

From: Terry_Gregston@blm.gov
Sent: Thursday, August 05, 2010 11:20 AM
To: Bratcher, Mike, EMNRD
Cc: Michael Barrett
Subject: RE: FW: Williams A Federal Battery Spill Reports

The BLM also requires a 2 to 3 day notification prior to sampling. We will need the opportunity to witness the sampling prior to final closure. All lab results from the final closure sampling must be sent to a 3rd party lab; field sample analysis is not acceptable for closure of the spill; however, you can utilize field samples during the cleanup to monitor cleanup levels until closure limits are achieved. Then, once your field samples show that you have achieved your cleanup goals, call me and I'll come out and witness the final closure sampling of the excavation.

Once closure is approved, you can backfill with clean soils. And once again, you'll need to notify me prior to removing your heavy equipment from the location at final reclamation. It is more cost effective for the operator if we do our final onsite for dirt work just prior to the site being completed. That way if there are any issues that need to be further addressed, you have the equipment on the location to address it and don't have to haul it back out. The spill site, like all surface disturbances on federal lands, will then need to be seeded. Notify me again when seeding will take place; verification of seeding is necessary prior to spill closure. Then, the site is monitored until it is vegetated.

The following is the text from our current spill reclamation protocols. This is somewhat changed from the past, so I am sending it to you for your reference on this particular spill so that you will be aware of what the BLM will require in the future. The main change is to get spills addressed sooner than in the past, so we will be requiring delineation and cleanup plan submittal within 15 days of the spill event. Additionally, for spills that create surface disturbances in undisturbed pastures and other areas that have not been approved, you'll also need to submit a Sundry notice with your delineation analysis and spill cleanup plan. Quite frankly, it looks more complicated than what it is. Mainly, we are asking to be kept closely in the loop on spill events so that we can document the spill cleanup and methods; prove that cleanup of the spill has been achieved; show that the spill was addressed in a timely manner; and document that both industry and the BLM are doing due diligence on all spill events. If you have an questions, please feel free to call.

1. Contact Terry Gregston, (575) 234-5958, 3 days prior to sampling for spill delineation.
2. After spill delineation, submit the following within 15 days of the spill date for BLM approval (Attn: Terry Gregston) prior to beginning final cleanup operations:
 - a. Third party lab analysis of the spill delineation sampling
 - b. A spill sample plat map
 - c. A cleanup plan (Attn: Terry Gregston) for BLM approval prior to beginning cleanup operations.
 - d. A Sundry notice (form 3160-5) for unauthorized disturbance, referencing the attached cleanup plan to mitigate the disturbance.
3. You will need to obtain "like-approval" by the OCD for any cleanup plan prior to implementation.
4. Contact Terry Gregston, (575) 234-5958, prior to moving equipment on the location for cleanup.
5. Contact Terry Gregston, (575) 234-5958, to witness bottomhole sampling prior to closure.
6. Contact Terry Gregston, (575) 234-5958, prior to pulling heavy equipment off the location and prior to seeding.
7. You can submit cleanup plans via email to terry_gregston@nm.blm.gov. However, submission by email does not imply automatic approval and occasionally email submitted plans are never received. Confirm BLM receipt of email plans by phone well in advance of the abatement date.

Terry Gregston
Environmental Protection Specialist
Bureau of Land Management
620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958

Fax (575) 234-5927

"Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>

To <Terry_Gregston@blm.gov>, "Michael Barrett" <mbarrett@limerockresources.com>
cc

08/05/2010 10:00 AM

Subject RE: FW Williams A Federal Battery Spill Reports

Greetings,

OCD is in agreement with Ms. Gregston. Quick removal of impacted materials is important in mitigating damage. Once all required clearances have been obtained, removal of impacted soils would typically be considered "immediate response action" by the operator or responsible party. OCD will require delineation/confirmation samples to be obtained for analyses prior to any backfill operations. 48 hour notification is also required prior to obtaining samples where the analyses will be submitted to OCD.

If you have any questions or concerns, please contact me.

Mike Bratcher

NMOCD DISTRICT 2
1301 W. GRAND AVE.
ARTESIA, NM 88210
575-748-1283 EXT.108
mike.bratcher@state.nm.us

From: Terry_Gregston@blm.gov [mailto:Terry_Gregston@blm.gov]
Sent: Tuesday, August 03, 2010 1:59 PM
To: Michael Barrett
Cc: Bratcher, Mike, EMNRD
Subject: Re: FW: Williams A Federal Battery Spill Reports

Mr. Barrett and Mr. Bratcher,

Attached you will find a spill map of the 08/02/10 spill on the Williams A Federal 1 for your reference. At the moment, migration of the spill has been partially contained by a pipeline ROW berm to the west and south of the spill. If it will take any amount of time to clean up the spill, or if rain appears to be imminent, I would advise adding to this existing containment on the south end to ensure that the spill does not migrate down slope.

I have checked the spill path against existing archeological surveys and found that a portion of the spill crossed unsurveyed areas. However, a consultation with our lead Archeologist revealed that he is very familiar with this area/location. He has cleared the site of any archeological concerns and the operator can proceed with cleanup at the earliest time possible.

Pending OCD approval, I would like to propose that the heavily contaminated surface soils be picked up and removed as soon as possible to limit the aerial spreading of the spill in the event of rains. Once that surface removal of obviously wet/contaminated soils is done, then we can sample and delineate what is left. The location is on top of a hill crest with very thin topsoils and lots of rocks. A portion of the spill cleanup may also impact a buried pipeline that runs to the west of the spill path. Cleanup of this portion of the spill path will need to be coordinated with the pipeline company/owner. If the pipeline company/owner is Lime Rock, then that makes cleanup that much easier. Again, this is one reason why I'd like to move on picking up the contaminated soils as soon as possible. The longer the spill sits and/or gets rained on, the greater the potential for the spill to run into the pipeline trench and follow that trench downslope (which may have already occurred).

If you have any questions, please feel free to call me. I have received notice that our cell phone transmission lines are experiencing intermittent failures today. So if you can't get through on my cell, use the land line listed below.

Terry Gregston
Environmental Protection Specialist
Bureau of Land Management
620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958
Fax (575) 234-5927
"Michael Barrett" <mbarrett@limerockresources.com>

08/03/2010 01 28 PM

To <Terry_Gregston@blm.gov>
cc
Subject Re FW Williams A Federal Battery Spill Reports

Ok. Thx.
I notified the NMOCD this a.m.

Sent using BlackBerry

From: Terry_Gregston@blm.gov
To: Michael Barrett
Sent: Tue Aug 03 14:24:21 2010
Subject: Re: FW: Williams A Federal Battery Spill Reports

Mr. Barrett,

I have received your email copy of your spill report form for the Williams A Federal Battery spill on 080210. I have GPS'd the spill and will contact you shortly about the archeology on the site.

Thank you,

Terry Gregston
Environmental Protection Specialist
Bureau of Land Management
620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958
Fax (575) 234-5927

"Michael Barrett" <mbarrett@limerockresources.com>

08/02/2010 07:33 PM

To <terry_gregston@blm.gov>
cc
Subject FW: Williams A Federal Battery Spill Reports

From: Michael Barrett
Sent: Monday, August 02, 2010 7:28 PM
To: Terry_Gregscon@blm.gov
Subject: FW: Williams A Federal Battery Spill Reports

From: Michael Barrett
Sent: Monday, August 02, 2010 7:26 PM
To: 'terry_gregscon@nm.blm.gov'
Subject: Williams A Federal Battery Spill Reports

Terry, here is the BLM Undesirable Event Form along w/ Lime Rocks internal spill form.
I will w/o your contact in the morning after you have viewed the site.
Also, I will notify the NMOCD in the a.m.

Michael Barrett
Production Supervisor
Lime Rock Resources
t 575-623-8424
f 575-623-8810
c 505-353-2644
e mbarrett@limerockresources.com



[attachment "Williams A Fed BTTY - Spill Report.xls" deleted by Terry G Gregston/CFO/NM/BLM/DOI] [attachment "Lime Rock Williams BTTY - BLM Spill Form.pdf" deleted by Terry G Gregston/CFO/NM/BLM/DOI]

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