

From: Tucker, Shelly
To: [Cliff Brunson](#)
Cc: [Yu, Olivia, EMNRD](#); [Kathy Purvis](#); [Wade Dittrich](#); [Jennifer_Smith@oxy.com](#); [Ken Swinney](#); [Jennifer Gilkey](#)
Subject: Re: OXY MLMU Satellite #4 (1RP-4752) - Delineation Workplan
Date: Tuesday, December 26, 2017 4:03:46 PM

BLM concurs with NMOCD stipulations and approval.

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

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

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.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Wed, Oct 4, 2017 at 9:43 AM, Kathy Purvis <kathy@bbcinternational.com> wrote:

Here you go Shelly...Let me know if you need anything else.

Kathy Purvis

BBC International, Inc.

1324 W. Marland Blvd.

Hobbs, NM 88240

Business: (575) 397-6388

Cell: (575) 441-8619

kathy@bbcinternational.com

From: Tucker, Shelly [mailto:stucker@blm.gov]

Sent: Tuesday, October 3, 2017 4:29 PM

To: Cliff Brunson <cbrunson@bbcinternational.com>

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Wade Dittrich <Wade_Dittrich@oxy.com>; Jennifer_Smith@oxy.com; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Katherine Purvis <kathy@bbcinternational.com>

Subject: Re: OXY MLMU Satellite #4 (IRP-4752) - Delineation Workplan

Cliff...this was forwarded to me...could you shoot me a copy of your plan when you have a moment for my records? Thanks!

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

Sincerely,

Shelly J Tucker

Environmental Protection Specialist

O&G Spill/Release Coordinator

Bureau of Land Management

620 E. Greene St

Carlsbad, NM 88220

575.234.5905 - Direct

575.361.0084 - Cellular

575.234.6235 - Emergency Spill Number

stucker@blm.gov

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.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Thu, Sep 28, 2017 at 11:27 AM, Price, Henryetta <hprice@blm.gov> wrote:

Forwarded to Shelly.

Thank you for the notification.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Thu, Sep 28, 2017 at 10:33 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Brunson:

Please be advised that the western portion of this release (SP3 and westward) crossed over onto BLM surface ownership. Also, note that there is a NMOSE well (CP00443) within 1700 m of the eastern portion of the release indicating that depth to groundwater is 90 ft. bgs. Therefore, the RRALs are modified to reflect this information.

Please address these concerns regarding the delineation workplan for 1RP-4752:

1. Data provided for SP1 does not indicate a proposed 1 ft. excavation is necessary. However, laboratory analyses of confirmation surface (0-6") edge samples of the area represented by SP1 (yellow) are required to complete horizontal delineation.
2. Chloride levels at 3 ft. bgs exceeds permissible 600 mg/kg for the area represented by SP2-6. Excavation to 4 ft. bgs is required along with a minimal 20 mil liner.
3. NMOCD will grant a proposed 3 ft. excavation without a liner for the eastern area represented by SP7 and SP8.
4. Bottom and sidewall confirmation samples are required for proposed excavated areas. Distance intervals among sample locations should be not greater than 50 ft. apart.
5. One edge sample must be at the border between SP1(yellow) and SP2-6 area (pink); and the border between SP6 and SP7 for the differing excavation depths.
6. Provide a scaled map with the confirmation bottom and sidewall sample locations marked, liner location outlined, and depth of excavated areas annotated.

Please confirm or inform if clarification is requested.

Thanks,

Olivia Yu

Environmental Specialist

NMOCD, District I

Olivia.yu@state.nm.us

575-393-6161 x113

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 ground water, 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, local laws and/or regulations.

From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Thursday, September 14, 2017 6:53 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Wade Dittrich <Wade_Dittrich@oxy.com>; Jennifer_Smith@oxy.com; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>
Subject: OXY MLMU Satellite #4 (1RP-4752) - Delineation Workplan

Olivia,

Please find the attached Delineation Workplan and remediation proposal for the OXY MLMU Satellite #4 (1RP-4752). 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.
