

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, February 06, 2014 10:07 AM  
**To:** 'jwlowry@basinenv.com'; TASavoie@BassPet.com; SJWalters@BassPet.com  
**Cc:** bblackwood@basinenv.com  
**Subject:** RE: BOPCO's PLU #188Y Injection Line Release -- Line and Backfill Exc. #3

Joel,

Subject to BLM approval also.

Thanks,

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

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**From:** Joel Lowry [<mailto:jwlowry@basinenv.com>]  
**Sent:** Thursday, February 06, 2014 9:54 AM  
**To:** Bratcher, Mike, EMNRD; [TASavoie@BassPet.com](mailto:TASavoie@BassPet.com); [SJWalters@BassPet.com](mailto:SJWalters@BassPet.com)  
**Cc:** [bblackwood@basinenv.com](mailto:bblackwood@basinenv.com)  
**Subject:** BOPCO's PLU #188Y Injection Line Release -- Line and Backfill Exc. #3

Mr. Bratcher,

As per our phone conversation, a 20-Millimeter Polyurethane Liner will be installed in the floor of Excavation #3 at the current depth of approximately 6' bgs. Upon installing the liner, the excavation will be backfilled with locally purchased, non-impacted material. Remaining open excavations east of Regency's 6" gas line will also be backfilled with locally purchased, non-impacted material. If you have any questions or need any additional information, please feel free to contact me by phone or email. Thanks.

Respectfully,

Joel Lowry

## Bratcher, Mike, EMNRD

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**From:** Joel Lowry <jwlowry@basinenv.com>  
**Sent:** Tuesday, February 04, 2014 7:17 AM  
**To:** Bratcher, Mike, EMNRD; TASavoie@BassPet.com; SJWalters@BassPet.com  
**Cc:** bblackwood@basinenv.com  
**Subject:** BOPCO's PLU 188Y -- Permission to Backfill Excavated Areas adjacent to Fiberglass Injection Line  
**Attachments:** BOPCO's PLU #188Y Information Packet.pdf

Mr. Bratcher,

Please find attached an information packet that has been prepared for BOPCO's PLU # 188Y produced water release. The release site is located in U/L "D", Sec. 5, Township 24S, Range 30E at 32.25180 North -103.90868 West. The release was attributed to the failure of a section 3" high-pressure fiberglass injection line.

On January 20, 2014, Basin Environmental began excavation activities at the release site. An excavation was advanced at the release point until field tests suggested concentrations of BTEX, TPH and chloride were below NMOCD Regulatory Standards. Further excavation to the south was precluded until the final stages of the remediation project, at which time a portion of the caliche access road will be removed. The final dimensions of the primary excavation at the release point were approximately 70' in length, 15' to 50' in width and 4' to 12' in depth.

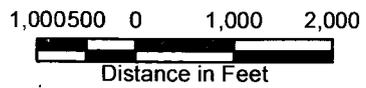
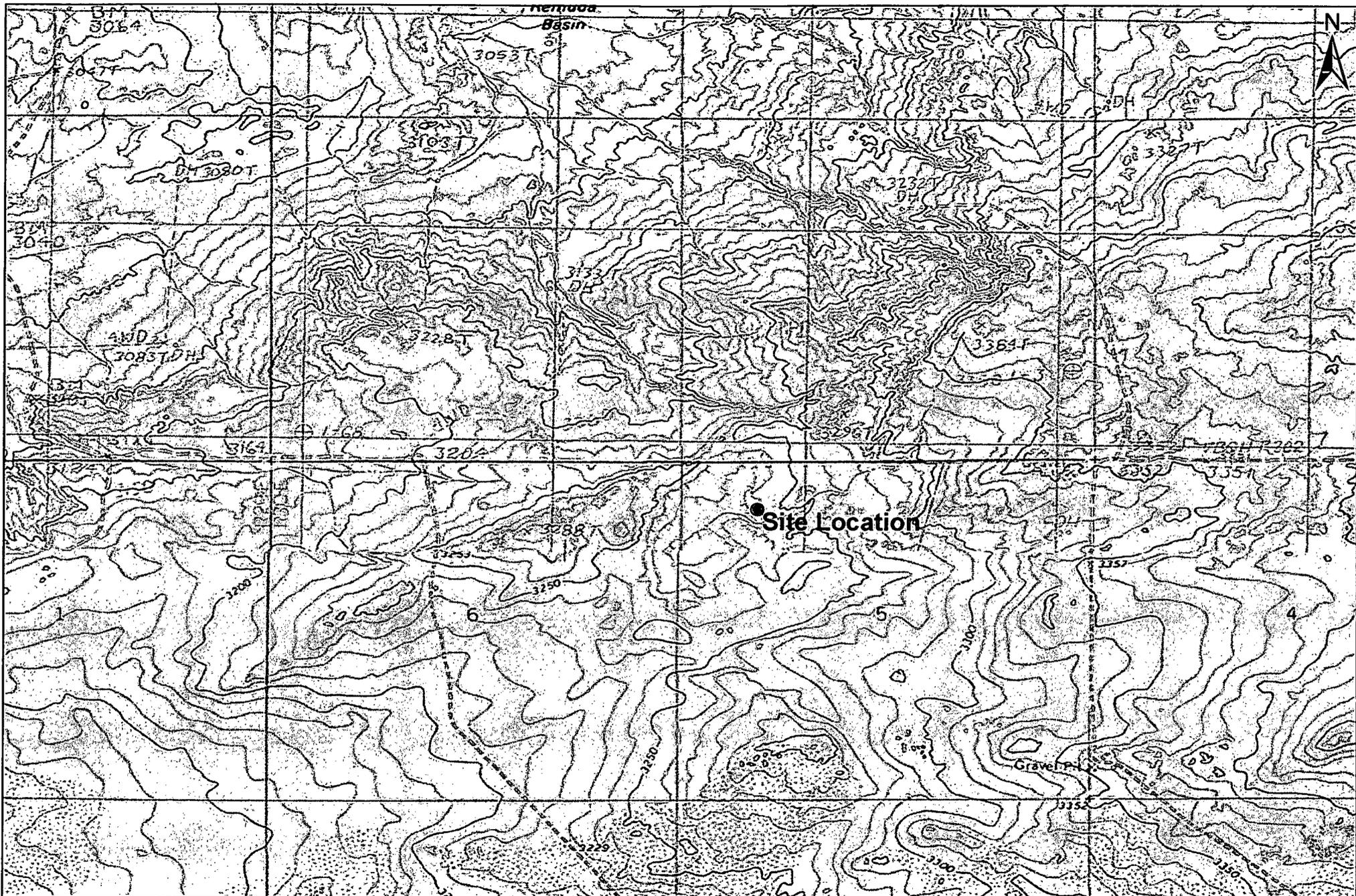
On January 27, 2014, Basin began excavating a pooling area west of the release point, located atop multiple active pipelines. Excavation sidewalls were advanced until field tests suggested concentrations of BTEX, TPH and chloride were below NMOCD Regulatory Standards. An approximate 3' buffer of undisturbed soil was left in-situ on one or both sides of all active pipelines as a safety precaution. The floors of the resulting excavations were advanced until concentrations of chloride were below NMOCD Regulatory Standards or to the maximum extent practicable given the congested nature of the active pipelines, instability of the sand and need for appropriated benches. The final dimensions of Exc. 3 were approximately 42' in length, 20' in width and 6' in depth. The final dimensions of Exc. 4 were approximately 70' in length, 15' in width and 4' in depth.

On January 28, 2014, a series of test trenches (Exc. 3 TT and Exc. 4 TT) were advanced within the areas exhibiting chloride concentrations above NMOCD Regulatory Standards in an effort to determine the vertical extent of soil impact. Test Trench Exc. 3 TT was advanced in the floor of Exc. 3 to approximately 18' bgs. During the advancement of the test trench, soil samples were collected at 8', 12' 16' and 18' bgs and submitted to the laboratory for analysis of chloride concentrations. Laboratory analytical results indicated chloride concentrations ranged from 17,000 ppm for the soil sample collected at 12' bgs to 96.0 ppm for the soil sample collected at 18' bgs. Test Trench Exc. 4 TT was advanced in the floor of Exc. 4 to approximately 18' bgs. During the advancement of the test trench, soil samples were collected at 4', 8' 12' and 18' bgs and submitted to the laboratory for analysis of chloride concentrations. Laboratory analytical results indicated chloride concentrations ranged from 6,000 ppm for the soil sample collected at 8' bgs to 928 ppm for the soil sample collected at 18' bgs. Laboratory analytical results suggest soil containing concentrations of chloride above NMOCD Regulatory Standards does not extend below 18' bgs in the areas of Exc. 3 and Exc. 4. Laboratory results for TPH analysis of soil samples Exc. 3 TT @ 8' and Exc. 4 TT @ 4' are still pending; field tests suggest they are below NMOCD Regulatory Standards. Additionally, field test results suggest chloride concentrations in soil samples Exc. 4b Floor @ 4'. Exc. 4c Floor @ 4' and Exc. 4 East Floor were below NMOCD Regulatory Standards.

Due to the congested nature of the active pipelines and soil instability, BOPCO requests permission to backfill the excavated areas within the pipeline right-of-ways with non-impacted material without delay. If you have any questions or need any additional information, please feel free to contact myself or Jody Walters by phone or email. Jody has indicated that he may be following up with you shortly. Thanks.

Respectfully,

Joel Lowry

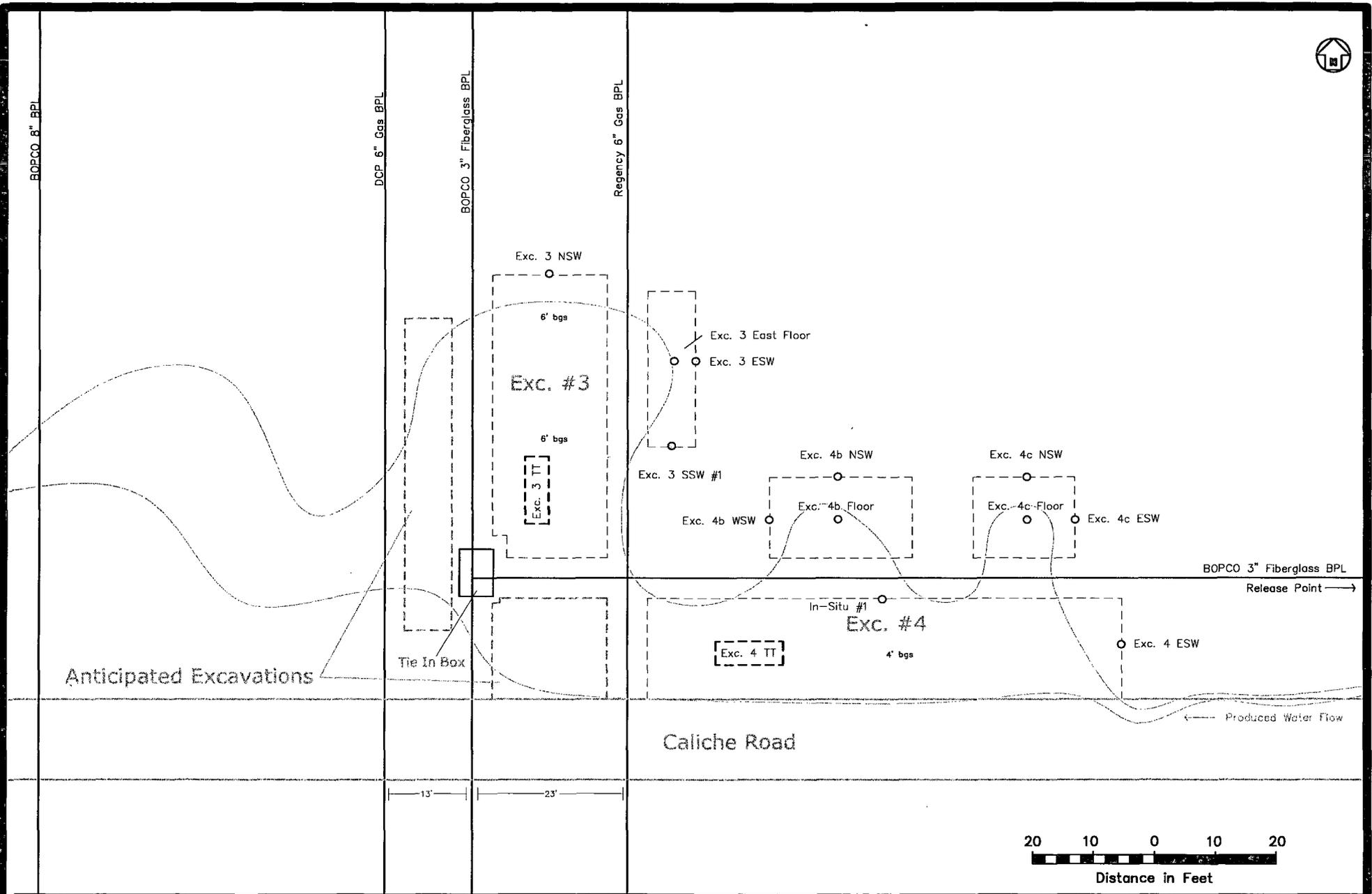


**Figure 2**  
**Site Location Map**  
**BOPCO, LP**  
**Poker Lake Unit #188Y**  
**Eddy County, New Mexico**



Basin Environmental Service Technologies, LLC  
 3100 Plains Hwy.  
 Lovington, NM 88260

Drawn By: BJA	Checked By: BRB
January 17, 2014	Scale: 1" = 2,000'

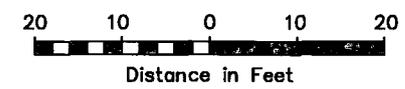


Anticipated Excavations

Tie In Box

Caliche Road

← Produced Water Flow



**Legend:**

- Excavation Extent
- Anticipated Excavation
- BLP Pipeline
- Spill Margins
- High-Pressure Fiberglass
- Sample Location

**Figure 2**  
 Site & Sample Location Map  
 BOPCO, L.P.  
 PLU #188 Y  
 Eddy County, New Mexico

**Basin Environmental Services**

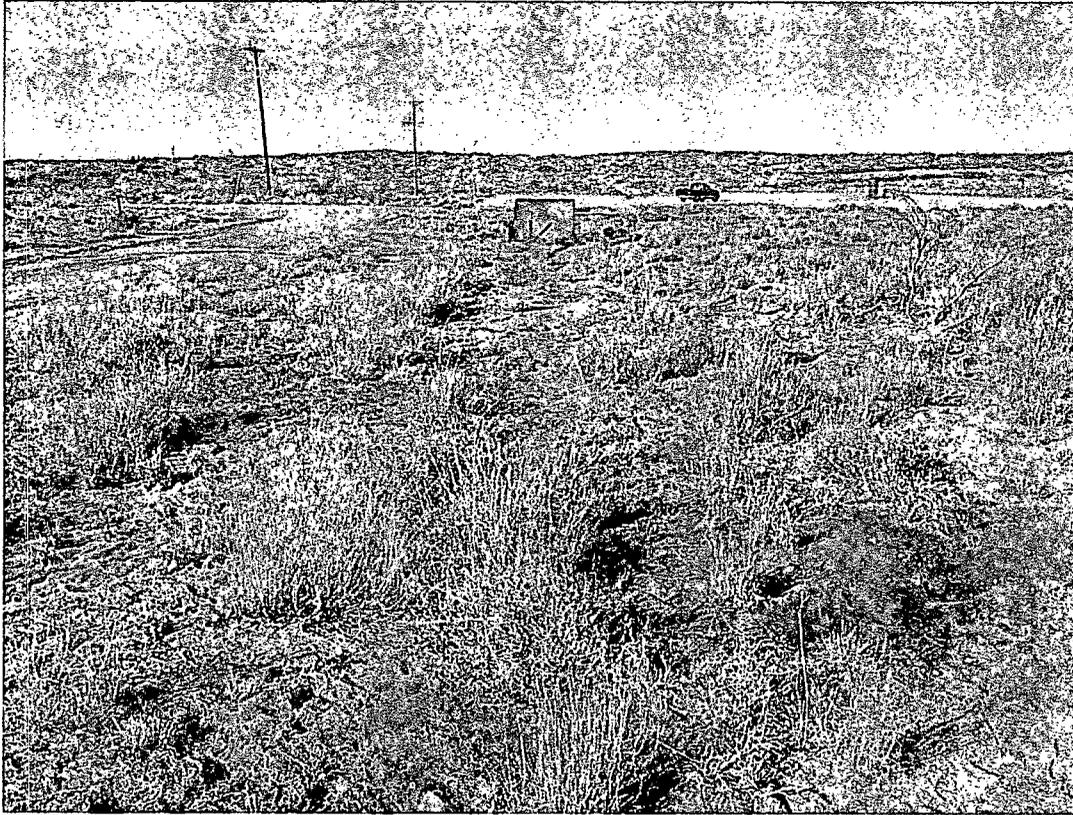
Prep By: JWL	Checked By: BJA
January 30, 2013	Scale 1"=20'

**TABLE 1**  
**CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDES IN SOIL**

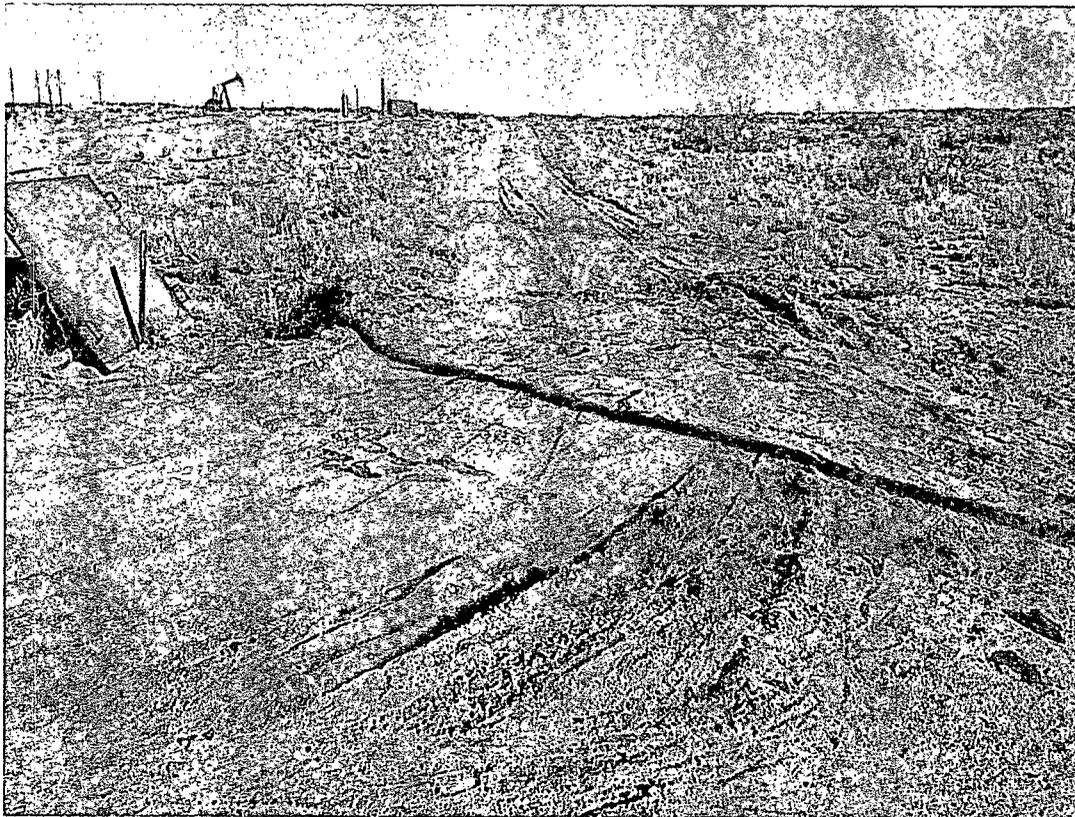
BOPCO, LP  
 PLU #188Y  
 EDDY COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M			TOTAL TPH C <sub>6</sub> -C <sub>36</sub> (mg/Kg)	4500 Cl-B CHLORIDE (mg/Kg)
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>12</sub> (mg/Kg)	DRO C <sub>12</sub> -C <sub>28</sub> (mg/Kg)	ORO C <sub>28</sub> -C <sub>36</sub> (mg/Kg)		
RP N. Floor @ 12'	12'	1/20/2014	In-Situ	-	-	-	-	-	-	-	-	-	112
RP S. Floor @ 9'	9'	1/20/2014	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	544
RP ESW #1	9'	1/20/2014	In-Situ	-	-	-	-	-	-	-	-	-	560
RP ESW #2	5'	1/20/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
RP NSW	9'	1/20/2014	In-Situ	-	-	-	-	-	-	-	-	-	224
RP WSW #1	5'	1/20/2014	In-Situ	-	-	-	-	-	-	-	-	-	176
Exc. 3 TT @ 8'	8'	1/28/2014	In-Situ	pending	pending	pending	pending	pending	pending	pending	pending	pending	10,900
Exc. 3 TT @ 12'	12'	1/28/2014	In-Situ	-	-	-	-	-	-	-	-	-	17,000
Exc. 3 TT @ 16'	16'	1/28/2014	In-Situ	-	-	-	-	-	-	-	-	-	2,200
Exc. 3 TT @ 18'	18'	1/28/2014	In-Situ	-	-	-	-	-	-	-	-	-	96.0
Exc. 4 TT @ 4'	4'	1/28/2014	In-Situ	pending	pending	pending	pending	pending	pending	pending	pending	pending	3,280
Exc. 4 TT @ 8'	8'	1/28/2014	In-Situ	-	-	-	-	-	-	-	-	-	6,000
Exc. 4 TT @ 12'	12'	1/28/2014	In-Situ	-	-	-	-	-	-	-	-	-	1,760
Exc. 4 TT @ 18'	18'	1/28/2014	In-Situ	-	-	-	-	-	-	-	-	-	928
Exc. 4b NSW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	272.0
Exc. 4b WSW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	320.0
Exc. 4c NSW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
Exc. 4c ESW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
Exc. 4 ESW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
Exc. 3 NSW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
Exc. 3 ESW	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
Exc. 3 SSW #1	3'	1/29/2014	In-Situ	-	-	-	-	-	-	-	-	-	<16.0
Exc. East Floor	4'	1/29/2014	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	48.0
Exc. 4b Floor @ 4'	4'	1/31/2014	In-Situ	-	-	-	-	-	-	-	-	-	pending
Exc. 4c Floor @ 4'	4'	1/31/2014	In-Situ	-	-	-	-	-	-	-	-	-	pending
Exc. 4 East Floor	4'	1/31/2014	In-Situ	-	-	-	-	-	-	-	-	-	pending
In-Situ #1	3'	1/31/2014	In-Situ	-	-	-	-	-	-	-	-	-	pending
<b>NMOCD Criteria</b>				<b>10</b>				<b>50</b>				<b>5,000</b>	<b>1,000</b>

- = Not analyzed.



Photograph the initial release at the PLU #188Y Release Site.



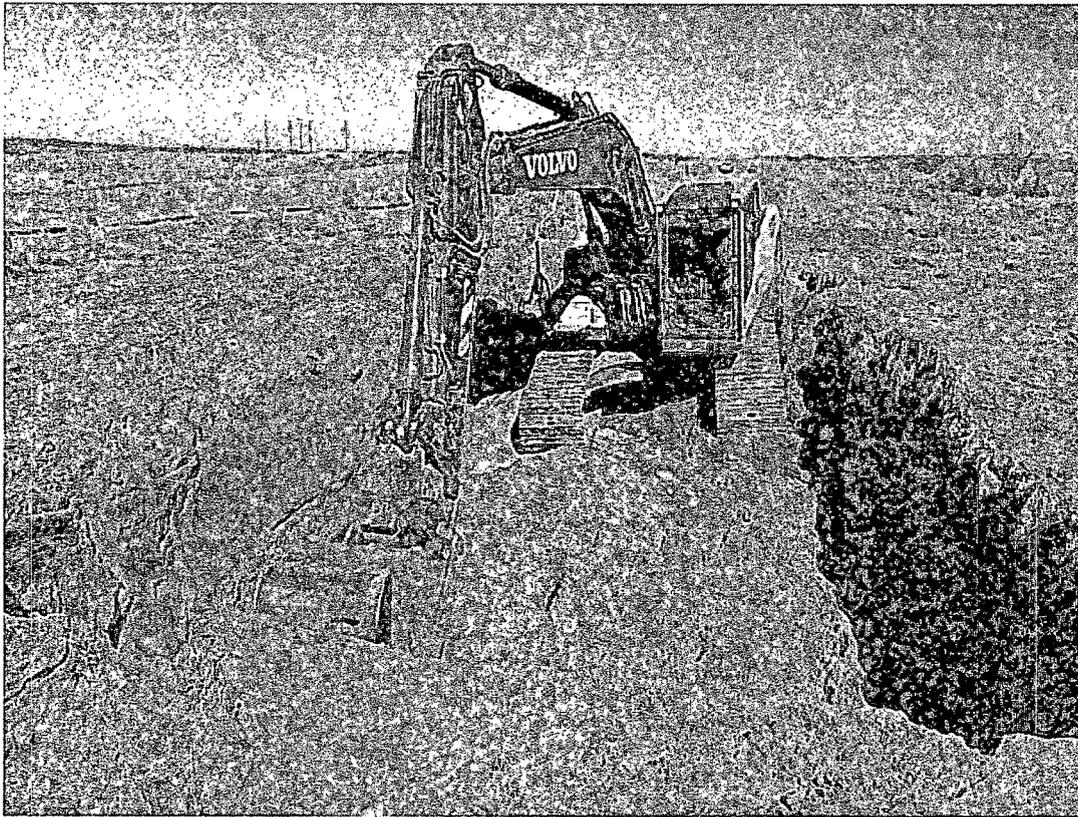
Photograph the initial release and primary pooling area at the PLU #188Y Release Site.



Photograph the excavated release point at the PLU #188Y Release Site.



Photograph of the excavations #3, #4, #4b and #4c at the PLU #188Y Release Site.



Photograph the advancement of the Test Trench within Excavation #3 at the PLU #188Y Release Site.