

From: [Hughes, Solomon](#)
To: [Randall Hicks](#)
Cc: [Bratcher, Mike, EMNRD](#); [Gonzalez, Luis](#); mike@rthicksconsult.com; [James Amos](#)
Subject: Re: SW Royalties - North Hackberry Yates 105 release
Date: Monday, December 01, 2014 12:15:09 PM

Mr. Hicks,

I appreciate it very much and look forward to speaking to you on Thursday.

Sol Hughes

Environmental Protection Division
Bureau of Land Management
620 E. Greene St
Carlsbad, NM

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On Fri, Nov 28, 2014 at 11:59 AM, Randall Hicks <r@rthicksconsult.com> wrote:

Mr. Hughes

I am meeting with Jim Amos on another matter next Thursday at 9 am. Perhaps we can resolve any outstanding issues regarding the remedy at the North Hackberry site after the 9 am meeting in Carlsbad?

Let me know what you think. I hope to stop off at OCD Artesia next week – probably after the 9 am meeting on Thursday - to see if we can tie up any loose ends on that side too.

I hope you had a good Thanksgiving.

Randall T. Hicks

505-266-5004 (office)

505-238-9515 (cell and best number to use)

From: Randall Hicks [mailto:r@rthicksconsult.com]
Sent: Monday, November 03, 2014 4:43 PM
To: 'Bratcher, Mike, EMNRD'; shughes@blm.gov

Cc: 'Gonzalez, Luis'; mike@rthicksconsult.com; 'James Amos'; jim.griswold@state.nm.us
Subject: SW Royalties - North Hackberry Yates 105 release

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

Randall Hicks

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