C.F., III and R.D. Sharp. 1983. A Proposal for Estimation of Soil Leaching Constants for Use in Assessment Models. J. Environ. Qual. 12(1):17-28 (Original reference).

^b From Dean et al. (1989)

TABLE 6-2. DESCRIPTIVE STATISTICS FOR SATURATED HYDRAULIC CONDUCTIVITY
(cm hr⁻¹)

Soil Type	Hydraulic Conductivity (Ks)*			n		
	x	s	CV			
Clay**	0.2	0.42	210.3	114	cm/hr	17.52
Clay Loam	0.26	0.7	267.2	345	cm/hr	22.776
Loam	1.04	1.82	174.6	735	cm/hr	91.104
Loamy Sand	14.59	11.36	77.9	315	cm/hr	1278.084
Silt	0.25	0.33	129.9	88	cm/hr	21.9
Silt Loam	0.45	1.23	275.1	1093	cm/hr	39.42
Silty Clay	0.02	0.11	453.3	126	cm/hr	1.752
Silty Clay Loam	0.07	0.19	288.7	592	cm/hr	6.132
Sand	29.7	15.6	52.4	246	cm/hr	2601.72
Sandy Clay	0.12	0.28	234.1	46	cm/hr	10.512
Sandy Clay Loam	1.31	2.74	208.6	214	cm/hr	114.756
Sandy Loam	4.42	5.63	127	1183	cm/hr	387.192

* n = Sample size, \bar{x} = Mean, s = Standard deviation, CV = Coefficient of variation (percent)

** Agricultural soil, less than 60 percent clay

Sources: From Dean et al. (1989),
Original reference Carsel and Parrish (1988).

Saturated water content is the maximum volumetric amount of water in the soil when all pores are filled with water. Very often it is assumed that saturated water content equals the porosity n . However, in many cases q_s is smaller than n due to the fact that small amounts of air will be trapped in very small pores. Residual water content can be defined as the asymptote of the pF-curve when h gets very high negative values. Usually q_R is very small - on the order of 0.001--0.02 for coarse soils but gets as high values as 0.15..0.25 for heavy clay soils. Air entry point h_a is

Soil texture. Fine-textured soils can hold much more organic matter than sandy soils for two reasons. First, clay particles form electrochemical bonds that hold organic compounds. Second, decomposition occurs faster in well-aerated sandy soils. A sandy loam rarely holds more than 2% organic matter.

The recharge rate in this model is the net amount of water that percolates directly into the aquifer system outside of the land disposal facility. The recharge is assumed to have no contamination and hence dilutes the groundwater contaminant plume. The recharge rate into the plume can be calculated in a variety of ways. One possibility is to use a model, such as HELP (Hydrologic Evaluation of Landfill Performance) (Schroeder et al., 1984), without any engineering controls (leachate collection system or a liner) to simulate the water balance for natural conditions.

The infiltration rate is the net amount of leachate that percolates into the aquifer system from a land disposal facility. Because of the use of engineering controls and the presence of non-native porous materials in the landfill facility, the infiltration rate will typically be different than the recharge rate. However, it can be estimated by similar

Most soils contain 2-10 percent organic matter. *The Importance of Soil Organic Matter: Key to Drought-Resistant Soil and Sustained Food Production.* <http://www.fao.org>