

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, April 19, 2018 8:18 AM  
**To:** Vernon Black; Tucker, Shelly  
**Cc:** Weaver, Crystal, EMNRD; Shoemaker, Mike  
**Subject:** RE: Devon Belgain 15 Fed Com 1H WOrk Plan

RE: Devon Energy \* Belgian 15 Fed Com 1H \* 2RP-4151 \* DOR 3/8/17

OCD concurs with BLM denial of the proposal for remediation of the above referenced release. OCD will typically not approve liner placement at less than 4' bgs. Also, as stated, based on the lab data, delineation is not complete and the field screens appear to be dramatically different than the lab data. For future proposals, please put the lab data in a table format, as well as sending the documentation.

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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.

**From:** Tucker, Shelly <stucker@blm.gov>  
**Sent:** Wednesday, April 18, 2018 4:26 PM  
**To:** Vernon Black <vblack@hungry-horse.com>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>  
**Subject:** Re: Devon Belgain 15 Fed Com 1H WOrk Plan

Looking at the lab data, it does not show the release site has been fully delineated. I cannot approve removing 3' and laying a liner without a full delineation. For that reason BLM **denies** this proposal.

**NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).**

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
O&G Spill/Release Coordinator

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

## Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

The **BLM acceptance/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 groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Mon, Mar 12, 2018 at 6:38 AM, Vernon Black <[vblack@hungry-horse.com](mailto:vblack@hungry-horse.com)> wrote:

Good Morning,

Please see the attached remediation work plan and the accompanying lab report for referenced site. I look forward to hearing from you.

Thanks in advance for your help.

VKB