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## PHOENIX ENVIRONMENTAL LLC

P.O. Box 1856 21

2113 French Dr.

Hobbs, NM 88241-1856

Office 505-391-9685

Fax 505-391-9687

February 21, 2008

Kaiser-Francis Oil Company P. O. Box 120 Rush Springs, OK 73082

Attn: Mr. Charles Garner Drilling Superintendent

## RE: Work Plan and Cost to Clean Up the Bell Lake Unit # 26 Drilling Pit Located in UL-I, Sec 6, T24S and R34E of Lea County, New Mexico API # 30-025-38564

Dear Mr. Garner:

Phoenix Environmental, LLC (Phoenix) would like to take this time to thank you and Kaiser-Francis Oil Co. for the opportunity to provide our professional services. Please find attached our work plan and cost 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 505-631-8310.

Sincerely,

s/aum

C. E. Nowak General Manager Phoenix Environmental LLC







## Summary/Overview

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The Bell Lake Unit # 26 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 activities associated with the drilling and production of oil and gas.

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

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 75'-80' 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 2,500cyds of impacted cuttings and drilling mud at the site that needs to be addressed for site closure.

- 1. First Phoenix will call One-Call for line spot clearance before any excavation at the site is started.
- 2. Phoenix will mobilize to the site located southwest of Eunice, NM equipment and personnel necessary to start and complete the site remediation as required, getting the site back into compliance.
- 3. The site will be cleared of brush and debris and a staging area set up for site control and safety.



- 4. Phoenix will excavate on the south side of the drilling pit the tomb to hold the contents of the drilling pit. While leaving the top of the impacted soils at a minimum of three feet below grade, the size of the tomb will need to be 150x30x20 and will yield an estimated 3,334cyds of total material and will hold an estimated 2,800cyds of impacted soils.
- 5. Once the tomb area has been excavated it will be lined with 20mil HDPE bottom and a 20mil sewn on top above the impacted soils before backfilling
- 6. Impacted soils at the site will then be placed in the lined tomb area until the top of the impacted soils are at a minimum of three feet below grade.
- 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 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 and conclusions 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 505-631-8310 at any time.

Sincerely,

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C. E. Nowak General Manager Phoenix Environmental LLC





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