

Bratcher, Mike, EMNRD

From: Terry_Gregston@blm.gov
Sent: Tuesday, May 12, 2009 4:47 PM
To: Isaac Kincaid
Cc: Bratcher, Mike, EMNRD; Susana Rodriguez; Sergio Contreras; terry_gregston@nm.blm.gov
Subject: Re: FW: Oxy

Please refer to notes added in bold in the following email.

Terry Gregston
Environmental Protection Specialist
Bureau of Land Management
620 E. Greene St.
Carlsbad, NM 88220
Office (575) 234-5958
Fax (575) 234-5927

"Isaac Kincaid" <ikincaid@sesi-nm.com>

To <mike.bratcher@state.nm.us>, <terry_gregston@nm.blm.gov>, "Sergio Contreras" <scontreras@sesi-nm.com>, "Susana Rodriguez" <office2@sesi-nm.com>

05/12/2009 07:22 AM

cc

Subject FW: Oxy

From: Isaac Kincaid [<mailto:ikincaid@sesi-nm.com>]
Sent: Thursday, May 07, 2009 5:26 PM
To: mike.bratcher@state.nm.us; 'terry_gregston@nm.blm.gov'; 'Kelton_Beaird@oxy.com'
Cc: Sergio Contreras (scontreras@sesi-nm.com); Susana Rodriguez (office2@sesi-nm.com)
Subject: Oxy

Dear Mr. Bratcher and Mrs. Gregston,

This letter is regarding the conversation that was taken place on May 7, 2009 at the Oxy Big Walt Battery, Oxy Shelby Federal #3, and Oxy McKittrick Central Tank Battery.

Oxy Big Walt Battery

In the conversation at the Battery site it was stated that the location looked okay and a mixture of the BLM #3 and BLM #4 seed will be applied and the site would be able to close once vegetation growth was stabilized. The application of the seed will be applied towards the end of June or beginning of July depending upon weather. Conformation samples of the area will be obtained and analyzed for TPH and BTEX. There will be no further action required.

PLEASE ADD: Erosion control measures will be implemented where the spill area has been trenched by washing and treatment applications. There will be no further action required once vegetation has been re-established. (TG)

(Seeding may help with re-establishment, but if re-establishment of vegetation is not achieved after seeding, there may be further actions required to adequately reclaim the location. TG)

Oxy Shelby Federal #3

The Shelby location was proposed to obtain samples from location area and will be analyzed for TPH and BTEX. The site will then be steam cleaned and another application of micro-blaze will be applied towards the end of June or beginning of July depending upon weather. Once, the micro-blaze has been applied let set for a couple of months and then come back for conformation sampling.

PLEASE ADD: It is recommended that water be applied after the Micro-blaze to keep the microbes active, especially if the current drought conditions continue. Once the soils are remediated, seeding of the location is also recommended. Final closure of the location is dependent upon re-establishment of vegetation. (TG)

Oxy McKittrick Central Tank Battery

The McKittrick Battery was proposed that the top 2' or easily removed area inside (east side) the tank battery will be excavated and hauled to an approved NMOCD facility. The area will then be backfilled with clean soil and the height of the berm wall will be elevated to an approved standard.

PLEASE ADD: Emergency secondary containment measures will be available on the location during all construction activities. (TG)

ADDITIONALLY: I discussed this location Jim Amos, BLM, because it is a large tank battery located in a critical cave/karst area with significant potential to affect groundwaters. This tank battery is unlined, which makes that potential greater. As part of the spill cleanup efforts, it would be in OXY's best interests to install some sort of liner in this tank battery. Likewise, installation of an overflow tank might be advised as well. TG.

Isaac Kincaid
Safety and Environmental Solutions
505-390-8841
ikincaid@sesi-nm.com

This inbound email has been scanned by the MessageLabs Email Security System.

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, May 12, 2009 1:14 PM
To: 'Isaac Kincaid'; terry_gregston@nm.blm.gov; Sergio Contreras; Susana Rodriguez
Cc: Kelton Beaird
Subject: RE: Oxy

Isaac,

Regarding the **Oxy Big Walt Battery:**

It is my understanding that this remediation project encompasses three releases that had occurred on this site. The tank battery area on location has been dismantled and reset to a new site on the well pad to allow for remediation of the former battery site. The area of concern at this point, is the hillside adjacent to the well site. A Closure Report was presented to OCD during our meeting at the site on May 7, 2009. The Closure Report will be held pending outcome of the upcoming sampling event at the hillside area. If the analytical data warrants closure, a Final Report C-141 must also be submitted to OCD. For closure, like approval will be required from BLM.

Oxy Shelby Federal #3:

I agree with the proposal to obtain another round of samples from the release site. Dependent on the analytical data, further actions may be required at this site. A Closure Report was presented to OCD for this site as well during our May 7, 2009 meeting. The report will be held pending outcome of the upcoming sampling event and possible subsequent remedial actions. A Final Report C-141 will be required for final closure of this site as well as like approval from BLM.

Oxy McKittrick Central Tank Battery:

In reviewing the data on this release site, it seems, based on the analytical data, that the area exhibiting the highest hydrocarbon levels is BH-2, which is on the well pad in front of the load line. TPH at 5' bgs was 8000 mg/kg. OCD would require some material removal at this area. Taking into consideration that rock is encountered fairly shallow at this site, I would like to see as much of the impacted material removed in the battery area and the load line area as is practicable. The Closure Report submitted to OCD at our meeting on May 7, 2009 will be held pending satisfactory completion of this project. A Final Report C-141 and like approval from BLM will be required for final closure of this site.

For all projects, please notify OCD District 2 Office 48 hours prior to obtaining samples where analyses of samples obtained are to be submitted to OCD.

Be advised that OCD approval of work proposals 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.

Please contact me for any questions and/or concerns.

Sincerely,

Mike Bratcher
NMOCD District 2
1301 W. Grand Ave.
Artesia, NM 88210
575-748-1283 Ext.108

mike.bratcher@state.nm.us

From: Isaac Kincaid [mailto:ikincaid@sesi-nm.com]
Sent: Tuesday, May 12, 2009 7:22 AM
To: Bratcher, Mike, EMNRD; terry_gregston@nm.blm.gov; Sergio Contreras; Susana Rodriguiz
Subject: FW: Oxy

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If you would please reply. Thank you,

Isaac Kincaid
Safety and Environmental Solutions
505-390-8841
ikincaid@sesi-nm.com

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Bonham, Sherry, EMNRD

From: Isaac Kincaid [ikincaid@sesi-nm.com]
Sent: Friday, January 09, 2009 9:34 AM
To: Bonham, Sherry, EMNRD; Kelton_Beairst@oxy.com; Sergio Contreras
Subject: Oxy Mckittrick

Sherry,

I was e-mailing you in regards to the conversation we had on 01/08/09 about the Oxy Mckittrick Battery. In the conversation it was noted that there were two release on the one site the 1 release was not reported do to it being under 5 BBLS. The work plan that was submitted will be the same and excavation will be approximately 2' around the battery on the East and West sides. After 2' has been excavated samples will be obtained and analyzed, due to hard rock and an active battery, and the analytical are returned then you will determine further action.

If you have any questions please let me know.

Thank you,

Isaac Kincaid
Safety and Environmental Solutions
505-390-8841
ikincaid@sesi-nm.com

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