

Bratcher, Mike, EMNRD

From: Cheryl Winkler [cmwink@me.com]
Sent: Tuesday, January 25, 2011 11:34 AM
To: Bratcher, Mike, EMNRD
Cc: tbrandt@mar-win.com; gherrera@mar-win.com
Subject: Dublin 23 Federal No. 1 Lab Results Today

Mike,

Just received a call from the lab regarding the samples which were pulled last week on the Dublin 23 Federal No. 1 unauthorized discharge. Paperwork (emailed info) will not be available until later this afternoon but they phoned the soil chloride values to me, which are as follows:

	NEW VALUES	PREVIOUS VALUES
1.	By tank battery area - 5,210 mg/K	3,640 mg/K
2.	Middle area discharge - 4,260 mg/K	5,450 mg/K
3.	Discharge at end of spill - 3,700 mg/K	4,540 mg/K
4.	SE Leg area - 2,370 mg/K	2,370 mg/K

If you compare these to the results from last week's tests, they are basically identical. This is occurring because we have a million rocks to a tablespoon of dirt. The surface area ratios are completely skewed to favor the contaminant values because these values are derived from two sources (1) minute amounts of loose soil which continues to mix with (2) minor amounts of soil attached to rocks constantly being moved during remediation activities within the surrounding environment. Unless all loose rock is removed and the rock cap swept clean, I doubt the soil chloride values will decrease enough to be significantly different from the data we now have.

Further, such an aggressive/radical action forebears any common sense application of environmental assuredness. Remember to, we began with 80,000 mg/K on the surface which for all practical and measurable options has been removed. What does make sense is to replace the excavated material with good soil, fertilize and seed it pursuant to BLM seed mixes for this area. Thus, restoring the natural habitat of the area. No contamination will pass through the rock cap and penetration of the cap is definitely not prudent.

I would like the opportunity to speak with you on this, Mike. This is a very small area compared to many discharges; no hydrocarbons are present and we have delineated it to the top of the existing rock cap.

Further delineation is not possible due to the situation in the field and soil chloride values are not significant when held in context with the actual infield situation. Can you call me soon?

Thank you so much,
Cheryl

Bratcher, Mike, EMNRD

From: Cheryl Winkler [cmwink@me.com]
Sent: Tuesday, January 25, 2011 12:42 PM
To: Bratcher, Mike, EMNRD; james_amos@nm.blm.gov
Subject: Fwd: Dublin 23 Fed no.1 Discharge
Attachments: Summary_Report.pdf; ATT00001.htm

FYI these are the results from the January 24th sampling event when cap rock was reached. Would you please phone regarding this cleanup? I really need to discuss it with you.

Thank you so much, Cheryl

Begin forwarded message:

From: reports@traceanalysis.com
Date: January 25, 2011 1:33:28 PM CST
To: cmwink@mac.com
Subject: Dublin 23 Fed no.1 Discharge

NOTE: To ensure you receive email, please add reports@traceanalysis.com to your address book.

TraceAnalysis, Inc.

(attachments enclosed)

Work Order: 11012404
Contact Person: Tom Brandt

Project Name: Dublin 23 Fed. No. 1 Discharge
Project Number: Unauthorized Discharge

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Summary Report

Tom Brandt
 Marshall & Winston Inc.
 P.O. Box 50880
 Midland, Tx 79710

Report Date: January 25, 2011

Work Order: 11012404



Project Name: Dublin 23 Fed. No. 1 Discharge
 Project Number: Unauthorized Discharge

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
255956	By Tank Battery	soil	2011-01-24	00:00	2011-01-24
255957	Discharge Middle Area	soil	2011-01-24	00:00	2011-01-24
255958	Discharge at End	soil	2011-01-24	00:00	2011-01-24
255959	SE Leg of Discharge	soil	2011-01-24	00:00	2011-01-24

Sample: 255956 - By Tank Battery

Param	Flag	Result	Units	RL
Chloride		5210	mg/Kg	2.50

Sample: 255957 - Discharge Middle Area

Param	Flag	Result	Units	RL
Chloride		4260	mg/Kg	2.50

Sample: 255958 - Discharge at End

Param	Flag	Result	Units	RL
Chloride		3700	mg/Kg	2.50

Sample: 255959 - SE Leg of Discharge

Param	Flag	Result	Units	RL
Chloride		2370	mg/Kg	2.50

Bratcher, Mike, EMNRD

From: Cheryl Winkler [cmwink@me.com]
Sent: Monday, January 24, 2011 5:19 PM
To: Bratcher, Mike, EMNRD; jim_amos@nm.blm.gov
Cc: tbrandt@mar-win.com; gherrera@mar-win.com
Subject: Dublin 23 Federal No. 1 Further Excavation Consideration

Greetings Mike!

The attached 4 photos were taken during the latest excavation of the contaminated soil resulting from the unauthorized discharge of produced water by the trucking company hauling for Marshall & Winston. As you can tell from the laboratory analyticals which I have forwarded to you, the sodium chloride levels are currently averaging around 5,000 mg/K in the impacted soils. Since this report was issued, we have subsequently removed another 4" of material in an attempt to reach NMOCD regulatory standards but I would suggest it is not bearing further environmental benefit for the simple reason that the impact is not a "fit" for the normal situation. We have been excavating mostly rock with very little accompanying soil because it just isn't present in this ecosystem. Currently, we are on top of the cap in this area whose groundwater lies somewhere around 400 feet beneath it.

The latest soil chloride samples will be ready by early tomorrow but the dilemma still remains. We are on solid rock (See jpeg No. 5967) and literally cannot excavate more unless we penetrate the rock lens with something like a rock hammer. Then, we will only pollute the subterranean environment. *This is a very small area as well.*

Mike, please ring when you have looked at these so we might discuss potential solutions. I have also spoken with Jim Amos regarding the situation due to the standing NWO's on the Dublin leases which are due on 1 February 2011 and will forward him the necessary data. If possible, I would like to make that deadline.

I have kept the images in jpeg format so they will be easy to open. I still need to shut down the "zip" on my computer which no one seems to be able to open!

Thanks so much! I appreciate it. Speak with you soon.

Cheryl







