

Bratcher, Mike, EMNRD

From: Kelton_Beaird@oxy.com
Sent: Wednesday, January 26, 2011 6:07 AM
To: jamos@blm.gov; Dusty_Wilson@oxy.com; tgregsto@blm.gov; tbadbear@blm.gov
Cc: Bratcher, Mike, EMNRD; Leking, Geoffrey R, EMNRD
Subject: RE: FW: Oxy MidCon-North Indian Basin Unit #15
Attachments: H20719 OXY.pdf

Importance: High

Jim,

If you could please see the attached analytical, you will see on the chain of custody at the end of the document, that initial samples were taken on 8-25-10, and not 12-23-10. The samples taken 12-23-10, were taken when an environmental contractor was available to perform delineation. This was the earliest available time for a contractor to perform delineation.

Thanks,

Kelton Beaird
HES Specialist
Oxy Mid-Con
Carlsbad, NM
O: 575-628-4121
C: 575-390-1903

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

From: jamos@blm.gov [<mailto:jamos@blm.gov>]
Sent: Tuesday, January 25, 2011 10:47 AM
To: Beaird, Kelton H; Wilson, Dusty L; tgregsto@blm.gov; tbadbear@blm.gov
Cc: mike.bratcher@state.nm.us; GeoffreyR.Leking@state.nm.us
Subject: Re: FW: Oxy MidCon-North Indian Basin Unit #15

Quick response to spills and the remediation and restoration of spills are at the top of BLM priorities. Quick response to stop the release, contain, and remove the pollutants is a must. I believe we're all on the same page, and we do a good job of stopping and containing. We're quick to make repairs and return the wells to production. This seems to be the end of quick. The above release was discovered 7/20/10. As per records supplied, the site was sampled 12/23/10, with analysis delivered to Cardinal Laboratories on 12/30/10, and results sent to BBC on 1/5/11. A plan, based on a discussion with OCD on 1/11/11 was submitted for approval to the OCD on 1/12/11. Mike approved the plan 1/14/11. On 1/18/11, the plan was submitted to the BLM for authorization. The urgency to get this started this week is diminished in that the spill is 189 days old.

The 43 CFR 3162.5-1(c), states, "The operator shall exercise due diligence in taking necessary measures, subject to approval by the authorized officer, to control and remove pollutants...." Environmental protection, including the remediation and restoration of the spill area is to receive the same quick response as the repairing of the line and the return to production. Oxy has several spills and/or compliance events that exceed the referenced spill. We somehow need to get past issues and get on with what's best for the environment. As you are aware, any activity on BLM managed lands and/or mineral estate, where the federal minerals created the event, the BLM will have to approve any surface disturbing activities. The OCD is the primary authorization to provide groundwater protection, and very seldom will

the BLM be more stringent (but it could happen under certain circumstances). The BLM will be the primary authorization for surface restoration on BLM lands. We have made the reporting process as easy as possible in that we accept one report (C-141). The process can be quickened by CC'ing the BLM when requesting authorization from the OCD. At no time do I want to hear that the BLM is holding up work when we're at day 189. If the request for authorization is delayed for more than a week, please get with me and I'll get with either, Terry or Trishia, and if I can't get with them I will make a call and get you something out. We will not delay the process without good cause.

Terry will get the authorization out ASAP.

If you have any questions, feel free to get back to me.

thanks,

J. Amos

September 03, 2010

KELTON BEAIRD

Oxy USA- Carlsbad

1502 W. Commerce

Carlsbad, NM 88220

RE: NIBU 15

Enclosed are the results of analyses for samples received by the laboratory on 08/25/10 14:40.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

Oxy USA- Carlsbad
KELTON BEAIRD
1502 W. Commerce
Carlsbad NM, 88220
Fax To: (575) 628-4125

Received: 08/25/2010
Reported: 09/03/2010
Project Name: NIBU 15
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 08/25/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: BKG. (H020719-01)

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/30/2010	ND	2.15	108	2.00	3.13	
Toluene*	0.057	0.050	08/30/2010	ND	1.99	99.6	2.00	2.36	
Ethylbenzene*	0.052	0.050	08/30/2010	ND	2.04	102	2.00	3.33	
Total Xylenes*	<0.150	0.150	08/30/2010	ND	6.06	101	6.00	3.52	

Surrogate: 4-Bromofluorobenzene (PIL) 100 % 80-120

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/27/2010	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: AB					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/03/2010	ND	178	88.9	200	2.97	
DRO >C10-C28	<10.0	10.0	09/03/2010	ND	199	99.5	200	16.2	

Surrogate: 1-Chlorooctane 91.9 % 70-130

Surrogate: 1-Chlorooctadecane 73.6 % 70-130

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

Oxy USA- Carlsbad
KELTON BEAIRD
1502 W. Commerce
Carlsbad NM, 88220
Fax To: (575) 628-4125

Received: 08/25/2010
Reported: 09/03/2010
Project Name: NIBU 15
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 08/25/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP - 1 SURF. (H020719-02)

BTEX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/30/2010	ND	2.15	108	2.00	3.13	
Toluene*	<0.050	0.050	08/30/2010	ND	1.99	99.6	2.00	2.36	
Ethylbenzene*	<0.050	0.050	08/30/2010	ND	2.04	102	2.00	3.33	
Total Xylenes*	<0.150	0.150	08/30/2010	ND	6.06	101	6.00	3.52	

Surrogate: 4-Bromofluorobenzene (PIL) 104 % 80-120

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	08/27/2010	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/03/2010	ND	178	88.9	200	2.97		
DRO >C10-C28	<10.0	10.0	09/03/2010	ND	199	99.5	200	16.2		

Surrogate: 1-Chlorooctane 87.5 % 70-130

Surrogate: 1-Chlorooctadecane 64.4 % 70-130

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KELTON BEAIRD
1502 W. Commerce
Carlsbad NM, 88220
Fax To: (575) 628-4125

Received: 08/25/2010
Reported: 09/03/2010
Project Name: NIBU 15
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 08/25/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP - 2 SURF. (H020719-03)

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.067	0.050	08/30/2010	ND	2.15	108	2.00	3.13	
Toluene*	0.739	0.050	08/30/2010	ND	1.99	99.6	2.00	2.36	
Ethylbenzene*	0.062	0.050	08/30/2010	ND	2.04	102	2.00	3.33	
Total Xylenes*	<0.150	0.150	08/30/2010	ND	6.06	101	6.00	3.52	

Surrogate: 4-Bromofluorobenzene (PIL) 101 % 80-120

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2720	16.0	08/27/2010	ND	432	108	400	0.00	
TPH 8015M		mg/kg		Analyzed By: AB					
				S-04					

Surrogate: 1-Chlorooctane 75.7 % 70-130

Surrogate: 1-Chlorooctadecane 48.9 % 70-130

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Analytical Results For:

Oxy USA- Carlsbad
KELTON BEAIRD
1502 W. Commerce
Carlsbad NM, 88220
Fax To: (575) 628-4125

Received: 08/25/2010
Reported: 09/03/2010
Project Name: NIBU 15
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 08/25/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP - 3 SURF. (H020719-04)

BTEX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/30/2010	ND	2.15	108	2.00	3.13	
Toluene*	0.314	0.050	08/30/2010	ND	1.99	99.6	2.00	2.36	
Ethylbenzene*	<0.050	0.050	08/30/2010	ND	2.04	102	2.00	3.33	
Total Xylenes*	<0.150	0.150	08/30/2010	ND	6.06	101	6.00	3.52	

Surrogate: 4-Bromofluorobenzene (PIE) 99.8 % 80-120

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4640	16.0	08/27/2010	ND	432	108	400	0.00	
TPH 8015M		mg/kg		Analyzed By: AB					
									S-04

Surrogate: 1-Chlorooctane 69.5 % 70-130

Surrogate: 1-Chlorooctadecane 44.3 % 70-130

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KELTON BEAIRD
1502 W. Commerce
Carlsbad NM, 88220
Fax To: (575) 628-4125

Received: 08/25/2010
Reported: 09/03/2010
Project Name: NIBU 15
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 08/25/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP - 4 SURF. (H020719-05)

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	08/30/2010	ND	2.15	108	2.00	3.13	
Toluene*	1.99	0.100	08/30/2010	ND	1.99	99.6	2.00	2.36	
Ethylbenzene*	<0.100	0.100	08/30/2010	ND	2.04	102	2.00	3.33	
Total Xylenes*	<0.300	0.300	08/30/2010	ND	6.06	101	6.00	3.52	

Surrogate: 4-Bromofluorobenzene (PIL) 100 % 80-120

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1070	16.0	08/27/2010	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: AB					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/03/2010	ND	181	90.4	200	1.19	
DRO >C10-C28	1440	10.0	09/03/2010	ND	178	89.1	200	8.56	

Surrogate: 1-Chlorooctane 82.0 % 70-130

Surrogate: 1-Chlorooctadecane 57.3 % 70-130

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported on an as received basis (wet) unless otherwise noted on report

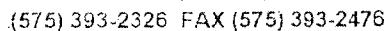
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