

Bratcher, Mike, EMNRD

From: Amos, James <jamos@blm.gov>
Sent: Wednesday, September 18, 2013 8:39 AM
To: Amber Cannon; Bratcher, Mike, EMNRD; Jerald Whitlock
Subject: Re: Dolores/Martha Workplans

Amber,

I've looked at the four work plans submitted and will approve with the following conditions:

Martha AIK Federal #1:

1. MB (inside battery), would like to see complete delineation, more excavation and removal, However, I realize this may be impossible working within the battery.
2. MF1, MF2 and MF3, sites need additional delineation to background (MF3 has not started dropping cleaning up). As for the remediation plan, we need at a maximum, the site excavated to 4' prior to liner placement. Closure can consist of placing 3' of caliche and we can work with surfacing material from some of the adjacent locations. We're in LPC and SDL habitat and we're not going to be able to utilize undisturbed sand dunes for capping. We'll work with you on the backfill. As for the roads to drop off the caliche, no problem. When the caliche is picked up you may be able to use for backfill on the other sites.

Martha AIK Federal #1 Tin Horn:

1. MT1, Would like to see somewhere between the 3' and 4', seems to be cleaning up.
2. MT2. Would like to see somewhere between the 2' and 4', have some concern about the bottom sample climbing. I would like to see the background achieved.
3. MTH3, I'm OK with the no excavation. However, I have some concern with the bottom sample climbing. I would like to see background achieved.

Martha AIK Federal #6 Tin Horn:

1. M61, I would feel better with another .5' excavation, or at the least bringing the backfill to above grade to keep the site from pooling on top of the site.
2. TH2, I would like to remove an additional .5'-1.0' (2' we're still high, but drops off quickly).
3. TH3, I'm OK with the liner placement and backfill. However, we need further delineation to background. The additional excavation to the west, taking out the 9,330 chlorides, should be to background.
4. At this time, I'm not too concerned about the road. May need to look at later when reclaimed.

Dolores AIL Federal #1 Tin Horn:

1. Scrape the pad and remove the surface impact. Will address the impact @ abandonment.

2. We can monitor section 3. If salts show up through the leaching process, we may have to excavate and haul.
3. I'm OK with the excavation of the 4'.
4. Excavate and remove the 6160 chlorides and we'll pretty much have the bulk.

The above changes would be subject to OCD like approval. Notify Duncan Whitlock @ 575-234-59236 prior to start. If we need to discuss further, Duncan and I can come to Artesia and meet with you and Mike. Let me know.

Thanks,

On Fri, Sep 13, 2013 at 1:52 PM, Amber Cannon <ACannon@yatespetroleum.com> wrote:

Jim,

This morning, Lupe Carrasco dropped off four work plans for your review. They are for the Martha AIK Federal #1 Tin Horn, Martha AIK Federal #1 Field, Martha AIK Federal #6 Tin Horn, and Dolores AIL Federal #1 Tin Horn releases. Please review these and let me know any responses you might have and if Yates can move forward with clean up. Yates would like to get started on this work as soon as possible, as our production department has decided they are going to start replacing these lines in the near future.

I am still working on the work plans for the two Dolores AIL Federal #2 (Livingston Ridge Water Line) releases. I will get these plans to you as soon as they are completed.

Thanks,

Amber Cannon

Environmental Regulatory Agent

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