

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, November 17, 2011 11:44 AM
To: 'Cliff P. Brunson'
Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: RE: Oxy-Cal-Mon #17

Cliff,

Your request to backfill the excavated area associated with the release at this site is approved. Please proceed on your schedule.

Thank you,

Mike Bratcher

NMOCD District 2
811 S. First Street
Artesia, NM 88210
575-748-1283 Ext. 108
575-626-0857
mike.bratcher@state.nm.us

From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Thursday, November 17, 2011 9:12 AM
To: Bratcher, Mike, EMNRD
Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Re: Oxy-Cal-Mon #17

Mike,

I have attached a summary table and lab data for the confirmation sampling that you requested below and Oxy agreed to for the Cal-Mon #17 site. As you recall, this was in the area of SP-2. You will see the results are non-detect.

Therefore, Oxy is requesting the approval to backfill this site and complete it. If you would please review the data and respond back to me as soon as possible, it would be greatly appreciated. We will then schedule the backfill and complete this site.

Thank you,

Cliff

Cliff 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: Mike Bratcher <Mike.Bratcher@state.nm.us>

Date: Wed, 12 Oct 2011 15:38:10 +0000

To: Cliff Brunson <cbrunson@bbcinternational.com>

Cc: Dusty Wilson <Dusty_Wilson@oxy.com>, C J Summers <Chancey_Summers@oxy.com>, Ken Swinney <kswinney@bbcinternational.com>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Kathy Purvis <kathy@bbcinternational.com>

Subject: RE: Oxy-Cal-Mon #17

Reference: OXY USA * Cal-Mon 017 * 30-015-28024 * P-35-23s-31e * Eddy County, New Mexico

OCD Reference Number: 2RP-886 * DOR: 8/6/11

Cliff,

As discussed, the remediation proposal submitted for cleanup of the above referenced release of produced fluid is approved with the following conditions and/or stipulations:

- Notify OCD District 2 office 48 hours prior to commencement of remedial activities.
- Notify OCD District 2 office 48 hours prior to obtaining any samples where the analyses will be submitted to OCD.
- OCD review of confirmation sample data and approval required prior to backfilling any excavations.
- Submit a Form C-141 Final Report and closure report upon satisfactory completion of project.
- Project is to be completed and closure documentation submitted to OCD not later than December 12, 2011.
- Like approval by BLM or any other regulatory authority as may be applicable.

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.

It is OCD's understanding that this release is the result of an unauthorized dumping event.

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

Mike Bratcher

NMOCD District 2

811 S. First Street

Artesia, NM 88210

575-748-1283 Ext. 108

575-626-0857

mike.bratcher@state.nm.us

From: Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]

Sent: Saturday, September 17, 2011 4:42 PM

To: Bratcher, Mike, EMNRD

Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Oxy-Cal-Mon #17

Mike,

This e-mail is to confirm our discussion on September 13, 2011 concerning the remediation plan for the release that occurred at the Oxy Cal-Mon #17. As agreed, Oxy will excavate 1 foot of the impacted soil in the spill area and down to 3 feet in the area of SP-2 which appears to be a pooling zone of the spill. A confirmation sample will be collected in the area of SP-2 which will be analyzed for TPH and BTEX per the NMOCD's request. The excavation will then be backfilled with clean soil. The depth to groundwater in this area is approximately 300 feet.

I have attached the site drawing and laboratory data and a few pictures that we reviewed during our discussion for your files. If you would please reply back via e-mail with your concurrence of this remediation plan, it would be greatly appreciated.

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

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To: Bratcher, Mike, EMNRD
Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Re: Oxy-Cal-Mon #17
Attachments: Confirmation Sampling Summary and Data for Cal-Mon #17.pdf

Mike,

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Date: Wed, 12 Oct 2011 15:38:10 +0000
To: Cliff Brunson <cbrunson@bbcinternational.com>
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Laboratory Analytical Results Summary
Oxy, Calmon #17

		Sample	SP2@3'
Analyte	Method	Date	11/7/11
			mg/Kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

November 11, 2011

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: CAL MON 17

Enclosed are the results of analyses for samples received by the laboratory on 11/07/11 16:25.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (505) 397-0397

 Received: 11/07/2011
 Reported: 11/11/2011
 Project Name: CAL MON 17
 Project Number: NONE GIVEN
 Project Location: C-29

 Sampling Date: 11/07/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP 2 @ 3 FT. (H102416-01)

BTX 8021B		mg/L		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/10/2011	ND	1.90	95.0	2.00	1.40		
Toluene*	<0.050	0.050	11/10/2011	ND	1.82	91.1	2.00	0.969		
Ethylbenzene*	<0.050	0.050	11/10/2011	ND	2.09	104	2.00	1.51		
Total Xylenes*	<0.150	0.150	11/10/2011	ND	6.04	101	6.00	1.01		

Surrogate: 4-Bromofluorobenzene (PIE) 97.8 % 70.7-118

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/10/2011	ND	188	94.2	200	1.88	
DRO >C10-C28	<10.0	10.0	11/10/2011	ND	196	97.8	200	6.72	


Surrogate: 1-Chlorooctane 76.6 % 55.5-154

Surrogate: 1-Chlorooctadecane 98.1 % 57.6-158

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

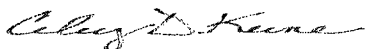
Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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