

Bratcher, Mike, EMNRD

From: tgregsto@blm.gov
Sent: Tuesday, January 25, 2011 12:00 PM
To: Cliff P. Brunson
Cc: Jennifer Gilkey; Kelton Beard; Ken Swinney; Bratcher, Mike, EMNRD; Terry Gregston
Subject: Re: FW: Oxy MidCon-North Indian Basin Unit #15

Indian Basin Unit 15 Work Plan:

Your work plan is approved with the following stipulations:

1. Notify Terry Gregston, (575) 361-2635, when you move equipment onto the location to begin cleanup operations.
2. Notify Terry Gregston in the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts. An onsite may be required to assess the situation.
3. The BLM will wish to inspect the excavation once it reaches cleanup depth. Confirmation samples of the bottom and sidewalls will be required; the BLM will witness the sampling. Confirmation samples will also be required of the surface under the spoil pile; if found to be salt affected from leachate from the spoil pile or initial spill, this area will also be excavated down to clean soils. Contact Terry Gregston to schedule.
4. Once samples are cleared through a third party lab, the excavation can be backfilled with clean soil. Lab analysis must be forwarded to Terry Gregston at terry_gregston@nm.blm.gov for final approval before backfilling.
5. Once the excavation is backfilled with clean soil, install erosion control berms to prevent the unconsolidated soils from washing or blowing away. Seed with a combination BLM seed mix #3 and #4 (50/50 mix).
6. Notify the BLM when the site work is finished for final sign off on spill cleanup.
7. Continue to monitor spill reclamation area to ensure impacted pasture areas revegetate and that erosion issues do not develop.

BLM approval of this proposal 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 that location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until contaminant issues 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.

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

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

To "Terry Gregston" <terry_gregston@nm.blm.gov>

cc "Kelton Beard" <Kelton_Beard@oxy.com>, "Mike Bratcher"

<Mike.Bratcher@state.nm.us>, "Ken Swinney" <kswinney@bbcinternational.com>.

01/18/2011 12:42 PM

Terry,

Please see the e-mails below concerning the Oxy North Indian Basin Unit #15 remediation. As can be seen, Oxy has proposed a remediation plan to the NMOCD and Mike Bratcher of the NMOCD has approved the plan. Oxy is requesting the BLM's approval as well. If you would please review the material and get back to us via reply all e-mail with the BLM's approval or any questions, it would be greatly appreciated. I have also attached the data and site diagram for your review.

Thank you in advance for your time on this matter.

Regards,

Cliff Brunson

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Friday, January 14, 2011 4:22 PM
To: Cliff P. Brunson
Cc: Kelton Beaird; Ken Swinney; Jennifer Gilkey
Subject: RE: Oxy MidCon-North Indian Basin Unit #15

Reference: OXY (OGRID# 16696) North Indian Basin Ut 015 * 30-015-28305 * F-2-21s-23e * Eddy County, New Mexico

Cliff and Kelton,

The proposal for remediation of the produced fluids release that occurred on 7/20/2010, at or near the above referenced well site, is approved with the following conditions and/or stipulations:

- Notify the OCD District 2 Office 48 hours prior to commencement of remedial activities.
- In the event additional sampling is required, notify OCD 48 hours prior to obtaining samples.
- Submit a Form C-141 marked Final Report along with a closure report upon satisfactory completion of project.
- Project to completed and documentation filed with OCD not later than 3/14/2011.
- Like approval by BLM as may be applicable.

Be advised that 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 and or concerns, please contact me.

MIKE BRATCHER

NMOCD District 2
1301 W. Grand Ave.
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: Wednesday, January 12, 2011 3:32 PM
To: Bratcher, Mike, EMNRD
Cc: Kelton Beard; Ken Swinney; Jennifer Gilkey
Subject: Oxy MidCon-North Indian Basin Unit #15

Mike,

This e-mail is to confirm our discussion yesterday, Jan. 11, 2010, concerning the remediation plan for the Oxy North Indian Basin Unit #15 release. I have attached the information that we reviewed together.

As you recall, Oxy proposed to backfill the open excavation trench with the spoils pile and then at the north end of the release in the area of sample points SP5, SP6, and SP7, a one foot excavation would be performed. The excavated soil will be disposed of at an OCD-approved facility and the site will be backfilled with clean soil.

Please respond back via e-mail with your concurrence and approval.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
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[attachment "North Indian Basin Unit #15-2.pdf" deleted by Terry G Gregston/CFO/NM/BLM/DOI]