

**BW-18**

**Key Energy  
Hobbs Truckers II**

**Correspondence  
2013**

**Griswold, Jim, EMNRD**

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**From:** Griswold, Jim, EMNRD  
**Sent:** Wednesday, July 24, 2013 8:07 AM  
**To:** 'wayne price'  
**Cc:** Mike Slaughter; gnance@keyenergy.com  
**Subject:** RE: Key Truckers II BW-18 Brine Well Emergency Request

Please proceed with earthmoving activities.

Jim Griswold  
Senior Hydrologist  
EMNRD/Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505.476.3465  
email: [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)

-----Original Message-----

From: wayne price [<mailto:wayneprice77@earthlink.net>]  
Sent: Tuesday, July 23, 2013 9:27 PM  
To: Griswold, Jim, EMNRD  
Cc: Mike Slaughter; [gnance@keyenergy.com](mailto:gnance@keyenergy.com)  
Subject: Key Truckers II BW-18 Brine Well Emergency Request

Dear Jim,

Pursuant to our meeting today Key Energy is going to remove a contaminated dirt pile and dispose of at the Gandy-Marley OCD permitted facility, and back-haul red bed clay and install in bottom of pit, compacted to a proctor density 90%+. The existing liner and leak detection of the pit has been removed and we are concerned about run-off from the adjacent contaminated dirt pile causing a possible infiltration of pore water in excess of the WQCC standards.

I have attached for a quick reference of an aerial plot plan, a site investigation map and corresponding results of the borings. We have removed more than 5000 yards out of the pit, with the most heavily concentrated being place adjacent to and on the north side of the pit. We are experiencing some rains and as discussed, we do not want to cause a groundwater impact since the liner has been removed.

This action will prevent a groundwater impact. Please note, as discussed, the old R&R company operated an illegal dump pit for years. The OCD took action and required a clean-up which has been completed, but there was no follow-up on the groundwater impact.

Please note, it does appear that Key's pit did not cause any groundwater contamination as show on the sampling boring report. It does appear the old R&R pit did impact groundwater and has migrated under and across our site.

Once we install the protective barrier then we will have time to strategize on the final closure. Our intention will most likely blend the remaining soils to an acceptable level and backfill the pit. We will seek a closure request before we take that next step. This will allow us time to submit a budget plan to our Houston folks.

We would appreciate an acknowledgement of our actions ASAP!

Sincerely,



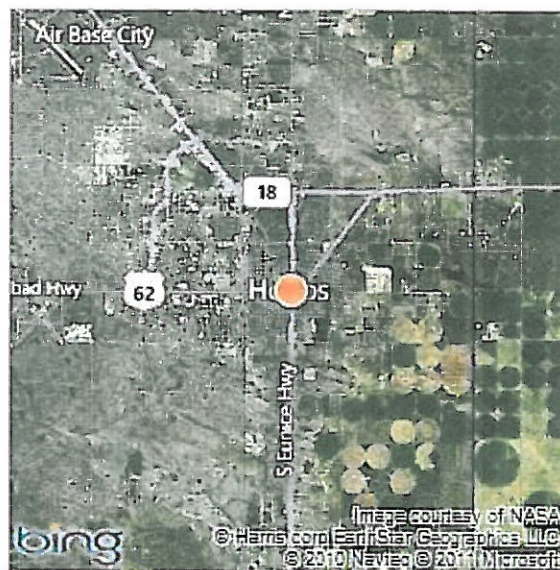
Hobbs, NM

My Notes

Truckers 2



On the go? Use [m.bing.com](http://m.bing.com) to find maps, directions, businesses, and more

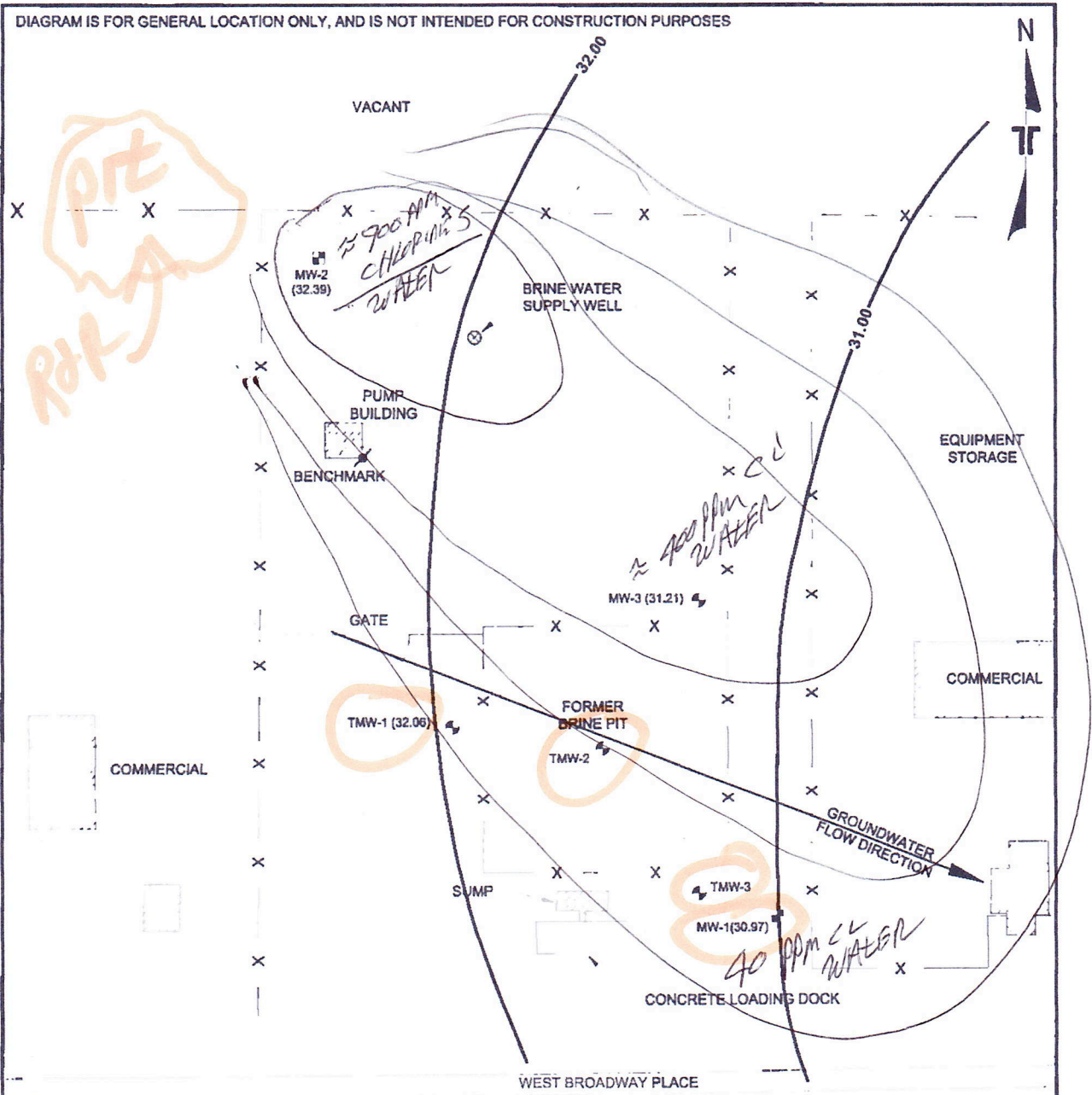


100' x 50'





DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES



LEGEND	
--X--	FENCE
⚡	TEMPORARY MONITORING WELL
⚡	PERMANENT MONITORING WELL

NOTE: ELEVATIONS ARE SET TO AN ARBITRARY 100' BENCHMARK


Project Manager: WB	Project No. A4117048	 <p>Consulting Engineers &amp; Scientists</p> <p>1211 W Florida Street Midland, Texas 79701 Ph: (432) 684 8800 FAX: (432) 684 9608</p>	GROUNDWATER GRADIENT MAP FOR 6-10-2011	Figure
Drawn by: RF	Scale: AS SHOWN		TRUCKER'S # 2 BRINE STATION	3
Checked by: WB	File Name: A4117048		WEST BROADWAY PLACE	
Approved by: BB	Date: 06/20/2011		HOBBS, LEE COUNTY, NEW MEXICO	

Table 1

## CONCENTRATIONS OF CHLORIDES IN SOIL

Key Energy Services, Inc.  
Trucker's #2 Brine Station  
Lea County, NM  
Terracon Project Number A4117046

All concentrations are in mg/ kg

SAMPLE LOCATION	SAMPLE DATE	SAMPLE INTERVAL	EPA Method 300.1
			Total Chlorides
TMW-1	06/08/11	0-5 fbgs	2,770
TMW-1	06/08/11	5-7 fbgs	2,110
TMW-1	06/08/11	8-10 fbgs	1,650
TMW-1	06/08/11	20-22 fbgs	541
TMW-1	06/08/11	30-32 fbgs	194
TMW-1	06/08/11	40-42 fbgs	83.5
TMW-1	06/08/11	50-52 fbgs	67.1
TMW-1	06/08/11	60-62 fbgs	18.0
TMW-2	06/08/11	0-2 fbgs	5,130
TMW-2	06/08/11	2-4 fbgs	6,180
TMW-2	06/08/11	4-6 fbgs	4,780
TMW-2	06/08/11	6-8 fbgs	5,580
TMW-2	06/08/11	8-10 fbgs	3,340
TMW-2	06/08/11	20-22 fbgs	27.7
TMW-2	06/08/11	30-32 fbgs	50.5
TMW-2	06/08/11	40-42 fbgs	72.1
TMW-2	06/08/11	50-52 fbgs	36.3
TMW-3	06/09/11	0-2 fbgs	3,170
TMW-3	06/09/11	2-4 fbgs	3,370
TMW-3	06/09/11	4-6 fbgs	2,710
TMW-3	06/09/11	6-8 fbgs	1,890
TMW-3	06/09/11	8-10 fbgs	1,250
TMW-3	06/09/11	20-22 fbgs	127
TMW-3	06/09/11	30-32 fbgs	146
TMW-3	06/09/11	40-42 fbgs	64.5
TMW-3	06/09/11	50-52 fbgs	45.9
TMW-3	06/09/11	60-62 fbgs	72.3
MW-3	06/09/11	0-2 fbgs	555
MW-3	06/09/11	2-4 fbgs	1,530
MW-3	06/09/11	4-6 fbgs	1,610
MW-3	06/09/11	6-8 fbgs	1,200
MW-3	06/09/11	8-10 fbgs	847
MW-3	06/09/11	20-22 fbgs	811
MW-3	06/09/11	30-32 fbgs	645
MW-3	06/09/11	40-42 fbgs	145
MW-3	06/09/11	50-52 fbgs	130
MW-3	06/09/11	60-62 fbgs	40.7

## NOTES:

fbgs = feet below ground surface

TMW-2 was advanced beginning 10 fbgs, making the sample interval effectively 10 feet deeper than documented on laboratory identification information.