DISTORALLY 1220 S. St. French Dr., Same Fr., NM 87505

Form C-144 Nas 1, 2004

PHOENIX ENVIRO

Alimetres 1815 M. Francis Cv., Holde, Nim 181240 State of New Mexico Energy Minerals and Natural Resources District II 1301 W. Ormai Avenue, Arenda, NM 66216 District III I Cao Rio Brisco Road, Azes, NM 87410

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

For drilling and production the littles, subtait to appropriate NMOCD District Office. For downstream facilities, subtait to Sente Pe office

Pit or Below-Grade Tank Registration or Closure

is pit or below-grade tank covered by a "general plan"? Yes [] No [M] Type of action: Registration of a pit or bulier-grade tank [D] Closure of a pit or helper-grade tank [M]		
C. 4 74 BILL 605 6 186	432-687-6600 mail address 6	1
Operator Significa COMATING Telephone Auditor Policia 10303 Middle Toras		and the Constitution of th
	30-02532937 UN ONCO H	5m 10 T 235 R 94 E
· · · · · · · · · · · · · · · · · · ·		- 27'-55" WALE 1927 [] 1913 []
Surface Owner: Federal D State D Private D Indian D		
- All	Andrewson's mak	
Disc. Delling (Production Disposal)	Volume;bbi Type of fluid:	4
Workers 🖸 Emergency 🖸	Construction respected:	A
Lined W Contract [Double-walled, were leak detection? Yes 1 15	or, topolais way act.
Liner type: Symbotic [] Truckness[O_mil Clay []		
Fft Volume [550 be)		
Deput to ground water (vertical distance finds bottom of pit to required	Less than 50 that	(20 points)
tigh water clonesics of ground water.) 280 Bq 5	50 first or many, but less than 100 sect.	(10 polata)
~~~~		( v p.sa.s)
Wellnesd personium som: (Lass than 200 for from a private determin	Yes	(20 points)
within source, or less than 1000 test from all other water sources.)	No	( C points)
Orstance to surface water (normoretal distance to all wetlands, player,	Lans then 200 fast	(20 points)
Miganou candis, dambra, and personnal and ephonoral watercourses.)	200 fost or shore, but less than 1000 ther	(10 posts)
	1000 feet or more	(O points)
	Reality State (Total Points)	0
Califician and content (1) which congrues of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the contin		
Our are burying an phase) course of fifthe the original finding the original and the first and the original		
5) At 4ct with featurate respite and a character and a character and a character and a consideration		
AND WOOD CONDUCTOR SOCIO ( MORE ( NOV.)		
		N Film coop & Co
φ Descined		WUL LUUT -
Hobbs A		
OCD &		
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		
\(\frac{1}{10}\)\(\frac{1}{10}\)		
has been will be constructed or closest according to NESOCO guidelines		
Sum 6/29/07		<del></del>
Marian Marian David		
Year exclination and NAOCO approval of this application/alcount does not relieve the operator of limitity should the constant of the pit or tank constanting ground water or observable and one in the provider of the pit or tank constanting ground water or observable and observable and or observable and or observable and observabl		
Approval		
PRINCE NOMETTICE L'TORGESON. ENVIRO ENER SIEVE S		



## PHOENIX ENVIRONMENTAL LLC

P.O. Box 1856

2113 French Dr.

Hobbs, NM 88241-1856

Office 505-391-9685

Fax 505-391-9687

July 3, 2007

Sianna Oil & Gas Co. LLC. P.O. Box 10303 Midland Tx. 79702

Attn: Mr. Richard Vannoy **Production Supervisor** 

RE: Work Plan and Cost to Clean Up the Newkumet Fed # 1 Drill Pit Located in U/L H Sec 10, T23S and R34E of Lea County, New Mexico

Dear Mr. Vannoy:

Phoenix Environmental, LLC (Phoenix) would like to take this time to thank you and Sianna Operating, for the opportunity to provide our professional services. Please find attached our work plan for the above listed site.

If you have any questions and/or need more data in regards to projects please call at any time. My cell phone is 505-631-8323.

Sincerely,

Reynaldo Garza, Sr. Project Manager

Phoenix Environmental LLC

SE Hopp OCD

Rec Hopp OCD



## Summary/Overview

The Newkumet Fed # 4 Drilling pit site should be completed and remediated in accordance with the standards of the NMOCD. It is our understanding that any potential contamination from the site was a result of leaching from the old existing drilling pit that was closed years ago.

The potential contaminates of concern are mid to high-level concentrations of drilling mud and cuttings that were left after drilling operations were completed and the old pit was closed.

The lands primary use is domestic pasture for ranching and the production of oil and gas.

The ground water depth data available for this area showed the depth to ground water to be in the 280' range BGS.

Pursuant to the standards of the NMOCD, the clean up level for this site will be at <5,000ppm of TPH, <50ppm for BTEX and Chlorides less than <250ppm.

The following scope of work was based on data from our site visit and the requirements of the NMOCD for site clean up.

## Scope of Work for Entombment of Impacted Soils

**NOTE:** Phoenix, for the purpose of this work plan, will estimate that there is approximately 2,225cyds of impacted cuttings and caliche from the Drilling Pit at the site that needs to be addressed for site closure. This would involve the removal of the top three feet of impacted soils and re deep burying the impacted soils in place.

- 1. First Phoenix will call One-Call for line spot clearance before any excavation at the site is started.
- Phoenix will mobilize to the site located in the Antelope Ridge area Southwest of Eunice, NM equipment and personnel necessary to start and complete the site remediation as required, getting the site back into compliance.



- 3. First the site will be cleared of brush and debris and a staging area set up for site control and safety.
- 4. Phoenix will excavate the tomb to hold the contents from the top three feet of the old Drilling Pit. While leaving the top of the impacted soils at a minimum of three feet below grade and lined with 12mil HDPE bottom. The size of the tomb will need to be 30x20x125 and will yield an estimated 2,778cyds of total material and will hold an estimated 2,333cyds of impacted soils.
- 5. Once the tomb area has been excavated it will be lined with 12mil HDPE bottom and sides. Impacted soils at the site will then be immobilized, transferred and placed in the lined tomb area until the top of the impacted soils are at a minimum of three feet below grade.
- 6. A 20mil sewn on top will be placed above the impacted soils before backfilling the tomb area.
- 7. Phoenix will field screen the site during the excavation and once the TPH and CL has dropped below clean up requirements final samples will be taken and sent to a third party lab for analysis.
- 8. Once all of the remediation criteria have been met for site closure and compliance, the site will be backfilled with clean material from the site. The site will be contoured with a slight crown to prevent the ponding of any rain water and reseeded.
- 9. Once all of the closure criteria have been met, a final closure report will be prepared by Phoenix. This report will include a summary of remediation operations, findings on-site and lab analysis, site maps and project photos.

If you have any questions and/or need more data in regards to this project please call 505-631-8323 at any time.

Sincerely

Reynaldo Garza

Sr. Project Manager

Phoenix Environmental LLC







