

2R-370

**GENERAL
CORRESPONDENCE**

**YEAR(S):
2009-2012**

From: Ben J. Arguijo [<mailto:bjarguijo@basinenv.com>]
Sent: Wednesday, June 20, 2012 5:48 PM
To: VonGonten, Glenn, EMNRD
Cc: 'Savoie, Tony A.'; ccruz@BassPet.Com
Subject: Josephine Rodke Federal #1 - Monitor Well P&A Request

Mr. von Gonten,

Attached please find a "Monitor Well P&A Request" for the site known as Josephine Rodke Federal #1 in El Paso County, New Mexico. A hard copy will be forwarded via postal mail.

If you have any questions or concerns, please do not hesitate to contact me by telephone or e-mail.

Thank you for your consideration.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
Project Manager
Basin Environmental
3100 Plains Hwy.
P.O. Box 301
Lovington, NM 88260
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Basin Environmental Service Technologies, LLC

3100 Plains Highway
P. O. Box 301
Lovington, New Mexico 88260
bjarguijo@basinenv.com
Office: (575) 396-2378

Fax: (575) 396-1429



June 20, 2012

Mr. Glenn von Gonten
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Monitor Well P&A Request
BOPCO, LP
Josephine Rodke Federal #1
Unit Letter "C" (NE/NW), Section 27, Township 20 South, Range 31 East
Eddy County, New Mexico
NMOCD Reference #2RP-370

Dear Mr. von Gonten,

Basin Environmental Service Technologies, LLC (Basin Environmental), on behalf of BOPCO, LP (BOPCO), has prepared this Monitor Well P&A Request for the site known as Josephine Rodke Federal #1 (Josephine Rodke): an historic, unlined pit. The legal description of the site is Unit Letter "C" (NE/NW), Section 27, Township 20 South, Range 31 East, in Eddy County, New Mexico. The property is owned and administered by the United States Department of the Interior, Bureau of Land Management (BLM). The geographic coordinates of the site are 32° 32' 45.132" North latitude and 103° 51' 15.048" West longitude. A "Site Location Map" is enclosed as Figure 1.

A well pad adjacent to the Josephine Rodke site is currently being expanded to accommodate a large-scale directional drilling "Island Project". Forty (40) exploratory wellbores are scheduled to be drilled in the area over the next several years, and the footprint of the expanded well pad encompasses the Josephine Rodke excavation and four (4) on-site monitor wells. Locations of the monitor wells and the dimensions of the initial excavation are depicted in the enclosed "Site and Sample Location Map" (Figure 2).

On June 18, 2012, during a routine inspection of the construction site, BOPCO discovered that the steel monuments, PVC casings, and concrete surface seals of the four (4) on-site monitor wells (MW-1 through MW-4) had been sheared off at the ground surface and covered with approximately six (6) to eight (8) feet of caliche during the expansion of the well pad. A representative of Basin Environmental immediately reported the incident to the New Mexico Oil Conservation Division (NMOCD) and the New Mexico Office of the State Engineer (NMOSE).

Page 2
Glenn von Gonten
June 20, 2012

On June 19, 2012, Basin Surveys dispatched a survey crew to the site to assist BOPCO and Basin Environmental personnel in locating the sites of the monitor wells. Once the monitor wells had been located, a backhoe was utilized to excavate the caliche atop the monitor wells, and the PVC casings were repaired. Following repairs, the casings were extended approximately five (5) feet above ground surface and fitted with impermeable PVC caps.

Due to environmental and safety concerns associated with the "Island Project", BOPCO hereby requests permission to plug and abandon (P&A) the four (4) monitor wells at the Josephine Rodke site. Pending NMOCD approval, the monitor wells will be P&A'd pursuant to NMOSE and NMOCD regulatory requirements. Following completion of the exploratory directional drilling, which is scheduled to continue through the year 2019, the site will be revisited. Should the NMOCD deem it appropriate, additional monitor wells will be installed at that time to further investigate the extent of chloride impact to groundwater in the area.

For your convenience, a summary of analytical data from the 2010 – 2012 quarterly groundwater monitoring events is enclosed as Table 1, " Concentrations of Chloride & Total Dissolved Solids in Groundwater".

Should you have any questions, please do not hesitate to contact me at (575) 396-2378 or Tony Savoie at (432)556-8730.

Respectfully,



Ben J. Arguijo
Basin Environmental Service Technologies, LLC

Cc: Tony Savoie, BOPCO, LP (TASavoie@BassPet.com)
Carlos Cruz, BOPCO, LP (CCruz@BassPet.com)

Enclosures:

Figures

Figure 1: Site Location Map
Figure 2: Site and Sample Location Map

Tables

Table 1: Concentrations of Chloride & Total Dissolved Solids in Groundwater

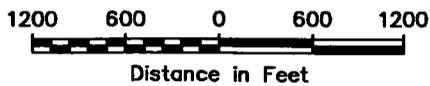
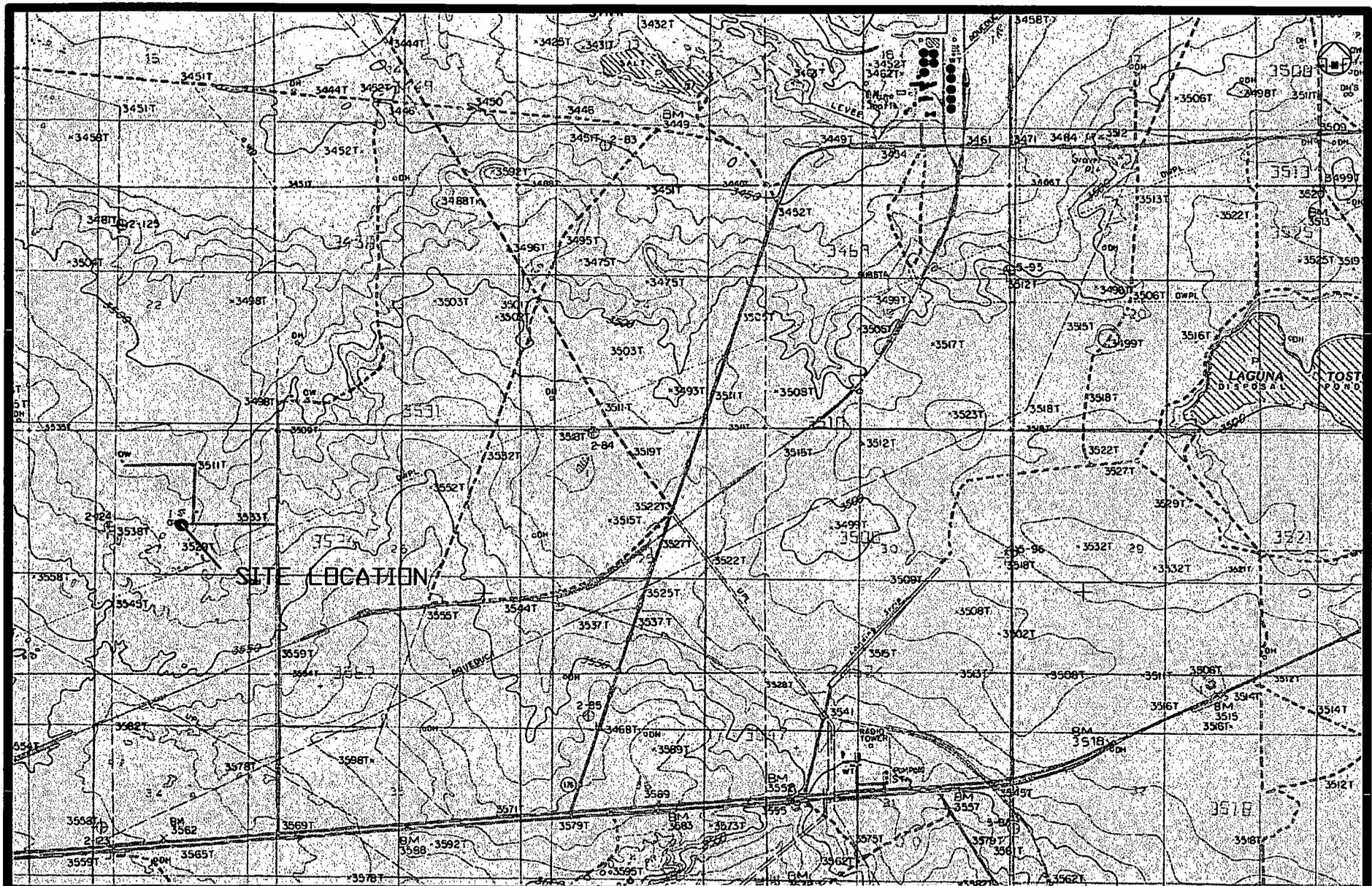
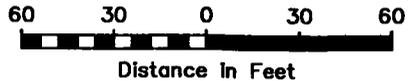
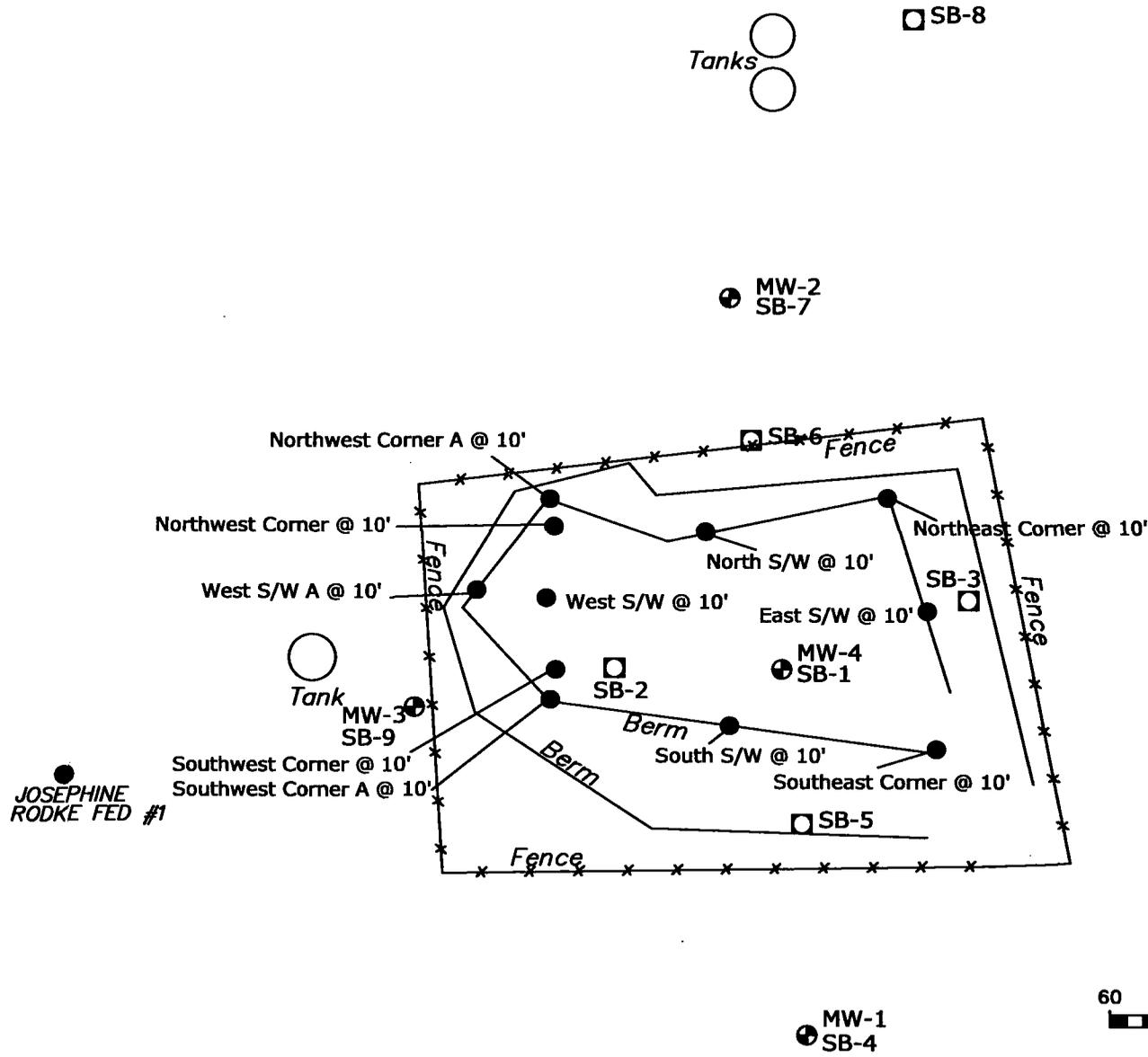


Figure 1
 Site Location Map
 BOPCO, LP
 Joesphine Rodke Federal #1
 Eddy County, New Mexico
 2RP-370

Basin Environmental Consulting

Prep By: CDS	Checked By: CDS
October 29, 2009	Scale 1"=1,200'



- Legend:**
- Excavation Extent
 - - - Bench Extent
 - MW-1 Monitor Well Location
 - SB-1 Soil Boring Location
 - Soil Sample Location

Figure 2
Site and Sample Location Map
BOPCO
Josephine Rodke #1
Eddy County, NM

Basin Environmental Consulting

Prep By: CDS	Checked By: CJB
March 3, 2010	Scale 1"=60'

TABLE 1

CONCENTRATIONS OF CHLORIDE &
 TOTAL DISSOLVED SOLIDS IN GROUNDWATER
 BOPCO, LP
 JOESPHINE RODKE FEDERAL #1
 EDDY COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	4500 Cl-B	EPA 160.1
		CHLORIDE (mg/L)	TDS (mg/L)
MW-1	1/12/2010	112	708
	1/19/2010	108	639
	6/3/2010	116	-
	9/17/2010	124	-
	12/15/2010	120	-
	3/23/2011	124	-
	6/8/2011	124	-
	8/31/2011	124	-
	11/15/2011	128	-
	2/10/2012	124	-
	5/21/2012	124	-
MW-2	1/12/2010	136	598
	1/19/2010	128	541
	6/3/2010	132	-
	9/17/2010	140	-
	12/15/2010	140	-
	3/23/2011	128	-
	6/8/2011	132	-
	8/31/2011	124	-
	11/15/2011	140	-
	2/10/2012	140	-
	5/21/2012	128	-
MW-3	1/12/2010	24,500	39,300
	1/19/2010	46,000	72,800
	3/24/2010	61,000	-
	6/3/2010	41,000	-
	9/17/2010	32,000	-
	12/15/2010	42,000	-
	3/23/2011	34,000	-
	6/8/2011	35,600	-
	8/31/2011	20,400	-
	11/15/2011	30,000	-
	2/10/2012	23,000	-
	5/21/2012	11,300	-
MW-4	1/12/2010	196	687
	1/19/2010	136	603
	6/3/2010	132	-
	9/17/2010	164	-
	12/15/2010	136	-

TABLE 1

**CONCENTRATIONS OF CHLORIDE &
TOTAL DISSOLVED SOLIDS IN GROUNDWATER
BOPCO, LP
JOESPHINE RODKE FEDERAL #1
EDDY COUNTY, NEW MEXICO**

SAMPLE LOCATION	SAMPLE DATE	4500 Cl-B	EPA 160.1
		CHLORIDE (mg/L)	TDS (mg/L)
MW-4	3/23/2011	140	-
	6/8/2011	132	-
	8/31/2011	156	-
	11/15/2011	140	-
	2/10/2012	152	-
	5/21/2012	140	-
NMOCDCRITERIA		250	10,000

From: [Chuck Daniels](#)
To: [VonGonten, Glenn, EMNRD](#)
Cc: [Debi Moore](#)
Subject: BOPCO, L.P. Permanent Pit Closure
Date: Monday, July 20, 2009 10:31:54 AM

Mr. Von Gonten

I would like to confirm verbal permission to proceed with the excavation and removal of contaminated soil from the Josephine Rodke Federal #1 and GH Cobb Federal #1 permanent pits. A C-141 form will be sent to you and Mike Bratcher per our phone conversation. BOPCO, L.P. and Sport Environmental Services is committed to handling the closure of these pits in compliance with the NMOCD regulations. Field Chloride titrations will be performed for vertical and horizontal delineation, when field titrations confirm acceptable levels an analytical report will be conducted for confirmation sampling. If you have any questions regarding the aforementioned sites please contact us.

Respectfully Submitted,



CHUCK DANIELS

Environmental Coordinator

Sport Environmental Services, PLLC
502 North Big Spring Street
Midland, Texas 79701
chuck@sportenvironmental.com
Business: 432.683.1100
Fax: 888.500.0622
Cell: 432.661.5969

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

From: Debi Moore
To: VonGonten, Glenn, EMNRD
Cc: Chuck Daniels; Mark Staley; Steve Johnson
Subject: BOPCO - GH Cobb and Josephine Rodke Pit Closure Approval
Date: Thursday, July 23, 2009 9:45:56 AM

Mr. Von Gonten,

I have learned from Chuck Daniels, Environmental Coordinator, that we have been granted NMOCD verbal approval to excavation up to 30 feet at the BOPCO GH Cobb and Josephine Rodke permanent pit closure sites. Please let this email serve as confirmation of the NMOCD's approval and notification that excavation continuance will commence on Monday, July 27th.

If you have any questions or comments, please contact me anytime.

Thank you,
Debi Moore



DEBI SPORT MOORE, M.E., R.E.P.A

President

Sport Environmental Services, PLLC
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Business: 432.683.1100
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If you have any questions or comments, please contact me anytime.

Thank you,
Debi Moore



DEBI SPORT MOORE, M.E., R.E.P.A

President

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From: Sharon Longstreet
To: VonGonten, Glenn, EMNRD
Subject: BOPCO - G.H. Cobb Federal #1 & Josephine Rodke Federal #1
Date: Wednesday, August 12, 2009 3:58:18 PM
Attachments: Daily Activity Summary - Josephine Rodke Federal #1.xls
Daily Activity Summary - G.H. Cobb Federal #1.xls

Mark Staley requested I forward to you. (I will send photos by separate e-mails.)

Sharon Longstreet



SHARON LONGSTREET

Environmental Technician

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sharon@sportenvironmental.com
Business: 432.683.1100
Fax: 888.500.0622

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Daily Activity Summary

BOPCO, L.P.

Location: Josephine Rodke Federal #1

Date	Daily Description of Work Performed	Yards Hauled	Total Yards Hauled
7/7/2009	Drove to location. Met with Big D. Began excavating pit area. Approximately 39' x 45'. Ran into dark oily soil at 4' in the center of the pit. Found buried fiberglass pipe fragments in middle of pit at 3'. Took the whole floor to 6'. Ran into caliche at 6'. Started digging caliche out of the northwest corner. Will finish excavating tomorrow. Hauled 19 12-yd loads and 3 20-yd loads. Total for today 288 yds. Equipment: 1 loader(1/2 day), 1 backhoe, 5 12-yd dumps and 1 belly dump(1/2 day)	288 yds	288 yds
7/8/2009	Continued excavating down to 10'. Excavated half of the floor from 6' to 10'. Will finish tomorrow. Hauled 40 12-yd loads and 19 20-yd loads to CRI. Total for today: 860 yards. Total to date: 1,148. Equipment: 5 12-yd dumps, 3 belly dumps, 1 loader and 1 backhoe.	860 yds	1,148 yds
7/9/2009	Continued excavating. Finished the entire pit area. Hauled off 22-12yd and 7-20yd loads. Hauled 404 yards today. Total to date: 1,552. Equipment: 5 12-yd dumps, 3 belly dumps, 1 loader and 1 backhoe.	404 yds	1552 yds
7/27/2009	Drove to location to continue excavating. Took the floor to 15' and sampled. Took a 5-pt composite with field titrations. Sample came out at 9100 mg/kg. Excavator hydraulic line broke. Will continue to 20' tomorrow. Hauled off 22-12yd and 7-20yd loads. Hauled 6-12yd loads and 12 20-yd loads to CRI. Total for today 312 yards. Equipment: 1 excavator, 2 20-yd belly dump, 1 12-yd dump truck.	312 yds	1864 yds
7/28/2009	Continued excavating. Met with Corey Needham with Pettigrew and Associates about a benching plan. They said they would have a plan to us by 9:30 in the morning. Excavated to 20'. Sampled at 20' 14,948 mg/kg. Hauled 5-12yd loads and 20 20-yd loads to CRI. Total for today 340 yards. Equipment: 1 excavator, 2 20-yd belly dump, 4 12-yd dump truck.	340 yds	2204 yds
7/29/2009	Hauled 38 12-yd loads. Total for today 456 yards. Waited on benching plan from Pettigrew. Received plan around 2pm. Discussed moving water tanks with BOPCO representative. Tanks will be moved in the morning. Began benching on the east side of excavation. Equipment: 1 excavator, 1 loader, 3 12-yd dump trucks.	456 yds	2660 yds
7/30/2009	Continued benching. Started on east and north walls. Spoke with BLM about moving roads that will be impacted by benching area. They told me the roads were never permitted or they could not find an indication they were permitted. Jim Amos with BLM told me to contact Jenette Martinez at 575-234-5907 with the BLM. She will be the one to determine whether or not we can just send in a Sundry Notice for the roads or BOPCO will need to file for a right-of-way. Hauled 27 12-yd loads and 4 20-yd loads to CRI. Total for today 404 yards. Tested three separate stockpiles pulled from the east and north walls. The field titrations were 116mg/kg, 116 mg/kg and 132 mg/kg. Equipment: 1 excavator, 1 loader, 6 12-yd dump trucks, 1 20-yd belly dump.	404 yds	3064 yds
7/30/2009	Additional note: The BLM will be conducting an archeology survey at the location of new road placement.		
7/31/2009	Continued benching the east and north walls. Tested the sand coming out of the walls. It tested at 116 mg/kg. The caliche underneath the sand tested at 1060 mg/kg from the east wall. Hauled 5 12-yd loads and 1 20yd load to CRI. Total for today 80 yards. Equipment: 1 excavator, 1 loader, 6 12-yd dump trucks, 1 belly dump.	80 yds	3144 yds
8/3/2009	Continued benching side walls. We benched out the north and east walls to the second bench. Sampled the stockpile from the north wall on the first bench. It was 5116 mg/kg. The caliche from the second bench was 908 mg/kg. The second bench on the east wall was 448 mg/kg. Hauled 29 12yd loads and 9 20yd loads to CRI. Total for today 528 yards. Equipment: 1 excavator, 1 loader, 5 12-yd dump trucks, 1 belly dump.	528 yds	3672 yds

8/4/2009	<p>Finished benching the north and east walls. Will move west road in the morning and begin benching the west wall. Road will need to be 14' wide and 1/2' deep of caliche. Spoke with Jennette Martinez with the BLM. She said we need to find out if the roads are on lease or off lease. Spoke with Owen Lofton ge said we need to file a Sundry Notice. Maps were sent to Owen Lofton and Martin Stein. Jennette called back with a verbal approval. Tested 3rd bench on north wall. Titration was 384 mg/kg. Hauled 35 12yd loads and 27 20yd loads. Total for today is 960yards. Equipment: 1 excavator, 1 loader, 5 12-yd dump trucks, 3 20-yd belly dumps.</p>	960 yds	4632 yds
8/5/2009	<p>Continued benching. Received phone call from Jennette Martinez with the BLM. She was under the impression we were going to change the county road. I explained we were only doing the road next to the well. I told her about the revised maps I sent to Martin Stein. She was supposed to get back with me. She never did. I asked if I should hold off on moving the road and she said no. We fenced the entire excavation off and bladed a new road from the #1 well to the battery. Started benching the west wall. The sand brought out tested at 778 mg/ kg. It was the top 1' to 6' going from north to south. Started excavating the caliche under the sand. Caliche had a dark color to it and a strong chloride smell. Will test tomorrow. Hauled 18 20yd loads and 25 12yd loads to CRI. Total for today 660 yards. Equipment: 1 excavator, 1 loader, 1 motor grader, 3 12-yd dump trucks, 3 20-yd belly dumps.</p>	660 yds	5292 yds
8/6/2009	<p>Continued benching. Received phone call from Jennette Martinez with the BLM. She was under the impression we were going to change the county road. I explained we were only doing the road next to the well. I told her about the revised maps I sent to Martin Stein. She was supposed to get back with me. She never did. I asked if I should hold off on moving the road and she said no. We fenced the entire excavation off and bladed a new road from the #1 well to the battery. Started benching the west wall. The sand brought out tested at 778 mg/ kg. It was the top 1' to 6' going from north to south. Started excavating the caliche under the sand. Caliche had a dark color to it and a strong chloride smell. Will test tomorrow. Hauled 18 20yd loads and 25 12yd loads to CRI. Total for today 660 yards. Equipment: 1 excavator, 1 loader, 1 motor grader, 3 12-yd dump trucks, 3 20-yd belly dumps.</p>	660 yds	5292 yds
8/7/2009	<p>Finished benching west wall and begun excavating floor. We will get to 25' on Monday. Tested caliche coming out of west wall. Analyzed at 1,901 mg/kg. Hauled 43 12yd loads to CRI. Total for today 516 yards. Equipment: 1 excavator, 1 loader, 6 12-yd dump trucks.</p>	516 yds	5808 yds
8/10/2009	<p>Finished digging to 25'. Will sample and go further in the morning. Hauled 42 12yd loads to CRI. Total for today 504 yards. Equipment: 1 excavator, 1 loader, 3 12-yd dump trucks.</p>	504 yds	6312 yds
8/11/2009	<p>Test soil at 25'. Analysis tested 12,616 mg/kg. Started excavating to 30'. Got half of the floor to 30'. Hauled 48 12yd loads and 8 20ys loads. Total for today 736 yards. Equipment: 1 excavator, 1 loader, 3 12-yd dump trucks, 1 20-yd belly dump.</p>	736 yds	7048 yds

Daily Activity Summary

BOPCO, L.P.

Location: G.H. Cobb Federal #1

Date	Daily Description of Work Performed	Loads Hauled	Loads Recvd
7/7/2009	Drove to location. Met with Big D. Began excavating pit area. Approximately 45' x 45'. Discovered light hydrocarbon staining in the center of the pit. Took the entire floor to 3'. Ran into caliche at 6' in NE corner. Excavated caliche out of the northwest corner to a depth of 10'; approximately 10' x 20' area. Estimate finishing excavating tomorrow. Hauled 18 12-yd loads to CRI. Total for today 216 cubic yds. Equipment: 1 loader(1/2 day), 1 backhoe, 5 12-yd dumps	216 yds	216 yds
7/8/2009	Drove to location. Excavated 24 x 18 x 10 area of pit location. Discovered heavy chloride and light hydrocarbon staining in caliche. Ran into caliche at 3.5' North and center of pit. Approximately 10' x 45' remaining. Estimate finishing excavating today. At this point contamination concentration is located in the center north area of pit. Hauled 20 12-yd and 9 24-yd loads to CRI. Total for today 456 cubic yds. Equipment: 1 loader(1/4 day), 1 backhoe, 5 12-yd dumps 3 24-yd belly dumps.	456 yds	672 yds
7/9/2009	Drove to location. Excavated remaining pit contents. Discovered heavy chloride and light hydrocarbon staining in middle south end of pit area. Obtained a 5 point sample of pit floor at the depth of 10' and field composite sample of each wall at a depth of 5'. Hauled 30 12-yd and 18 24-yd loads to CRI. Total for today 792 cubic yds. Equipment: 1 loader(1/2day), 1 backhoe, 5 12-yd dumps 2 24-yd belly dumps.	792 yds	1464 yds
7/27/2009	Drove to location to continue excavating. Took the floor to 15' and sampled. Took a 5-pt composite with field titrations. Sample came out at 6,592 mg/kg. Midway through 20' excavation process ran into discolored sandstone at 16', excavation slowed because of hardness. Will continue to 20' tomorrow. Hauled 1-12yd loads and 2-20-yd loads to CRI. Total for today 52 yards. Equipment: 1 excavator, 2 20-yd belly dump, 1 12-yd dump truck.	52 yds	1516 yds
7/28/2009	Drove to location to continue excavating. Took the floor to 20' and sampled. Took a 5-pt composite with field titrations. Sample came out at 19,576 mg/kg. Start benching 9-29, still in layer of sandstone at 20'. Hauled 4-12yd loads and 8-20-yd loads to CRI. Total for today 208 yards. Equipment: 1 excavator, 2 20-yd belly dump, 1 12-yd dump truck..	208 yds	1724 yds
7/29/2009	Drove to location hauled 30-12yd loads and 11-20-yd loads to CRI. Total for today 590 yards. Will start benching tomorrow for further excavation. Equipment: 1 excavator, 1 20-yd belly dump, 3 12-yd dump truck..	590 yds	2314 yds
7/30/2009	Drove to location to continue excavating. Benched north and east side 24' to a depth of 4'. Took three stockpile 5-pt composite field titrations. Sample north 2 @ 7,401 ppm. Sample east @ 697 ppm. Hauled 39-12yd loads and 10-20-yd loads to CRI. Total for today 668 yards. Equipment: 1 excavator, 1 20-yd belly dump, 6 12-yd dump truck.	668 yds	2982 yds
7/31/2009	Continued benching the east and south walls. Tested south wall stockpile, chloride concentration is 4,288 ppm. Tested east wall interior benching stockpile, chloride concentration is 16,316 ppm. Hauled 45 12-yd loads and 8 20yd load to CRI. Total for today 700 yards. Equipment: 1 excavator, 1 loader, 1 belly dump, 6 12-yd dump trucks.	700 yds	3682 yds
8/3/2009	Continued benching the east and north walls. The east wall benching caliche tested at 16,316 mg/kg. The caliche underneath at 14,984 mg/kg from the north wall. Hauled 36 12-yd loads and 2 20yd load to CRI. Total for today 412 yards. Equipment: 1 excavator, 1 loader, 1 belly dump, 6 12-yd dump trucks.	412 yds	4094 yds
8/4/2009	Drove to location to continue excavating. Took 1/4 of the floor to 25' and sampled. Took a 5-pt composite with field titrations of North benching soil 13,724 ppm. Hauled 32-12yd loads to CRI. Total for today 384 yards. Equipment: 1 excavator, 1 12-yd dump truck.	384 yds	4478 yds

8/5/2009	<p>Drove to location to continue excavating. Took 3/4 of the floor to 25'. Floor is sandstone and is very hard to excavate. Will finish excavating floor to 25' and south benching on 8-6-09. Mark Staley with Sport Environmental Services had this conversation with BLM: "Received phone call from Jennette Martinez with the BLM. She was under the impression we were going to change the county road. I explained we were only doing the road next to the well. I told her about the revised maps I sent to Martin Stein. She was supposed to get back with me. She never did. I asked if I should hold off on moving the road and she said no." A small section 30' x 150' corner on the South side of the location was cleared for transportation purposes. Outside perimeter of job site is completely fenced.</p> <p>Hauled 30-12yd loads to CRI. Total for today 360 yards. Equipment: 1 excavator, 3 12-yd dump trucks.</p>	360 yds	4838 yds
8/6/2009	<p>Drove to location, finished excavating to 25'. Chloride concentrations were 23,804 ppm on the floor. Continued excavation to 30'. 1/4 of floor has been excavated and removed at 30'. Mark Staley spoke with Jennette Martinez with the BLM. She said she spoke with Martin Stein and he said everything was ok with the roads as long as we stay where the drawing said we were. She gave us the all clear to move roads.</p> <p>Hauled 28-12yd loads 4-20 yd loads to CRI. Total for today 476 yards. Equipment: 1 excavator, 3 12-yd dump trucks, 2 20-yd belly dumps.</p>	476 yds	5314 yds
8/7/2009	<p>Drove to location. Finished excavating to 30'. Chloride concentrations were 16,316 at 30'. Tried to contact Glenn VonGonten with NMOCD for approval or counsel for continuation of the remediation process.</p> <p>Hauled 23-12yd loads to CRI. Total for today 276 yards. Equipment: 1 excavator, 3 12-yd dump trucks.</p>	276 yds	5590 yds
8/10/2009	<p>Drove to location and finished benching south. Tested south excavated soil for chloride concentrations, the results were 14,948. I contacted Glenn VonGonten with the NMOCD and he required further excavation until chloride levels dropped to an acceptable level to consider risk based closure. I sent Mr. VonGonten an email confirming our conversation and asked him what is the acceptable chloride levels and excavation depth the NMOCD will consider a risk based closure for this particular pit. Corry with Pettigrew & Associates, came by to evaluate site for new benching plan to further excavate material to 50'.</p> <p>Hauled 18-12yd loads to CRI. Total for today 216 yards. Equipment: 1 excavator 1/2 day, 1 loader, 2 -12-yd dump trucks.</p>	216 yds	5806 yds
8/11/2009	<p>Drove to location, started benching plan to 50'. Tested excavated soil from north, east, south for chloride concentrations results were, North - 10,700 ppm, East - 13,724 ppm, South - 12,616 ppm. ... I talked to Glenn VonGonten on the way home, he is trying to direct me back to the Carlsbad district office and researching the hydrology of our site locations to determine a risk based closure. He said some unlined pits were permitted because of their vicinity adjacent to the potash mines. He wants me to contact him in the morning.</p> <p>Hauled 24-12yd loads to CRI. Total for today 288 yards. Equipment: 1 excavator, 1 loader, 3 -12-yd dump trucks.</p>	288 yds	6094 yds

From: Bratcher, Mike, EMNRD
To: VonGonten, Glenn, EMNRD; Jones, Brad A., EMNRD
Subject: BOPCO Pits
Date: Friday, August 14, 2009 9:14:04 AM

Glenn,

Have you guys opened up anything in RBDMS for the BOPCO Josephine Rodke and GH Cobb sites?
If not, I will go ahead and assign an RP # for them.

Thanks,

Mike

From: Bratcher, Mike, EMNRD
To: VonGonten, Glenn, EMNRD
Subject: BOPCO Josephine Rodke/Cobb pit closure
Date: Wednesday, February 03, 2010 11:31:53 AM

Glenn: I had a phone call from Tony Savoie w/BOPCO this morning. He wanted to notify us that they likely have some ground water impact at the Cobb site. They have done extensive borehole delineation at both sites and have completed several monitor wells at both sites. As I understand, most of the monitor wells have a very slow recharge rate. They are still in investigative mode and will have more data available soon.

Mike Bratcher

NMOCD DISTRICT 2
1301 W. GRAND AVE.
ARTESIA, NM 88210
575-748-1283 EXT.108
mike.bratcher@state.nm.us

From: Bratcher, Mike, EMNRD
To: VonGonten, Glenn, EMNRD
Cc: Sanchez, Daniel J., EMNRD
Subject: RE: BOPCO Josephine Rodke Production Pit Data
Date: Tuesday, May 25, 2010 2:54:28 PM

Sport Environmental was working on this project when I got it. BOPCO elected to bring in another firm (Basin Environmental) to finish it out. When Basin moved in, the excavation was 155' x 161' x 35' deep. It was benched, with all of the excavated material hauled to disposal. I thought I had a spreadsheet on volume of material removed, but don't see it in the file. I'll try to get that information as it does need to be in the file. They backfilled up to a point that they could get a rig in to do the delineation with the understanding that they may be required to re-excavate, but I am not sure it would be practicable to attempt to get to the really hot stuff a 90 – 95'. An excavation to get that deep would take in the entire location and a large portion of the pasture.

I won't do anything else until you have had a chance to review. They are still working on the other site (Cobb)

Thanks – Mike

From: VonGonten, Glenn, EMNRD
Sent: Tuesday, May 25, 2010 1:25 PM
To: Bratcher, Mike, EMNRD
Cc: Sanchez, Daniel J., EMNRD
Subject: RE: BOPCO Josephine Rodke Production Pit Data

Mike,

How much soil have they excavated already? I'd like take a look at this before they backfill.

Glenn

From: Bratcher, Mike, EMNRD
Sent: Tuesday, May 25, 2010 11:05 AM
To: VonGonten, Glenn, EMNRD
Cc: Jones, Brad A., EMNRD
Subject: BOPCO Josephine Rodke Production Pit Data

Glenn,

Here is a link to a folder on the L Drive. I imaged just the analytical data (short version), and lithology of the borings from the BOPCO – Josephine Rodke prod pit. Four of the soil borings have been converted to monitor wells. The biggest hit on the water samples is from MW-3, which is outside of the excavation and well outside the area the original pit covered. I have a theory, but take a look and see what you think. On the soil samples, there are some pretty high chloride numbers in SB-1, with the highest coming in at 90' – 95' bgs. They are proposing to install a cap, backfill the excavation and continue with the ground water investigation. I am inclined to approve

it unless you want something different done.

Call me if you have any questions. <L:\Artesia\BOPCO Josephine Rodke Prod Pit>

Mike Bratcher

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575-748-1283 EXT.108
mike.bratcher@state.nm.us

"Democracy is two wolves and a lamb deciding what to have for dinner. Liberty is a well armed lamb." - Benjamin Franklin

From: [Bratcher, Mike, EMNRD](#)
To: [VonGonten, Glenn, EMNRD](#)
Subject: BOPCO Rodke & Cobb pits
Date: Tuesday, July 27, 2010 11:09:45 AM

Glenn,

I just had the latest submittal for the BOPCO GH Cobb site imaged to the L drive. I received it June 24, but just now getting it on there for you guys to review. Here is the link:

[L:\Artesia\BOPCO Josephine Rodke - GH Cobb Prod Pits](#)

This latest doc is in the GH Cobb folder

Mike Bratcher

NMOCD DISTRICT 2
1301 W. GRAND AVE.
ARTESIA, NM 88210
575-748-1283 EXT.108
mike.bratcher@state.nm.us

From: [Jones, Brad A., EMNRD](#)
To: [VonGonten, Glenn, EMNRD](#)
Subject: FW: BOPCO Josephine Rodke Production Pit Data
Date: Thursday, September 30, 2010 5:33:07 PM

From: Bratcher, Mike, EMNRD
Sent: Tuesday, May 25, 2010 11:05 AM
To: VonGonten, Glenn, EMNRD
Cc: Jones, Brad A., EMNRD
Subject: BOPCO Josephine Rodke Production Pit Data

Glenn,

Here is a link to a folder on the L Drive. I imaged just the analytical data (short version), and lithology of the borings from the BOPCO – Josephine Rodke prod pit. Four of the soil borings have been converted to monitor wells. The biggest hit on the water samples is from MW-3, which is outside of the excavation and well outside the area the original pit covered. I have a theory, but take a look and see what you think. On the soil samples, there are some pretty high chloride numbers in SB-1, with the highest coming in at 90' – 95' bgs. They are proposing to install a cap, backfill the excavation and continue with the ground water investigation. I am inclined to approve it unless you want something different done.

Call me if you have any questions. [L:\Artesia\BOPCO Josephine Rodke Prod Pit](#)

Mike Bratcher

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mike.bratcher@state.nm.us

¹Democracy is two wolves and a lamb deciding what to have for dinner. Liberty is a well armed lamb.¹ - Benjamin Franklin

From: Ben J. Arguijo
To: VonGonten, Glenn, EMNRD
Cc: Bratcher, Mike, EMNRD
Subject: Status of G.H. Cobb Federal #1 (#2RP-369) Soil Closure Review?
Date: Monday, March 07, 2011 11:05:32 AM

Mr. von Gonten,

I am writing to request a status update on your review of the "Remediation Summary and Soil Closure Strategy" for the G.H. Cobb Federal #1 release site (NMOCD reference #2RP-369). The document was dated "December 2010" and was signed by my former colleague, Joel Lowry. According to my tracking slip, it was delivered to your office on December 28, 2010 (if any of that information helps).

We are hoping to begin backfilling the excavation in the next few weeks, if at all possible.

Thank you for your time and consideration. If you have any questions, comments, or concerns, please do not hesitate to contact me by telephone or e-mail.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
Project Manager
Basin Environmental
3100 Plains Hwy.
P.O. Box 301
Lovington, NM 88260
p:(575)396-2378 m:(806)549-9597
f:(575)396-1429
bjarguijo@basinenv.com

From: Jones, Brad A., EMNRD
To: VonGonten, Glenn, EMNRD
Subject: FW: BOPCO - GH COBB
Date: Monday, June 18, 2012 11:20:24 AM
Attachments: 2009-7-2 GH Cobb Federal #1 PP CP.pdf

From: Jones, Brad A., EMNRD
Sent: Thursday, July 02, 2009 5:03 PM
To: 'Mark Staley'
Subject: RE: BOPCO - GH COBB

Mark,

Please see the attached... it is a copy of your closure plan approvals. A hardcopy will be mailed to Mr. Steve Johnson of BOPCO next Monday. In accordance with Paragraph (5) of Subsection I of 19.15.17.13 NMAC, "*The operator shall notify the division when it has seeded or planted and when it successfully achieves re-vegetation.*" This was a requirement left out of your closure plan that must be satisfied. If you have any questions regarding this matter, please do not hesitate to contact me.

Brad
Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Mark Staley [<mailto:mark@sportenvironmental.com>]
Sent: Thursday, July 02, 2009 3:22 PM
To: Jones, Brad A., EMNRD
Cc: Debi Moore
Subject: BOPCO - GH COBB and JOESPHINE RODKE

Brad,

I was looking at our schedule and wanted to see if we could get verbal approval for the pit closure? We have next week free and would like to start on the excavation process and get some samples into the lab. Would this be possible?