

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, September 23, 2010 4:05 PM
To: 'Kindley, Jeff'
Cc: Sockwell, Lyn; Tavarez, Ike
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 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?

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.

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.

Thanks,

Mike Bratcher

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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
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