

Bratcher, Mike, EMNRD

From: Brian Weaver <brian.weaver@skaconsulting.com>
Sent: Tuesday, September 24, 2013 8:02 AM
To: Bratcher, Mike, EMNRD
Subject: RE: Turner B Tank Battery Site; Loco Hills, Eddy County, NM

**RE: SITE INVESTIGATION REPORT AND ABATEMENT PLAN
TURNER B SOUTH TANK BATTERY
SECTION 29, TOWNSHIP 17 SOUTH, RANGE 31 EAST
LOCO HILLS, EDDY COUNTY, NEW MEXICO**

Mike,

I just wanted to give you a quick update about this project.

Earlier this year, I forwarded you a message (see below) about this LINN Energy site in District 2. I am working directly with Mr. Daniel Frick in LINN's Houston Office on this project. Recently, after we obtained approval from the BLM Archeological (Mr. Martin Stein), we mobilized to the Site and conducted a subsurface investigation including drilling for the collection of soil sampling and analytical testing. This work was conducted in an effort to evaluate the magnitude and extent of the produced water release that occurred at the Site. We have obtained these results, are evaluating, and currently preparing the above-referenced report for your review/approval. In terms of the scope of this project (per the message/outline provided below), we are at Task #4. We anticipate completing this report within the next few weeks and will then forward to you. Once the report has been finalized and is ready to submit to you, I will provide you another update with a firm delivery date.

If you have any questions or would like to discuss in the interim, please do not hesitate to call or email. We look forward to working with you and the OCD on this most important project.

Thank you,

BRIAN T. WEAVER, P.G.
[SKA Consulting, L.P.](#)

Ph: 713.266.6056
Fax: 713.266.0996
Direct: 832.255.5550
Mob: 713.907.3485

From: Brian Weaver
Sent: Tuesday, March 05, 2013 3:33 PM
To: mike.bratcher@state.nm.us
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,

BRIAN T. WEAVER, P.G.

Vice President & Partner



SKA CONSULTING, L.P.

Consulting Engineers, Scientists, and Geologists

1515 Witte Road, Suite 150

Houston, Texas 77080

Ph: 713.266.6056

Fax: 713.266.0996

Direct: 832.255.5550

Mob: 713.907.3485

www.skaconsulting.com

The information in this email may be confidential and/or privileged. This email is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein is prohibited. The information contained in this e-mail, including any attachments, is not intended and should not be construed as an official confirmation of any transaction or proposal unless expressly provided.

-- Thank You
