

**Bratcher, Mike, EMNRD**

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**From:** Gregston, Terry G [tgregsto@blm.gov]  
**Sent:** Monday, November 14, 2011 4:37 PM  
**To:** Tavarez, Ike; Bratcher, Mike, EMNRD  
**Cc:** Joshua Russo; Grubbs, Robert  
**Subject:** RE: Burch Keely 196-Work Plan-Approval stipulations

The work plan for the Burch Keeley 196/197 well location, 02/06/11 spill tracking number 11NU039TG, is approved with the following stipulations:

1. Notify Terry Gregston, (575) 361-2635, when you move equipment onto the location to begin cleanup operations.
2. Notify Terry Gregston in the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts. An onsite may be required to assess the situation.
3. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures.
4. Although a portion of the spill may have impacted a reserve pit area, any spillage in the reserve pit area must be mitigated fully.
5. The BLM will wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of sidewalls and any visibly affected areas outside of the excavation trench will be required; the BLM will witness the sampling. Contact Terry Gregston to schedule.
7. Lab analysis of the confirmation sampling must be forwarded to Terry Gregston at [terry\\_gregston@nm.blm.gov](mailto:terry_gregston@nm.blm.gov) for final approval before backfilling. Based on the sampling results, additional cleanup may be required or the site may be approved for closure.
8. In areas where liners are to be installed, the BLM requires an onsite to GPS the liner installations prior to backfilling over the liners.
9. Once final approval of cleanup is given, the excavation can be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
10. Pad areas should be resurfaced with 6" if clean caliche on top of the backfill material.
11. Disturbed pasture areas/excavations will be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils. 2' of topsoil similar to that in the surrounding native terrain should be installed on top of backfill materials in disturbed pasture areas.
12. Install erosion control measures in the pasture-affected and reserve pit areas to prevent the unconsolidated reclamation materials from washing or blowing away until reclaimed areas settle and begin to revegetate.
13. Seed reclaimed and equipment-impacted pasture areas and reserve pit area with a combination BLM seed mix #2 and #4 (50/50 mix).
14. Install secondary containment berms around existing production equipment and the pad to prevent future spills from being released off the facility location.
15. Notify the BLM when the site work is finished for final inspection.
16. Continue to monitor reclaimed pasture and reserve pit areas to ensure:
  - a.) erosion issues do not develop,
  - b.) that pasture areas and the reserve pit fully revegetate.
17. Upon abandonment of the well, any portions of the spill that were not fully mitigated (due to safety concerns created by proximity to standing equipment) will be fully mitigated and surface vegetation restored across the entire location.

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

**Terry Gregston**

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**From:** Tavarez, Ike [mailto:Ike.Tavarez@tetrattech.com]  
**Sent:** Wednesday, October 26, 2011 12:59 PM  
**To:** Bratcher, Mike, EMNRD (mike.bratcher@state.nm.us); Terry Gregston (terry\_gregston@nm.blm.gov)  
**Cc:** Pat Ellis; Joshua Russo; Grubbs, Robert  
**Subject:** COG - Birch Keely #196 Well Site = Work Plan - Approval Request

Mike and Terry,

Please find the enclosed Work Plan for the Birch Keely #196 Well Site located in Eddy County, New Mexico. The work plan includes the soil assessments and recommendations for the remediation for the site. I will mail you a hard copy of the work plan for your files. Once approved, Tetra Tech will schedule the soil remediation and notify you before we start. Please let me know if you need additional information or call me if you have any questions, thanks

Ike Tavarez, PG | Senior Project Manager

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