

Bratcher, Mike, EMNRD

From: Christopher_Jones@oxy.com
Sent: Wednesday, September 11, 2013 11:58 AM
To: Bratcher, Mike, EMNRD
Subject: RE: Oxy-Winston #6-Remediation Plan

That sounds good Mike, I appreciate you working with me in trying to get these older spills closed out. I will forward this to Cliff and get on it shortly.

Chris Jones
HES Specialist
Permian Primary Production
Carlsbad, NM
Cell 575-499-3337
Off 575-628-4121

"We do not inherit the earth from
our ancestors; we borrow it from
our children." Chief Seattle

-----Original Message-----

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, September 11, 2013 11:53 AM
To: Jones, Christopher K; Jim Amos (jamos@blm.gov)
Subject: RE: Oxy-Winston #6-Remediation Plan

Chris,

The groundwater trend map shows this site to be in an area with groundwater less than 25' bgs. OSE database shows a data point in section 29 to be 20' to water. The work plan was submitted listing water depth at less than 50', giving the site a ranking of 20. RRAL for TPH is 100 mg/kg at that ranking. Allowing for inconsistencies in both the map and the OSE site, and probably elevation differences, we should assume water is going to at least be less than 100', which puts TPH RRAL at 1000 mg/kg. SP1 comes in at 8960 mg/kg, which is too high even for a site ranking of 0. SP7 shows TPH at 2430 mg/kg. The sampling event was 10 months ago, but showed levels to clean up at 2' for both sample points. Jim has pointed out concerns with elevated chloride levels, and suggested a method to try instead of the proposed soil removal across the entire spill path. I am OK with this revised proposal except in the area of SP1 and SP7. OCD will require following closely, the original proposal of removal of impacted material to 1 1/2' in the area of SP1, and in the area of SP7, soil removal to a minimum of 1'.

If you have any questions or concerns, let me know.

Mike Bratcher
NMOCD District 2
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-----Original Message-----

From: Christopher_Jones@oxy.com [mailto:Christopher_Jones@oxy.com]
Sent: Tuesday, September 10, 2013 4:33 PM
To: Bratcher, Mike, EMNRD
Subject: Fwd: Oxy-Winston #6-Remediation Plan

Mike I would like to do the following to the Winston 6 instead of what was previously agreed on if it is fine with you.

Chris Jones
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Begin forwarded message:

From: "Amos, James" <jamos@blm.gov<mailto:jamos@blm.gov>>
Date: September 10, 2013, 4:24:03 PM MDT
To: "Jones, Christopher K" <Christopher_Jones@oxy.com<mailto:Christopher_Jones@oxy.com>>
Subject: Re: FW: Oxy-Winston #6-Remediation Plan

Chris,

Looking at the analyticals, I'm seeing the high TPH and some significant chlorides in the upper one foot. I went to the spill location and followed the spill path. I'm seeing the oil residue, which is still present (has degraded somewhat). The big impacts are from the salts (dead grasses and shrubs). There is some vegetation (minimal) present. My recommendation is as follows: Utilize a backhoe or trackhoe and break up the soils through the top one foot (where you can). Spread a high nitrogen fertilizer throughout the impacted area, seed with BLM #4 (salt tolerant). Monitor for 1-2 years. If the salts are not an issue we'll get some good revegetation. If the salts are a problem and nothing grows, we'll have to excavate the material and replace. Let me know if this will work for you.

Thanks,

On Mon, Sep 9, 2013 at 3:17 PM, <Christopher_Jones@oxy.com<mailto:Christopher_Jones@oxy.com>> wrote:
Jim, I went out to this site today, the growth in the area of the spill is full of trees and shrubs, etc. I know that we have an approved work plan but with recent conversations about how you have approached spills in the pasture I thought I would look at a couple of sites we have. With the amount of growth and greenery that is in the area I am asking for closure of this spill, due to the fact that there seems to be no adverse affect from the spill. Please go and look at this location to see what I am talking about. I would hate to tear up all of the growth to get up what used to be contaminated area. Please get back to me at your convenience so that I can move on cleaning it up or sending in a closure report.

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From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com<mailto:cbrunson@bbcinternational.com>]
Sent: Friday, April 05, 2013 11:07 AM
To: James Amos
Cc: Jones, Christopher K; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: FW: Oxy-Winston #6-Remediation Plan

Jim,

I sent this plan for approval to Terry back on January 23 right after our meeting and before she left for her new post and I never received anything back. Would you please review and approve or address any questions you may have.

I greatly appreciate it.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
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From: Cliff Brunson <cbrunson@bbcinternational.com<mailto:cbrunson@bbcinternational.com>>
Date: Wednesday, January 23, 2013 6:40 PM
To: Terry Gregston <tgregsto@blm.gov<mailto:tgregsto@blm.gov>>
Cc: James Amos <jamos@blm.gov<mailto:jamos@blm.gov>>, Chris Jones
<Christopher_Jones@oxy.com<mailto:Christopher_Jones@oxy.com>>, Ken Swinney
<kswinney@bbcinternational.com<mailto:kswinney@bbcinternational.com>>, Jennifer Gilkey
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<kathy@bbcinternational.com<mailto:kathy@bbcinternational.com>>

Subject: Oxy-Winston #6-Remediation Plan

Terry,

I have attached a remediation packet of information for your review. This is the same information that was presented in our meeting on January 22, 2013. The packet includes a site diagram with sample points,, a lab data summary table, and the original lab data. As we discussed, Oxy will excavate the impacted soil to a depth of 1.5 feet across the entire leak area as depicted on the diagram. The excavation will then backfilled with appropriate clean soil. Any pasture areas affected and/or disturbed will be re-seeded with the appropriate BLM seed mixture as well.

Oxy is therefore requesting the approval of the BLM to proceed with the submitted remediation plan. If you would please respond back via e-mail with your approval, it would be greatly appreciated. If you have any questions, please let us know.

Thank you,

Cliff

Cliff P. Brunson, CEI, CRS

President

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James A. Amos

Bureau of Land Management

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