

Bratcher, Mike, EMNRD

From: tgregsto@blm.gov
Sent: Sunday, January 23, 2011 5:24 PM
To: Tavarez, Ike
Cc: 'James Amos (james_amos@nm.blm.gov)'; Joshua Russo; Bratcher, Mike, EMNRD; Pat Ellis; Terry Gregston (terry_gregston@nm.blm.gov)
Subject: RE: Beech Federal Confirmation Sampling and Closure Request

Mr. Tavarez,

I have reviewed the submitted cleanup and closure plans on the Beech Federal 2. The closure levels at T-1 at 4 feet would be adequate for surface restoration, assuming 4 feet of clean fill. However, there are some concerns about the higher salt concentrations at deeper levels and the origins of those higher concentrations. As a result, I will defer to OCD's call on this one as to whether they are satisfied with the closure level or not.

As part of the closure plan on this site, I would like to see the berms on this site addressed in a different manner. The battery berms on this location encompass a very large L-shaped area, which funnels all spills and a significant amount of rainfall collected in the large enclosed area into the lowest segment of the bermed enclosure, namely the site at T-1, which is showing salt concentrations at depth. In its current configuration, all spills drain down to the T1 site, flowing across a much larger area than necessary, making it more difficult to collect and pick up any spills, and making T1 not only a spill collection site, but a rainwater collection (and subsequently hydraulic driver) site. Since we already have salts at depth at the T1 site, additional hydraulic drivers in the form of new spills and/or rainwater runoff needs to be removed or lessened from that site. Redesign of the upslope berms, decrease of the area encompassed by those berms, and/or additional compartmentalization of upslope berms would greatly decrease the hydraulic load on the T1 location and would greatly assist in keeping the salts at depth at the T1 site in a more stabilized state.

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01/12/2011 01:59 PM

To "Mike Bratcher (mbratcher@state.nm.us)" <mbratcher@state.nm.us>, "Terry Gregston (terry_gregston@nm.blm.gov)" <terry_gregston@nm.blm.gov>

cc Pat Ellis <PEllis@conchoresources.com>, Joshua Russo <jrusso@conchoresources.com>, "James Amos (james_amos@nm.blm.gov)" <james_amos@nm.blm.gov>

Subject RE: Beech Federal Confirmation Sampling and Closure Request

COG Operating

Beech Federal #2 Tank Battery

Section 25, T17S, R27E

Eddy County, New Mexico

32.80212 104.22891

Mike and Terry,

Please find enclosed the confirmation samples collected at the Beech Federal Tank Battery. The excavated areas and depths are shown in the attached Table and Figure. In summary, confirmation samples were collected in the areas of AH-2 (CS-2) and AH-3 (CS-1) and the area outside the berm on the north end (CS-3). All the excavations were left open. As discussed in the work plan, the area of AH-1 was excavated to the appropriate depth and proposed to install a backhoe test trench (T-1) to better define the chloride impact in this area. Referring to Table 1, CS-1, CS-2 and CS-3 showed bottom hole chlorides of 368 mg/kg, <200 mg/kg and <200 mg/kg, respectively. T-1 bottom holes showed a chloride of 1,700 mg/kg at 4' below surface and increased at 8' to 3,660 mg/kg and declined to 445 at 12' below surface.

The background samples (BG) did show a chloride high of 508 mg/kg at 2-2.5' and the groundwater depth is estimated to be around 125' below surface. Please review data and let me know if the concentrations in T-1 would be acceptable for closure. If needed, the area of AH-3 (T-1) can be capped with a 40 mil liner and backfilled. The area is approximately 30' x 30' and has been excavated 4' below surface. Please let me know so we can proceed with the closure activities or call me if you have any questions. Once completed, a closure report will be submitted for your files, thanks

Ike Tavarez, PG | Senior Project Manager

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[attachment "COG - Beech Federal #2 TB Work Plan .pdf" deleted by Terry G Gregston/CFO/NM/BLM/DOI] [attachment "COG - Beech Federal TB Confirmation Sampling .pdf" deleted by Terry G Gregston/CFO/NM/BLM/DOI]