

Bratcher, Mike, EMNRD

From: jamos@blm.gov
Sent: Tuesday, January 25, 2011 10:47 AM
To: Kelton_Beaird@oxy.com; dusty_wilson@oxy.com; tgregsto@blm.gov; tbadbear@blm.gov
Cc: Bratcher, Mike, EMNRD; Leking, Geoffrey R, EMNRD
Subject: Re: FW: Oxy MidCon-North Indian Basin Unit #15

Quick response to spills and the remediation and restoration of spills are at the top of BLM priorities. Quick response to stop the release, contain, and remove the pollutants is a must. I believe we're all on the same page, and we do a good job of stopping and containing. We're quick to make repairs and return the wells to production. This seems to be the end of quick. The above release was discovered 7/20/10. As per records supplied, the site was sampled 12/23/10, with analysis delivered to Cardinal Laboratories on 12/30/10, and results sent to BBC on 1/5/11. A plan, based on a discussion with OCD on 1/11/11 was submitted for approval to the OCD on 1/12/11. Mike approved the plan 1/14/11. On 1/18/11, the plan was submitted to the BLM for authorization. The urgency to get this started this week is diminished in that the spill is 189 days old.

The 43 CFR 3162.5-1(c), states, "The operator shall exercise due diligence in taking necessary measures, subject to approval by the authorized officer, to control and remove pollutants...." Environmental protection, including the remediation and restoration of the spill area is to receive the same quick response as the repairing of the line and the return to production. Oxy has several spills and/or compliance events that exceed the referenced spill. We somehow need to get past issues and get on with what's best for the environment. As you are aware, any activity on BLM managed lands and/or mineral estate, where the federal minerals created the event, the BLM will have to approve any surface disturbing activities. The OCD is the primary authorization to provide groundwater protection, and very seldom will the BLM be more stringent (but it could happen under certain circumstances). The BLM will be the primary authorization for surface restoration on BLM lands. We have made the reporting process as easy as possible in that we accept one report (C-141). The process can be quickened by CC'ing the BLM when requesting authorization from the OCD. At no time do I want to hear that the BLM is holding up work when we're at day 189. If the request for authorization is delayed for more than a week, please get with me and I'll get with either, Terry or Trishia, and if I can't get with them I will make a call and get you something out. We will not delay the process without good cause.

Terry will get the authorization out ASAP.

If you have any questions, feel free to get back to me.

thanks,

J. Amos