

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, April 17, 2018 7:37 AM
To: Cliff Brunson; Tucker, Shelly
Cc: Weaver, Crystal, EMNRD; Macurdy, David William; Barnhill, Amy D.; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: RE: [EXTERNAL] RE: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud

RE: Chevron USA * Hayhurst SO 10 P3 24H * 2RP-4200 * DOR: 4/17/17

Chevron's request for an extension to complete remedial activities on the above referenced release is approved. Please note the site is in an area of potentially shallow ground water, and the December analytical data showed impact at that time, confined, for the most part, to the surface of the pad. The current remediation proposal is accepted for record only, at this time.

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: Tucker, Shelly <stucker@blm.gov>
Sent: Monday, April 16, 2018 1:54 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Macurdy, David William <david.macurdy@chevron.com>; Barnhill, Amy D. <ABarnhill@chevron.com>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>
Subject: Re: [EXTERNAL] RE: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud

BLM approved the proposed remediation and grants an extension until the location is to where activities can safely occur.

NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

575.234.5905 - Direct

575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

Bureau of Land Management

620 E. Greene St
Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Fri, Apr 13, 2018 at 8:40 AM, Cliff Brunson <cbrunson@bbcinternational.com> wrote:

Shelly, Mike, and Crystal,

I have been asked by Chevron to summarize our discussion yesterday concerning the status of this spill remediation. I talked to both Mike and Shelly yesterday by phone about the past, current, and future activities at this location. This is a six well pad and has had continuous operations on it since the spill of April 2017 due to unplanned delays in development activities of two wells associated with offset well fracing interference risks. As was discussed, the schedule for activities on this location is non-stop for the rest of this year with fracing, completion, testing, and putting on production operations. Per our discussion, Chevron is requesting an extension to conduct the remediation of the 2017 spill to no later than May 2019. This is due to the operational schedule does not have an appropriate window of time to conduct the remediation without any equipment or operations blocking the area of impact. Attempting to conduct simultaneous operations would operationally be impossible due to equipment located on the spill area and even if the equipment was not required to be positioned in this area there would be a significant safety risk conducting remediation with other operations ongoing.

Chevron will remediate this spill sooner if a window opens in the schedule. The remediation plan as submitted on March 22, 2018 is not yet approved, however Chevron will conduct confirmation bottom and sidewall sampling of the spill area to verify regulatory limits are achieved in the event site conditions alter from what the laboratory data confirms the conditions are presently.

It would be greatly appreciated if an approval of the proposed plan be issued and a confirmation email agreeing to this extension.

Thank you very much for your time and consideration regarding this matter.

Sincerely,

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

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From: Barnhill, Amy D.
> Sent: Thursday, March 22, 2018 3:00 PM
> To: Weaver, Crystal, EMNRD
> <Crystal.Weaver@state.nm.us<mailto:Crystal.Weaver@state.nm.us>>;
> Tucker, Shelly <stucker@blm.gov<mailto:stucker@blm.gov>>
> Cc: Bratcher, Mike, EMNRD
> <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>;
> Barnhill, Amy D. <ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>>
> Subject: RE: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud

>
> Crystal and Shelly,
> Completions currently has coiled tubing on location rigging up for drill out activities. This activity will take approximately 10 days; being completed around April 1st. After April 1st a remediation crew should be able to start clean-up activities.
>
> In response to the concern raised in the email below regarding the liner; to my knowledge, no one documents or records the exact location of each tear, rip or separation in the liner during routine drilling operations. If major or several significant tears are discovered, the vinyl liner is quickly repaired.
>
> E-tech sampled an area covering 19,202 square feet and results showed hydrocarbon signatures present. I believe full delineation of the spill area will be completed. A site map and corrective action plan are attached, please forward your approval at your earliest convenience.

>
> As soon as the clean-up activity is complete, we will submit a closure report. Please let me know if you have other questions or concerns.

>
> Thank you,
> Amy Barnhill, BSEM
> HES Environmental Specialist
> MCBU
> Office: 432-687-7108
> Cell: 432-940-8524
> E-Mail: ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>
> #OurEnvironmentMatters
>

> From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
> Sent: Wednesday, March 21, 2018 2:12 PM
> To: Tucker, Shelly <stucker@blm.gov><mailto:stucker@blm.gov>>;
> Barnhill, Amy D. <ABarnhill@chevron.com><mailto:ABarnhill@chevron.com>>
> Cc: DeLeon, Josepha <JDxD@chevron.com><mailto:JDxD@chevron.com>>;
> Bratcher, Mike, EMNRD
> <mike.bratcher@state.nm.us><mailto:mike.bratcher@state.nm.us>>; Meaux,
> Luke <LukeMeaux@chevron.com><mailto:LukeMeaux@chevron.com>>; Leonard,
> Nicklois L
> <Nicklois.Leonard@chevron.com><mailto:Nicklois.Leonard@chevron.com>>;
> Debeysey, Svetlana
> <LDebeysey@chevron.com><mailto:LDebeysey@chevron.com>>
> Subject: [**EXTERNAL**] RE: Re: Re: Re: Spill - Hayhurst SO 10 P3 24H
> - Oil Based Mud
>
> RE: Chevron * Hayhurst SO 10 P3 24H * 30-015-43926 * 2RP-4200
>
> Hello all,
>
> I appreciate Shelly asking for an update and I appreciate you all making efforts on meeting her request. However, for how old this release is we really need to see some data and hopefully a closure report on this one. It was stated that the majority of this one stayed within a lined area. We need to see statements that "the liner has been thoroughly inspected and that Chevron attests to the full integrity of the liner area." If any holes or rips are found in the lined area a full report needs to be provided along with a site map with locations of holes/rips marked on the map because a full delineation will be required for all areas where the liner is compromised.
>
> This release occurred almost 1 year ago back on 4/17/17. Please provide all or most of what has been asked for above by no later than 3/30/18.
>
> Thank you,
>
>
> Crystal Weaver
> Environmental Specialist
> OCD – Artesia District II
> 811 S. 1st Street
> Artesia, NM 88210
> Office: 575-748-1283 ext. 101
> Cell: 575-840-5963
> Fax: 575-748-9720
>
>
>
> From: Tucker, Shelly [mailto:stucker@blm.gov]
> Sent: Tuesday, March 20, 2018 7:15 AM
> To: Barnhill, Amy D.
> <ABarnhill@chevron.com><mailto:ABarnhill@chevron.com>>
> Cc: DeLeon, Josepha <JDxD@chevron.com><mailto:JDxD@chevron.com>>;
> Weaver, Crystal, EMNRD
> <Crystal.Weaver@state.nm.us><mailto:Crystal.Weaver@state.nm.us>>;
> Bratcher, Mike, EMNRD
> <mike.bratcher@state.nm.us><mailto:mike.bratcher@state.nm.us>>; Meaux,

> Luke <LukeMeaux@chevron.com<mailto:LukeMeaux@chevron.com>>; Leonard,
> Nicklois L
> <Nicklois.Leonard@chevron.com<mailto:Nicklois.Leonard@chevron.com>>;
> Debeyessey, Svetlana
> <LDebeysey@chevron.com<mailto:LDebeysey@chevron.com>>
> Subject: Re: Re: Re: Re: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud
>
> Thank you very much. I will look for your email.
>
> If you have any questions or concerns, please do not hesitate to contact me.
>
> Sincerely,
>
> Shelly J Tucker
> Environmental Protection Specialist
> O&G Spill/Release Coordinator
>
> Bureau of Land Management
> 620 E. Greene St
> Carlsbad, NM 88220
>
> 575.234.5905 - Direct
> 575.361.0084 - Cellular
> 575.234.6235 - Emergency Spill Number
>
> stucker@blm.gov<mailto:stucker@blm.gov>
>
>
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>
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>
> On Mon, Mar 19, 2018 at 11:10 AM, Barnhill, Amy D. <ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>> wrote:
> Hello Ms Tucker,
> My names is Amy and I will be your point of contact for this spill going forward. I have reached out to the company we are working with to get a status update. I will let you know as soon as I receive an answer from them. Please do not hesitate to contact me should you need anything.
>
> Thank you,
> Amy Barnhill, BSEM
> HES Environmental Specialist

> MCBU
> Office: 432-687-7108
> Cell: 432-940-8524
> E-Mail: ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>
> #OurEnvironmentMatters
>
> From: Tucker, Shelly [mailto:stucker@blm.gov<mailto:stucker@blm.gov>]
> Sent: Thursday, March 15, 2018 5:13 PM
> To: Debeyessey, Svetlana
> <LDebeyessey@chevron.com<mailto:LDebeyessey@chevron.com>>
> Cc: DeLeon, Josepha <JDxD@chevron.com<mailto:JDxD@chevron.com>>;
> Weaver, Crystal, EMNRD
> <Crystal.Weaver@state.nm.us<mailto:Crystal.Weaver@state.nm.us>>;
> Bratcher, Mike, EMNRD
> <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>; Meaux,
> Luke <LukeMeaux@chevron.com<mailto:LukeMeaux@chevron.com>>; Leonard,
> Nicklois L
> <Nicklois.Leonard@chevron.com<mailto:Nicklois.Leonard@chevron.com>>
> Subject: [****EXTERNAL****] Re: Re: Re: Spill - Hayhurst SO 10 P3 24H -
> Oil Based Mud
>
> Was checking on the status of this release.
>
> If you have any questions or concerns, please do not hesitate to contact me.
>
> Sincerely,
>
> Shelly J Tucker
> Environmental Protection Specialist
> O&G Spill/Release Coordinator