

From: [Hughes, Solomon](#)
To: [Larry Davis](#)
Cc: [Jeffery Robertson](#); [Jeff Teare](#); [Greg McWilliams](#); [James Amos](#)
Subject: Re: EnergyQuest Proposed Actions - Grayburg Water Flood and Beeson #029
Date: Tuesday, October 28, 2014 2:54:24 PM
Attachments: image001.png

Mr. Davis,

Everything looks good on both plans. I would just like to state one thing for the sake of clarity:

The core sample taken from the floor of the Beeson F Fed 29 excavation needs to be fully delineated, i.e., chloride samples need to be taken at regular intervals until we see a level that is below 1000ppm and levels are no longer rising with increasing sample depths.

As we discussed before, Jeff and I feel that this will delineation will likely be, more or less, a formality on the way to getting the spill site approved for a cap.

Bests,
Sol

Sol Hughes

Environmental Protection Division
Bureau of Land Management
620 E. Greene St
Carlsbad, NM

Office: 575.234.5951
Cell: 575.499.3378

On Tue, Oct 28, 2014 at 12:59 PM, Larry Davis <Larry.Davis@energyquest.us> wrote:

Sol and Jeff,

Thank you again for taking the time to meet with and guide us towards what the Bureau of Land Management is looking for regarding corrective actions at the Beeson F Federal #029 release site and the Grayburg Jackson Water Flood Unit Tank Battery A. We truly appreciated your visit to the sites and the direct input provided at each location. Below are the proposed corrective actions based upon our joint tour of the sites and discussions of Thursday, October 23, 2014.

Corrective Actions for Beeson F Federal #029 Release site

It has been determined that this area has no groundwater concerns. Excavation at the site has reached a depth of approximately thirteen feet. Included in the discussion was reduction of the pad site and using material from the pad both as backfill and potentially as the cap over the backfill.

The corrective actions we discussed included:

1. Extract one (1) core sample from the floor of the excavated site and test for chlorides.
2. Remove caliche from the outer skirt of the #029 pad and re-use it for backfill and as a cap over the backfill. Extract sample from this material to verify it is clean of contaminants before using it for a cap over the backfill.
3. Backfill the excavation to the exposed natural caliche layer.
4. Cap the backfill with at least 1 foot of clean caliche (intent is to use caliche from the #029 pad if sampling shows it to be clean – if not, clean caliche will be brought in).
5. Add an additional 2 feet of clean, viable soil to the caliche cap, and contour the entire site to imitate as best as possible the natural contours of the surrounding area.
6. Replace material removed from the #029 pad with enough clean, viable soil to allow for proper root growth and contouring of the area to imitate as best as possible the natural contours of the surrounding area.
7. When appropriate, re-seed both locations with mixture determined by the BLM as best suited for the area.

Corrective Actions for the Grayburg Jackson Water Flood Unit Tank Battery A

This site includes three areas for corrective actions: the hard-packed surface layer of the hill directly behind the tank battery and two areas in the basin behind that hill. The affected surface area of the hill is approximately 60 yards long X 15 yards wide. The larger of the two areas in the basin is approximately 35 yards long X 25 yards wide, while the smaller one is approximately 10 yards square.

The corrective actions we discussed included:

1. Break up the hard-pack and till all three areas to a depth of at least 6 inches.
2. Add nitrogen-rich fertilizer to each area and till again.
3. After the fertilizer has had time to be effective, extract samples at depths of 6 inches and 12 inches: two (2) samples from the hilltop, and three (3) samples from the basin – two (2) from the larger area, one (1) from the smaller area.
4. Test all samples for residual contaminants using the normal battery of tests.
5. Assuming that tests show acceptable levels, re-seed all three locations when appropriate with mixture determined by the BLM as best suited for the area.

Please use “Reply All” in response to this email, confirming acceptance of these proposed actions.

Thank you again for your time and expertise.

Larry D. Davis

Environmental Quality & Safety Manager



Telephone: 281-651-5201 (direct)

E-Fax: 281-651-5207