

From: [Yu, Olivia, EMNRD](#)
To: "Tucker, Shelly"; [Cliff Brunson](#)
Cc: [Wade Dittrich](#); [Jennifer_Smith@oxy.com](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)
Subject: RE: [EXTERNAL] OXY Red Tank 35 Federal #3 SWD Battery - Delineation Workplan
Date: Tuesday, April 24, 2018 9:26:00 AM

Mr. Brunson:

Please note that NMOCD does not have records of confirmatory samples or a final C-141 for 1RP-3625. Please inform if this workplan will also include the release area for 1RP-3625.

NMOCD approves of the proposed additional delineation and remediation plan for 1RP-3973, 1RP-4093, 1RP-4118, 1RP-4267, 1RP-4339, and 1RP-4689 with these stipulations:

- For the release on January 18, 2016 (1RP-4118): bottom confirmation sample needed for the proposed 3.5 ft. excavation for the area represented by SP2. Situate additional bottom confirmation samples for the area represented by SP3 and SP5 closer to the original sample location from March 31, 2016 sample date to ensure that the elevated chlorides at 1 ft. bgs were removed completely.
- A confirmation sidewall sample is required at the western side of the release on April 22, 2016 (1RP-4267), overlapping the release from January 18, 2016 (1RP-4118).
- If the proposed depths of excavation are not within permissible levels, please proceed to the next foot. Due to the multiple releases at this location, laboratory analyses for TPH extended (GRO, DRO, MRO) and chlorides are required for all confirmation samples. BTEX samples are required for confirmation samples in the tank battery area and the additional delineation area for 1RP-4267, which overlapped the release for 1RP-4118.
- Tabulate GPS coordinates for all confirmation and delineation sample locations as well as the dimensions of the lined areas.
- Dated, optimally geo-referenced, photo documentation of remedial activities, including proper emplacement of a minimal 20 mil liner is required.

Please confirm or inform for clarification.

Thanks,
Olivia

From: Tucker, Shelly <stucker@blm.gov>
Sent: Monday, April 16, 2018 2:04 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Wade Dittrich <Wade_Dittrich@oxy.com>; Jennifer_Smith@oxy.com; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>
Subject: Re: [EXTERNAL] OXY Red Tank 35 Federal #3 SWD Battery - Delineation Workplan

BLM accepts your delineation proposal as written.

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 Wed, Apr 11, 2018 at 7:50 PM, Cliff Brunson <cbrunson@bbcinternational.com> wrote:

Olivia and Shelly,

I have attached the updated delineation workplan that we discussed at the BLM's office on March 29, 2018. I updated the diagram to reflect the areas and depths of the excavation that we agreed upon. I also placed additional delineation and confirmation samples points on the diagram to reflect our discussion.

Oxy is ready to start the remediation and demolition of the battery, therefore, Oxy is requesting your written approval of the plan as discussed so that activities may commence. If you have any questions, please let me know.

Thank you again for the meeting and discussion about this matter. We look forward to your approvals.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
President

BBC International, Inc.
World-Wide Environmental Specialists
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From: [Cliff Brunson](#)
To: [Yu, Olivia, EMNRD](#); "[Shelly Tucker](#)"
Cc: "[Wade Dittrich](#)"; "[Ken Swinney](#)"
Subject: RE: [EXTERNAL] Re: Meeting Request-March 29, 2018
Date: Wednesday, March 28, 2018 4:38:27 PM

Olivia, yes this includes 1RP-4689 and I apologize that I didn't include it in my email. I meant to. 1RP-3625 is not one I am aware of. I will check on it and hopefully have information tomorrow.

Cliff P. Brunson, CEI, CRS
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From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Wednesday, March 28, 2018 4:09 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>; 'Shelly Tucker' <stucker@blm.gov>
Cc: 'Wade Dittrich' <Wade_Dittrich@oxy.com>; 'Ken Swinney' <kswinney@bbcinternational.com>
Subject: RE: [EXTERNAL] Re: Meeting Request-March 29, 2018

Mr. Brunson:

Just to confirm, since I did not see the initial C-141s included in the attachment, the proposed remediation will encompass 1RP-3625 and 1RP-4689 as well?

Thanks,
Olivia

From: Cliff Brunson <cbrunson@bbcinternational.com>
Sent: Tuesday, March 27, 2018 8:13 PM
To: 'Shelly Tucker' <stucker@blm.gov>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Wade Dittrich' <Wade_Dittrich@oxy.com>; 'Ken Swinney' <kswinney@bbcinternational.com>

Subject: RE: [EXTERNAL] Re: Meeting Request-March 29, 2018

Olivia and Shelly,

I have attached the materials that we will use in our meeting on Thursday. This is the information of the leaks at this location and the sampling data and initial C-141s. I will present Oxy's request for the remediation at the meeting. Oxy is hopeful that we can come to an agreement on the path forward during this meeting. As I mentioned, Oxy is going to dismantle this facility and rebuild it as a lined facility and wants to conduct the remediation right after the demolition of the current facility which is scheduled in the 2nd quarter of this year.

I look forward to meeting with you on Thursday.

Thanks, Cliff

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From: Shelly Tucker <stucker@blm.gov>
Sent: Saturday, March 24, 2018 10:47 AM
To: Cliff P. Brunson <cbrunson@bbcinternational.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Re: [EXTERNAL] Re: Meeting Request-March 29, 2018

Works perfect for me. Thanks!!

Shelly J Tucker
BLM-Carlsbad

EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Cliff P. Brunson" <cbrunson@bbcinternational.com>
Date: 3/23/18 2:45 PM (GMT-07:00)
To: "Yu, Olivia, EMNRD" <Olivia.Yu@state.nm.us>
Cc: Shelly Tucker <stucker@blm.gov>
Subject: [EXTERNAL] Re: Meeting Request-March 29, 2018

10 am works for me. I will submit docs next week prior to meeting.

Sent from my iPhone

On Mar 23, 2018, at 3:27 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

10 am, BLM Carlsbad office?

Mr. Brunson: please submit documents for review in advance.

Thanks,
Olivia

From: Shelly Tucker [<mailto:stucker@blm.gov>]
Sent: Friday, March 23, 2018 2:16 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Re: Meeting Request-March 29, 2018

Thursday morning would be best for me. My boys have a baseball game against Ocate in Las Cruces that afternoon so i need to leave by around noon.

Shelly J Tucker
BLM-Carlsbad
EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Cliff Brunson <cbrunson@bbcinternational.com>

Date: 3/22/18 6:56 PM (GMT-07:00)

To: 'Olivia Yu' <Olivia.Yu@state.nm.us>, 'Shelly Tucker' <stucker@blm.gov>

Subject: Meeting Request-March 29, 2018

Olivia and Shelly,

I have spoken to both of you about a joint meeting next week concerning an Oxy site. It appears that next Thursday, March 29 is hopefully available for all of us. Therefore, I am requesting a meeting at BLM's office on Thursday morning, March 29.

Please advise as to what time will work for the both of you. I can meet anytime that day.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

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