

From: [Bratcher, Mike, EMNRD](#)
To: [Gonzales, EL](#); [Michael Burton](#); [Lance Crenshaw](#); [Tucker, Shelly](#); djglass@blm.gov
Cc: [Patterson, Heather, EMNRD](#); [Jones, Kellie, EMNRD](#); [Keyes, Jamie, EMNRD](#); [Billings, Bradford, EMNRD](#); [Oberding, Tomas, EMNRD](#)
Subject: RE: Skelly Unit 255 - work plan
Date: Thursday, February 04, 2016 1:23:45 PM

EL,

OCD has no record of having received a C-141 for a release associated with Skelly Unit 255 (30-015-29238). It is noted that the C-141 provided in Diversified's remediation proposal indicates the release was "water/oil" and then gives volumes of "1 bbl/3 bbls". The C-141 indicates no fluid was recovered. The Diversified remediation proposal indicates that all fluid was recovered. Based on photos provided and extent of contamination, OCD does not agree with the reported release volumes, and believes the release was much greater than the indicated 4 bbls. For data entry purposes, OCD will accept for record, the C-141 provided in the Diversified proposal. At this time, OCD will concur with BLM approval to defer remediation to time of closure of the facility. Notations indicating deferral will be made in OCD database, which will reflect in OCD Online database.

OCD also requests Diversified provide OCD with a copy of the "ConocoPhillips" ground water map that they have referenced in several remediation proposals lately. OCD would also request that Linn Energy make an effort to correct inconsistencies in release/remedial activities prior to submitting documents and proposals to OCD. Please reference OCD assigned RP number for all future submittals relevant to remedial activities. These assigned numbers are available on OCD website, or can be provided by District Environmental staff.

Thank you,

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Mike Bratcher
NMOCD District 2
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From: Tucker, Shelly [mailto:stucker@blm.gov]
Sent: Tuesday, February 02, 2016 10:04 AM
To: Gonzales, EL; Michael Burton; Lance Crenshaw
Cc: Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD
Subject: Skelly Unit 255 - work plan

BLM accepts/approves your work plan with the stipulation the remaining impact

will have to be addressed upon closure of facility. Please ensure like concurrence with the NMOCD.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
Bureau of Land Management

620 E. Greene St
Carlsbad, NM 88220

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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.

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