Bratcher, Mike, EMNRD

From:

Bratcher, Mike, EMNRD

Sent:

Thursday, April 16, 2009 3:37 PM

To:

'Sally Jones', C. Jenkins

Cc:

Debi Smith

Subject:

RE: Poker Lake 183Q oops

Sally,

Your request to close the drilling pit at the BOPCO Poker Lake Unit 183Q (API: 30-015-33224) is approved for closure utilizing the 30 mil LLDPE liner option. As discussed, the stockpiled material that has been excavated will be analyzed, with the intent to remove to disposal, approximately 30% of the total volume. The material removed will be that exhibiting the highest chloride concentrations. The remaining materials will then be blended with the same volume of material hauled to disposal, of like, clean material. The stockpiled, blended material will then be used as backfill in the pit excavation. The liner will be installed at not less than 4' bgs and covered per OCD Rules and Guidelines. Field analyses may be utilized in determining the stockpile material that will be hauled to disposal.

Please notify me 48 hours prior to installation of the liner.

BOPCO is to be advised that this approval does not relieve the operator of liability should these operations have failed to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, this approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

It is my understanding that a hard copy of the proposal is being mailed to the OCD District 2 office. This email approval will allow for immediate mobilization of equipment to close the pit.

Sincerely,

Mike Bratcher NMOCD District 2 1301 W. Grand Ave. Artesia, NM 88210 575-748-1283 Ext.108 mike.bratcher@state.nm.us

From: Sally Jones [mailto:sally@sportenvironmental.com]

Sent: Monday, April 13, 2009 2:52 PM

To: Bratcher, Mike, EMNRD **Subject:** Poker Lake 183Q oops

Hey Mike,

Here is the letter for Poker Lake 183Q. The photos are the same ones previously submitted, but these scanned ones may be hard to see. If you see anything you don't like, let me know.

Thanks, Sally

This inbound email has been scanned by the MessageLabs Email Security System.



SPORT ENVIRONMENTAL SERVICES, PLLC

502 N. Big Spring Street, Midland, Texas 79701 Business: 432.683.1100 Fax: 888.500.0622

April 13, 2009

Mr. Mike Bratcher State of New Mexico Oil Conservation Division 1301 W. Grand Avenue Artesia, NM 88210

Re: Risk-Based Pit Closure BOPCO, L.P. Poker Lake Unit #183Q Section 7, T-24-S, R-30-E Eddy County, New Mexico

Dear Mike,

As previously discussed, the above mentioned pit closure was approved for deep burial under the "old" Rule 50 since closure (dewatering) had commenced prior to June 16, 2008. However, results from delineation sampling have to date resulted in excavation to a depth of 50 feet. The soil in this area is sandy and excavation any deeper will most likely result in caving in of the walls. This is evidenced by the attached photos.

Attached, please find the Pit Closure Diagram and Sample Data Summaries reflecting the design of the excavation area and analytical results. After excavating the pit to a depth of 50 feet, two areas, samples 1-SW and 4-NC, have elevated chlorides under the "New Pit Rule" of 2160 mg/kg and 1220 mg/kg, respectively. The excavated soil is stockpiled on site.

Due to the nature of the unsafe work site, we would like to request an alternative risk-based closure for this pit. We propose that the stockpile of excavated soils be fully delineated for chloride concentrations using a chloride field test. As discussed, twenty to thirty percent of the total volume of excavated soil with the highest chloride concentrations will be disposed at CRI (Controlled Recovery Incorporated), Permit No. R-9166. The same volume of "clean soil" will be brought to the site for blending with the remaining stockpile. The blended soil will be placed in the pit; a 30 mL LLDPE liner or clay like soil with a NMOCD approved impermeability rating will be installed in a crowned fashion over the soil for chloride encapsulation. If a liner is used, it will be anchored utilizing a trench that will be dug around the entire perimeter of the excavated area. An adequate depth of caliche and topsoil will be placed over the liner or clay and the area reseeded as required.

Thank you in advance for your consideration. If you have any questions or comments with regard to this

matter, please contact me at either my office (432.683.1100) or on my cell (432.553.8555).

Sincerely,

DARI S. MOORE

Debi S. Moore, M.E., R.E.P.A. President

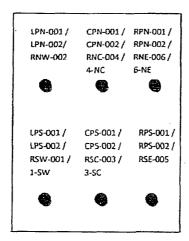
Enclosure: Pit Sampling Diagram

Site Photographs taken August 2, 2008

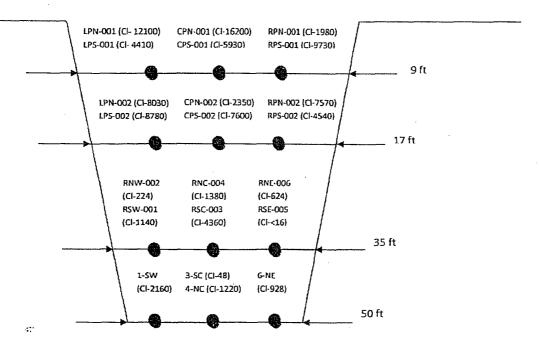
Sample Data Summaries

cc: Mr. C.K. "Buddy" Jenkins

BOPCO, L.P. P. O. Box 2760 Midland, TX 79702







Poker Lake Unit #183Q, Pit Sampling Diagram (All Chloride levels are represented in units of mg/kg (wet))



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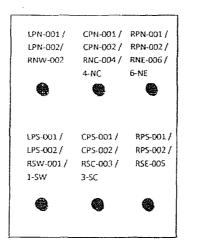
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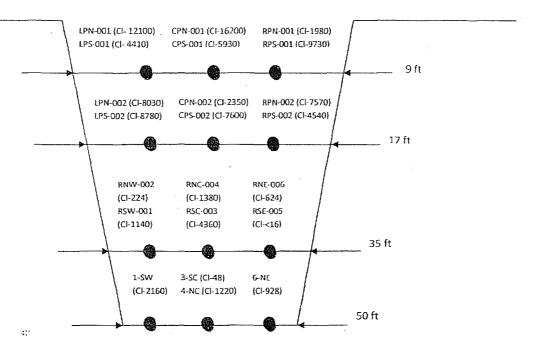
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cc: Mr. C.K. "Buddy" Jenkins

BOPCO, L.P. P. O. Box 2760 Midland, TX 79702







Poker Lake Unit #183Q, Pit Sampling Diagram (All Chloride levels are represented in units of mg/kg (wet))





Project Name: Project Location:

BEPCO, L.P. - Poker Lake Unit #183Q

Eddy County, New Mexico

						Analytical Results												
		_				VINITE'S RIMERO	Methods: EPA 8015M (TPH), EPA 8021B (BTEX), SW 846 9253 (CI)											
Sample ID	Lab ID	Matrix	Latitude/Longitude	Date Sampled	Date Received.	Carbon Ranges C6-C12 (mg/kgˈdry)	Carbon Ranges C12-C28	Carbon Ranges C28-C35	Total Hydrocarboris	Benzene	Toluene	Ethylbenzene	Xylene (p/m)	Xylene (¢)	Totai Xylenes	Total BTEX	Chloride (Cl) (mg/kg wet)	% Moisture
Sampling round	1 by Sport Envi	ronmen	tal Services, PLLC. L	aboratory analysis l	by XENCO Laborate	ories.							傳導等					RATE
LPN-001	308165-001	Soil		7/17/2007 13:30	7/18/2008 7:42	26.7	303	ND	329.7	ND	0.0214	0.0672	0.1689	0.0870	0.2559	0.3445	12100	8.76
LPS-001	308165-002	Soil		7/17/2007 13:35	7/18/2008 7:42	24.2	335	ND	359.2	ND	0.0029	0.011	0.0308	0.0164	0.0472	0.0611	4410	6.61
CPN-001	308165-003	Soil		7/17/2007 13:37	7/18/2008 7:42	35,3	224	ND	259.3	ND	0.0075	0.0265	0.0678	0.0323	0.1001	0.1341	16200	10.3
CPS-001	308165-004	Soil		7/17/2007 13:41	7/18/2008 7:42	46.0	352	ND	398	0.0015	0.0314	0.0818	0.2041	0.1009	0.305	0.4197	5930.0	15.6
RPN-001	308165-005	Soil		7/17/2007 13:45	7/18/2008 7:42	ND	338	ND	338	ND	ND	ND	ND	ND	ND	ND	1980	23.5
RPS-001	308165-006	Soil		7/17/2007 13:49	7/18/2008 7;42	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	9730	14.2
NPW-001 (Composite)	308165-007	Soil		7/17/2008 13:54	7/18/2008 7:42	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	115	21.7
SPW-001 (Composite)	308165-008	Soil		7/17/2008 13:58	7/18/2008 7:42	ND	29.6	ND	29.6	ND	ND	ND_	0.0023	0.0012	0.0035	0.0035	3920	5
EPW-001 (Composite)	308165-009	Soil		7/17/2008 14:03	7/18/2008 7:42	ND	106	19.2	125	ND	NĐ	ND	ND	ND	ND	ND	4040	16
WPW-001 (composite)	308165-010	Soil		7/17/2008 14:09	7/18/2008 7:42	ND	31.4	ND	31.4	ND.	ND	0.0016	0.0041	0.0035	0.0076	0.0092	366	8.53



p. 1 of 1

Project Name: Project Location:

BEPCO, L.P. - Poker Lake Unit #183Q Eddy County, New Mexico

												Ana	lytical R	esults				Coverdie		
						Methods: EPA 8015M (TPH); EPA 8021B (BTEX), SW 846 9253 (CI)														
Sample ID	tab ID	Matrix	Sample Depth	ž single	Date Received	Carbon Ranges C6-C10 (mg/kg dry)	Carbon Ranges C10-C28	Carbon Ranges C28-C35	Total Petroleum Hydrocarbons, mg/kg, EPA Method 8015	Lotal Petroleum Hydrocarbons, mg/kg, EPA Method 418-1	Benzene	Toluene	Ethylbenzene	Xylene (p/m)	Xylane (o)	Total Xylenes	Total BTEX	Chloride (CI) (mg/kg wet)	% Moisture	
3ampling round	d 2 by Sport En	vironme	ntal Services,	PLLC: Laboaratory	Ananlysis by XENC	O Lab	oratory	勝思												
PN-002	308391-001	Soil		7/22/2008 7:30	7/22/2008 10:53	ND	182	ND	182	ND	ND	ND	ND	ND	ND	ND	8030	4,49		
PS-002	308391-002	Soil		7/22/2008 7:35	7/22/2008 10:53	47.6	752	ND	799.6	ND	ND	ND	ND	ND	ND	ND	8780	5.09		
:PN-002	308391-003	Soil		7/22/2008 7:40	7/22/2008 10:53	ND	70.9	ND	70.9	ND	ND	ND	ND	ND	ND	ND	2350	3.64		
:PS-002	308391-004	Soil		7/22/2008 7:45	7/22/2008 10:53	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	7600	5.17		
IPN-002	308391-005	Soil		7/22/2008 7:50	7/22/2008 10:53	ND	232	ND	232	ND	ND	ND	ND	ND	ND	ND	7570	3.32		
(PS-002	308391-006	Soil		7/22/2008 7:55	7/22/2008 10:53	ND	ND	ND	ND	ИD	ND	ND	ND	ND	ND	ND	4540	2.66		
IPW-002 Composite)	308391-007	Soil		7/22/2008 8:00	7/22/2008 10:53	ND	346	ND	346	ND	ND	ND	ND	ND	ND	ND	6370	1.06		
:PW-002 Composite)	308391-008	Soil		7/22/2008 8:05	7/22/2008 10:53	ND	55.1	ND	55.1	ND	ND	ND	ND	ND	ND	ND	1510	ND		
PW-002 Composite)	308391-009	Soil		7/22/2008 8:10	7/22/2008 10:53	ND	58.3	ND	58.3	ND	ND	ND	ND	ND	ND	ND	14700	ND		
VPW-002 Composite)	308391-010	Soil		7/22/2008 8:15	7/22/2008 10:53	ND	491	ND	491	ND	ND	ND	ND	ND	ND	ND	4310	ND		





Project Name:

BEPCO, L.P. - Poker Lake Unit #183Q Eddy County, New Mexico

Project Location:

	Analytical Results															h.i.u. 174	Fig. 1		
	· · · · · · · · · · · · · · · · · · ·						Methods: «EPA 8015M (TPH), EPA 8021B (BTEX), SW 846 9253 (CI)												
Sample ID	Lab ID	We have a			Date Received	Carbon Ranges C6-C12 : (mg/kg dry)	Carbon Ranges C12-C28	Carbon Ranges C28-C35	Total Hydrocarbons	Benzene	Toluene	Ethylbenzene	Xylene (p/m)	Xylene.(o)	Total Xylenes	Total BTEX	Chloride (Cl) (mg/kg wet)	%.Moisture	
Sampling round	3 by Big D. Lat	oratory	analysis by Cardinal	Laboratories.												200 - 100 -			
RSW-001	H15247-1	Soil		7/28/2008 0:00	7/28/2008 0:00												1140		
RNW-002	H15247-1	Soii		7/28/2008 0:00	7/28/2008 0:00												224		
RSC-003	H15247-1	Soil		7/28/2008 0:00	7/28/2008 0:00												4360		
RNC-004	H15247-1	Soil		7/28/2008 0:00	7/28/2008 0:00												1380,0		
RSE-005	H15247-1	Soil		7/28/2008 0:00	7/28/2008 0:00			ļ									<16		
RNE-006	H15247-1	Soil		7/28/2008 0:00	7/28/2008 0:00						:						624		
					<u> </u>							_							



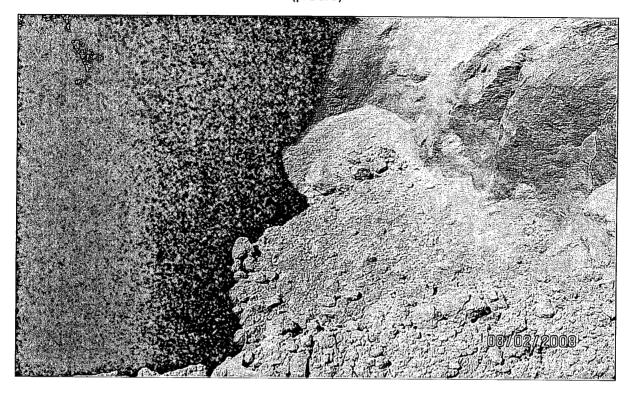


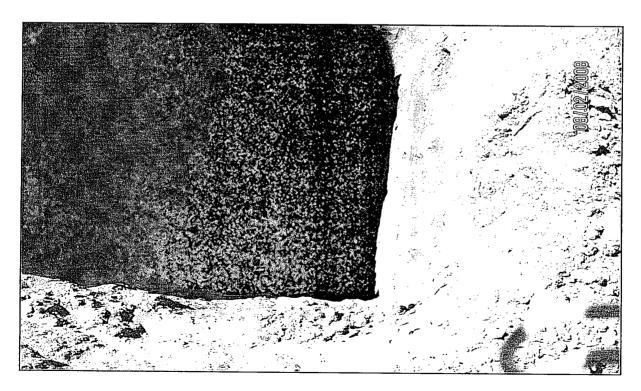
Project Name: Project Location:

BEPCO, L.P. - Poker Lake Unit #183Q Eddy County, New Mexico

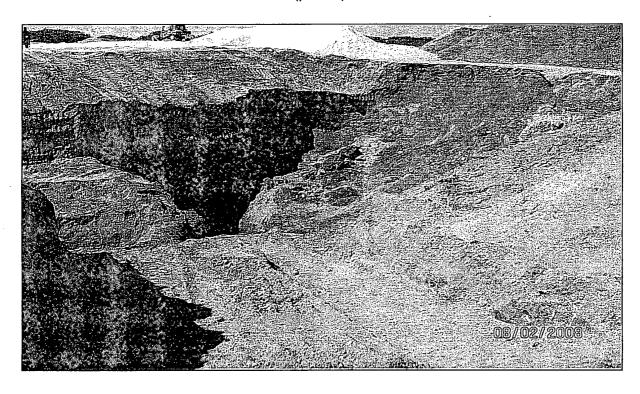
			trix Latitude/Longitude	Date Sampled	Date Received	Analytical Results													
Sample ID						Methods: EPA 8015M (TPH), EPA 8021B (BTEX), SW 846 9253 (CI)													
	Lab ID					Carbon Ranges C6-C12 (mg/kg dry)	Carbon Ranges C.12-C28	Carbon Ranges C28-C35	Total Hydrocarbons	Benzene	Toluene	Ethylbenzene	Xylene (p/m).	Xylene (0).	Total Xylenes.	Total BTEX	Chloride (CI) (mg/kg wet)	% Moisture	
Sampling round	14 by Big D. La	poratory	analysis by Cardinal	Laboratories.							7.70								
1-SW	H15646-1	Soil		7/30/2008 0:00	8/1/2008 0:00												2160		
3-SC	H15646-2	Soil		7/30/2008 0:00	8/1/2008 0:00												48		
4-NC	H15646-3	Soil		7/30/2008 0:00	8/1/2008 0:00												1220		
6-NE	H15646-1	Soil		7/30/2008 0:00	8/1/2008 0:00												928.0		
														<u> </u>					

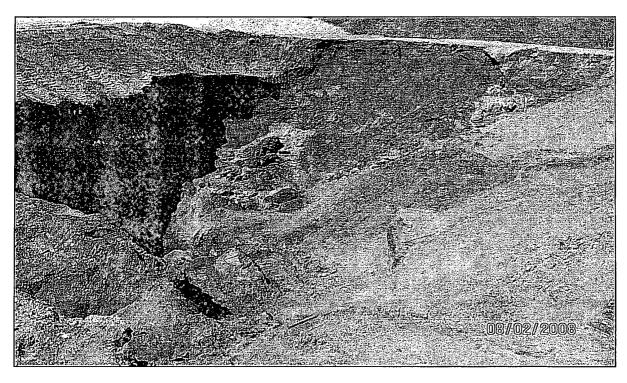
BEPCO, LP – Poker Lake Unit #183Q Site Photographs taken August 2, 2008 (p. 1 of 3)





BEPCO, LP - Poker Lake Unit #183Q Site Photographs taken August 2, 2008 (p. 2 of 3)





BEPCO, LP – Poker Lake Unit #183Q Site Photographs taken August 2, 2008 (p. 3 of 3)

