Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD

Sent: Thursday, February 22, 2018 10:20 AM

To: Cliff Brunson; Shelly Tucker

Cc: Weaver, Crystal, EMNRD; Becky Haskell; Ken Swinney; Jennifer Gilkey; Kathy Purvis **Subject:** RE: COG West Brushy 8 Federal SWD #1 (2RP-4240) - Delineation Workplan

RE: COG * West Brushy 8 Fed SWD 1 * 2RP-4240 * DOR: 5/27/2017

Greetings all,

After consulting with Ms. Weaver and going over the previous releases at this site, this proposal (2RP-4240) is approved as submitted. Some of the data and information from the previous releases was not available to Ms. Weaver when she reviewed this proposal, and was my fault. Since there are several releases to be addressed relative to this site, OCD notes the open RP numbers, and status, as follows:

- 2RP-3353 and 2RP-3774 releases cover basically the same area, and have approved remediation proposals.
- 2RP-4094 has an approved remediation proposal.
- 2RP-4330 has an approved remediation proposal.
- 2RP-4240 now has an approved remediation proposal.

It is OCD's understanding that all the releases associated with this site, as listed above, will be addressed upon mobilization to the site, and that mobilization will occur in the very near future. Please advise once that has been scheduled. Also, please advise if this information is not as reflected in COG records.

In addition, for future reference, when performing vertical delineation and transitioning from conventional delineation to utilizing boring equipment, please attempt where possible, to obtain samples in a manner that does not leave gaps in the analytical data. OCD would prefer to see uniform data throughout the delineation process.

Federal sites will require like approval from BLM, if not previously obtained.

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: Cliff Brunson [mailto:cbrunson@bbcinternational.com]

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

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Becky Haskell <rhaskell@concho.com>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <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
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