Bratcher, Mike, EMNRD

From: Van Curen, Jennifer < jvancure@blm.gov>

Sent: Monday, June 09, 2014 3:29 PM

To: Natalie Gladden

Cc: Bratcher, Mike, EMNRD; Wall, Fred; Michael Patterson Subject: Re: JL Keel B #30 Remediation Plan as submitted

Natalie,

I will need a plat to show where the burial is planned. I don't see a problem with either location. Please be aware that the pit for the 23 is to the north and has some issues with vegetating. The #36 has a pit to the west it looks like some fill on the south. Of course these areas would not be likely places for the deep bury. There are dunal features on the NE corner of the 23 off pad area.

The area will need to get an arch clearance. I don't see any arch clearance for any of that area. Also can you send me a map to show where the spill disturbance is needed for the pasture.

Thanks,

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 re vegetate, 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.

JENNIFER E VAN CUREN ENVIRONMENTAL PROTECTION SPECIALIST DOI-BLM-CARLSBAD FIELD OFFICE 320 E GREENE ST. CARLSBAD, NM 88220 OFFICE- 575-234-5905

CELL - 575-361-0042 FAX - 575-234-5927

"There are known knowns. These are things we know that we know. There are known unknowns. That is to say, there are things that we know we don't know." Jim Perry

On Mon, Jun 9, 2014 at 12:39 PM, Natalie Gladden < ngladden@diversifiedfsi.com > wrote:

Jennifer,

Thank you for the timely response to this Work Plan. This leak site is approximately 2000' from the JL Keel B #30 well pad. There are two wells closer to the release site. The JL Keel A #36 is closer to the top of the spill, approximately 300' from the spill site. The JL Keel A #23 is at the bottom of the spill, approximately 200' from the spill site. If at all possible Linn Energy would like to complete the deep bury option near the JL Keel A #23 site. Are you ok with this?

Thanks for your help in this matter and have a great afternoon!

Natalie Gladden

Environmental Director

DFSI Environmental Services

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From: Van Curen, Jennifer [mailto:jvancure@blm.gov]

Sent: Monday, June 09, 2014 8:33 AM

To: Natalie Gladden

Cc: Mike Bratcher; Wall, Fred

Subject: Re: JL Keel B #30 Remediation Plan as submitted

Natalie.

Either option can be approved by the BLM. If option 2 is approved by the OCD, the area for the deep bury will need to be at a well pad. So, a portion of pad can be peeled back for the deep bury to be on a permitted space. There will need to be a sign to show that there is a deep bury (prevent trenching or digging) and at time of plugging the well, a permanent marker will need to show legals of deep bury. Deep bury will need to be 4' below normal grade, so be sure that if there is slope, it is accounted for in the deep bury.

If option 1 is utilized, this area is not in timing but in habitat potential area. There will need to be 1-2' of caliche on top of liner and compacted just in case shinnery does move in. This will assist the root system to move across into the sandier soils and away from liner. Key liner at least 2' down around contaminants to prevent leaching across.

As always, I recommend looking for wells for downsize in area that will have clean material for the 1' caliche back fill. This will aid with material and hauling.

If you have any questions please let me know.

JENNIFER E VAN CUREN

ENVIRONMENTAL PROTECTION SPECIALIST

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On Fri, Jun 6, 2014 at 4:55 PM, Natalie Gladden < ngladden@diversifiedfsi.com > wrote:

All,

Attached you will find the Remediation Plan for the Linn Energy JL Keel B #30. In this plan there are two Options to choose from, please concur if approved which Option you would like to be done.

Thanks,

Natalie Gladden Environmental Director DFSI Environmental Services

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JL Keel B #30 Remediation Plan as submitted

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