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Subject: SW Royalties - North Hackberry Yates 105 release
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Attachments: [Report to BLM and OCDfinalrevised.pdf](#)

Mr. Hughes and Mr. Bratcher:

This report supersedes and replaces previous submissions. I tried to simplify our report to make it clear that

1. All of the material that does not meet BLM burial or surface standards (1000 ppm chloride) have been removed from the location to disposal at R360
2. The residual material at depths below 4 feet, on average, are well below the chloride burial standard of OCD (10,000 mg/kg where the depth to groundwater is greater than 50 feet).
3. The material to backfill the trench will be less than 600 mg/kg chloride after blending during placement, which is the OCD standard.

For the benefit of BLM, Appendix A of the report presents the view of the Oil Conservation Commission regarding concentration standards for residual material at the ground surface (the soil zone) and standards for residual material that will be buried beneath 4-feet of clean soil cover. I understand that there may be some disagreement regarding the applicability to remediation of spills and the concentrations of Table I of the Pit Rule and the findings of the Commission. Indeed, I disagree with the OCC Findings as our work shows that in many cases (perhaps 50%), the standards established in the Pit Rule are too low. At this site, the residual material meets these conservative concentration limits and we hope BLM and OCD will approve the proposed remedy.

I have copied Jim Griswold of OCD on this communication in the event he wishes to weigh in on the matters presented in Appendix A

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