

Bratcher, Mike, EMNRD

From: Brian Weaver <brian.weaver@skaconsulting.com>
Sent: Tuesday, March 05, 2013 2:33 PM
To: Bratcher, Mike, EMNRD
Subject: Turner B Tank Battery Site; Loco Hills, Eddy County, NM

Mike,

I hope this message finds you well.

SKA Consulting, L.P. (SKA) is working with LINN Operating (LINN) in the Loco Hills area at the above-referenced tank battery site. In this work, I have a few items I would like to discuss with you. Below is a summary:

The site is located within BLM property and we are currently working with BLM personnel (Martin Stein [archaeology] and Terri Gregston [environmental]) on this project. Specifically, the Site pertains to a release that occurred from the above-referenced tank battery in late 2012. Due to that release and based on the location of the Site, the BLM requested LINN to perform an Archeological Treatment Plan before any on-site activities could be performed. Over the past few months, we have been working closely with the BLM. Currently, we are finalizing the Archeological Treatment Plan and will soon submit to Mr. Martin Stein (BLM) for review.

However, looking forward and in an effort to combine our future efforts with both the BLM (archeological) and OCD (assessment and future abatement), this is where I would like to discuss with you and ensure you are agreeable to some of the proposed methods outlined in our draft Archeological Treatment Plan – that is, before we submit the Plan to the BLM. Basically, to implement the Archeological Treatment Plan (archeological investigations), the proposed field methods currently proposed include mechanical scraping of the soils to a depth of impacts. The area for these archeological investigations include the entire boundary of the release near the tank battery. By nature of mechanical scraping, the archeological investigations will not only be investigating for buried archeological sites (for purposes required by the BLM), they will also (in effect) be remediating the impacted surface and near surface soils originating from the release (ultimately, for the OCD). The result is this: (1) we can investigate and remediate in one process; (2) project is more efficient; (3) project becomes more cost effective; and (4) faster to complete the project. To do this, we will need to first conduct an environmental assessment of soils in the area, to ensure we have determined the magnitude and extent (ie., vertical and horizontal delineation) of the impacts as a result of the release. After that assessment is complete, we would then submit to OCD a Site Investigation Report and Abatement Plan. Besides documenting the findings and conclusions of the assessment, that report will essentially propose (in the Abatement Plan sections) exactly what is provided in the current Archeological Treatment Plan – machine scraping of soils within the boundary of the release for both the BLM and OCD (concurrent investigation + remediation).

Today, I had a call with Martin Stein with the BLM. Martin concurred he is agreeable to performing these field methods (mechanical scraping) for both the purposes of the BLM (ie., to implement the Archeological Treatment Plan) and OCD (ie, to conduct abatement measures) – that is, if you (OCD) are agreeable to allowing these field efforts to occur simultaneously. Therefore, Martin has indicated he (BLM) would allow environmental site assessment and abatement activities to occur at the site before the final archeological investigations are complete.

Generally, the major work tasks for this project would include the following (in this order):

- (1) SKA submits the Archeological Treatment Plan to BLM
- (2) BLM provides approval
- (3) SKA conducts environmental site assessment activities
- (4) SKA submits a Site Investigation Report and Abatement Plan to OCD
- (5) OCD provides approval

- (6) SKA implements the Archeological Treatment Plan (ie, archeological investigations) and Soil Abatement Plan (ie, remediation) simultaneously.
- (7) SKA submits the findings of the Archeological investigations to the BLM and a Soil Abatement Completion Report to the OCD
- (8) BLM provides approval
- (9) OCD provides approval
- (10) Site is closed

Please feel free to call/email me if you have any questions/comments. I welcome your feedback and any additional information/assistance you can provide.

I will be glad to discuss this site and the details, at your convenience.

Kindest regards,

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-- Thank You
