

**From:** tgregsto@blm.gov  
**Sent:** Thursday, September 01, 2011 12:33 PM  
**To:** Tavarez, Ike  
**Cc:** Joshua Russo; Bratcher, Mike, EMNRD; Pat Ellis; Grubbs, Robert  
**Subject:** Re: East High Lonesome Tank Battery- Work Plan-Approval Stipulations

**East High Lonesome Tank Battery:**

It should be noted that the OCD required the installation of a water monitoring well on this location. The operator installed a water monitoring well on 03/03/11 to a depth of 220'. On 03/23/11, the well was gaged and found to be dry. Depth to groundwater at the spill location is in excess of 220'.

The work plan for the East High Lonesome Tank Battery spill, federal tracking number 10NU056TG, 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 proposal to leave all contaminants in place in proximity to the tank battery equipment is denied. Contaminants around tank battery equipment should be removed to the extent practical. Safety concerns may limit the extent of the cleanup in proximity to large equipment, but the BLM has been mandated to ensure that oil and gas operations do not pose a mortality threat to wildlife or livestock. Contaminants left in place around tank batteries pose a threat to wildlife and livestock. Removal of as much of the contaminants as can be safely removed in proximity to the facility equipment will be achieved in order to comply with applicable wildlife protection mandates.
4. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures. In the case of the East High Lonesome 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 may be 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.
5. Contaminated areas that are not in close proximity to standing equipment will be excavated to a depth of 4' or 1,000ppm chlorides, whichever is achieved first. Contaminated berm materials will also be removed.
6. 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.
7. Lab analysis of the confirmation sampling must be forwarded to Terry Gregston at [terry\\_gregston@nm.blm.gov](mailto: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.
8. 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.
9. Install secondary containment berms around existing production equipment and the pad to prevent future spills from being released off the facility location.
10. Notify the BLM when the site work is finished for final inspection.
11. 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 across the entire location.

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

08/19/2011 09:47 AM

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>, "James\_Amos@blm.gov" <James\_Amos@blm.gov>, "Grubbs, Robert" <Robert.Grubbs@tetratech.com>

Subject COG - East High Lonesome Tank Battery- Work Plan Approval Request

Mike and Terry,

Please find the enclosed Work Plan for the COG - East High Lonesome Tank Battery located in Eddy County, New Mexico. The work plan includes the soil assessment and recommendations for the remediation for the site. Due to the limited groundwater data in the area, Tetra Tech installed a temporary well to establish depth to groundwater for the area. The temporary well was installed at the facility. The well was installed to a total depth of 220' below surface and found no measureable groundwater (dry) in the well. The groundwater information is included in the attached work plan. 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 before we start. Please let me know if you need additional information or call me if you have any questions, thanks

Ike Tavarez, PG | Senior Project Manager

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[attachment "COG - East High Lonesome TB - Work Plan .pdf" deleted by Terry G  
Gregston/CFO/NM/BLM/DOI]