

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, January 07, 2014 1:46 PM
To: Zack Thomas (zthomas@mewbourne.com)
Subject: RE: quick draw 15 B #1 Final C141

Zack - As an addendum to the last email, this is for the Delaware Ranch SWD site only. The Quick Draw will require analytical data from both sides of the draw and areas that were excavated in the draw. - Mike

-----Original Message-----

From: Bratcher, Mike, EMNRD
Sent: Tuesday, January 07, 2014 1:39 PM
To: 'Zack Thomas'
Subject: RE: quick draw 15 B #1 Final C141

Put together a site map/diagram showing the release area with a report on what was done, how much material was excavated, hauled to disposal, etc. Since there is no analytical data, the run tickets for the haul off would be good too. This was a net 50 bbl release, so you at least need to show enough material was hauled out to justify the cleanup. The alternative is to drill it and obtain samples, and that is probably what should be done. Not trying to be difficult, but I have to have justification for closing these things out, especially the one in the draw. There are at least 3 other agencies involved with that one. I try to keep things in house here to make it a little easier on the operators, while still accomplishing OCD requirements, but I can't work solely on the C-141s. I know I didn't require analytical data on the very first site I worked with you on, but that one was, for the most part, surficial overspray. And I did catch a little flak from another agency over that. Just help me out here a little. When working on these things, give me a call and let me know what's going on. By rule, an operator is supposed to have an approved remediation proposal, based on analytical data and site ranking, before commencement of cleanup ops, but lack of staff on OCD's part doesn't always allow for that. And I certainly don't have a problem with "immediate response" activities, such as excavating out what is visually identifiable as being impacted (BLM approval is required on Federal sites, especially when it is off the well pad), but in almost every case, OCD will require analytical data to show cleanup levels were achieved, prior to backfill, or an alternative method was used.

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

-----Original Message-----

From: Zack Thomas [<mailto:zthomas@mewbourne.com>]
Sent: Tuesday, January 07, 2014 11:48 AM
To: Bratcher, Mike, EMNRD
Subject: RE: quick draw 15 B #1 Final C141

ok, so what do you propose I do?

(Embedded image Zack Thomas
moved to file: Environmental Rep.
pic19169.gif) Mewbourne Oil Company

Phone: (575)-602-2188
Email: ZThomas@Mewbourne.com
701 S. Cecil
Hobbs, NM 88240 US

From: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>
To: Zack Thomas <zthomas@mewbourne.com>,
Date: 01/07/2014 11:26 AM
Subject: RE: quick draw 15 B #1 Final C141

I can't close it out without analytical data showing it was remediated to RRAL for that site/site ranking.

Mike Bratcher
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-----Original Message-----

From: Zack Thomas [<mailto:zthomas@mewbourne.com>]
Sent: Tuesday, January 07, 2014 11:08 AM
To: Bratcher, Mike, EMNRD
Subject: RE: quick draw 15 B #1 Final C141

Mike,

I will get everything you need on the quick draw 15 B #1 but on the delaware ranch swd release I do not have photos or analytical data so what do I need to do for that?

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moved to file: Environmental Rep.
pic19264.gif) Mewbourne Oil Company

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From: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>
To: Zack Thomas <zthomas@mewbourne.com>, "Jim Amos
(jamos@blm.gov)"
<jamos@blm.gov>,
Date: 01/07/2014 10:59 AM
Subject: RE: quick draw 15 B #1 Final C141

Zack,

This Final Report C-141 will not be approved without a detailed report on what was done to remediate the release, to include analytical data and photos. This is similar to the Delaware Ranch SWD release. (Date of release 7/3/13. See my email to you on 9/24/13). Just submitting an initial and final C-141 for remediation of spills is not adequate for closure. The submitted C-141 for closure of the Quick Draw 15 B #1 (9/12/13 release date) is denied.

Mike Bratcher
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-----Original Message-----

From: Zack Thomas [<mailto:zthomas@mewbourne.com>]
Sent: Tuesday, January 07, 2014 9:44 AM
To: Bratcher, Mike, EMNRD
Subject: quick draw 15 B #1 Final C141

(See attached file: quick draw 15 B #1 final c141.pdf)

(Embedded image Zack Thomas
moved to file: Environmental Rep.
pic10298.gif) Mewbourne Oil Company

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