

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, December 06, 2011 3:10 PM
To: 'Amber Cannon'
Subject: RE: Cigarillo SWD #1 (2RP-849)

Amber,

OCD strongly recommends removal, as soon as possible, of all material exhibiting chloride levels in excess of 10,000 mg/kg, as proposed. OCD would have some concerns with the proposal for area 1, and area 2, with area 1 being the greater concern. Analytical data for area 1 shows a 6' column of chloride impacted material in excess of 4500 mg/kg at each 1 foot interval, with the 5' and 6' interval both showing 4890 mg/kg (no significant decrease in chloride levels). With Yates' concerns for safety in excavating this area, maybe we should consider an onsite meeting to discuss options.

Mike Bratcher

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From: Amber Cannon [<mailto:ACannon@yatespetroleum.com>]
Sent: Monday, December 05, 2011 11:37 AM
To: Bratcher, Mike, EMNRD
Subject: FW: Cigarillo SWD #1 (2RP-849)

Mike,

Please find attached a site diagram and a sample table summary (along with analytical results from the laboratory) for the Cigarillo SWD #1 release that occurred 7/24/2011 (2RP-849).

Based on the analytical results, Yates Petroleum Corporation would like to propose the following action for this location:

Scrape 6" from the entire spill area including Sections 1 (yellow), 2 (pink), 3 (orange) and 4 (green). This will eliminate the chlorides above 15,000 that came back from analytical report 426981. The other analytical reports show a decrease in the chloride levels in all four sections.

Yates realizes that section 1 (yellow) still shows chlorides to be over 5,000 at 1'. 2' and 3' (analytical report 430159); however we feel there is a significant safety hazard to clean-up contractors as there are high voltage electrical panels and lines that run through this section. This section is also on the facility pad. If allowed to leave these numbers in place, we would address these chlorides when the well is plugged and abandoned in the future.

Once the 6" is excavated from the location and disposed of at an NMOCD approved facility, Yates Petroleum would then submit a Final C-141 to your office requesting backfill and closure.

Thank you for your time,

Amber Cannon

Environmental Regulatory Agent

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