

**From:** [Hughes, Solomon](#)  
**To:** [Larry Davis](#)  
**Cc:** [Jeffery Robertson](#); [James Amos](#); [Jeff Teare](#); [Greg McWilliams](#); [Cliff Brunson](#)  
**Subject:** Re: Sampling Results - Beeson F Federal #29  
**Date:** Monday, December 01, 2014 2:13:59 PM  
**Attachments:** image002.png  
LPC Shinnery Seed Mix.pdf

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Gentlemen,

The plan is approved as written with the following conditions of approval:

We, the BLM understand your plan will encompass the following:

1. The affected area will be capped with a 1-ft-or-greater deep layer of caliche four feet below the ground surface (bgs).
2. You may use whatever acceptable clean material you choose to backfill from 2-ft bgs to 4-ft bgs (sand, caliche, or topsoil).
3. Clean topsoil (material contaminated to a level less than or approximately equal to the background, unaffected areas) will be emplaced in the affected area from the surface level to 2-ft bgs.
4. After clean topsoil is emplaced. The affected surface will need to be reseeded with BLM LPC/Shinnery Site Seed Mixture. Info is attached.
5. The limit of the horizontal extent of affected 4-ft bgs zone shall be defined as where wall samples show chloride levels below 1000 ppm. Remediate accordingly.

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

Bests,

Sol

**Sol Hughes**  
Environmental Protection Division  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM

Office: 575.234.5951  
Cell: 575.499.3378

On Mon, Dec 1, 2014 at 1:53 PM, Hughes, Solomon <[shughes@blm.gov](mailto:shughes@blm.gov)> wrote:  
I am recalling the last email as it was sent incomplete. Please, standby for the full email.

**Sol Hughes**

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On Mon, Dec 1, 2014 at 1:52 PM, Hughes, Solomon <[shughes@blm.gov](mailto:shughes@blm.gov)> wrote:  
Gentlemen,

This plan is approved as written with the following conditions of approval:

We, the BLM understand you plan will encompass the following:

**This plan still needs to be approved by NMOCD.** BLM approval of this proposal does not relieve the operator of liability, should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, any other aspects of the natural environment, human health, or if the location does not properly reclaim. In such an event that location does not re-vegetate, or future issues with contaminants are encountered, the operator will be asked to address the location 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.

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On Wed, Nov 26, 2014 at 9:19 AM, Larry Davis <[Larry.Davis@energyquest.us](mailto:Larry.Davis@energyquest.us)> wrote:

Sol and Jeff,

We have the results of samples taken from the Beeson F Federal #29 location. Attached are the lab results/summaries for the original samples from August 20, 2014 **and** follow-up samples from November 14, 2014.

- 1) The sample of greatest concern is labeled SP7 in all reports. The November 14 samples were taken from the same location as the previous SP7 sample, but at greater depths.
  - a. You will see a dramatic difference in chlorides between samples taken in August and November.
  - b. More importantly, you will see a huge decrease in chlorides between 14 feet and 15 feet. According to the test results, the 15 foot sample is within tolerances.
- 2) The sample labeled SP1 in the analysis dated 11-14-2014 is from that portion of the surface pad we intend to use both as backfill and as a cap underneath the top soil layer as outlined in the remediation plan. Testing shows the pad caliche is clean.

Thus, we await your approval of the sample results to initiate the previously approved remediation plan for this site.

Larry D. Davis

Environmental Quality & Safety Manager



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