

**NM2 - 22**

**GENERAL  
CORRESPONDENCE  
YEAR(S):**

**2005**

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Bratcher, Mike, EMNRD

To: Martin, Ed, EMNRD

Cc:

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Subject: Marbob Energy Disposal Proposal

Attachments:

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Ed,

Tim Gum and I met with Randy Hicks, Gil Van Deventer and Dean Chumbley (w/Marbob) yesterday at the site of the proposed drilling pit contents disposal. Currently the surface owner is BLM, so one of the initial hurdles would be to get ownership to Marbob. Their intent then is to drill four or five, 5" OD boreholes on the fringe area of the pit. Different depths of the boreholes were discussed, but I gathered that Randy Hicks believes somewhere around 50' will give the information they want. One of the intents of the boreholes is to determine actual depth to groundwater, which I dont think is deep enough to determine that. The Loco Hills Gas Storage Facility is just West of this site and I think groundwater is around 90' there. They will be coring so probably what Randy is looking at is to verify the existence of anything that could be considered a "barrier" to vertical migration of chlorides. I am pretty sure this and evaporation ratios will be part of the justification for approval.

They also indicated that the pit will be used for hydrocarbon impacted soils in a seperate portion of the pit. They seemed to be hesitant to call it a landfarm and seemed to prefer landfill. I asked if the hydrocarbons would be remediated to acceptable levels there or if remediation would be done at another site and then brought in to this pit. The answer was sort of vague, so I assume they have not really thought that out yet.

The pit is to be permitted through a 711 permit. I am not familiar with what is required for this type of permitting, but Dean indicated they have researched and "have copies" of all 711 permits in the area.

One question I asked was if there was any natural run-off from rain into the pit from the outlying area. Since last year was an extremely wet year here, if there is any run-off, there should be some visible indication. That had not been looked at (or thought of) yet.

Hope this is some help and let me know if we can do anything else on this end.

Mike