

Bratcher, Mike, EMNRD

From: Kindley, Jeff [Jeff.Kindley@tetrattech.com]
Sent: Wednesday, August 24, 2011 9:14 AM
To: Bratcher, Mike, EMNRD
Subject: RE: Basic Energy Services, Inc., Myrtle Myra Saltwater Disposal release

Mike,

We are in the process of lining up a company to begin excavation of the Myrtle Myra Saltwater Disposal release area.

The following are the responses to your email sent on September 23, 2010.

Thanks,

Jeff Kindley, P.G.

Subject: RE: Basic Energy Services, Inc., Myrtle Myra Saltwater Disposal release

Jeff,

After visiting the site, reviewing the data, and some correspondence with Lyn Sockwell, I have the following questions and comments:

The injection pump and related appurtenances are situated in the immediate vicinity of the well head. Lyn has indicated that this equipment will be moved to the battery area. This area will require investigation and most likely some remedial actions. We did not discuss anticipated date this move will take place. The injection pump and related appurtenances situated in the vicinity of the wellhead have been moved over towards the battery.

The West end of the location is bermed, and is elevated a few feet above natural grade from the surrounding pasture. I assume that the proposed excavations will be limited to the confines of the bermed pad area. Have there been any samples obtained from the area outside the berm? Since it was contained to within the berm, no investigation or samples were collected from outside the berm area. Since the soils were sand it appears the released water, which was not captured during the release, went straight down and hence would not likely be found outside the bermed areas.

In proposing depths for liner installation and indicating depths samples were obtained, is bgs from pad surface or natural grade of surrounding pasture? We may want to consider the natural grade for purposes of liner installation. The initial proposed liners depths were from below the pad but will be adjusted to reflect the natural grade of the surrounding soils when installed.

In the area of BH-3, the proposal is to excavate to 10'. I would prefer a deeper excavation in this area, if possible, up to 16'. This may not be practicable to achieve and may be something we need to discuss. If possible, we will try and excavate up to 16 feet below the surface.

Thanks,

Mike Bratcher

NMOCD DISTRICT 2
1301 W. GRAND AVE.
ARTESIA, NM 88210
575-748-1283 EXT.108

From: Kindley, Jeff [mailto:Jeff.Kindley@tetrattech.com]
Sent: Wednesday, September 22, 2010 2:00 PM
To: Bratcher, Mike, EMNRD
Cc: Sockwell, Lyn; Tavarez, Ike
Subject: Basic Energy Services, Inc., Myrtle Myra Saltwater Disposal release

Mike,

In our meeting of September 1, 2010, we discussed the Basic Energy Services, Inc. (Basic) Work Plan (dated August 30, 2010) for the Myrtle Myra Saltwater Disposal #1 release located in Unit C, Section 21, Township 21 South, Range 27 East in Eddy County, New Mexico. During the meeting, Basic presented our proposal to excavate and remove a 12 foot by 85 foot by 10 foot deep area adjacent to BH-1 and BH-2, and bringing the excavation in BH-1 up to surface grade with clean soils. In the vicinity of BH-2, clean soils would be utilized to bring the excavation to within 4 feet below ground surface (bgs). Afterwards a 40 mil liner measuring 25 feet by 12 feet would be placed at the 4 foot level to impede further vertical migration of chlorides within the area. Upon completion of the liner, BH-2 would be brought up to surface grade with clean soils. In the vicinity of borehole BH-3, Basic proposed to excavate an area measuring 45 feet by 25 feet by 10 feet deep in the area and bringing the site to within 4 feet bgs with clean backfill material. At 4 feet, a 40 mil liner measuring 45 feet by 25 feet would be placed in the excavation to impede further vertical migration of the chlorides within the soil. After completion of the placement of the liner, the area would be brought up to natural grade with clean soils.

During the meeting, you stated you would like the opportunity to visit the site before you make a decision on the work plan. This email is to address whether you have had an opportunity to visit the site, and if you have, whether the proposed work plan satisfactorily meets the NMOCD's requirements for addressing the chloride impacts at the site.

Thanks for your help with this matter,

Jeffrey Kindley, PG | Senior Environmental Geologist
Cell: 432.634.2263 | Main: 432.682.4559 | Fax: 432.682.3946
Jeff.Kindley@tetrattech.com

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Bratcher, Mike, EMNRD

From: Sockwell, Lyn [Lyn.Sockwell@basicenergyservices.com]
Sent: Thursday, September 16, 2010 2:42 PM
To: Bratcher, Mike, EMNRD
Subject: RE: Basic Energy, Belco Saltwater Disposal #1 Work Plan

Mike, I don't think it is. Plans are to move the pumps and associated equipment back in a containment area to the North side next to the containment for the tanks. In addition we will build a new unloading pad with concrete to make it easier for the trucks to come in, unload and pull out. This way they will not have to pull in and back up to unload.

Lyn Sockwell
Director of Environmental

Office # (432) 571-8592
Fax # (432) 620-5501
Cell# (432) 238-9579



From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Thursday, September 16, 2010 2:15 PM
To: Sockwell, Lyn
Subject: RE: Basic Energy, Belco Saltwater Disposal #1 Work Plan

Lyn: I did get out to visit this site. The pump and related devices are situated at the well head here. Do you know if this area is lined or not?

From: Sockwell, Lyn [mailto:Lyn.Sockwell@basicenergyservices.com]
Sent: Thursday, September 16, 2010 9:28 AM
To: Bratcher, Mike, EMNRD
Subject: RE: Basic Energy, Belco Saltwater Disposal #1 Work Plan

Thanks Mike. Any update on the Myrtle Myra review?

Lyn Sockwell
Director of Environmental

Office # (432) 571-8592
Fax # (432) 620-5501
Cell# (432) 238-9579



From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, September 15, 2010 3:45 PM
To: Kindley, Jeff

Cc: Sockwell, Lyn; Tavarez, Ike

Subject: RE: Basic Energy, Belco Saltwater Disposal #1 Work Plan

Jeffery,

The remediation proposal, as referenced in your email (Work Plan dated August 20, 2010), is approved for remedial activities at Basic Energy Services' Belco 001 (API: 30-015-25141). Please advise the OCD District 2 office 48 hours prior to commencement of operations and 48 hours prior to installation of liners. No portion of any liner may be installed closer than 4 feet to natural surface grade.

In the event groundwater abatement is required, the abatement process will be coordinated through OCD Santa Fe Environmental Bureau.

Basic Energy Services is advised that this approval does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, this approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, please contact me.

Mike Bratcher

NMOCD District 2

1301 W. Grand Ave.

Artesia, NM 88210

575-748-1283 Ext.108

575-626-0857

mike.bratcher@state.nm.us

From: Kindley, Jeff [mailto:Jeff.Kindley@tetrattech.com]

Sent: Friday, September 03, 2010 2:13 PM

To: Bratcher, Mike, EMNRD

Cc: Sockwell, Lyn; Tavarez, Ike

Subject: Basic Energy, Belco Saltwater Disposal #1 Work Plan

Mike,

In our meeting of September 1, 2010, we discussed the Basic Energy (Basic) Work Plan (dated August 30, 2010) for the Belco Saltwater Disposal #1 release located in Unit E, Section 20, Township 23 South, Range 28 East in Eddy County, New Mexico. During the meeting, Basic presented our proposal to excavate and remove the bulk of the chloride impacted soils at the site, which includes removal of impacted soil and placement of a liner at 4 feet below ground surface (bgs) in the vicinity of borehole BH-2. Once the soils are excavated, properly disposed of in an approved landfill, and backfilled with clean soils, Basic will submit a closure plan to the NMOCD for the soils. It was agreed that the groundwater would be handled by Mr. Glenn von Gonten of the NMOCD in Santa Fe. Basic will contact and, if need be, submit a groundwater impact notification to Mr. von Gonten by next week.

This email is to verify that Basic has the NMOCD's approval to proceed with the proposed work plan as they pertain to the soils at the facility.

We appreciate you taking time out of your busy schedule to meet with Ike, myself, and Mr. Lyn Sockwell of Basic on this work plan.

Thanks,

Jeffrey Kindley, PG | Senior Environmental Geologist
Cell: 432.634.2263 | Main: 432.682.4559 | Fax: 432.682.3946
Jeff.Kindley@tetrattech.com

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