

Bratcher, Mike, EMNRD

From: Gregston, Terry G <tgregsto@blm.gov>
Sent: Monday, October 10, 2011 3:37 PM
To: Tavaraz, Ike
Cc: Bratcher, Mike, EMNRD; Amos, James A
Subject: RE: COG - Moose 23 Federal 1Y Tank Battery-Work Plan stipulations

Gentlemen,

The work plan for the Moose 23 Federal 1Y Tank Battery is approved with the following stipulations:

1. Notify Terry Gregston, (575) 361-2635, when you move equipment onto the location to begin cleanup operations.
2. Notify Terry Gregston in the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts. An onsite may be required to assess the situation.
3. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures. In the case of the Moose 23 Federal 1Y Tank Battery, the location is still a working tank battery location. As such, excavation depths in portions of the spill area in close proximity to standing production equipment maybe limited due to safety concerns. In such cases, such limits to cleanup measures should be considered a temporary spill abatement measure that will be further mitigated upon the abandonment of the well/facility location. Appropriate notations to that effect will be entered in the well file.
4. While sites AH6 and AH7 are below closure limits, some surface cleanup may be required in these areas to prevent oiled soils from oiling rainwater held in the tank battery containment, creating a hazard to birds/bats/wildlife.
5. The BLM will wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of sidewalls and any visibly affected areas outside of the excavation trench will be required; the BLM will witness the sampling. Contact Terry Gregston to schedule.
6. Lab analysis of the confirmation sampling must be forwarded to Terry Gregston at terry_gregston@nm.blm.gov for final approval before backfilling. Based on the sampling results, additional cleanup may be required or the site may be approved for closure.
7. Once final approval of cleanup is given, the excavation can be backfilled with clean caliche to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
8. Install secondary containment berms around existing production equipment and/or the pad to prevent future spills from being released off the location.
9. Notify the BLM when the site work is finished for final inspection.
10. Upon abandonment of the well, any portions of the spill that were not fully mitigated (due to safety concerns created by proximity to standing equipment) will be fully mitigated and surface vegetation restored.

BLM approval of this proposal does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health, or the environment, or if the location fails to reclaim properly. In such an event that location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws/regulations.

Terry Gregston
Environmental Protection Specialist
Bureau of Land Management

620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958
Cell (575) 361-2635
Fax (575) 234-5927

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From: Tavarez, Ike [mailto:Ike.Tavarez@tetrattech.com]
Sent: Thursday, September 22, 2011 3:52 PM
To: Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Amos, James A
Subject: FW: COG - Moose Fed. TB and Dogwood Fed. - Eddy County - Work Plan Approval Request

Terry,

The original sent email failed due to size. Here is the Moose Work Plan and the Dogwood Wood will follow, thanks .

Ike Tavarez
Tetra Tech

From: Tavarez, Ike
Sent: Thursday, September 22, 2011 4:19 PM
To: 'Bratcher, Mike, EMNRD'; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: 'Pat Ellis'; 'Joshua Russo'; James Amos@blm.gov; Grubbs, Robert
Subject: COG - Moose Fed. TB and Dogwood Fed. - Eddy County - Work Plan Approval Request

Mike and Terry,

Please find the enclosed Work Plans for the Moose Federal Tank Battery and the Dogwood Federal Tank Battery located in Eddy County, New Mexico. The work plans includes the soil assessment and recommendations for the remediation of each site. I will mail you a hard copy of the work plan for your files. Once approved, Tetra Tech will schedule the soil remediation and notify you prior to implementing the work plan.. Please let me know if you need additional information or call me if you have any questions, thanks

Ike Tavarez, PG | Senior Project Manager

Mail: 32.667.4659 Fax: 432.682.0946 Cell: 432.474.1876

Ike.Tavarez@tetrattech.com

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1910 North Big Spring | Midland, TX 79705 www.tetrattech.com

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