

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, January 23, 2013 9:13 AM
To: 'Cliff P. Brunson'
Subject: RE: Oxy-Winston Gas Com Battery-Remediation Plan

Cliff,

This is the site that BLM wanted the battery removed. We had talked about you getting back with them on it. I don't think I can approve to just remove 2'. With ground water @ 50', the proposed removal leaves some pretty elevated lighter end hydrocarbons in place. Even with a cap, this stuff will still be mobile to some extent. The real problem areas are:

- SP-4 * At 3' BTEX is a little over 280, and TPH is 10,170
- SP-5 * At 3' BTEX isn't too bad (around 22) but TPH is 8310. At 4' TPH comes down some and BTEX goes up a little.
- SP-6 * At 1' BTEX was over 50 and TPH was over 12,000. SB-1 was right next to this sample point and it wasn't too bad, so I guess really, 4 & 5 are the worst, and those are probably the hardest areas to get to, especially 5. I think you had photos when we met.

Let me know if you have any more feedback from BLM, but with shallow ground water, there are some pretty high numbers being left in place. I need to go out in the field for a little bit this morning, but should be back in the office not long after lunch.

Thanks,

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

From: Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Monday, January 21, 2013 5:07 PM
To: Bratcher, Mike, EMNRD
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Oxy-Winston Gas Com Battery-Remediation Plan

Mike,

This e-mail is to confirm our discussion on December 17, 2012 and January 14, 2013 concerning the remediation plan for the release that occurred at the Oxy Winston Gas Com Battery. I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. As agreed, Oxy will excavate 2 feet across the entire battery area inside the berms. Then, a 1 foot compacted clay liner will be installed and then the excavation will be backfilled with clean soil. The depth to groundwater in this area is less than 50 feet.

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

Cliff P. Brunson, CEI, CRS
President
BBC International, Inc.
World-Wide Environmental Specialists
Mailing Address:
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Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, January 24, 2013 7:22 AM
To: 'Cliff P. Brunson'
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: RE: Oxy-Winston Gas Com Battery-Remediation Plan

Reference: OXY USA * Winston Gas Com 2 Battery * 30-015-28633 * B-31-21s-24e * Eddy County, New Mexico
NMOCD Tracking Number: 2RP-1281 * Date of release: 8/10/12

Cliff,

Your proposal for remediation of the above referenced release is approved. As we discussed, BLM approval has been obtained, so please proceed on your schedule.

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.

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

Mike Bratcher
NMOCD District 2
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Artesia, NM 88210
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C: 575-626-0857
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From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Wednesday, January 23, 2013 5:16 PM
To: Bratcher, Mike, EMNRD
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: FW: Oxy-Winston Gas Com Battery-Remediation Plan

Mike,

This message to add additional information that I left out of my e-mail below on Jan. 21, 2013. In addition to the activities described below, Oxy will dig as deep as possible allowed by hand digging in the areas of SP4 and SP5 as we previously discussed. These areas will be excavated first so these areas are exposed to the atmosphere the longest to allow for the BTEX components to degrade as much as possible prior to in the installation of the clay liner.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
President
BBC International, Inc.
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From: Cliff Brunson <cbrunson@bbcinternational.com>
Date: Monday, January 21, 2013 5:06 PM
To: Mike Bratcher <mike.bratcher@state.nm.us>
Cc: Chris Jones <Christopher_Jones@oxy.com>, Ken Swinney <kswinney@bbcinternational.com>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Kathy Purvis <kathy@bbcinternational.com>
Subject: Oxy-Winston Gas Com Battery-Remediation Plan

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Bratcher, Mike, EMNRD

From: Microsoft Outlook
To: Cliff P. Brunson; Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Sent: Thursday, January 24, 2013 7:22 AM
Subject: Relayed: RE: Oxy-Winston Gas Com Battery-Remediation Plan

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

[Cliff P. Brunson \(cbrunson@bbcinternational.com\)](mailto:cbrunson@bbcinternational.com)

[Chris Jones \(Christopher Jones@oxy.com\)](mailto:Christopher.Jones@oxy.com)

[Ken Swinney \(kswinney@bbcinternational.com\)](mailto:kswinney@bbcinternational.com)

[Jennifer Gilkey \(jgilkey@bbcinternational.com\)](mailto:jgilkey@bbcinternational.com)

[Kathy Purvis \(kathy@bbcinternational.com\)](mailto:kathy@bbcinternational.com)

Subject: RE: Oxy-Winston Gas Com Battery-Remediation Plan