

From: Price, Henryetta
To: [Cliff Brunson](#)
Cc: [Yu, Olivia](#), [EMNRD](#), [Rebecca Haskell](#), [Ken Swinney](#), [Jennifer Gilkey](#), [Kathy Purvis](#)
Subject: Re: COG - Lusk Deep Unit A #023H - Delineation Workplan
Date: Wednesday, November 1, 2017 11:15:32 AM

BLM approves the proposed work plan. Must have like approval from NMOCD prior to work. Thank you.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management
Hprice@blm.gov
Phone 575-234-5951
Cell 575-706-2780
Fax 575-234-5927

On Fri, Oct 27, 2017 at 12:10 PM, Cliff Brunson <cbrunson@bbcinternational.com> wrote:

Olivia and Henryetta,

Please find attached the Delineation Workplan for the COG Lusk Deep Unit A #023H release site. Per Olivia's request below, COG has conducted further delineation at depth and has altered the excavation depth at SP5 to 4 feet instead of the original 3 feet. All other conditions will be met. COG respectfully requests both the NMOCD and BLM approve this plan so remediation activities may proceed. If you would please reply back with your approval via email, it would be greatly appreciated.

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



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prohibited.

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Monday, March 27, 2017 4:52 PM

To: Rebecca Haskell <RHaskell@concho.com>; Cliff Brunson <cbrunson@bbcinternational.com>; Shelly Tucker <stucker@blm.gov>

Cc: Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>

Subject: RE: COG - Lusk Deep Unit A #023H - Delineation Workplan

Dear Mr. Brunson:

NMOCD determines that the delineation workplan for IRP-4657 does not provide sufficient evidence of complete vertical delineation. Please address these concerns.

1. Vertically delineate an additional 5 ft. below the depth (minimum) at which permissible chloride levels were attained for each of the sample points.
2. Excavation to 3 ft. at SP5 does not capture all the contaminated soil. Impacted soil should be removed to 4 ft. bgs for the area around SP5.
3. Bottom and confirmation sidewall samples are requested at all sample points.

Thanks,

Olivia Yu

Environmental Specialist

NMOCD, District I

Olivia.yu@state.nm.us

575-393-6161 x113

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: Yu, Olivia, EMNRD

Sent: Monday, March 27, 2017 10:26 AM

To: 'Rebecca Haskell' <RHaskell@concho.com>; Cliff Brunson <cbrunson@bbcinternational.com>; Shelly Tucker <stucker@blm.gov>

Cc: Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>

Subject: RE: COG - Lusk Deep Unit A #023H - Delineation Workplan

Dear Ms. Haskell:

As NMOCD does not have a record of a processed initial C141, a 1RP is issued for the incident. The delineation workplan is under review.

4657	3/27/2017	A	COG	Lusk Deep Unit A #023H battery	30-025- 40260	19S-32E- 19P	6/10/2016
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Thanks,

Olivia Yu

Environmental Specialist

NMOCD, District I

Olivia.yu@state.nm.us

575-393-6161 x113

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: Rebecca Haskell [<mailto:RHaskell@concho.com>]

Sent: Monday, March 20, 2017 12:16 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Cliff Brunson <cbrunson@bbcinternational.com>; Shelly Tucker <stucker@blm.gov>

Cc: Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>

Subject: RE: COG - Lusk Deep Unit A #023H - Delineation Workplan

Ms. Yu,

Please see attached Notification submitted to Mr. Keyes on June 10, 2016 and the Initial C-141 submitted on June 20, 2016. Please let me know if you need any additional information.

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

Cell: 432-556-5130

rhaskell@concho.com



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, March 20, 2017 12:50 PM
To: Cliff Brunson; Shelly Tucker
Cc: Rebecca Haskell; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: [External] RE: COG - Lusk Deep Unit A #023H - Delineation Workplan

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

Dear All:

NMOCD does not have a record of the original submission of the initial C-141. If anyone has a copy, please provide this information.

Thanks,

Olivia

From: Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Monday, March 20, 2017 11:11 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: Becky Haskell <rhaskell@concho.com>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>
Subject: COG - Lusk Deep Unit A #023H - Delineation Workplan

Olivia and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the COG Lusk Deep Unit A #023H. There is no RP number associated with this leak that was provided by the NMOCD. We searched online as well and were not successful in locating one. COG is requesting that you review this plan and is looking forward to the OCD's and BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

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