

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, October 26, 2017 9:14 AM
To: Lucas Middleton
Cc: Weaver, Crystal, EMNRD; Blaney, Karolina; Tucker, Shelly
Subject: RE: Work Plan for Brushy Creek Gathering

RE: WPX * Brushy Creek Gathering Station, aka Brushy Draw Booster Station, aka UCBH WW Fed 1 (30-015-24451) **2RP-2742** (DOR:1/7/15) * **2RP-2796** (DOR:1/22/15) * **2RP-3195** (DOR:8/10/15) * **2RP-3811** (DOR:7/13/16)

Greetings,

The proposal submitted by SMA, on behalf of WPX, is **not** approved as submitted. Part 2.O of the submittal indicates a site ranking of 10, based on depth to ground water being less than 100' bgs. The chart lists "Total Site Ranking" as zero. For clarification, site ranking is 10. Part 4.O of the submittal indicates "composite" samples will be obtained for delineation. Composite samples will not be allowed for delineation of this site. Part 4.O also requests deferral of the entire location. Deferral will not be considered until the site has been adequately, and completely delineated. Figure 2, location map, shows a yellow outline of the affected area. The outline does not include the southeast corner of the site and a portion of the road that appears to exhibit chloride impact. More than one delineation point will be required at this site, and is to include the area just mentioned. Please resubmit a proposal that shows how SMA will adequately delineate the site. Final disposition may then be considered based on analytical data. **Please submit this proposal not later than 11/9/2017.**

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

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail 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.

From: Lucas Middleton [mailto:lucas.middleton@soudermiller.com]
Sent: Tuesday, October 17, 2017 12:02 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Blaney, Karolina <Karolina.Blaney@wpxenergy.com>
Subject: Work Plan for Brushy Creek Gathering

I have attached a work plan for approval on a WPX location named the Brushy Creek Gathering Station BATTERY, 30-015-24451,(2RP-3811, 2RP-2742, 2RP-2796,2RP-3195)

Call or Email with any question or comments.

Thank you and have a good day

Lucas Middleton
Staff Scientist
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