

30-015-20918
2AP-611

Bratcher, Mike, EMNRD

From: tgregsto@blm.gov
Sent: Thursday, March 17, 2011 7:25 PM
To: Ken Swinney
Cc: Bratcher, Mike, EMNRD; 'Bradley Blevins'; cbrunson@bbcinternational.com; Terry_Gregston@blm.gov; jamos@blm.gov
Subject: Re: Old Indian Draw Unit #1 Sampling Notification

Mr. Blevins, Mr. Swinney,

The email for soil sampling was sent out while I was away for a week of training. As such, I did not know about the sampling event until it was over. It is important that contractors get confirmation that their sampling notification has been received prior to proceeding with the sampling. I usually respond to my emails on the date that I received them to confirm notification and/or to make any adjustments in scheduling so that the sampling can be witnessed. In this case, the point was mute because the sampling had already occurred. If you don't hear back from an authorized officer when you send them an email, please be sure to contact them by phone to confirm that they have received notification or not. Otherwise, you may run the risk of having to go out and pull a second set of samples. My cell phone number is (575) 361-2635. I pretty much have it with me 24/7.

On 03/14/11, I went out and assessed the Old Indian Draw 1 spill site and found that a great deal of work is in progress on the location. Old facilities are being torn down, equipment being removed, etc.. From the looks of the facility, it was greatly in need of such work and I am glad Chesapeake is being proactive on a facility that appears to be in much need of maintenance. However, there were also a number of environmental violations as well: leaking barrels of lubricant, unnetted chemical catchments, and a really funky electrical line laying on the ground in a traffic area that could be a real safety hazard. I also saw where some samples had been taken off to one side and I am assuming that this is where BBC took some of their soil samples for the spill event.

What the BLM would like to see done on this site is for all the contamination, both from the spill and from prior operations, be addressed. Perhaps that would be best done for some areas as you go along and remove equipment; for other areas it might be best to do the cleanup after large areas of equipment are removed.

What we would like to see is a cleanup plan that includes both the spill cleanup and the rest of the battery contaminated soil removal because there appears to be a lot of overlap between the two. Just keep in mind that any excavations necessary to remove contaminants either from the spill or the tank battery cleanup will need to be inspected prior to backfilling with clean soil. Also, pay close attention to any old compressor sites; sampling for heavy metals under old compressors will be required in addition to the usual chlorides, BTEX, hydrocarbons. Doing both the facility cleanup and the spill cleanup at the same time should also be more economical in terms of equipment, etc..

If that suits Chesapeake, let me know. Otherwise, we'll need to have two separate plans; one for the spill, and one for the facility cleanup.

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

"Ken Swinney" <kswinney@bbcinternational.com>

03/08/2011 04:18 PM

To <Terry_Gregston@blm.gov>
cc <cbrunson@bbcinternational.com>, "Bradley Blevins" <bradley.blevins@chk.com>
Subject Old Indian Draw Unit #1 Sampling Notification

Terry,

This email is to inform you that BBC International, Inc. is scheduled to delineate the release site for the Chesapeake Old Indian Draw Unit #1 Thursday afternoon at 1:00 pm, 3-10-11. We will be using an environmental drilling rig to drill and sample the release site. The legal location for the site is Unit Letter J , Section 18, Township 22S, Range 28 E, Eddy County, New Mexico. If there are any changes to time or date I will notify you.

Thank you,

Ken Swinney

Kenneth W. Swinney, CEI, CRS
Director of Operations
BBC International, Inc.
World-Wide Environmental Specialists
Mailing Address:
P. O. Box 805
Hobbs, NM 88241-0805 USA
Shipping Address:
1324 W. Marland Blvd.
Hobbs, NM 88240 USA
Phone: (575) 397-6388
Fax: (575) 397-0397
E-mail: kswinney@bbcinternational.com

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