

Bratcher, Mike, EMNRD

From: Gregston, Terry G [tgregsto@blm.gov]
Sent: Saturday, October 22, 2011 4:19 PM
To: Cliff P. Brunson; James Amos; Terry Gregston; Stockton, Aaron J
Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis; Bratcher, Mike, EMNRD
Subject: Indian Basin Central Tank Battery-work plan question

Gentlemen and Ladies,

The Indian Basin Central Tank Battery and the location of this spill (and previous spills at this location) are in Critical Cave and Karst terrain. What measures does the operator propose to take to prevent downward migration of the hydrocarbons left in place at this location and to prevent long-term impacts to cave/karst resources and groundwater from spill leaching or migration?

Terry Gregston

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From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Thursday, October 20, 2011 3:58 PM
To: James Amos; Terry Gregston
Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: FW: Oxy-Indian Basin Central Tank Battery

Jim/Terry,

On behalf of Oxy, BBC would like to present the following remediation plan for the Oxy Indian Basin Central Tank Battery site. Oxy is proposing to excavate and remove 1 to 2 feet as practicable of impacted soil in the spill area (inside the containment wall/firewall) 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
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From: Mike Bratcher <Mike.Bratcher@state.nm.us>
Date: Tue, 11 Oct 2011 21:10:12 +0000
To: Cliff Brunson <cbrunson@bbcinternational.com>
Cc: Dusty Wilson <Dusty_Wilson@oxy.com>, C J Summers <Chancey_Summers@oxy.com>, Ken Swinney <kswinney@bbcinternational.com>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Kathy Purvis <kathy@bbcinternational.com>
Subject: RE: Oxy-Indian Basin Central Tank Battery

Reference: OXY USA * Indian Basin CTB (CTB-400) Old Ranch Knoll 8 #5 * 30-015-31326 * K-8-22s-24e * Eddy County, New Mexico
OCD Reference Number: 2RP-628 * DOR: 2/11/11

Cliff,

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

- Notify OCD District 2 office 48 hours prior to commencement of remedial activities.
- Notify OCD District 2 office 48 hours prior to obtaining any samples where the analyses will be submitted to OCD.
- Confirmation samples may be required, dependent on actual excavation depth achieved. OCD approval required prior to backfilling any excavated area.
- 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 December 11, 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 notification, please contact me.

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From: Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Friday, September 16, 2011 6:59 PM
To: Bratcher, Mike, EMNRD
Cc: Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Oxy-Indian Basin Central Tank Battery

Mike,

This e-mail is to confirm our discussion on September 13, 2011 concerning the remediation plan for the release that occurred at the Oxy Indian Basin Central Tank Battery. As agreed, Oxy will hand excavate 1 to 2 feet of the impacted soil in the spill area or as practicable. The excavation will then be backfilled with clean soil appropriate for the interior of a battery. In addition, natural attenuation will be occurring for the subsurface hydrocarbons that will be remaining after the excavation. The depth to groundwater in this area is approximately 100 feet.

I have attached the site drawing and laboratory data and a few pictures that we reviewed during our discussion for your files. If you would please reply back via e-mail with your concurrence of this remediation plan, it would be greatly appreciated.

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

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