

From: Patterson, Heather, EMNRD
To: ["Larry Davis"](#)
Cc: [Bratcher, Mike, EMNRD](#)
Subject: RE: Remediation of Grayburg Jackson Water Flood Unit Tank Battery A
Date: Thursday, December 18, 2014 9:58:00 AM
Attachments: image001.png

Larry,

Thank you for including the OCD in this remediation. While OCD approval is not a requirement on a BLM interim remediation, we appreciate the notification and feel it is important to document the work done. I will attach this information to the nearest well, the Grayburg Jackson #12, and assign it the OCD tracking number 2RP-2670. Please proceed as per BLM requirements.

Heather Patterson
Environmental Specialist
NMOCD District II
(575)748-1283 ext.101

From: Larry Davis [mailto:Larry.Davis@energyquest.us]
Sent: Wednesday, December 17, 2014 10:58 AM
To: Patterson, Heather, EMNRD
Subject: Remediation of Grayburg Jackson Water Flood Unit Tank Battery A

Heather,

It dawned on me that your agency has not been involved in the discussion for mandated remediation resulting from historical neglect around the Grayburg Jackson Water Flood Unit Tank Battery A. The Bureau of Land Management sent Notice of Written Order 14-SH-113W to Southern Bay Operating, LLC, directing remediation to specific surface areas which, over time, had become hardened and sterile. See attached Order.

As a result of acquisition, EnergyQuest inherited this site and thereby became the party responsible for acting upon the Order. On the same occasion where EnergyQuest met with Sol Hughes and Jeffery Robertson of the BLM to discuss remediation of the Beeson F Federal #029 (on 23 October 2014), we discussed specific requirements for this site. The remediation proposal appears below. BLM has approved this proposal (see attached Outlook item), but we have not yet begun work. Work will be done by BBC International, Inc., located in Hobbs, New Mexico.

Sol Hughes did not include a disclaimer about submitting this plan to your office for review; however, I am certain that it should have been. Thus, I am presenting it for your review and approval.

Corrective Actions for the Grayburg Jackson Water Flood Unit Tank Battery A

This site includes three areas for corrective actions: the hard-packed surface layer of the hill directly behind the tank battery and two areas in the basin behind that hill. The affected surface area of the hill is approximately 60 yards long X 15 yards wide. The larger of the two areas in the basin is approximately 35 yards long X 25 yards wide, while the smaller one is approximately 10 yards square.

The corrective actions we discussed included:

1. Break up the hard-pack and till all three areas to a depth of at least 6 inches.
 2. Add nitrogen-rich fertilizer to each area and till again.
 3. After the fertilizer has had time to be effective, extract samples at depths of 6 inches and 12 inches: two (2) samples from the hilltop, and three (3) samples from the basin – two (2) from the larger area, one (1) from the smaller area.
 4. Test all samples for residual contaminants using the normal battery of tests.
 5. Assuming that tests show acceptable levels, re-seed all three locations when appropriate with mixture determined by the BLM as best suited for the area.
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Larry D. Davis

Environmental Quality & Safety Manager



Telephone: 281-651-5201 (direct)

E-Fax: 281-651-5207