

Hamlet, Robert, EMNRD

From: Cliff Brunson <cbrunson@bbcinternational.com>
Sent: Friday, June 28, 2019 5:09 PM
To: Hamlet, Robert, EMNRD
Cc: Venegas, Victoria, EMNRD; 'Wade Dittrich'; 'Ken Swinney'; 'Jennifer Gilkey'; 'Kathy Purvis'; Bratcher, Mike, EMNRD
Subject: RE: [EXT] OXY Cedar Canyon 15 1 WTF South - Delineation Workplan (Denied - Please recomplete the workplan to meet <50 feet limit requirements) (2RP-5037) (8-15-2018)
Attachments: Delineation Workplan, Cedar Canyon 15 1 WTF South (8-15-18).pdf

Rob,

Please find the attached amended Workplan to reflect deeper excavation due to the site lying within a 100-year floodplain. We increased one area to a foot and the other area to 4 feet. Oxy looks forward to receiving the OCD's approval of this amended plan.

Thanks, 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: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Monday, March 4, 2019 2:07 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>
Cc: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; 'Wade Dittrich' <Wade_Dittrich@oxy.com>; 'Ken Swinney' <kswinney@bbcinternational.com>; 'Jennifer Gilkey' <jgilkey@bbcinternational.com>; 'Kathy Purvis' <kathy@bbcinternational.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: RE: [EXT] OXY Cedar Canyon 15 1 WTF South - Delineation Workplan (Denied - Please recomplete the workplan to meet <50 feet limit requirements) (2RP-5037) (8-15-2018)

Cliff,

OCD currently considers the well to lie within a 100-year floodplain for rule compliance purposes. Please correct the workplan/remediation proposal to conform to the <50 feet limit requirements. Below is the relevant portion of the spill rule (Part 29): 19.15.29.12 C.(4)

(4) If a release occurs within the following areas, the responsible party must treat the release as if it occurred less than 50 feet to ground water in Table I of 19.15.29.12 NMAC:

(a) within (i) 300 feet of any continuously flowing watercourse or any other significant watercourse, or (ii) 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark); 19.15.29 NMAC 5

(b) within 300 feet from an occupied permanent residence, school, hospital, institution or church;

(c) within (i) 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or (ii) 1000 feet of any fresh water well or spring;

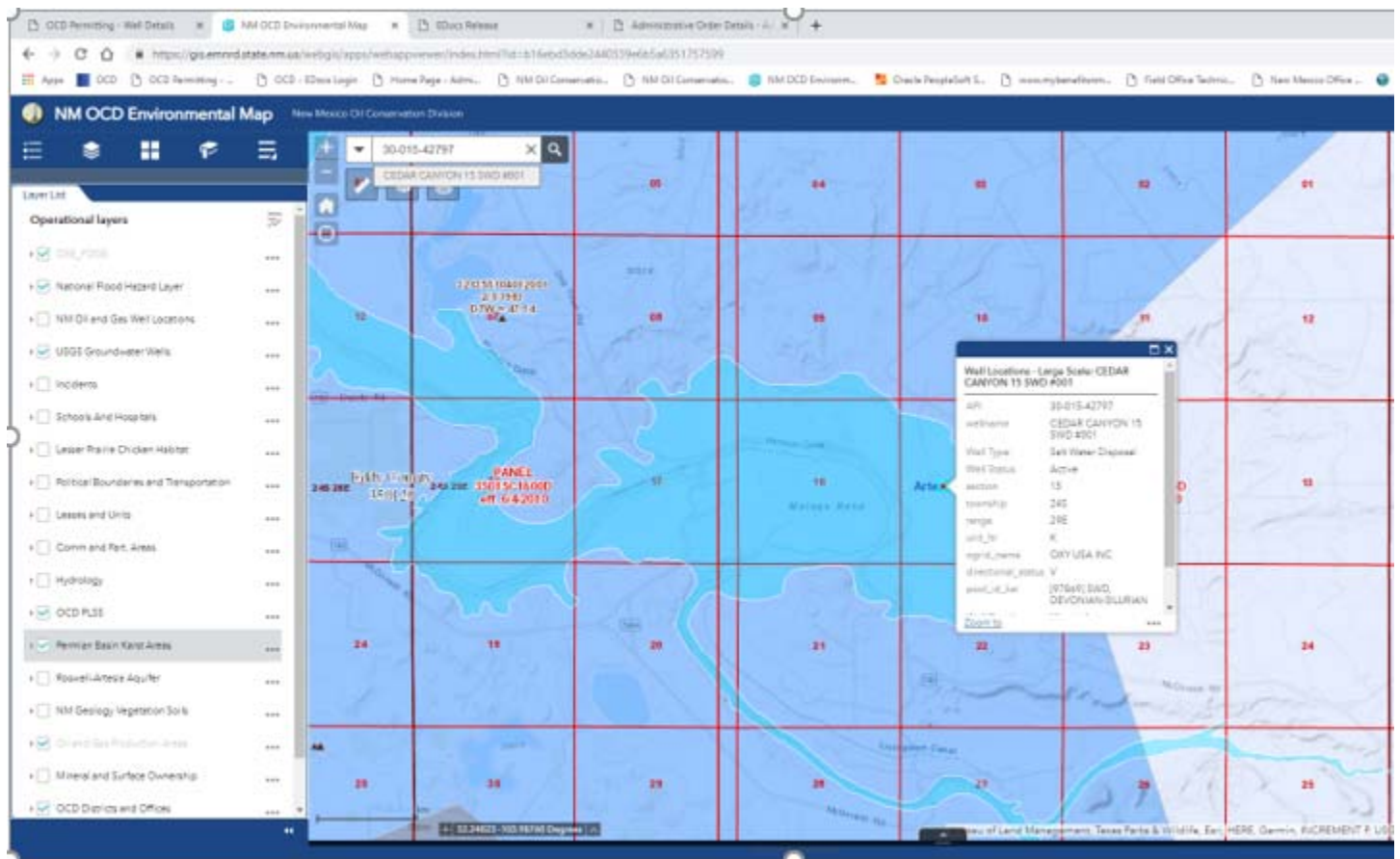
(d) within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended, unless the municipality specifically approves;

(e) within 300 feet of a wetland;

(f) within the area overlying a subsurface mine;

(g) within an unstable area; or

(h) within a 100-year floodplain



Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210

(575) 840-5963
Robert.Hamlet@state.nm.us

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 groundwater, 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, or local laws and/or regulations.

From: Cliff Brunson <cbrunson@bbcinternational.com>
Sent: Thursday, February 21, 2019 2:22 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; 'Wade Dittrich' <Wade_Dittrich@oxy.com>; 'Ken Swinney' <kswinney@bbcinternational.com>; 'Jennifer Gilkey' <jgilkey@bbcinternational.com>; 'Kathy Purvis' <kathy@bbcinternational.com>
Subject: [EXT] OXY Cedar Canyon 15 1 WTF South (2RP-5037) - Delineation Workplan

All,

Please find the attached Delineation Workplan and remediation proposal for the Oxy Cedar Canyon 15 1 WTF (South) (2RP-5037). OXY is requesting that you review this plan and is looking forward to the OCD's approval.

If you have any questions, please let me know.

Thanks, 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.
