

From: Patterson, Heather, EMNRD
To: ["Larry Davis"](#)
Cc: [Jeff Teare](#); [Greg McWilliams](#); [Cliff Brunson](#); [Hughes, Solomon](#); [Bratcher, Mike, EMNRD](#)
Subject: RE: Remediation of release site Beeson F Federal #029
Date: Tuesday, December 09, 2014 1:29:00 PM
Attachments: image001.png

Larry,

Your proposed remediation is approved as written.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson
Environmental Specialist
NMOCD District II
(575)748-1283 ext.101

From: Larry Davis [mailto:Larry.Davis@energyquest.us]
Sent: Monday, December 01, 2014 3:19 PM
To: Patterson, Heather, EMNRD
Cc: Jeff Teare; Greg McWilliams; Cliff Brunson
Subject: Remediation of release site Beeson F Federal #029

Heather,

Regarding remediation of the Beeson F Federal #029 site resulting from a release on 03 August 2014, EnergyQuest has repaired all damaged lines and excavated the impacted area, removing contaminated soils and vegetation. Samples from that site were tested; initial analysis is attached. (See PDF's "Lab Analysis" and Lab Summary" dated 8-20-14). On 23 October 2014, EnergyQuest met and consulted with Sol Hughes and Jeffrey Robertson from the BLM. Following an on-site visit by both gentlemen, a remediation plan was developed and submitted to the BLM for approval. Below is the plan presented:

Corrective Actions for Beeson F Federal #029 Release site

It has been determined that this area has no groundwater concerns. Excavation at the site has reached a depth of approximately thirteen feet. Included in the discussion was reduction of the pad site and using material from the pad both as backfill and potentially as the cap over the backfill.

The corrective actions we discussed included:

1. Extract one (1) core sample from the floor of the excavated site and test for chlorides.
2. Remove caliche from the outer skirt of the #029 pad and re-use it for backfill and as a cap over the backfill. Extract sample from this material to verify it is clean of contaminants

before using it for a cap over the backfill.

3. Backfill the excavation to the exposed natural caliche layer.
4. Cap the backfill with at least 1 foot of clean caliche (intent is to use caliche from the #029 pad if sampling shows it to be clean – if not, clean caliche will be brought in).
5. Add an additional 2 feet of clean, viable soil to the caliche cap, and contour the entire site to imitate as best as possible the natural contours of the surrounding area.
6. Replace material removed from the #029 pad with enough clean, viable soil to allow for proper root growth and contouring of the area to imitate as best as possible the natural contours of the surrounding area.
7. When appropriate, re-seed both locations with mixture determined by the BLM as best suited for the area.

BLM accepted EnergyQuest's proposal for Corrective Actions on October 29, 2014, with the stipulation that additional samples demonstrated that contaminants were within acceptable limits. (See attached email "Re: EnergyQuest Proposed Actions – Grayburg Water Flood and Beeson #029".) Please be aware that this email also contains a proposal for remediation of the Grayburg Jackson Water Flood Tank Battery, which is not part of the Beeson #29 incident. That remediation is to correct historical damage that EnergyQuest inherited from previous operators.

As directed by the BLM, additional samples were taken from the Beeson #29 site and submitted for analysis; testing demonstrated that samples were within limits. (See attached email "Sampling Results – Beeson F Federal #29" and PDF's "Lab Analysis" and "Lab Summary" dated 11-14-14).

On December 1, 2014, Sol Hughes gave BLM's approval to proceed with remediation and outlined expectations. However, BLM stipulated that the proposal still requires approval from NMOCD. ("Re: Sampling Results – Beeson F Federal #29".)

In accordance with that requirement, EnergyQuest now submits our proposal and supporting documents for your review and approval.

Larry D. Davis

Environmental Quality & Safety Manager

The logo for EnergyQuest, featuring the word "EnergyQuest" in a stylized blue font with a small graphic element to the left.

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