

Bratcher, Mike, EMNRD

From: Michael Stubblefield [mstubblefield@talonlpe.com]
Sent: Tuesday, May 31, 2011 10:10 AM
To: Bratcher, Mike, EMNRD
Cc: David Adkins
Subject: FW: Keel A 34 work plan approval and approval stipulations

From: tgregsto@blm.gov [mailto:tgregsto@blm.gov]
Sent: Monday, May 30, 2011 4:25 PM
To: Michael Stubblefield
Subject: Re: Keel A 34 work plan approval and approval stipulations

Mr. Stubblefield,

The work plan for the J L Keel A 34 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. The goal of horizontal cleanup is to ensure that there is a minimum of 4 feet of clean soil across the horizontal surface of the entire spill affected area.
4. 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.
5. 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.
6. Notify Terry Gregston when the clay liner is installed. An onsite may be required prior to backfilling on top of the liner.
7. Once final approval of cleanup is given, the excavation can be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
8. Install erosion control measures in the pasture-affected areas to prevent the unconsolidated soils from washing or blowing away.
9. Seed reclaimed and equipment-impacted pasture areas with a combination BLM seed mix #2 and #4 (50/50 mix).
10. Notify the BLM when the site work is finished for final inspection and sign off on spill cleanup.
11. Continue to monitor spill reclamation area to ensure impacted pasture areas revegetate and that erosion issues do not develop.

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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Michael Stubblefield <mstubblefield@talonlpe.com>

To "terry_gregston@blm.gov" <terry_gregston@blm.gov>

cc

05/24/2011 07:56 AM

Subject FW:

Terry,

Talon/LPE is sending you the work plan for the Linn Operating Keel A No. 35 release.

Mike Stubblefield
Talon/LPE Project Manager

-----Original Message-----

From: David Adkins [<mailto:dadkins@talonlpe.com>]

Sent: Monday, May 23, 2011 9:48 PM

To: Michael Stubblefield

Subject:

This E-mail was sent from "RNPD1CF02" (C2525).

Scan Date: 05.23.2011 18:47:42 (-0900)

Queries to: scans@talonlpe.com

[attachment "20110523184742264.pdf" deleted by Terry G Gregston/CFO/NM/BLM/DOI]