

**From:** [Pruett, Maria, EMNRD](#)  
**To:** ["Blaney, Karolina"; "Tucker, Shelly"](#)  
**Cc:** [Bratcher, Mike, EMNRD](#); [Raley, Jim](#); ["vjordan@blm.gov"](mailto:vjordan@blm.gov)  
**Subject:** 2RP-3734 & 3700: WPX Brushy Pipe ROW - deferral request  
**Date:** Monday, August 20, 2018 12:41:00 PM

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Hello Ms. Blaney,

OCD has received your deferral request, thank you!

At this time OCD denies this deferral request. Per the new spill rule section: 19.15.29.12. (C.)(2) deferrals may only be granted when there is a full delineation. It appears that some delineation at 3 points was done following the first spill in April 2016, with some additional sampling at other points following the second spill in June 2016. The highest recorded values show Cl- levels as high as 53,500. To move forward with another request OCD would need, at a minimum, the following:

1. Full current delineation at the same points in each spill.
2. Additional information on any high-pressure buried lines including who they belong to, depth and a written notification from owner on current policies regarding excavation. Please note, the presence of above ground poly-lines does not meet standards for deferment.
3. BLM right of way policies at this location.

Please let me know if you have any questions or need further information.

Best Regards,

*Maria Pruett*

Environmental Specialist  
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**From:** Blaney, Karolina <Karolina.Blaney@wpenergy.com>  
**Sent:** Thursday, August 16, 2018 2:05 PM  
**To:** 'Tucker, Shelly' <stucker@blm.gov>; Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Raley, Jim <James.Raley@wpenergy.com>  
**Subject:** WPX Brushy Pipe ROW - deferral request

Good afternoon,

Attached is a characterization summary and deferral request for the Brushy pipeline ROW spills. Please let me know if you have any questions or recommendation or if you'd like to meet and discuss this in person.

Thank you and have a great afternoon,

*Karolina Blaney*

Environmental Specialist

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