

Bratcher, Mike, EMNRD

From: Tavarez, Ike [Ike.Tavarez@tetrattech.com]
Sent: Tuesday, November 02, 2010 8:56 AM
To: Bratcher, Mike, EMNRD; James_Amos@blm.gov
Cc: Terry Gregston (terry_gregston@nm.blm.gov); Pat Ellis; Joshua Russo
Subject: FW: COG - Tex-Mack - Notification Additional Excavation
Attachments: COG -Tex Mack Confirmation Sampling .pdf

Mike and James,

Tetra Tech has completed the site remediation as discussed the submitted work plan. All the areas were excavated to the appropriate depths and backfilled. In the area of AH-5, the impact was excavated down to approximately 6' below surface. Tetra Tech collected a confirmation bottom hole sample and showed TPH and BTEX concentrations below the RRAL. The excavation bottom was then trenched with a backhoe to define the extent of the chloride impact. The chloride concentrations did decline with depth. However, the total BTEX exceeded the RRAL at 8-8.5' and decline at 10-10.5' below the RRAL (shown in the attached Table, AH-5). Based on the results, Tetra Tech will remove the hydrocarbon impacted soil above the RRAL in the area of AH-5 and has scheduled the excavation on Thursday morning (11-4-10). If you have any questions please call me.

Ike Tavarez
Tetra Tech

see attachment

From: Terry_Gregston@blm.gov [mailto:Terry_Gregston@blm.gov]
Sent: Thursday, October 07, 2010 5:02 PM
To: Bratcher, Mike, EMNRD
Cc: Tavarez, Ike; james_amos@nm.blm.gov; Joshua Russo; Pat Ellis; terry_gregston@nm.blm.gov
Subject: RE: COG - Tex-Mack Work Plan

Ike,

The cleanup plan for the Tex Mack 11 Federal 35 spill is approved with the following additional stipulations:

1. Notify Terry Gregston (575) 234-5958 when you move equipment onto the location to begin cleanup.
2. Confirmation samples will be required of the excavated bottom to ensure cleanup levels have been reached. Contact Terry Gregston to witness the final sampling.
3. Contact Terry Gregston for final inspection after all work is complete.

In such an event that future issues with contaminants are encountered, the operator will be asked to address the situation until contaminant issues are fully addressed 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.

Terry Gregston
Environmental Protection Specialist
Bureau of Land Management
620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958
Fax (575) 234-5927

"Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>

10/07/2010 09:32 AM

To "Tavarez, Ike" <Ike.Tavarez@tetrattech.com>, <terry_gregston@nm.blm.gov>
cc "Pat Ellis" <PELLis@conchoresources.com>, "Joshua Russo"
<jrusso@conchoresources.com>, <james_amos@nm.blm.gov>

Tracking for this incident is: 2RP-443

From: Bratcher, Mike, EMNRD
Sent: Thursday, October 07, 2010 9:11 AM
To: 'Tavarez, Ike'; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Pat Ellis; Joshua Russo; 'James Amos (james_amos@nm.blm.gov)'
Subject: RE: COG - Tex-Mack Work Plan

Ike,

The remediation proposal for the Tex Mack 11 – 35 release is approved as submitted. Please provide notification prior to obtaining delineation samples in the AH-5 area.

COG is advised that OCD approval does not relieve the operator of liability should their 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, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

Like approval by BLM required as may be applicable.

If you have any questions or concerns, please contact me.

Mike Bratcher

NMDCD District 2
1301 W. Grand Ave.
Artesia, NM 88210
575-748-1283 Ext.108
575-626-0857
mike.bratcher@state.nm.us

From: Tavarez, Ike [mailto:Ike.Tavarez@tetratech.com]
Sent: Monday, October 04, 2010 3:36 PM
To: Bratcher, Mike, EMNRD; Terry Gregston (terry_gregston@nm.blm.gov)
Cc: Pat Ellis; Joshua Russo; 'James Amos (james_amos@nm.blm.gov)'
Subject: COG - Tex-Mack Work Plan

COG Operating
Tex-Mack 11 Federal #35
Section 11, T17S, R31E, Unit M
Eddy County, New Mexico

Mike and Terry,

Please find the attached the work plan for the COG - Tex-Mack 11 Federal #35, Eddy County, New Mexico for your review. Once approved, Tetra Tech will schedule the soil remediation at the site. Call me if you have any questions or comments on the work plan, thanks

Ike Tavarez, PC | Senior Project Manager

Mail : 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878

Ike.Tavarez@tetratech.com

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Table 1
COG Operating LLC.
TEX-MACK 11 FEDERAL #35
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft)	Depth (BEB)	Soil Status		TPH (mg/kg)			Benzene (mg/kg)	Toluene (mg/kg)	Ethlybenzene (mg/kg)	Xylene (mg/kg)	Total BTEX	Chloride (mg/kg)
				In-Situ	Removed	GRO	DRO	Total						
AH-3	8/12/2010	0-1'			X	<2.00	<50.0	<50.0	-	-	-	-		2,100
	"	1-1.5'		X		-	-	-	-	-	-	-		233
	"	2-2.5'		X		-	-	-	-	-	-	-		<200
	"	3-3.5'		X		-	-	-	-	-	-	-		<200
	"	4-4.5'		X		-	-	-	-	-	-	-		<200
AH-4	8/12/2010	0-1'			X	1,910	4,580	6,490	1.15	14.6	26.8	33.3	75.85	731
	"	1-1.5'		X		<2.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200		<200
	"	2-2.5'		X		-	-	-	-	-	-	-		<200
	"	3-3.5'		X		-	-	-	-	-	-	-		<200
	"	4-4.5'		X		-	-	-	-	-	-	-		<200

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				In-Situ	Removed	GRO	DRO	Total						
AH-5	8/12/2010	0-1'			X	2,720	2,590	5,310	6.43	36.0	32.0	36.5	110.93	1,620
	"	1-1.5'			X	4,320	6,940	11,260	22.4	104	81.8	95.6	303.8	704
	"	2-2.5'			X	2,610	4,470	7,080	7.78	67.6	58.1	67.6	201.08	307
	"	3-3.5'			X	2,940	3,430	6,370	4.16	60.8	58.8	67.2	190.96	302
	"	4-4.5'			X	1,060	4,040	5,100	1.71	22.2	22.1	24.9	70.91	222
	"	5-5.5'			X	2,310	4,460	6,770	12.0	86.9	77.6	83.1	259.6	<200
	"	6-6.5'		X		2.40	<50.0	2.40	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	291
	"	7-7.5'		X		-	-	-	-	-	-	-		1,220
	"	8-8.5'		X		-	-	-	-	-	-	-		1,360
	"	9-9.5'		X		-	-	-	-	-	-	-		1,060
CS-1	10/21/2010	6-6.5	X			112	2.58	115	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<200
(bottom hole)														
T-1	10/21/2010	8-8.5	X			1,860	3,020	4,880	7.38	57.4	60.1	69.6	194.48	<200
(trench)		10-10.5	X			<2.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	207
		12-12.5	X			-	-	-	-	-	-	-		864
		14-14.5	X			-	-	-	-	-	-	-		<200
North wall	10/21/2010	-				<2.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<200
East wall	10/21/2010	-				<2.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<200
Southwall	10/21/2010	-				<2.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<200
west wall	10/21/2010	-				<2.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<200

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				In-Situ	Removed	GRO	DRO	Total						
AH-6	8/12/2010	0-1'			X	<2.00	<50.0	<50.0	-	-	-	-		1,280
	"	1-1.5'		X		-	-	-	-	-	-	-		<200
	"	2-2.5'		X		-	-	-	-	-	-	-		<200
	"	3-3.5'		X		-	-	-	-	-	-	-		<200
	"	4-4.5'		X		-	-	-	-	-	-	-		<200

BEB Below Excavation Bottom

(--) Not Analyzed

☐ Excavation Depths