



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

*14-Dec-05*

## **BASS ENTERPRISES PRODUCTION COMPANY**

901 North Canal, Suite 704

Carlsbad, NM 88220

### **REMEDIATION WORK PLAN - BIG EDDY UNIT NO. 41 (INDIAN FLATS BASS FEDERAL BATTERY #1)**

A review of the remediation work plan submitted on November 30, 2005 for the Big Eddy Unit No. 41 (Indian Flats Bass Federal Battery #1) (30-015-22229) has been completed by this office. OCD Rule 19.15.3.116.D [NMAC] requires that the responsible person for a release must complete division approved corrective action and that releases will be addressed in accordance with a remediation work plan submitted to and approved by the division. The work plan submitted does not contain sufficient information to evaluate the proposed remediation.

To provide you with approval for corrective actions the OCD District 2 Office must first receive either an amended remediation work plan or additional information that addresses the following:

1. Site characterization
  - What is the depth to ground water, nearest distance to a water course, nearest water well, nearest surface water body?
  - Using this data, what is the site ranking for this location?
  - What are the remediation action levels (RRAL) for the materials released? (BTEX, TPH, Chlorides)
  - Has the Surface Owner (BLM) been notified and have any stipulations or restrictions been placed on the remediation of the release?
2. Release characterization
  - Are any soils Highly Saturated/Contaminated? Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining. Highly Contaminated/Saturated Soils must be remediated by excavating to the maximum depth and horizontal extent practicable until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level.
3. Remediation Technique
  - The work plan submitted states "Move in backhoe and remove all contaminated soil inside and outside the berm area and place in firewall." If the intent of this technique is to leave these materials on location without reducing the contaminant concentrations then you must provide a risk assessment that shows contaminants will not pose a threat of migrating to groundwater, off the location or will not otherwise cause harm to human health, the environment or plant or animal life.
4. Sampling
  - At what point will samples be taken? Specific dates and times are not necessary, sampling to delineate the impacted area to the vertical and horizontal extents and sampling to ensure that all unexcavated material is below the RRAL should be addressed.

5. Termination of Remediation

- What is the benchmark or criteria that you will use to consider the remediation complete?

**Please provide the above information to the OCD District 2 Office prior to December 23, 2005.**

The OCD District 2 Office uses the "Guidelines For Remediation of Leaks, Spills, and Releases" to evaluate the adequacy of all remediation work plans submitted for approval.

Please feel free to contact me if I can be of further assistance in this matter.

A handwritten signature in black ink, appearing to read "Chris Beadle", with a long horizontal flourish extending to the right.

Chris Beadle  
Artesia OCD District Office

BASS ENTERPRISES PRODUCTION COMPANY  
901 NORTH CANAL, STE #704  
CARLSBAD, NEW MEXICO 88220  
TELEPHONE: 505-887-7329  
FAX: 505-887-7473

November 30, 2005

NMOCD District II  
1301 W. Grand Ave.  
Artesia, NM 88210

Attn: Chris Beadle

Remediation Work Plan – Correction of Violation

Big Eddy # 41 – Indian Flats Bass Federal Battery # 1

1. Remove weeds & growth around battery
2. Move in backhoe and remove all contaminated soil inside and outside the berm area near flare to firewall.
3. Backfill contaminated areas with replacement fill.
4. Site ready for inspection

Thank you,

Denis Swenson  
505-361-8078

~~Glenn~~ ~~Swenson~~ ~~Swenson~~

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CARLSBAD, NEW MEXICO 88220  
TELEPHONE: 505-887-7329  
FAX: 505-887-7473

**TO: Chris Beadle/NMOCD District II**

**FROM: Denis Swenson**

**DATE: 11/30/05**

**REMARKS: Remediation Work Plan**