



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

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Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

14-Dec-05

BASS ENTERPRISES PRODUCTION COMPANY

901 North Canal, Suite 704

Carlsbad, NM 88220

REMEDIATION WORK PLAN - BIG EDDY UNIT NO. 56 SWD

A review of the remediation work plan submitted on December 13, 2005 for the Big Eddy Unit No. 56 SWD (30-015-22222) has been completed by this office. OCD Rule 19.15.3.116.D [NMAC] requires that the responsible person for a release must complete division approved corrective action and that releases will be addressed in accordance with a remediation work plan submitted to and approved by the division. The work plan submitted does not contain sufficient information to evaluate the proposed remediation.

To provide you with approval for corrective actions the OCD District 2 Office must first receive either an amended remediation work plan or additional information that addresses the following:

1. Site characterization
 - What is the depth to ground water, nearest distance to a water course, nearest water well, nearest surface water body?
 - Using this data, what is the site ranking for this location?
 - What are the remediation action levels (RRAL) for the materials released? (BTEX, TPH, Chlorides)
 - Has the Surface Owner (BLM) been notified and have any stipulations or restrictions been placed on the remediation of the release?
2. Release characterization
 - On the Form C-141 the source was described as "SWD pump shut down due to vibration." Has this been addressed to prevent a future shut-down and release?
 - On the Form C-141 the volume of the release is given as 75 barrels of produced water with 60 barrels recovered. What areas were affected by this release, are the impacted areas all on location, did any escape the location into pasture or any sensitive areas?
3. Remediation Technique
 - The work plan submitted states "Move in backhoe and remove all contaminated soil inside and outside the berm area and place in firewall." If the intent of this technique is to leave these materials on location without reducing the contaminant concentrations then you must provide a risk assessment that shows contaminants will not pose a threat of migrating to groundwater, off the location or will not otherwise cause harm to human health, the environment or plant or animal life.
4. Sampling
 - At what point will samples be taken? Specific dates and times are not necessary, sampling to delineate the impacted area to the vertical and horizontal extents and sampling to ensure that all unexcavated material is below the RRAL should be addressed.

5. Termination of Remediation

- What is the benchmark or criteria that you will use to consider the remediation complete?

Please provide the above information to the OCD District 2 Office prior to December 23, 2005.

The OCD District 2 Office uses the "Guidelines For Remediation of Leaks, Spills, and Releases" to evaluate the adequacy of all remediation work plans submitted for approval.

Please feel free to contact me if I can be of further assistance in this matter.



Chris Beadle
Artesia OCD District Office

BASS ENTERPRISES PRODUCTION COMPANY
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TELEPHONE: 505-887-7329
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December 13, 2005

NMOCD District II
1301 W. Grand Ave.
Artesia, NM 88210

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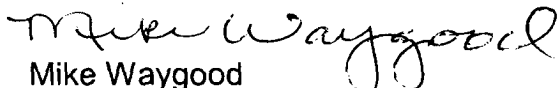
Attn: Chris Beadle

Remediation Work Plan – Correction of Violation

Big Eddy # 56 SWD

1. Remove weeds & growth around battery
2. Move in backhoe and remove all contaminated soil inside and outside the berm area and place in firewall.
3. Backfill contaminated areas with replacement fill.
4. Site ready for inspection by January 5, 2006.

Thank you,


Mike Waygood
505-361-8060