

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, October 28, 2010 11:43 AM
To: 'Tavarez, Ike'; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Pat Ellis; Joshua Russo
Subject: RE: COG - Skelly #611 Work Plan Approval Request

The remediation proposal submitted for the produced fluid release (release date 7/20/2010) on COG's Skelly Unit 611 (API: 30-015-36887) is approved with the following stipulations/conditions:

- Notify OCD 48 hours prior to commencement of remedial activities.
- Notify OCD 48 hours prior to obtaining samples where the analyses will be submitted to OCD.
- Submit a Form C-141 marked Final Report along with a closure report upon satisfactory completion of project.
- Like approval by BLM as may be applicable.

COG is advised that this approval does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose threat to ground water, surface water, human health or the environment. In addition, this approval does not relieve the operator of responsibility for compliance with any other Federal, State, local laws and/or regulations.

OCD tracking number for this incident is: **2RP-452**

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

Mike Bratcher

NMDCD District 2
1301 W. Grand Ave.
Artesia, NM 88210
575-748-1283 Ext.108
575-626-0857
mike.bratcher@state.nm.us

From: Tavarez, Ike [<mailto:Ike.Tavarez@tetrattech.com>]
Sent: Wednesday, October 27, 2010 10:26 AM
To: Bratcher, Mike, EMNRD; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Pat Ellis; Joshua Russo
Subject: COG - Skelly #611 Work Plan Approval Request

COG Operating
Skelly Unit #611 (well site)
Section 22, T17S, R31E, Unit I
Eddy County, New Mexico
32.81944 103.85217

Mike and Terry,

Please find enclosed the Skelly #611 Work Plan located in Eddy County, New Mexico. Once approved, Tetra Tech will schedule the soil remediation and will 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

Main: 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878

Ike.Tavarez@tetrattech.com

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Bratcher, Mike, EMNRD

From: Terry_Gregston@blm.gov
Sent: Wednesday, October 27, 2010 3:09 PM
To: Tavarez, Ike
Cc: Joshua Russo; Bratcher, Mike, EMNRD; Pat Ellis
Subject: Re: COG - Skelly Federal 611 work plan

Ike,

The Skelly Federal 611 work plan submitted on 10/27/10 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 during the process of cleanup.**
- 3. The BLM will wish to inspect the excavation once it reaches cleanup depth. Confirmation samples of the bottom will be required; the BLM will witness the sampling. Contact Terry Gregston to schedule.**
- 4. Once samples are cleared through a third party lab, the excavation can be backfilled with clean soil. Lab analysis must be forwarded to Terry Gregston at terry_gregston@nm.blm.gov for final approval prior to backfilling the excavation.**
- 5. The spill is on an active pad; no seeding is required except for the portions of the spill area that left the pad to the north and to the west. BLM #2 seed mix, hand broadcast is sufficient (areas off the pad are relatively small). Notify the BLM when the site work is finished for final sign off on spill cleanup.**

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
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Office (575) 234-5958
Fax (575) 234-5927