

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** [Cliff Brunson](#); [Bratcher, Mike, EMNRD](#); [Shelly Tucker](#)  
**Cc:** [Becky Haskell](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** RE: COG West Brushy 8 Federal SWD #1 (2RP-4240) - Delineation Workplan  
**Date:** Friday, February 16, 2018 3:45:00 PM

---

Rebecca/Cliff,

Due to the amount of time this work plan has sat in OCD's que I will go ahead and approve it, however, delineation on this is not complete and it will need to be completed during the excavation process.

- In the area of the spill that is demarked as the pink area (according to the site map in the work plan) recommended action proposed by BBC is 4ft excavation and a liner placed, however, sampling for all of that area only goes down to either a max of 3ft depth in some places (SP-6 & SP-7) and 4ft depth in other places (SP-4 & SP-5) and then has follow up delineation effort via soil boring that starts at 8ft depth (SB-1 & SB-2). Now I understand that there is a road along the pink demarked area but if able to delineate why was a gap made in the data? OCD factors vertical cumulations of chlorides in the soil column when determining where liner placement will be ideal to set if indeed a liner is the most appropriate measure that can be taken for remediation. So without a full delineation liner placement can not be determined. Please collect delineation data near the SB-1 and SB-2 areas, starting SB-1 at 5ft and SB-2 at 4ft. thru the 8ft interval. Upon receipt of data for delineation completion please contact OCD and mention that the project has an urgent need for liner placement determination in order to be able to backfill.
- I measured on my map that this release has a proximity of 1400+/- to the bank of the Pecos River and is on a steep elevational raise that appears to have a seamless downgrade starting from the boundary area of the release going to the river, because this release has sat for some time and because it has a sister release that has some overlap (2RP-3774) and that release has sat for even longer OCD would like to request a prompt submission of work plan be remitted for the older 2RP-3774 release (since one was never received) and requests that if practicable the two releases be remediated at the same time.
- The site ranking is never stated out right in this work plan but it can be inferred. So based on data OCD has referenced we will concur with the inferred ranking of 10 based on depth to ground water data cited in the work plan and cross checked by OCD. Since site ranking is not applicable for target delineation and clean up levels on chlorides, chlorides will need to be remediated (if practicable) and delineated to 600ppm or less both vertically and horizontally.
- Confirmation side wall lab tested samples will be required for all excavated areas.

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 Mike Bratcher and/or myself in the District II Office.

## Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1<sup>st</sup> Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

---

**From:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]

**Sent:** Wednesday, November 22, 2017 4:21 PM

**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>

**Cc:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>; Becky Haskell

<[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey

<[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>

**Subject:** COG West Brushy 8 Federal SWD #1 (2RP-4240) - Delineation Workplan

Mike and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the COG West Brushy 8 Federal SWD #1 (2RP-4240). COG is requesting that you review this plan and is looking forward to both the OCD's and BLM's approval.

If you have any questions, please let me know.

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

Shipping Address:

1324 W. Marland St.

Hobbs, NM 88240 USA

Phone: (575) 397-6388

Fax: (575) 397-0397

E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*