

Below is BLM's proposed action for the reclamation of the orphaned Hotchkiss lease located in the Carrizo Plain National Monument. We expect to have a draft Environmental Assessment (EA) completed by February 1, 2013. The draft EA will also be posted for public comment. Any questions, concerns or comments can be directed to Kevin Coodey by email at kcoodey@blm.gov.

Orphaned Hotchkiss Lease Reclamation

PURPOSE AND NEED

Background

The Hotchkiss Lease is a former BLM Oil and Gas Lease (CAS 079816A) that is currently orphaned. It consists of an access road, an overgrown well/facility pad (approximately 0.5 acre), one well (Hotchkiss #24-25), 16 storage tanks, vessels and drums, a produced water sump, and a 3.5 mile gas pipeline. The Hotchkiss Well #24-25 and Hotchkiss Facility are located in the SE/SW quarter/quarter of Section 25, T. 30S, R. 20E, MDBM, Kern County, CA on the western slope of the Temblor Mountain Range.

The Hotchkiss Lease Agreement was established and became effective on September 1, 1965. To date, Hotchkiss Well #24-25 is the only well that was drilled on this lease. The operator of the lease died unexpectedly in 2004 leaving this lease orphaned without a responsible party. BLM production records show that the well ceased production in March, 1996. The lease expired in November, 2005 due to lack of production.

In January, 2001 the land that this lease is located on was included within the Carrizo Plain National Monument boundary and thus could not be released to a responsible operator. Due to these factors, the lease fell back to the BLM with the responsibility to abandon the well, facilities, sump and pipeline.

BLM has worked in coordination with the California Division of Oil, Gas, and Geothermal Resources (CDOGGR) to abandon and reclaim this lease. CDOGGR has agreed to abandon the oil/gas well using state appropriated funds, leaving the abandonment of the facility, sump, and pipeline, removal of junk and debris, and reclamation to BLM. The project will be divided into three phases: (1) BLM will repair the access road, clear the well pad, and sample, remove and properly dispose of all fluids from the tanks and vessels. (2) CDOGGR will plug and abandon the well. (3) BLM will remove all storage tanks, vessels, pipelines (located on well/facility pad), junk and debris, and remove all visibly contaminated soil.

Purpose and Need

The lease currently poses a health and safety hazard to the public, wildlife, and the environment. There are numerous open top vessels containing oil which are entrapment hazards to wildlife. The well is also leaking natural gas into the air and polluting the environment. The leaking gas could also pose fire risk. There is a need to remediate these hazards and restore the area.

The purpose of the proposed action is to conduct final abandonment and restoration of this oil and gas lease and return the area to its natural function and conditions.

PROPOSED ACTION

The proposed action is to abandon the well, facilities, sump and pipeline and would include the following: repair the access road, clear the well pad, remove and properly dispose of all fluids from the tanks and vessels, properly abandon the well, remove all tanks, vessels, pipelines (located on well/facility pad), junk and debris, and remove all visibly contaminated soil. The work will be conducted on Bureau of Land Management (BLM) managed lands located in Sections 25 and 36, T. 30 S., R. 20E., MDBM. The project location is Kern County, CA within the Carrizo Plain National Monument (CPNM) (Map 1).

Detailed project proposal:

1. The BLM will conduct sampling to characterize fluids and soils for disposal purposes. The sampling will include fluids from the 16 tanks, vessels and drums, and soil from the sump.
2. BLM will mobilize all necessary personnel and equipment to the site. This includes heavy equipment to complete the roadwork, access and demolition of the facility, and the removal of wastes in subsequent tasks. BLM's contractor would like us to provide an onsite location (alongside the lease access road) for housing workers in a self-contained travel trailer during this project.
3. BLM will repair the access road as needed to facilitate heavy equipment to the well/facility pad in order to clear the pad, remove fluids from the tanks, vessels, and drums, abandon Hotchkiss Well #24-25, and demolish the Hotchkiss Facility. Most of the road repairs will be conducted in the NW quarter of Section 36, T30S, R20E, MDB&M. This road is currently classified as a BLM Resource Road. The anticipated repairs will return the road to a minimum of 10 feet wide in the straight-a-ways and 15 feet in the corners to allow site access by tractor trailer rigs. BLM will use a bulldozer to improve the access road. Minor grading will be done to remove ruts, channels, and rocks.
4. BLM will clear vegetation from the existing well/facility pad to allow a vacuum truck access to remove fluids, abandonment crew access to plug and abandon Hotchkiss Well #24-25, and access to demolish the facility. It is estimated that the pad is approximately 0.5 acres. Removed vegetation will remain on site for later use as surface rehabilitation material.
5. Based on the results of the waste characterization analysis, BLM will remove, consolidate, or segregate the oil and water present in the 16 permanent and temporary drums, tanks, and vessels. The fluids will be collected and transported to a BLM approved disposal or recycling facility. These materials will be transported under a Hazardous or Non-Hazardous Waste Manifest dependent on the respective laboratory analysis and waste profile. It is estimated that approximately 122.5 BBLS of oil/water will be removed. Where applicable, BLM will excavate to expose pipeline ends to allow the lines to be disconnected and drained. The shallow excavations will be lined with plastic to protect the existing soil from leaks or spills. Any remaining tank bottoms will be consolidated into 10 55-gallon drums and stored on site until proper waste characterization and profiling can be conducted. The tanks, vessels and well facility

pipings will then be rinsed with a solution of water and non-toxic, biodegradable detergent. All rinse water will be pumped into a temporary holding tank for proper disposal/recycling.

6. CDOGGR will move in to plug and abandon Hotchkiss Well #24-25 well in accordance with the existing BLM and CDOGGR regulations and requirements. They will move in a rig crew, conventional pulling hoist rig, pump truck, bulk truck (cement), vacuum truck (water), and a portable tank (well returns). It is estimated that the abandonment crew will be on location for 3 days. After the well is plugged to surface, CDOGGR will excavate the well head and cut the casing off 5 feet below surface. A steel plate will be welded on top of the casing and then the casing will be buried.
7. BLM will sample, characterize, and profile the waste of the consolidated tank bottoms stored in the 10 55-gallon drums for disposal.
8. BLM will remove the consolidated tank bottoms stored in the 10 55-gallon drums and dispose at a BLM approved disposal site.
9. Facility Demolition:
 - a. Remove all solid metal hatches from the tanks and replace with expanded metal covers to allow the tanks to ventilate before demolition and to prevent the use of these tanks by wildlife.
 - b. Isolate and disconnect all fuel, water, and gas pipelines from the tanks, and isolate and disconnect all electric lines.
 - c. This geographic area is subject to an extreme wild land fire hazard. All hot metal cutting will need a Hot Work Permit from the BLM Fire Program. Whenever possible, metal cutting will be done with cold cutting tools and shears. A fire watch will be posted at all times when metal is being cut. The BLM contractor will maintain sufficient water and firefighting tools on-site to suppress any accidental fire starts. They will also maintain the capability to contact emergency responders during all phases of the work on site.
 - d. Plastic sheeting will be laid down to catch all lead paint chips discharged during the removal and shearing of all metal. Paint chips will be collected and disposed of under the appropriate Hazardous Waste Manifest at a BLM approved treatment, storage, and disposal facility.
 - e. Remove all drums, tanks, vessels, pipelines, electrical conduit, concrete, valves, scrap metal, fencing, netting, vehicles, junk, and trash for disposal at a BLM approved disposal facility.
 - f. Remove all buried pipelines, oily soil, wood, metal, junk, and trash for disposal at a BLM approved disposal facility.
 - g. Excavate to remove all visibly stained soil from below tanks, vessels, and pipelines. It is estimated that 100 cubic yards of soil will be removed. The excavated soil will be placed temporarily on/under 6-mil visqueen while awaiting disposal profile approval from BLM.
 - h. After removal of stained soil, BLM will collect confirmatory soil samples under the tanks and the sump for laboratory analysis. These analyses will be utilized for waste profiling and to determine if additional excavation is required.

- i. Once the disposal profile is approved, BLM will load the contaminated soil into end-dump trucks for transportation and disposal at a state licensed disposal facility.
- j. Following approval, BLM will backfill the excavation sites with local borrow material. The backfill material will be moisture conditioned, placed in one-foot lifts, and compacted by track walking with on-site heavy equipment. Excavations will be backfilled to the original elevation.

*The fresh water spring box, pipeline and cattle trough will remain in place and must be at least as functional at the end of the project as they were at the beginning of the project.

*The well pad and all roads will remain intact at the end of this phase of the project. These will be used in the future for demolition and removal of the gas pipeline which will be proposed in a separate action.