

From: [Tucker, Shelly](#)
To: [Patterson, Heather, EMNRD](#)
Cc: [Rebecca Pons](#); [Brett Fulks](#); ballen@sesi-nm.com; [Bratcher, Mike, EMNRD](#)
Subject: Re: Work Plan
Date: Wednesday, July 29, 2015 3:15:04 PM

Rebecca,

The BLM approves this work plan as submitted. The BLM concurs with the OCD, the installation of this liner does not constitute this as a lined facility. Additionally, upon abandonment of this facility, the impacted material under the liner will have to be addressed at that time.

If you have any questions or concerns, please contact me.

Sincerely,

Shelly J. Tucker

Environmental Protection Specialist
Bureau of Land Management

620 E. Greene St
Carlsbad, NM 88220

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stucker@blm.gov



NOTE: BLM approval does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

On Wed, Jul 29, 2015 at 8:14 AM, Patterson, Heather, EMNRD
<Heather.Patterson@state.nm.us> wrote:

RE: Devon * Todd 24-B Battery 2 * 30-015-27691 * 2RP-3051 * 2RP-1686 * 2RP-1391

Rebecca,

This work plan is approved as written. Be advised that despite a liner being placed within the battery firewall, this will not be considered a lined facility by the OCD. Like approval by BLM is required for this site.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson

Environmental Specialist

NMOCD District II

Office (575)748-1283 ext.101

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From: Rebecca Pons [mailto:office2@sesi-nm.com]

Sent: Tuesday, July 28, 2015 1:55 PM

To: Patterson, Heather, EMNRD

Cc: Brett Fulks; ballen@sesi-nm.com

Subject: Work Plan

Good Afternoon Heather,

I have attached a plan of remediation for the above site. The spill area for this site was retained inside the bermed area for the tank battery. Due to the number of lines etc., we are proposing to conduct a 1' bgs excavation, line and backfill. The liner would prevent any further migration of chlorides. Please review and advise if you concur.

Thank You

Rebecca Pons

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703 East Clinton Street

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