

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Friday, July 15, 2011 1:36 PM
To: 'Cliff P. Brunson'
Cc: Kelton Beaird; Rick Kerby; Ken Swinney; Jennifer Gilkey
Subject: RE: Oxy-128 Production Facility

Reference: OXY * Indian Basin Station 128 (IHU 083) * 30-015-32875 * F-28-21s-24e * DOR: 2/6/11 * 2RP-629

Cliff,

As discussed, and based on review of the analytical data submitted, your proposal for remediation of the produced fluid release, referenced above, is approved with the following conditions of approval:

- Notify OCD District 2 office 48 hours prior to commencement of remedial activities.
- Notify OCD District 2 office 48 hours prior to obtaining samples where the analyses will be submitted to OCD.
- After the initial proposed excavation, samples are to be obtained from approximately the same areas as the initial samples, and lab tested for TPH. This analytical data will form the basis for OCD approving closure of the site, or, requiring additional remedial action. Based on the initial sample analyses, no further testing for chloride or BTEX will be required.
- Submit a form C-141 Final Report and closure report upon satisfactory completion of project.
- Like approval by BLM, or any other regulatory authority, as may be applicable.
- Project is to be completed and closure documentation submitted not later than September 15, 2011. Operator may request an extension of time for completion if additional reclamation is required.

Please submit a hard copy of the electronically submitted data and proposal.

Be advised OCD 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 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.

If you have any questions or concerns, and for notifications, please contact me.

MIKE BRATCHER

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From: Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Wednesday, July 13, 2011 6:24 PM
To: Bratcher, Mike, EMNRD
Cc: Kelton Beaird; Rick Kerby; Ken Swinney; Jennifer Gilkey
Subject: Oxy-128 Production Facility

Mike,

This message is to confirm our discussion yesterday on July 12, 2011 concerning the remediation plan for the above referenced site. Per our discussion and mutual agreement, Oxy will excavate and remove impacted soil on the location to a depth of one foot and off the location to a depth of one foot or as practicable. In the area of SP-13 at the end of the spill by the culvert, the depth of excavation will be at least one foot. Since there were no hydrocarbon samples taken below the surface, confirmation samples will be taken at the bottom of the one foot excavation across the site to determine that the appropriate hydrocarbons have been removed. The sample results will be discussed with the OCD prior to backfilling the site.

I have attached the site diagram and lab data for your files. If you would please respond back with your concurrence, it would be greatly appreciated. Thanks again for your time involving this matter.

Thanks, Cliff

Cliff Brunson, CEI, CRS
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Bratcher, Mike, EMNRD

From: Microsoft Outlook
To: Cliff P. Brunson; Kelton Beaird; Rick Kerby; Ken Swinney; Jennifer Gilkey
Sent: Friday, July 15, 2011 1:36 PM
Subject: Relayed: RE: Oxy-128 Production Facility

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

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Subject: RE: Oxy-128 Production Facility