

From: [Weaver, Crystal, EMNRD](#)
To: [Cliff Brunson](#)
Cc: [Becky Haskell](#); [Robert McNeill](#); [Bratcher, Mike, EMNRD](#); [James Amos](#); [Shelly Tucker](#); [Ken Swinney](#); [Griswold, Jim, EMNRD](#)
Subject: RE: [External] FW: West Brushy 8 Federal SWD #001 - 30-015-31675
Date: Friday, February 16, 2018 3:01:00 PM

RE: COG * West Brushy 8 SWD #1 * 30-015-31675

Rebecca/Cliff,

I am currently looking at the work plan for 2RP-4240 but this email sent back on 9/2017 said that you all were going to make progress sometime soon on the other 3 open older releases that are related to West Brushy 8 SWD #1. So I just wanted to follow up with you all on what the plan is for these along with inquire where you all are at on 2RP-4330.

- 2RP-4094 has a work plan approved since 4/2017 thru BBC International.
- 2RP-3353 had been proposed by Lupe Carrasco and Robert Grubbs from COG for deferment and asked to leave all contamination (aside from a surface scrape) in place and that deferment proposal was declined by OCD back in 4/2016 and I don't have anything else on record for this one since then.
- 2RP-3774 has no work plan submitted, but I do show that according to the spill site map that this release has some overlap release area that is compatible with 2RP-4240 which I am currently working on reviewing a work plan for 2RP-4240. So in my write up for work plan for 2RP-4240 OCD will request that both releases be dealt with at the same time if practicable.
- Now for my last question, the 10,000+bbbs release of 2RP-4330 has a work plan written by BBC International that was approved on 10/30/17. Has any progress been made on this one? We will need a status report on this one since it is the larger of all and the most concerning regarding potential for migration to the Pecos river/possible shallow ground water(due to proximity to the river). Please advise on the status of this one ASAP.

Please provide an overall plan of action for the entire set by no later than 2/23/18.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

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From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Friday, September 22, 2017 11:26 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Becky Haskell <rhaskell@concho.com>; Robert McNeill <RMcNeill@concho.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; James Amos <jamos@blm.gov>; Shelly Tucker <stucker@blm.gov>; Ken Swinney <kswinney@bbcinternational.com>
Subject: RE: [External] FW: West Brushy 8 Federal SWD #001 - 30-015-31675

Crystal,

We have approved plans on three leaks at the West Brushy 8 Federal SWD #001 (2RP-3353, 2RP-3774, 2RP-4094). We were going to start on these when the leak of 5/27/17 (2RP-4240) occurred. We conducted delineation of this leak and were not successful in completion because we were not able to get deep enough. We are scheduled to drill and sample the part of the leak that has not be delineated successfully the week of October 9th.

Hope this answers your questions. We will keep you updated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
President
BBC International, Inc.
World-Wide Environmental Specialists
Mailing Address:
P. O. Box 805
Hobbs, NM 88241-0805 USA
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From: Rebecca Haskell [mailto:RHaskell@concho.com]
Sent: Tuesday, September 19, 2017 1:06 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>
Subject: Fwd: [External] FW: West Brushy 8 Federal SWD #001 - 30-015-31675

Sent from my iPhone

Begin forwarded message:

From: "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>
To: "Rebecca Haskell" <RHaskell@concho.com>, "Robert McNeill" <RMcNeill@concho.com>
Cc: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "jamios@blm.gov" <jamios@blm.gov>, "Tucker, Shelly" <stucker@blm.gov>
Subject: [External] FW: West Brushy 8 Federal SWD #001 - 30-015-31675

**** External email. Use caution. ****

Hello all,

I know a lot is going on with the most recent release that occurred (2RP-4330), however, I had asked about all the prior releases to date that relate to this API and have open RPs (see email below and also see repeats of the same attachments above that went with that email). We still are waiting to hear from COG regarding any updates for these previous releases. Please advise.

The last thing I have in response to my email below is an email from Becky on 6/14/17 saying that BBC will delineate for the May 27, 2017 spill sometime in the following week from the date of that email. Have not heard anything since.

Thank you,

Crystal Weaver

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From: Weaver, Crystal, EMNRD
Sent: Tuesday, June 13, 2017 4:36 PM

To: 'Rebecca Haskell' <RHaskell@concho.com>; stucker@blm.gov
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Jim Amos (jamos@blm.gov)
<jamos@blm.gov>
Subject: RE: (C-141 Initial) West Brushy 8 Federal SWD #001 5/27/17 30-015-31675

RE: COG * West Brushy 8 Federal SWD #1 * 30-015-31675 * 2RP-4240

Becky,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval. The OCD tracking number for this event is 2RP-4240.

PLEASE NOTE: I was also looking in the files for this site location to see if there were any other remediations that we needed an update on and I came across case number [2RP-3353](#). Could we please get an update on that one. I have attached OCD's last response to COG and I also attached BLM's request on 6/13/16 for an update. Also [2RP-3774](#) which BBC International Inc. was contracted to work has not had an update to us since 3/1/17. BBC International states in the email that attached above that the remediation effort for 2RP-3774 will also incorporate a clean-up of the extent of 2RP-3353. So maybe following up with 2RP-3774 will cover follow up of both of these that I have requested. Also may we please get an update on [2RP-4094](#). I also attached a copy of the last correspondence from OCD which was a work plan approval to BBC International on 4/6/17.

Further Note: There have been 7 spills that have occurred at this site location starting since 2014. Therefore, OCD at this time would like to pose the question to COG regarding whether or not a root cause analysis has been conducted for this site location and if any considerations have been made regarding potentially replacing the poly-flow line (if it is the same one that has had reoccurring issues) or if anything further can be done to also prevent the reoccurring pw tank overflow issue.

Thank you,

Crystal Weaver

Environmental Specialist

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From: Rebecca Haskell [<mailto:RHaskell@concho.com>]
Sent: Thursday, June 1, 2017 12:26 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; stucker@blm.gov
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Jim Amos (jamos@blm.gov)
<jamos@blm.gov>
Subject: (C-141 Initial) West Brushy 8 Federal SWD #001 5/27/17 30-015-31675

Ms. Weaver / Ms. Tucker,

Please see the attached C-141 for your consideration. Please let me know if you have any questions or concerns.

Thank You,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
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rhaskell@concho.com



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From: Rebecca Haskell
Sent: Saturday, May 27, 2017 8:41 PM
To: Weaver, Crystal, EMNRD; stucker@blm.gov
Cc: Mike Bratcher (Mike.Bratcher@state.nm.us); Jim Amos (jamos@blm.gov)
Subject: (Notification) West Brushy 8 Federal SWD #001 5/27/17 30-015-31675

MS. WEAVER / MS. TUCKER,
COG OPERATING LLC IS REPORTING A RELEASE AT THE WEST BRUSHY 8

FEDERAL SWD #001 (30-015-31675)
UNIT A SECTION 08 TOWNSHIP 26S RANGE 29E
THE RELEASE OCCURRED AT APPROXIMATELY 4:00 PM ON 5-27-2017
ESTIMATED RELEASED: APPROX. 30 BBLs PRODUCED WATER
ESTIMATED RECOVERED: UNKNOWN AT THIS TIME

THE RELEASE WAS DUE TO A HOLE IN THE BOTTOM IN A FITTING IN A
FLOWLINE. THE FITTING WAS REPLACED. THIS AREA IS BEING EVALUATED
AND A C-141 WILL BE SUBMITTED. IF YOU HAVE ANY ADDITIONAL
QUESTIONS PLEASE FEEL FREE TO CONTACT ME.

THANK YOU,

Becky Haskell
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