

**From:** Gregston, Terry G [tgregsto@blm.gov]  
**Sent:** Saturday, October 22, 2011 3:38 PM  
**To:** Cliff P. Brunson; James Amos; Terry Gregston  
**Cc:** Dusty Wilson; C J Summers; Bratcher, Mike, EMNRD  
**Subject:** McKittrick 11 Federal 5-work plan approval stipulations

Gentlemen,

The work plan for the McKittrick 11 Federal 5, 07/06/11 spill tracking number 11NU096TG, is approved with the following stipulations:

1. Notify Terry Gregston, (575) 361-2635, when you move equipment onto the location to begin cleanup operations.
2. Notify Terry Gregston in the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts. An onsite may be required to assess the situation.
3. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures. In the case of the McKittrick 11 Federal 5, 11NU096TG spill, the location is still a working tank battery location. As such, excavation depths in portions of the spill area in close proximity to standing production equipment may be limited due to safety concerns. In such cases, such limits to cleanup measures should be considered a temporary spill abatement measure that will be further mitigated upon the abandonment of the well/facility location. Appropriate notations to that effect will be entered in the well file.
4. The BLM will wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of sidewalls and any visibly affected areas outside of the excavation trench will be required; the BLM will witness the sampling. Contact Terry Gregston to schedule.
5. Lab analysis of the confirmation sampling must be forwarded to Terry Gregston at [terry\\_gregston@nm.blm.gov](mailto:terry_gregston@nm.blm.gov) for final approval before backfilling. Based on the sampling results, additional cleanup may be required or the site may be approved for closure.
6. Once final approval of cleanup is given, the excavation can be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
7. Pad areas should be resurfaced with 6" if clean caliche on top of the backfill material.
8. Notify the BLM when the site work is finished for final inspection.
9. Upon abandonment of the facility, any portions of the spill that were not fully mitigated (due to safety concerns created by proximity to standing equipment) will be fully mitigated.

BLM approval of this proposal 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 location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until 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.

**Terry Gregston**

Environmental Protection Specialist  
Bureau of Land Management  
620 E. Greene St.  
Carlsbad, NM 88220  
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**From:** Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]  
**Sent:** Thursday, October 13, 2011 12:30 PM  
**To:** James Amos; Terry Gregston  
**Cc:** Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** FW: Oxy-McKittrick 11-5

Jim/Terry,

On behalf of Oxy, BBC would like to present the following remediation plan for the Oxy McKittrick 11-5 site. Oxy is proposing to excavate and remove 6 inches to 1 foot of impacted soil in the spill area as depicted on the attached site diagram. Oxy has already received the approval from the NMOCD as can be seen below. I have attached the site diagram, lab summary tables, and the lab data sheets for your review.

Oxy is asking for an approval from the BLM for this remediation plan so Oxy can move forward in remediating this site. If you could please respond back with your approval, it would be greatly appreciated. If you have any questions, please let us know.

Thank you for your time.

Sincerely,

Cliff Brunson

Cliff Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
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P. O. Box 805  
Hobbs, NM 88241-0805 USA  
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1324 W. Marland St.  
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Phone: (575) 397-6388  
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**From:** Mike Bratcher <[Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us)>  
**Date:** Fri, 26 Aug 2011 22:01:46 +0000  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Cc:** Dusty Wilson <[Dusty\\_Wilson@oxy.com](mailto:Dusty_Wilson@oxy.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>  
**Subject:** RE: Oxy-McKittrick 11-5

Cliff,

As discussed, the remediation proposal submitted for cleanup of the above referenced produced fluid release is approved with the following conditions/stipulations:

- Notify OCD District 2 office 48 hours prior to commencement of remedial activities.
- Notify OCD District 2 office 48 hours prior to obtaining samples, where the analyses will be submitted to OCD.
- Submit a Form C-141 Final Report and closure report upon satisfactory completion of project.
- Project is to be completed and closure documentation submitted to OCD not later than October 26, 2011.
- Like approval by BLM or any other regulatory authority as may be applicable.

Be advised, OCD 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 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.

If you have any questions or concerns, and for notifications, please contact me.

***Mike Bratcher***

NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
575-748-1283 Ext. 108  
575-626-0857  
[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)

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**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]

**Sent:** Friday, August 26, 2011 9:13 AM

**To:** Bratcher, Mike, EMNRD

**Cc:** Dusty Wilson; Ken Swinney; Jennifer Gilkey

**Subject:** Oxy-McKittrick 11-5

Mike,

This e-mail is to confirm our conversation of August 25, 2011 concerning the remediation plan for the Oxy McKittrick 11-5. As discussed, Oxy will remove 6 inches to 1 foot of impacted soil in the spill area as depicted in the attached map. The site will then be backfilled with clean soil. I have attached the map and lab data that we discussed for your files.

If you would please reply back with your concurrence on this path forward, it would be greatly appreciated.

Thank you for your time.

Cliff

World-Wide Environmental Specialists

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