Bratcher, Mike, EMNRD

From: Cliff Brunson <cbrunson@bbcinternational.com>

Sent: Friday, April 13, 2018 8:40 AM

To: 'Shelly Tucker'; Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD

Cc: 'Macurdy, David William'; 'Barnhill, Amy D.'; 'Ken Swinney'; 'Jennifer Gilkey'; 'Kathy Purvis'

Subject: RE: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud

Shelly, Mike, and Crystal,

I have been asked by Chevron to summarize our discussion yesterday concerning the status of this spill remediation. I talked to both Mike and Shelly yesterday by phone about the past, current, and future activities at this location. This is a six well pad and has had continuous operations on it since the spill of April 2017 due to unplanned delays in development activities of two wells associated with offset well fracing interference risks. As was discussed, the schedule for activities on this location is non-stop for the rest of this year with fracing, completion, testing, and putting on production operations. Per our discussion, Chevron is requesting an extension to conduct the remediation of the 2017 spill to no later than May 2019. This is due to the operational schedule does not have an appropriate window of time to conduct the remediation without any equipment or operations blocking the area of impact. Attempting to conduct simultaneous operations would operationally be impossible due to equipment located on the spill area and even if the equipment was not required to be positioned in this area there would be a significant safety risk conducting remediation with other operations ongoing.

Chevron will remediate this spill sooner if a window opens in the schedule. The remediation plan as submitted on March 22, 2018 is not yet approved, however Chevron will conduct confirmation bottom and sidewall sampling of the spill area to verify regulatory limits are achieved in the event site conditions alter from what the laboratory data confirms the conditions are presently.

It would be greatly appreciated if an approval of the proposed plan be issued and a confirmation email agreeing to this extension.

Thank you very much for your time and consideration regarding this matter.

Sincerely,

Cliff

Cliff P. 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: Barnhill, Amy D.

> Sent: Thursday, March 22, 2018 3:00 PM

> To: Weaver, Crystal, EMNRD

> <Crystal.Weaver@state.nm.us<mailto:Crystal.Weaver@state.nm.us>>;

> Tucker, Shelly <stucker@blm.gov<mailto:stucker@blm.gov>>

> Cc: Bratcher, Mike, EMNRD

> <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>;

> Barnhill, Amy D. <ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>>

> Subject: RE: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud

- > Crystal and Shelly,
- > Completions currently has coiled tubing on location rigging up for drill out activities. This activity will take approximately 10 days; being completed around April 1st. After April 1st a remediation crew should be able to start clean-up activities.

> In response to the concern raised in the email below regarding the liner; to my knowledge, no one documents or records the exact location of each tear, rip or separation in the liner during routine drilling operations. If major or several significant tears are discovered, the vinyl liner is quickly repaired.

- > E-tech sampled an area covering 19,202 square feet and results showed hydrocarbon signatures present. I believe full delineation of the spill area will be completed. A site map and corrective action plan are attached, please forward your approval at your earliest convenience.
- > As soon as the clean-up activity is complete, we will submit a closure report. Please let me know if you have other questions or concerns.
- > Thank you,
- > Amy Barnhill, BSEM
- > HES Environmental Specialist
- > MCBU
- > Office: 432-687-7108 > Cell: 432-940-8524
- > E-Mail: ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>
- > #OurEnvironmentMatters
- > From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
- > Sent: Wednesday, March 21, 2018 2:12 PM
- > To: Tucker, Shelly <stucker@blm.gov<mailto:stucker@blm.gov>>;
- > Barnhill, Amy D. <ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>>
- > Cc: DeLeon, Josepha < JDXD@chevron.com < mailto: JDXD@chevron.com >>;
- > Bratcher, Mike, EMNRD

```
> <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>; Meaux,
> Luke < LukeMeaux@chevron.com < mailto: LukeMeaux@chevron.com >>; Leonard,
> Nicklois L
> < Nicklois.Leonard@chevron.com < mailto: Nicklois.Leonard@chevron.com >>;
> Debeyssey, Svetlana
> <LDebeyssey@chevron.com<mailto:LDebeyssey@chevron.com>>
> Subject: [**EXTERNAL**] RE: Re: Re: Re: Spill - Hayhurst SO 10 P3 24H
> - Oil Based Mud
> RE: Chevron * Hayhurst SO 10 P3 24H * 30-015-43926 * 2RP-4200
> Hello all,
> I appreciate Shelly asking for an update and I appreciate you all making efforts on meeting her request. However, for
how old this release is we really need to see some data and hopefully a closure report on this one. It was stated that the
majority of this one stayed within a lined area. We need to see statements that "the liner has been thoroughly inspected
and that Chevron attests to the full integrity of the liner area." If any holes or rips are found in the lined area a full report
needs to be provided along with a site map with locations of holes/rips marked on the map because a full delineation
will be required for all areas where the liner is compromised.
> This release occurred almost 1 year ago back on 4/17/17. Please provide all or most of what has been asked for above
by no later than 3/30/18.
> Thank you,
>
> Crystal Weaver
> Environmental Specialist
> OCD - Artesia District II
> 811 S. 1st Street
> Artesia, NM 88210
> Office: 575-748-1283 ext. 101
> Cell: 575-840-5963
> Fax: 575-748-9720
>
>
> From: Tucker, Shelly [mailto:stucker@blm.gov]
> Sent: Tuesday, March 20, 2018 7:15 AM
> To: Barnhill, Amy D.
> < ABarnhill@chevron.com < mailto: ABarnhill@chevron.com >>
> Cc: DeLeon, Josepha <JDXD@chevron.com<mailto:JDXD@chevron.com>>;
> Weaver, Crystal, EMNRD
> < Crystal. Weaver@state.nm.us < mailto: Crystal. Weaver@state.nm.us >>;
> Bratcher, Mike, EMNRD
> <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>; Meaux,
> Luke <LukeMeaux@chevron.com<mailto:LukeMeaux@chevron.com>>; Leonard,
> Nicklois L
> < Nicklois.Leonard@chevron.com < mailto: Nicklois.Leonard@chevron.com >>;
> Debeyssey, Svetlana
> <LDebeyssey@chevron.com<mailto:LDebeyssey@chevron.com>>
> Subject: Re: Re: Re: Re: Spill - Hayhurst SO 10 P3 24H - Oil Based Mud
```

```
> Thank you very much. I will look for your email.
> If you have any questions or concerns, please do not hesitate to contact me.
> Sincerely,
> Shelly J Tucker
> Environmental Protection Specialist
> O&G Spill/Release Coordinator
> Bureau of Land Management
> 620 E. Greene St
> Carlsbad, NM 88220
> 575.234.5905 - Direct
> 575.361.0084 - Cellular
> 575.234.6235 - Emergency Spill Number
> stucker@blm.gov<mailto:stucker@blm.gov>
>
> The BLM acceptance/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 groundwater, surface water, human
health or the environment or if the location fails to reclaim properly. In such an event that the location does not
revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until
the 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.
> 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.
>
> On Mon, Mar 19, 2018 at 11:10 AM, Barnhill, Amy D. <ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>>
wrote:
> Hello Ms Tucker,
> My names is Amy and I will be your point of contact for this spill going forward. I have reached out to the company
we are working with to get a status update. I will let you know as soon as I receive an answer from them. Please do not
hesitate to contact me should you need anything.
> Thank you,
> Amy Barnhill, BSEM
> HES Environmental Specialist
> MCBU
> Office: 432-687-7108
> Cell: 432-940-8524
> E-Mail: ABarnhill@chevron.com<mailto:ABarnhill@chevron.com>
```

> #OurEnvironmentMatters

```
> From: Tucker, Shelly [mailto:stucker@blm.gov<mailto:stucker@blm.gov>]
> Sent: Thursday, March 15, 2018 5:13 PM
> To: Debeyssey, Svetlana
> <LDebeyssey@chevron.com<mailto:LDebeyssey@chevron.com>>
> Cc: DeLeon, Josepha < JDXD@chevron.com < mailto: JDXD@chevron.com >>;
> Weaver, Crystal, EMNRD
> < Crystal. Weaver@state.nm.us < mailto: Crystal. Weaver@state.nm.us >>;
> Bratcher, Mike, EMNRD
> <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>; Meaux,
> Luke < LukeMeaux@chevron.com < mailto: LukeMeaux@chevron.com >>; Leonard,
> Nicklois L
> < Nicklois.Leonard@chevron.com < mailto: Nicklois.Leonard@chevron.com >>
> Subject: [**EXTERNAL**] Re: Re: Re: Spill - Hayhurst SO 10 P3 24H -
> Oil Based Mud
> Was checking on the status of this release.
> If you have any questions or concerns, please do not hesitate to contact me.
```

- > Sincerely,
- > Sincerely
- > Shelly J Tucker
- > Environmental Protection Specialist
- > O&G Spill/Release Coordinator