

**From:** [Hughes, Solomon](#)  
**To:** [Bratcher, Mike, EMNRD](#)  
**Cc:** [Jacob Kamplain](#); [Robertson, Jeffery](#); [Patterson, Heather, EMNRD](#); [Baker, Larry](#); [Lara Weinheimer](#); [Laura Flores](#); [Catherine Ursanic](#); [Hack Conder](#)  
**Subject:** Re:  
**Date:** Wednesday, January 07, 2015 11:08:49 AM

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Jacob,

This plan is approved as written with the following conditions of approval:

BLM approval of this proposal does not relieve the operator of liability, should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, any other aspects of the natural environment, human health, or if the location does not properly reclaim. In such an event that location does not re-vegetate, or future issues with contaminants are encountered, the operator will be asked to address the location 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.

Bests,

Sol

**Sol Hughes**  
Environmental Protection Division  
Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM

Office: 575.234.5951  
Cell: 575.499.3378

On Wed, Jan 7, 2015 at 7:29 AM, Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)> wrote:

RE: Apache Corp. \* EAU 49 \* 30-015-03180 \* E-29-17s-29e \* Eddy County, NM  
NMOCD Tracking: 2RP-2638 \* Date of release: 11/17/14

Jacob,

Your proposal for remediation of the above referenced release is approved. Federal sites will require like approval from BLM.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

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

**Mike Bratcher**

**NMOCD District 2**

**811 S. First Street**

**Artesia, NM 88210**

**O: 575-748-1283 X108**

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**From:** Jacob Kamplain [mailto:[jkamplain@rice-ecs.com](mailto:jkamplain@rice-ecs.com)]

**Sent:** Tuesday, January 06, 2015 3:25 PM

**To:** 'Robertson, Jeffery'; Patterson, Heather, EMNRD

**Cc:** Bratcher, Mike, EMNRD; [shughes@blm.gov](mailto:shughes@blm.gov); 'Baker, Larry'; 'Lara Weinheimer'; 'Laura Flores'; 'Catherine Ursanic'; 'Hack Conder'

**Subject:**

All,

Apache Empire Abo C-49 SWD (2RP-2638)

UL/L sec. 29 T17S R29E

The site is located approximately 7.2 miles west of Loco Hills, New Mexico at UL/L sec. 29 T17S R29E. Previous soil bores conducted at this site show that there is no groundwater in this area.

RECS personnel were on site beginning on November 17<sup>th</sup>, 2014, to conduct remediation efforts. Based on an initial assessment of the release, the release area on the pad was scraped down 6 inches. Once the scrape was completed, 5 points were taken from the bottom of the scrape and sent to a commercial laboratory for analysis. The laboratory returned chloride readings that ranged from 752 mg/kg to non-detect. GRO, DRO and BTEX readings for the bottom samples returned values of non-detect.

In the pasture area to the west of the pad, the release was scraped down in two parts: a 1.5 ft excavation and a 6 inch scrape. At the base of the 1.5 ft excavation, two bottom samples and four wall samples were sent to a commercial laboratory for analysis. The laboratory returned chloride readings that ranged from 912 mg/kg to non-detect. GRO, DRO and BTEX readings for the bottom and wall samples returned values of non-detect. A bottom sample from the 6 inch scrape was taken and sent to a commercial laboratory for analysis. The 6 inch scrape bottom sample returned a chloride value of 240 mg/kg with GRO, DRO and BTEX readings of non-detect.

On December 9<sup>th</sup>, 2014, three auger points were installed in the release area to the east of the lease pad. The auger points were installed to a depth of 1 ft bgs, and the 1 ft bgs samples from each auger point were taken to a commercial laboratory for analysis. Hand Auger Point 1 returned a laboratory chloride value of 768 mg/kg, Hand Auger Point 2 returned a laboratory chloride value of 720 mg/kg, and Hand Auger Point 3 returned a laboratory chloride value of 144 mg/kg. The GRO, DRO and BTEX results for all samples returned values of non-detect.

The Excavation Data Map with the supporting labs are attached.

Based on the laboratory sampling data, Apache requests permission to backfill the lease pad, the scrape and excavation to the west of the lease pad. In addition, Apache requests permission to scrape the release area on the east side of the pad to 1 ft bgs and then backfill that scrape. Finally, a light scrape will be conducted on the east side of the tank battery to address stained areas that have been affected by battery operations.

All excavated soil will be taken to a NMOCD approved facility for disposal. Clean caliche will be imported to the site to backfill the lease pad, and clean top soil will be imported to site to backfill the pasture. Once the pasture areas have been backfilled, the disturbed areas will be seeded with a blend of native vegetation.

Please feel free to contact me with any questions or concerns, thank you.



Jacob Kamplain

Project Leader

419 W. Cain

Hobbs, NM 88240

575-942-8221