

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Wednesday, May 09, 2012 4:00 PM  
**To:** tainsworth@cimarex.com; Eddie Herchman; 'Gregston, Terry G'  
**Cc:** Sergio Contreras; Bob Allen  
**Subject:** RE: Cottonwood Draw 22 Federal Com 1; 04/27/12 submitted work plan: plan denied

Mr. Ainsworth & Mr. Herchman,

NMOCD has no record of notification of this release or submittal of a Form C-141.

Please advise.

***Mike Bratcher***

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575-626-0857  
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**From:** Gregston, Terry G [<mailto:tgregsto@blm.gov>]  
**Sent:** Wednesday, May 09, 2012 1:16 PM  
**To:** [tainsworth@cimarex.com](mailto:tainsworth@cimarex.com); Eddie Herchman; Bratcher, Mike, EMNRD  
**Cc:** Sergio Contreras; Bob Allen  
**Subject:** RE: Cottonwood Draw 22 Federal Com 1; 04/27/12 submitted work plan: plan denied

Gentlemen,

This notification is in regards to the following site and spill event:

Cottonwood Draw 22 Federal Com 1  
Event Date: 07/07/11  
Event Tracking Number: 11NU095TG  
Legals: 25S, 26E, section 22, SESE

**History:**

On 02/20/12, a cleanup plan was submitted for the spill on this location. The BLM rejected the submitted plan on 02/22/12 due to the fact that the lab data and plan charts did not correlate in the submitted plan.

On 02/23/12, a revised cleanup plan was submitted and approved with stipulated conditions of approval. The cleanup plan had stated that SESI would "excavate to clean" and the BLM had stipulated that the pad be sampled in a 50 foot grid to horizontally define the extent of the spill on the pad. Sample points were to be GPS'd and any surface samples that were below closure were to be verified by a 3<sup>rd</sup> party lab.

On 04/27/12, a delineation report was forwarded to the BLM that contained a revised proposal for the treatment of the spill affected pad. This delineation report included surface samples of the pad that showed that the pad had high levels of salt contamination ranging from 24,340ppm down to closure levels. Only one sample point on the pad was below closure, indicating that the majority of the pad has moderate to high salt impacts. Countermanding the previously



submitted plan on 02/23/12, which was approved by the BLM, SESI proposed to leave the spill in place on the pad until the well is abandoned. This proposal constitutes the submission of a plan revision.

**RESPONSE:**

The plan revision submitted on 04/27/12 is denied on the grounds that the plan revision has insufficient spill mitigation and environmental protection measures in a sensitive habitat. The Operator has ten days to either submit a new plan revision or to adopt the previously approved 02/23/12 work plan and Conditions of Approval. Like approval from the OCD is required on all cleanup plans.

It should also be noted that this spill has been on the ground for over a year and that recent and past rain events have not improved the contamination situation on this location. This is evidenced by the fact that the original spill only covered a portion of the pad; whereas, almost the entire pad is now testing positive for salt affected soils. Due to the spreading of the contaminants from the original event, the Operator is requested to achieve final spill mitigation at the earliest possible date.

Thank you for your attention to these concerns,

**Terry Gregston**

Environmental Protection Specialist  
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From: Susana Rodriguez [<mailto:office2@sesi-nm.com>]  
Sent: Friday, April 27, 2012 9:55 AM  
To: Gregston, Terry G  
Cc: Bob Allen; Sergio Contreras  
Subject: RE: Cottonwood Delineation Report

Ms. Gregston:

On behalf of Terry Ainsworth with Cimarex, I have attached a copy of the delineation report for the Cottonwood Draw 22-1. Please forward your approval/stipulations regarding this project. If you have any questions, please contact Bob Allen @ 575.390.7063 or Sergio Contreras @ 575.631.7444.

Thank you,

Susana Rodriguez  
Administrative Assistant



Safety & Environmental Solutions, Inc.

O: 575.397.0510

F: 575.393.4388

