

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, October 28, 2010 1:11 PM
To: 'Tavarez, Ike'; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Pat Ellis; Joshua Russo
Subject: RE: COG - Beech Federal #2 TB - Work Plan Approval Request

The remediation proposal submitted for the produced fluids release (release date 7/4/2010) on COG's Beech Federal 2 Tank Battery (API: 30-015-31790) is approved with the following stipulations/conditions:

- Notify OCD 48 hours prior to commencement of remedial activities.
- Notify OCD 48 hours prior to obtaining samples where the analyses will be submitted to OCD.
- As indicated in the proposal, a sample (or samples) is to be obtained below the 3'-3.5' interval in the area of AH1 to complete the delineation. A determination will be made as to whether this area will require further remediation based on the analytical data acquired.
- Submit a Form C-141 marked Final Report along with a closure report upon satisfactory completion of project.
- Like approval by BLM as may be applicable.

COG 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.

OCD Tracking number for this incident is: **2RP-453**

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

Mike Bratcher

NMOC District 2
1301 W. Grand Ave.
Artesia, NM 88210
575-748-1283 Ext.108
575-626-0857
mike.bratcher@state.nm.us

From: Tavarez, Ike [<mailto:Ike.Tavarez@tetrattech.com>]
Sent: Wednesday, October 27, 2010 12:32 PM
To: Bratcher, Mike, EMNRD; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Pat Ellis; Joshua Russo
Subject: COG - Beech Federal #2 TB - Work Plan Approval Request

COG Operating
Beech Federal #2 Tank Battery
Section 25, T17S, R27E
Eddy County, New Mexico
32.80212 104.22891

Mike and Terry,

Please find enclosed the Work Plan for the COG - Beech Federal #2 Tank Battery located in Eddy County, New Mexico. Once the work plan is 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

Main: 432.682.4539 | Fax: 432.682.5043 | Cell: 432.425.3878

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Bratcher, Mike, EMNRD

From: Terry_Gregston@blm.gov
Sent: Wednesday, October 27, 2010 4:19 PM
To: Tavaréz, Ike
Cc: Bratcher, Mike, EMNRD
Subject: Re: Beech Federal 2 work plan approval with stips

Beech Federal 2 Tank Battery Work Plan, Received 10/27/10

Your work plan 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 during the process of cleanup.**
- 3. Salted soils outside the berm on the north end (spill pooling area) will need to be removed*, along with contaminated berm soils.**
- 4. The BLM will wish to inspect the excavation once it reaches cleanup depth. Confirmation samples of the bottom will be required; the BLM will witness the sampling. Contact Terry Gregston to schedule.**
- 5. Once samples are cleared through a third party lab, the excavation can be backfilled with clean soil. Lab analysis must be forwarded to Terry Gregston at terry_gregston@nm.blm.gov for final approval before backfilling.**
- 6. The spill is on an active pad; no seeding is required. Notify the BLM when the site work is finished for final sign off on spill cleanup.**

***Salted soils were located outside the berm on the north side. It was unclear whether this had been caused by berm overflow, spray from the busted gasket, or that the spill had seeped through the bottom of the firewall. The north end of the berm is the lowest end of the berm and where the spill pooled. The salted area outside the berm needs to be field sampled and cleaned up along with the spill area inside the berm.**

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
Environmental Protection Specialist
Bureau of Land Management
620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958
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