

Bratcher, Mike, EMNRD

From: tgregsto@blm.gov
Sent: Thursday, August 18, 2011 6:19 PM
To: Tavarez, Ike
Cc: Joshua Russo; Bratcher, Mike, EMNRD; Pat Ellis; Grubbs, Robert; Terry Gregston (terry_gregston@nm.blm.gov); jamos@blm.gov; astockto@blm.gov; jgoodbar@blm.gov
Subject: Re: COG - Sagebrush Federal Tank Battery-Work Plan Approval stips

Gentlemen,

The work plan for the Sagebrush Federal Com 1 is approved with the following conditions of approval. It should be noted that this release occurred in a High Cave/Karst area with known shallow fresh groundwater concerns. As a result, some of the stipulations have been drafted at the specific request of the BLM Cave/Karst Natural Resource Specialists to address both Cave/Karst and hydrological concerns in the area. The stipulations are as follows:

1. Prior to beginning spill remediation work, and as soon as practical, a preliminary water sample will be pulled from the water well located 0.6 miles due west of the spill site and analyzed for chlorides, BTEX, and DRO/GRO. (Map to water well was forwarded on 07/28/11.) Monitoring water samples will be pulled and comparatively analyzed at 6 month intervals thereafter for a period of 2 years.
2. The new tank battery will be constructed with berms large enough to contain any spills that may occur. Bermed areas will be lined with rip-stop padding to prevent tears or punctures in the tank battery liner. The tank battery will be lined with a permanent 20 mil plastic liner.
3. The proposed work plan states that an excavation of 20 feet will be made. At 20 feet, according to the current delineation of the spill site, the site is still above closure limits on BTEX. If such proves to be the case during confirmation sampling as well, then the excavation will be extended in depth until BTEX falls below closure limits.
4. Due to the depth of the excavation to 20 or more feet, the excavation may need to be stepped out for safety reasons.
5. Any "stepping out" and/or excavation traffic in the adjoining pasture must be restricted to a distance of no more than 90 feet from the existing tank battery berm. If it is necessary to create a pasture disturbance that is greater than this distance in order to safely conduct the spill excavation, then an archeological survey of the impacted area beyond the 90 foot marker must be conducted *prior* to exceeding the 90 foot limit. The operator is advised to stake the boundary of the existing archeological survey, to put up a flagged temporary fence to keep all vehicles and construction equipment within the 90 foot limit, and to only permit pasture disturbances that are necessary for spill mitigation. Whenever possible, vehicles should park on and utilize the existing pad area instead of the pasture.
6. Notify Terry Gregston, (575) 361-2635, when you move equipment onto the location to begin cleanup operations.
7. Notify Terry Gregston in the event that you encounter excavation difficulties, *void areas, underground channel areas that come into the sides of the excavation,* or archeological artifacts. If you encounter either voids or side channels, stop operations and contact the BLM immediately. An onsite may be required to assess the situation prior to proceeding. Do not collapse side channels or backfill void areas.
8. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures.
9. The BLM will wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of bottom, 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.
10. 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.
11. Once final approval of cleanup is given, the excavation can be backfilled with 2 feet of clay material in the bottom, then the clay wetted and compacted. Clean caliche fill can be used on top of the clay layer to 4' BGS. Topsoil should be used as fill on top of the caliche to the surface. If the area is suitable to place into interim reclamation at that point, then the caliche pad surface should *not* be reinstalled and the reclaimed area should be ripped, erosion control installed, and seeded along with the disturbed pasture areas.
12. Disturbed pasture areas/excavations will 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. 4' of gypsum topsoil should be installed on top of backfill materials in pasture areas.
13. Install erosion control measures in the pasture-affected areas and reclaimed pad areas to prevent the unconsolidated

reclamation materials from washing or blowing away until reclaimed areas settle and begin to revegetate.

14. Portions of disturbed pad area that will be returned to active use status should be surfaced with 6" of clean caliche on top of clean soil backfill.
15. Seed reclaimed and equipment-impacted pasture areas with a combination BLM seed mix #3 and #4 (50/50 mix).
16. Notify the BLM when the site work is finished for final inspection and sign off on spill cleanup.
17. Continue to monitor spill reclamation area to ensure impacted pasture areas revegetate and that erosion issues do not develop.
18. Continue to pull water samples from the water well for a two-year period at 6-month intervals. Notify the BLM when the samples are to be taken; forward 3rd party lab analysis of the samples to the BLM as soon as practical after sampling. At the end of the two year monitoring period, the case will be evaluated as to whether or not there is a need to continue the monitoring.

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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"Tavarez, Ike" <Ike.Tavarez@tetrattech.com>

08/18/2011 02:34 PM

To "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Terry Gregston (terry_gregston@nm.blm.gov)" <terry_gregston@nm.blm.gov>

cc Pat Ellis <PEllis@conchoresources.com>, Joshua Russo <jrusso@conchoresources.com>, "Grubbs, Robert" <Robert.Grubbs@tetrattech.com>

Subject COG - Sagebrush Federal Tank Battery - Work Plan Approval Request

Mike and Terry,

Please find the enclosed Work Plan for the COG - Sagebrush Federal Tank Battery located in Eddy County, New Mexico. Once approved, Tetra Tech will schedule the soil remediation and will notify you before we start. I will mail you a hard copy of the work plan for your files. Please let me know if you need additional information or call me if you have any questions, thanks

Ike Tavarez, PG | Senior Project Manager

Main 432 682 4559 | Fax 432 682 3946 | Cell 432 425.3878

Ike Tavaréz@tetrattech.com

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

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[attachment "Sagebrush Federal Tank Battery - Work Plan .pdf" deleted by Terry G Gregston/CFO/NM/BLM/DOI]