

## Bratcher, Mike, EMNRD

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Monday, August 01, 2011 11:55 AM  
**To:** 'Cliff P. Brunson'  
**Subject:** RE: Oxy-Jones Canyon 4 Fed. #5: soil sampling question

Cliff,

I didn't realize the flow path was that long. However, as I understand it, the proposal is to remove 1' of impacted material all the way along the flow path, as practicable. If that is correct, OCD would not require the surface sample analysis from SP 7, as that material is going to be removed. The 1' sample from SP 7 was well within closure limits. I would suspect BLM will require confirmation samples prior to backfilling any of the excavation. Since the flow path is so long, I would request maybe 3 or so sample points be established at intervals along the flow path (excavation) just for confirmation, after excavation.

I am just sending this to you, but if you need to distribute, feel free.

*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:** Monday, August 01, 2011 11:17 AM  
**To:** tgregsto@blm.gov  
**Cc:** Dusty Wilson; James Amos; Jennifer Gilkey; Ken Swinney; Terry Gregston; Bratcher, Mike, EMNRD  
**Subject:** Re: Oxy-Jones Canyon 4 Fed. #5: soil sampling question

Terry,

We will discuss this site on Thursday afternoon. Dusty is just taking over this area so he wanted to discuss it with you on Thursday.

Thanks, 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

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

---

**From:** <tgregsto@blm.gov>  
**Date:** Sun, 31 Jul 2011 19:56:39 -0600  
**To:** Cliff Brunson <cbrunson@bbcinternational.com>  
**Cc:** Dusty Wilson <Dusty\_Wilson@oxy.com>, James Amos <James\_Amos@nm.blm.gov>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Ken Swinney <kswinney@bbcinternational.com>, Terry Gregston <terry\_gregston@nm.blm.gov>, Mike Bratcher <Mike.Bratcher@state.nm.us>  
**Subject:** Re: FW: Oxy-Jones Canyon 4 Fed. #5: soil sampling question

Mr. Brunson,

In reviewing your soil sample analysis, there was only one sample taken in the pasture; sample point #7. I did not find any analysis at sample point 7 for the surface; there was just a sample at 1 foot depth.

As you can see from the attached spill map, the spill on this location ran over 1,000 feet out into the pasture. Do you have any other sample data from the spill path after it left the pad?

Terry Gregston  
Environmental Protection Specialist  
Bureau of Land Management  
620 E. Greene St.  
Carlsbad, NM 88220  
Office (575) 234-5958  
Cell (575) 361-2635  
Fax (575) 234-5927

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

"Cliff P. Brunson" <cbrunson@bbcinternational.com>

07/27/2011 02:41 PM

To Terry Gregston <terry\_gregston@nm.blm.gov>  
cc Dusty Wilson <Dusty\_Wilson@oxy.com>, James Amos <James\_Amos@nm.blm.gov>, Ken Swinney <kswinney@bbcinternational.com>, Jennifer Gilkey <jgilkey@bbcinternational.com>  
Subject FW: Oxy-Jones Canyon 4 Fed. #5

Ms. Gregston,

This message is to update you on the status of this leak site. As you can see in the e-mail chain below, Oxy proposed a remediation plan to the NMOCD which the NMOCD has approved. Oxy is therefore requesting an approval in kind from the BLM so that this site can be advanced forward to clean up. I have attached the lab data and materials that the NMOCD reviewed in approving this site remediation.

I look forward to receiving the BLM's approval so we can move forward in taking care of this site. If you have any questions, please do not hesitate to contact myself or Ken Swinney with BBC, or Dusty Wilson with Oxy. Dusty has taken over the Carlsbad area also that was previously handled by Kelton Beaird.

Sincerely,

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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

**From:** Mike Bratcher <[Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us)>  
**Date:** Thu, 14 Jul 2011 19:23:32 +0000  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Cc:** Kelton Beaird <[Kelton\\_Beaird@oxy.com](mailto:Kelton_Beaird@oxy.com)>, Rick Kerby <[rick\\_kerby@oxy.com](mailto:rick_kerby@oxy.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>  
**Subject:** RE: Oxy-Jones Canyon 4 Fed. #5

Reference: OXY \* Jones Canyon 4 Fed 005 \* 30-015-30933 \* G-4-22s-24e \* DOR-4/6/11 \* 2RP-762

Cliff,

As discussed, and, based on analytical data provided, your proposal for remediation of a produced fluid release as 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.
- Notify OCD District 2 office in the event the proposed excavation depth/depths are not achieved.
- Submit a form C-141 Final Report and closure report upon satisfactory completion of project.
- Like approval by BLM or other regulatory authority as may be applicable.
- Project is to be completed and closure documentation submitted not later than September 14, 2011.

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 notification, 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](mailto:mike.bratcher@state.nm.us)

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Wednesday, July 13, 2011 5:04 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Kelton Beard; Rick Kerby; Ken Swinney; Jennifer Gilkey  
**Subject:** Oxy-Jones Canyon 4 Fed. #5

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 at SP-1 to a depth of 2 feet and in the areas of SP-2, SP-3, SP-4, SP-5, SP-6, and SP-7 soil will be excavated to a one foot depth or as practicable.

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  
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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*[attachment "Oxy-Jones Canyon 4 Fed #5.pdf" deleted by Terry G  
Gregston/CFO/NM/BLM/DOI]

**Bratcher, Mike, EMNRD**

---

**From:** Cliff P. Brunson [cbrunson@bbcinternational.com]  
**Sent:** Monday, August 01, 2011 11:17 AM  
**To:** tgregsto@blm.gov  
**Cc:** Dusty Wilson; James Amos; Jennifer Gilkey; Ken Swinney; Terry Gregston; Bratcher, Mike, EMNRD  
**Subject:** Re: Oxy-Jones Canyon 4 Fed. #5: soil sampling question

Terry,

We will discuss this site on Thursday afternoon. Dusty is just taking over this area so he wanted to discuss it with you on Thursday.

Thanks, 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

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

---

**From:** <tgregsto@blm.gov>  
**Date:** Sun, 31 Jul 2011 19:56:39 -0600  
**To:** Cliff Brunson <cbrunson@bbcinternational.com>  
**Cc:** Dusty Wilson <Dusty\_Wilson@oxy.com>, James Amos <James\_Amos@nm.blm.gov>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Ken Swinney <kswinney@bbcinternational.com>, Terry Gregston <terry\_gregston@nm.blm.gov>, Mike Bratcher <Mike.Bratcher@state.nm.us>  
**Subject:** Re: FW: Oxy-Jones Canyon 4 Fed. #5: soil sampling question

Mr. Brunson,

In reviewing your soil sample analysis, there was only one sample taken in the pasture, sample point #7. I did not find any analysis at sample point 7 for the surface; there was just a sample at 1 foot depth.

As you can see from the attached spill map, the spill on this location ran over 1,000 feet out into the pasture. Do you have any other sample data from the spill path after it left the pad?

Terry Gregston

Environmental Protection Specialist  
Bureau of Land Management  
620 E. Greene St.  
Carlsbad, NM 88220  
Office (575) 234-5958  
Cell (575) 361-2635  
Fax (575) 234-5927

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

"Cliff P. Brunson" <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>

07/27/2011 02:41 PM

To Terry Gregston <[terry\\_gregston@nm.blm.gov](mailto:terry_gregston@nm.blm.gov)>

cc Dusty Wilson <[Dusty\\_Wilson@oxy.com](mailto:Dusty_Wilson@oxy.com)>, James Amos <[James\\_Amos@nm.blm.gov](mailto:James_Amos@nm.blm.gov)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>

Subject FW: Oxy-Jones Canyon 4 Fed. #5

Ms. Gregston,

This message is to update you on the status of this leak site. As you can see in the e-mail chain below, Oxy proposed a remediation plan to the NMOCD which the NMOCD has approved. Oxy is therefore requesting an approval in kind from the BLM so that this site can be advanced forward to clean up. I have attached the lab data and materials that the NMOCD reviewed in approving this site remediation.

I look forward to receiving the BLM's approval so we can move forward in taking care of this site. If you have any questions, please do not hesitate to contact myself or Ken Swinney with BBC, or Dusty Wilson with Oxy. Dusty has taken over the Carlsbad area also that was previously handled by Kelton Beaird.

Sincerely,

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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

From: Mike Bratcher <[Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us)>

**Date:** Thu, 14 Jul 2011 19:23:32 +0000

**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>

**Cc:** Kelton Beaird <[Kelton\\_Beaird@oxy.com](mailto:Kelton_Beaird@oxy.com)>, Rick Kerby <[rick\\_kerby@oxy.com](mailto:rick_kerby@oxy.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>

**Subject:** RE: Oxy-Jones Canyon 4 Fed. #5

Reference: OXY \* Jones Canyon 4 Fed 005 \* 30-015-30933 \* G-4-22s-24e \* DOR-4/6/11 \* 2RP-762

Cliff,

As discussed, and, based on analytical data provided, your proposal for remediation of a produced fluid release as 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.
- Notify OCD District 2 office in the event the proposed excavation depth/depths are not achieved.
- Submit a form C-141 Final Report and closure report upon satisfactory completion of project.
- Like approval by BLM or other regulatory authority as may be applicable.
- Project is to be completed and closure documentation submitted not later than September 14, 2011.

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 notification, 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](mailto:mike.bratcher@state.nm.us)

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

**Sent:** Wednesday, July 13, 2011 5:04 PM

**To:** Bratcher, Mike, EMNRD

**Cc:** Kelton Beaird; Rick Kerby; Ken Swinney; Jennifer Gilkey

**Subject:** Oxy-Jones Canyon 4 Fed. #5

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 at SP-1 to a depth of 2 feet and in the areas of SP-2, SP-3, SP-4, SP-5, SP-6, and SP-7 soil will be excavated to a one foot depth or as practicable.

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  
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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*[attachment "Oxy-Jones Canyon 4 Fed #5.pdf" deleted by Terry G

Gregston/CFO/NM/BLM/DOI]