



HOBBS OCD

MAR 22 2012

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Electronic Correspondence

March 22, 2012

Mr. Geoffrey Leking  
State of New Mexico  
Oil Conservation Division  
1625 N. French Dr,  
Hobbs, New Mexico 88240  
[geoffreyr.leking@state.nm.us](mailto:geoffreyr.leking@state.nm.us)

30-025-00562

Re: Corrective Action Plan  
LINN Energy, Maljamar Grayburg Unit No. 77-2  
API No.: 30-025-50062  
Legal: H-15-17S-32E, 2310 FNL & 660 FEL  
GPS: N32° 50' 14.154, W103° 44' 53.201"  
Depth to Groundwater: 70 Feet

Dear Geoff:

Etech Environmental & Safety Solutions, Inc. (Etech) is pleased to submit the following corrective action plan on the aforementioned site for your review and approval.

### Scope of Work

The scope of this project is for the remediation of a produced water/hydrocarbon impact. Completion of remediation will involve the following actions:

1. Placement of a one-call for utility location.
2. Excavation of impacted soils until the chloride levels are less than 250 mg/kg and/or hydrocarbon levels of less than 1,000 mg/kg are reached. The impacted area will be excavated to a depth of 3-4 feet vertically. During the course of excavation soil samples will be screened on site to determine the progress of the remediation. Screening is achieved using a YSI chloride meter with a tolerance of +/- 6% which is the same tolerance as laboratory titration methods.
3. If screening indicates the chloride or TPH levels are still elevated, the excavation will be vertically delineated to a depth until the screening indicates the chloride levels are 250 mg/kg or less.
4. If the screening determines the remediation objectives have been reached, confirmation samples will be collected from the bottom of the excavation to confirm that remediation goals have been reached. If the excavation depth is greater than 2 feet vertical, side wall samples will be collected as well.
5. If the results of analysis determine that the chloride levels are above regulatory threshold levels, additional excavation may be performed until the remediation objectives are met. It should be noted that there may be circumstance that arise where additional excavation

approved w/  
consent to add  
TPH Delineation  
Language of Bullet 3,  
Geoff Leking  
Env Specialist  
NMOB-DIST 4/5/12

is not practical. In this event, you will be contacted to discuss the issue at hand and determine any alternative course of action that could be employed or if the site can be backfilled.

6. Backfilling of the excavated area(s) will be achieved by placing clean fill similar to the existing material from the site to within 1 foot of the surface. The last foot will be backfilled with top soil of similar configuration to the surrounding area and contoured to match the existing grade.
7. Where pad areas or interior areas of tank batteries are excavated as reasonably feasible to remove the grossly impacted soil, they will be backfilled to within 6 inches of surface then backfilled to grade with compacted caliche. Any firewalls or containment berms removed during remediation will be reinstalled.
8. The site will be seeded with a 50/50 mixture of BLM #2 and #4 seed. Seeding will take place when the seasonal conditions are conducive to maximizing the potential for seed germination. Actual seeding will be accomplished by broadcast or drilling; whichever is the most practical for the site.

#### **Notifications and Special Conditions**

1. The OCD and BLM will be notified prior to the commencement of on-site operations.
2. The OCD and BLM will be notified prior to each sampling event to allow the opportunity to witness the sampling events. Splits will be made available if requested.
3. The OCD and BLM (if applicable) will be notified when the site is closed for final inspection prior to seeding.
4. A final report documenting the closure of the site will be submitted along with a final C-141.

A site map presenting the area of excavation and the predetermined sampling points that will be used during the course of remediation is attached.

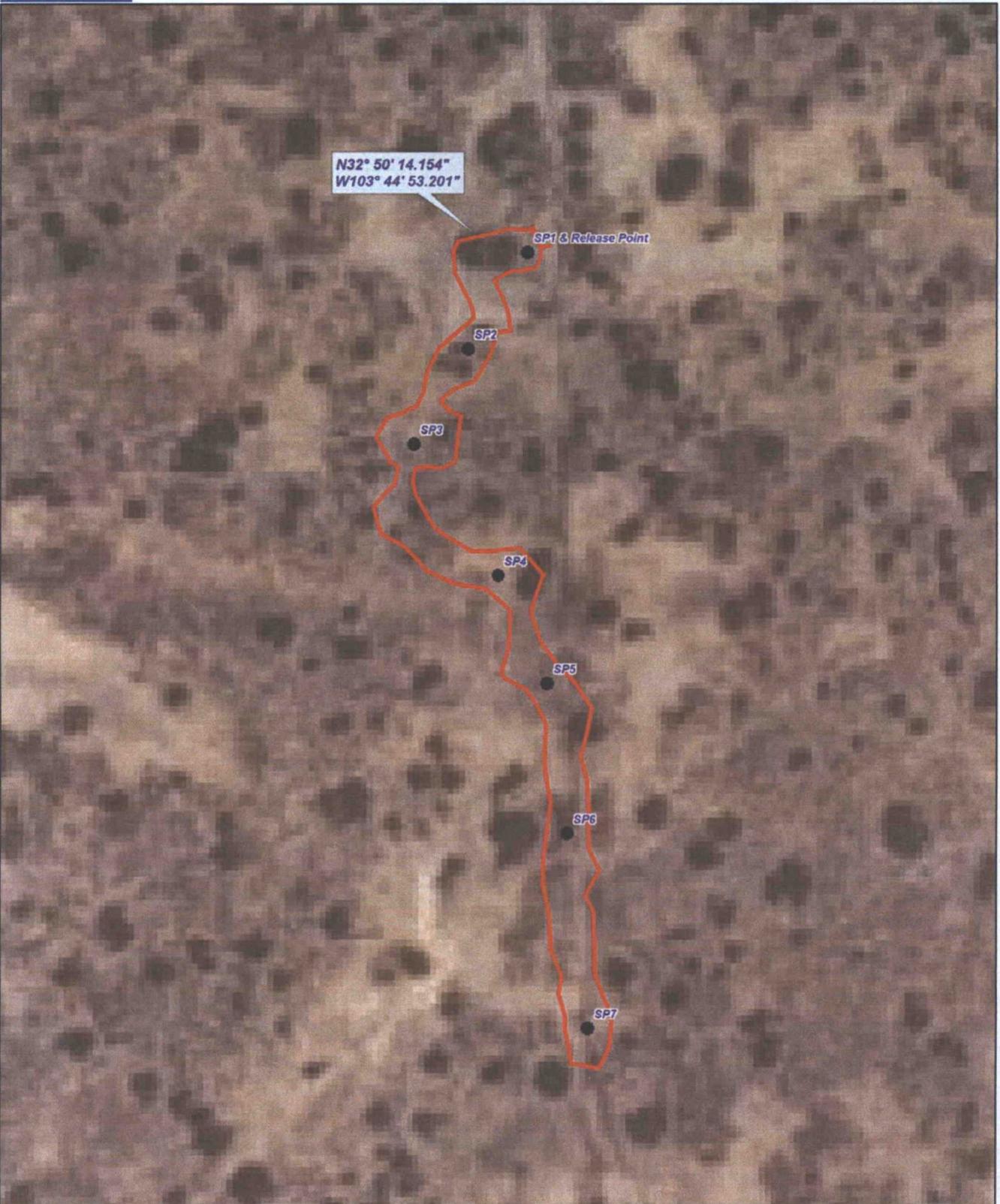
Thank you for your assistance on this matter. Should you have any questions, require additional information, or have any additional stipulations for this site, please contact Mr. Ron Ragland at (575) 738-1739 (Office) or via email at [RRagland@linnenergy.com](mailto:RRagland@linnenergy.com) or myself at (432) 563-2200 (office) or via email at [fred@etechnv.com](mailto:fred@etechnv.com).

Respectfully:



Fred Holmes  
Environmental Professional

cc: Trishia Bad Bear, BLM Carlsbad District Office, Hobbs Field Station  
[tbadbear@blm.gov](mailto:tbadbear@blm.gov)



N32° 50' 14.154"  
W103° 44' 53.201"

SP1 & Release Point

SP2

SP3

SP4

SP5

SP6

SP7

Scale 1:900



**MGU 77-2**  
**Release Assessment, Excavation & Sampling Points Map**



MN (7.6° E)

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