

From: [Hughes, Solomon](#)
To: [Vernon Black](#)
Cc: [Bratcher, Mike, EMNRD](#); [Gonzalez, Luis](#)
Subject: Re: Southwest Royalties-North Hackberry Yates #105
Date: Wednesday, July 23, 2014 12:20:20 PM
Attachments: [SWR N Hackberry Yates #105 #2 Lab.pdf](#)

Vernon,

I understand where you are coming from but I cannot approve this without OCD weighing in on it, because it does not meet their explicit standards for the cleanup of chlorides. I think they may adjust on a case by case basis but not, ultimately, my call to make.

Sol

Sol Hughes

Environmental Protection Division
Bureau of Land Management
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On Wed, Jul 23, 2014 at 11:40 AM, Vernon Black <VBlack@hungry-horse.com> wrote:

Good Morning Sol,

Please take a look at the attached lab results. These results are from the sampling after we had removed an additional 1'-2' from the four sample points that had elevated chlorides. We have made progress, but are not at the 1000 ppm you were seeking. I feel like continuing the excavation will have a significant impact on the surrounding terrain as it will be drastically altered in order to continue deepening the excavation and hauling off more material. At this point, I propose to place a 20 mil synthetic liner in the excavation below the pipe and backfill. I feel that this course of action will achieve the results we are seeking in that the synthetic barrier will prevent the movement of the chlorides both downward and upward. The impacted area can be easily lined and backfilled with little to no further disturbance to the surrounding terrain.

I look forward to hearing from you concerning this course of action.

Vernon K. Black

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