

From: Burton, Michael <mburton@blm.gov>
Sent: Thursday, June 13, 2013 7:42 AM
To: Lupe Carrasco
Cc: Amanda Trujillo; James Amos; Bratcher, Mike, EMNRD
Subject: Mimosa Fed SWD cleanup plan

Lupe,
The plan that was submitted is approved with these conditions of approval.

Unlined facility:

1. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures. In this case, the location is still a working tank battery location. As such, excavation depths in portions of the spill area in close proximity to standing production equipment may be limited due to safety concerns. In such cases, the spill area excavated as far as practical and safety limits to cleanup measures will be considered a temporary spill abatement measure that will be further mitigated upon the abandonment of the well/facility location. Appropriate notations to that effect will be entered in the well file.
2. Cleanup will include removal of any contaminated berm materials and/or unsuitable berm materials such as sandy soils, gravels, or cobblestones. Tank battery berms should be built of compactable caliche that is capable of fluid containment.
3. The BLM will wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of bottoms, sidewalls and any visibly affected areas outside of the excavation trench will be required; the BLM will witness the sampling. Contact the authorized officer to schedule.
4. Lab analysis of the confirmation sampling must be forwarded to the authorized officer for final approval before backfilling. Based on the sampling results, additional cleanup may be required or the site may be approved for closure.
5. Once final approval of cleanup is given, the excavation can be backfilled with compactable caliche to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
6. Install secondary containment berms of good quality compactable caliche around existing production equipment and the pad to prevent future spills from being released off the facility location.

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 revegetate, 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.

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