

## Bratcher, Mike, EMNRD

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, October 26, 2017 9:14 AM  
**To:** Lucas Middleton  
**Cc:** Weaver, Crystal, EMNRD; Blaney, Karolina; Tucker, Shelly  
**Subject:** RE: Work Plan for Brushy Creek Gathering

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

RE: WPX \* Brushy Creek Gathering Station, aka Brushy Draw Booster Station, aka UCBH WW Fed 1 (30-015-24451)  
**2RP-2742** (DOR:1/7/15) \* **2RP-2796** (DOR:1/22/15) \* **2RP-3195** (DOR:8/10/15) \* **2RP-3811** (DOR:7/13/16)

Greetings,

The proposal submitted by SMA, on behalf of WPX, is **not** approved as submitted. Part 2.O of the submittal indicates a site ranking of 10, based on depth to ground water being less than 100' bgs. The chart lists "Total Site Ranking" as zero. For clarification, site ranking is 10. Part 4.O of the submittal indicates "composite" samples will be obtained for delineation. Composite samples will not be allowed for delineation of this site. Part 4.O also requests deferral of the entire location. Deferral will not be considered until the site has been adequately, and completely delineated. Figure 2, location map, shows a yellow outline of the affected area. The outline does not include the southeast corner of the site and a portion of the road that appears to exhibit chloride impact. More than one delineation point will be required at this site, and is to include the area just mentioned. Please resubmit a proposal that shows how SMA will adequately delineate the site. Final disposition may then be considered based on analytical data. **Please submit this proposal not later than 11/9/2017.**

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

Thank you,

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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.

---

**From:** Lucas Middleton [mailto:lucas.middleton@soudermiller.com]  
**Sent:** Tuesday, October 17, 2017 12:02 PM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Blaney, Karolina <Karolina.Blaney@wpxenergy.com>  
**Subject:** Work Plan for Brushy Creek Gathering

I have attached a work plan for approval on a WPX location named the Brushy Creek Gathering Station BATTERY, 30-015-24451,( 2RP-3811, 2RP-2742, 2RP-2796,2RP-3195)

Call or Email with any question or comments.

Thank you and have a good day

Lucas Middleton  
Staff Scientist  
(575) 499-9244 (mobile)



Souder, Miller & Associates  
Engineering ☐ Environmental ☐ Surveying  
201 S. Halagueno  
Carlsbad, NM 88220  
[www.soudermiller.com](http://www.soudermiller.com)

**Notice of Confidentiality and Privileged Status:** This electronic mail message, including all attachments, is for the sole use of the intended recipient(s) and may contain confidential and/or privileged information or otherwise may be protected from disclosure. Any unauthorized review, use, disclosure, distribution or actions which rely on the contents of this information is prohibited. If you are not the intended recipient, please contact the sender and delete the message and any attachment(s) from your system.

**Statement on Viruses and Harmful Software:** While the message and attachment(s) have been scanned with anti-virus software, SMA does not guarantee that this message or any attachment(s) is free of computer viruses or other harmful software. SMA does not accept liability for any damages caused by any computer virus or other harmful software transmitted herewith.