

## Bratcher, Mike, EMNRD

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**From:** jamos@blm.gov  
**Sent:** Wednesday, January 26, 2011 7:28 AM  
**To:** Kelton\_Beaird@oxy.com  
**Cc:** Dusty\_Wilson@oxy.com; Leking, Geoffrey R, EMNRD; Bratcher, Mike, EMNRD; tbadbear@blm.gov; tgregsto@blm.gov  
**Subject:** RE: FW: Oxy MidCon-North Indian Basin Unit #15

Kelton,

I've seen Terry's inspection notes referencing the early analyticals. My referencing the 12/23/10 sampling was just the latest process running through the system for authorizations. The bottom line is still the 189 and counting days to remediate a 9 bbls spill. We're fighting battles every day trying to find drilling locations that meet the needs of industry, in an effort to meet the needs of the public. We're building larger locations that have tremendous impacts to the environment. All the easy location have already been drilled. We're developing in our more sensitive areas now. We can't leave these open trenches and associated contaminants out on the environment for these timeframes. The environmental groups will have a field day. Quick response to spills and remediation is a must in the current environment. The North Indian Basin Unit #15, is @ 189 days. The Federal 27 Battery release occurred 12/13/09, Tetra Tech will be starting soon. The Federal 26 poly flowline release was identified 3/16/10, I still have not seen the results of sampling or a plan for the remediation and restoration. I've got Written Orders out on a couple of pit reclamations that are this old. The Gulf spill and MMS policies and practices resulted in that organization disappearing, and a complete new agency taking over. I can't believe they will be friendly. Our office has already had 2 or more reviews, our PETs have already had to recertify on BOP enforcement. We have had technical reviews of our compliance process. We're currently in the process of getting away from sending the nonformal (E-mail, letter correspondence), and will be going back to the formal Notice of Written Orders and Noncompliance due to the events in the Gulf. The BLM is feeling the heat, industry will. Bigger issues facing us include the LPC and SDL habitats and the listing of these species. The two locations I referenced on C-29 fall into this habitat. We have to have action. I will be having my two wildlife biologist concentrating on these two critical areas. I could go on, but the bottom line is we need to be addressing these events timely and get good closures in a timely manner. We have no choice and industry has no choice. If questions get back to me. Kelton don't take this wrong. This is the same message we're giving our employees, etc. Our big push will be in trying to get the companies to be very proactive in prevention of releases. EPA will be making an appearance in the very near future, and will be spending a bit of time in the area, looking at SPCC plans etc.

Change is coming. We want to be ahead of the game. thanks