

# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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**BASS ENTERPRISES PRODUCTION COMPANY**

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Carlsbad, NM 88220

January 20, 2006

## **REMEDIATION WORK PLAN DENIAL - POKER LAKE UNIT 213**

A review of the remediation work plan submitted on January 12, 2006 for the Poker Lake Unit 213 (30-015-33859) has been completed by this office. The work plan is being returned for revision subject to the following comments:

1. Highly Contaminated/Saturated Soils are not limited to hydrocarbon contamination.
  - a. The release produced water at this location flowed into the pasture south of the tank battery, saturating the soils at the time of the release.
  - b. Since no delineation is provided in the work plan to show otherwise, it must be assumed that the flow paths and any pooling areas in the flow paths from this release have become highly contaminated by virtue of the liquids having evaporated leaving unsaturated but highly contaminated soils in place.
2. Highly Contaminated soils are present inside the berm of the tank battery.
  - a. Upon inspection of the location by OCD on January 18, 2006, soils inside the berm were found to exhibit gross staining in the walls of the berm and beneath the surface layer of soils inside the bermed area.
3. Site delineation (by visual examination) completed on January 18, 2006, shows that a watercourse may have been impacted.
  - a. The contamination flow path left the location south into the pasture then entered a natural drainage less than 1,000 feet from the location.
  - b. This drainage path leads to Dog Town Draw, a seasonal watercourse, west and down gradient from the location. (Map 1)
  - c. A watercourse is defined as any lake bed or gully, draw, stream bed, wash, arroyo, or natural or human-made channel through which water flows or has flowed.
4. Since no site delineation has been conducted it is not possible to evaluate the remediation methods proposed in the work plan.

Please submit a revised work plan, addressing the above comments prior to January 30, 2006.

Artesia OCD District Office

cc: Don George, S.M. Stoller Corporation (unsigned copy via e-mail only)

Map 1

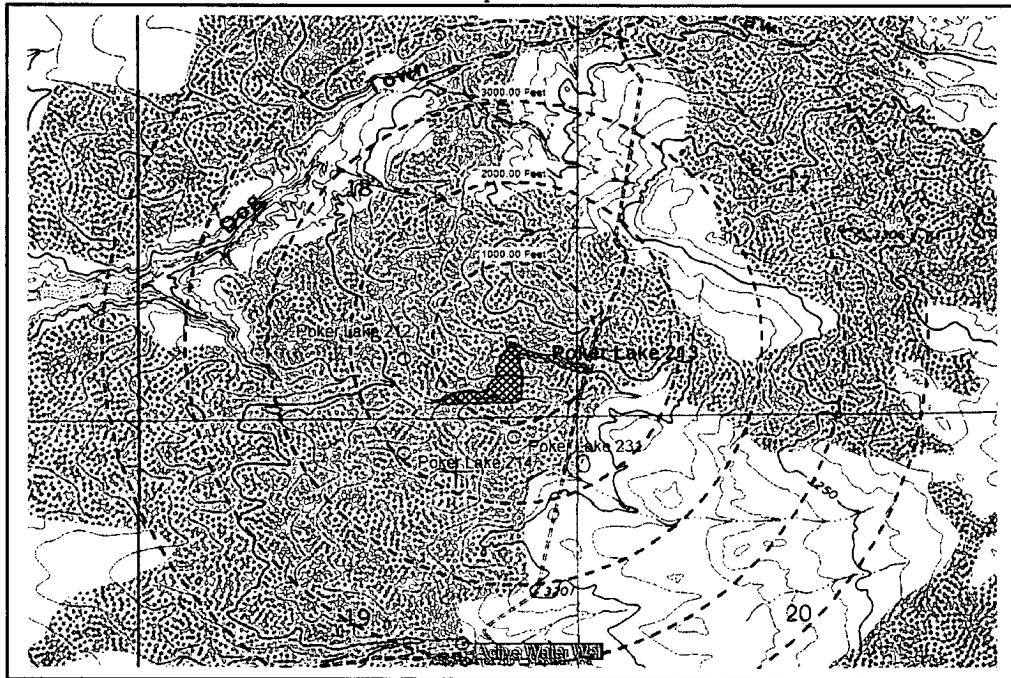


Photo looking NE to Poker Lake Unit 213  
from appx 400 feet south/southwest of location.

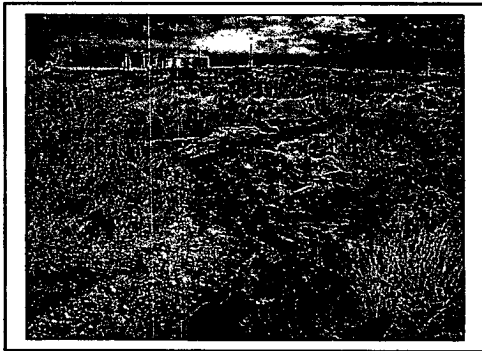


Photo looking SE appx 100 feet S of Poker Lake Unit 213 location

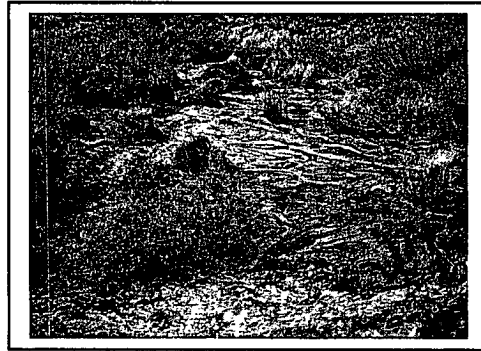


Photo looking NE to Poker Lake Unit 213  
from appx 150 feet southwest of location



Photo looking SE appx 50 feet S of Poker Lake Unit 213 location

