

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Friday, June 23, 2017 7:27 AM
To: 'Sheldon Hitchcock'; Tucker, Shelly
Cc: Shoemaker, Mike; Weaver, Crystal, EMNRD; David Adkins
Subject: RE: Devon Energy: Ore Ida 14 Fed #10 |30-015-29290|2RP-4123 & 2RP-3222| Backfill Request

RE: Devon Energy * Ore Ida 14 Fed 10 * 2RP-4123 & 2RP-3222

Sheldon,

Per our discussion yesterday, OCD approves your request for backfill. Federal sites will require like approval from BLM.

Mike Bratcher
NMOCD District 2
811 S. First St.
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

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: Sheldon Hitchcock [mailto:slhitchcock@talonlpe.com]
Sent: Tuesday, June 20, 2017 12:46 PM
To: Tucker, Shelly <stucker@blm.gov>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; David Adkins <dadkins@talonlpe.com>
Subject: Devon Energy: Ore Ida 14 Fed #10 |30-015-29290|2RP-4123 & 2RP-3222| Backfill Request

Hello everyone,

We have completed the excavation of the battery area at the Ore Ida. Below you can find data tables from all of the sampling events including the previously stipulated delineation. Please reference the attached site map for sample locations.

As we discussed previously, our plan to address potential impacts beneath the liner at the facility in an expedited manner involved removing the existing battery infrastructure, liner, gravel, berms, etc. and collecting bottom and sidewall samples from the excavation. This area has been excavated to a depth of 1-foot and the confirmation soil samples are summarized below.

On the "location portion" of the project we excavated the impacted area in the vicinity of sample location S-1 to a depth of 1-foot, S-2 was excavated to a depth of 2-feet, and S-3 (which is still in progress) will be excavated to a depth of 4-feet. A liner will be installed at the bottom of the S-3 excavation in order to encapsulate the remaining chloride impacts.

At this point given the data we have collected I would like to have your permission to backfill the affected areas. I will follow up with a formal closure report once the work is complete. Please let me know if you have any questions.

March 23, 2014 Hand Auger Sampling

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0	<0.300	1440*	<10.0	24.2
S-1	1	--	976*	--	--
S-1	2	--	1070*	--	--
S-1	3	--	656*	--	--
S-1	4	--	512*	--	--
S-1	5	--	368*	--	--
S-2	0	<0.300	14000*	<10.0	<10.0
S-2	1	--	2320*	--	--
S-2	2	--	992*	--	--
S-2	3	--	816*	--	--
S-2	4	--	1040*	--	--
S-2	5	--	864*	--	--
S-3	0	<0.300	16000*	<10.0	<10.0
S-3	1	--	2960*	--	--
S-3	2	--	5200*	--	--
S-3	3	--	4800*	--	--
S-3	4	--	4000*	--	--
S-3	5	--	2840*	--	--
S-4	0	--	160*	--	--
S-5	0	--	160*	--	--
S-6	0	--	32*	--	--

April 28, 2017 Backhoe Delineation

Sample ID	Depth (feet)	Chlorides (mg/kg)
S-1	6	1418
S-1	8	1418
S-1	10	850
S-1	12	496
S-1	14	709
S-2	6	1170*
S-2	8	864*
S-2	10	1120*
S-2	12	336*
S-2	14	160*
S-3	6	709
S-3	8	1205
S-3	10	1205
S-3	12	1063

May 16, 2017 Geoprobe Delineation

Sample ID	Depth (feet)	Chlorides (mg/kg)
S-1	15	1,134
S-1	20	2410
S-1	25	567
S-1	30	32*

S-3	15	463
S-3	20	709
S-3	25	425
S-3	30	283
S-3	38	32*

June 16, 2017 Confirmation Samples

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-7	0.5	--	464*	--	--
S-7	1	<0.300	336*	<10.0	<10.0
S-8	0	--	575*	--	--
S-9	0	--	336*	--	--
S-10	0	--	960*	--	--

(--) Analyte Not Tested

(*) Laboratory Chloride Confirmation

Respectfully,

Sheldon Hitchcock

Project Manager

Office: 575.746.8768

Direct: 575.616.4021

Cell: 575.689.5198

Fax: 575.746.8905

Emergency: 866.742.0742

Web: www.talonlpe.com



From: Tucker, Shelly [<mailto:stucker@blm.gov>]

Sent: Friday, June 2, 2017 3:32 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Cc: Shoemaker, Mike <Mike.Shoemaker@dmn.com>; Sheldon Hitchcock <shhitchcock@talonlpe.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; David Adkins <dadkins@talonlpe.com>

Subject: Re: [EXTERNAL] RE: Devon Energy: Ore Ida 14 Fed #10 | 30-015-29290 | 2RP-4123 & 2RP-3222 |

BLM concurs with the additional NMOCD stipulations.

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

Bureau of Land Management
620 E. Greene St

Carlsbad, NM 88220

575.234.5905 - Direct

575.361.0084 - Cellular

575.234.6235 - Emergency Spill Number

stucker@blm.gov

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 that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues 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 Wed, May 24, 2017 at 10:55 AM, Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us> wrote:

RE: Devon Energy * 2RP-3222 & 2RP-4123

Mike,

Thanks for the response. OCD approves Talon's proposal for remediation of the above referenced releases at this site, with the following notations and conditions of approval:

- OCD does request additional delineation at S1, S2 & S3. This may be accomplished during excavation activities utilizing field screens with bottom samples sent to lab. Backfill and liner installation does not necessarily need to be held up waiting on lab data, but it will be somewhat "at risk".
- OCD requests as much impacted material be removed as is practicable, around the production equipment on the pad.
- In the battery area, the liner installed at 4' will not necessarily be considered as a "lined battery", and OCD suggests a conventionally lined battery (liner directly beneath tanks and equipment) be reinstalled.
- A vertical and horizontal delineation for TPH, BTEX & chloride will be required in the battery. Again, to facilitate quick turnaround for reconstruction, lab data is required, but liner placement and backfill may proceed "at risk" based on field screens for chloride and PID reading for VOCs. Please include a table of all field screens in the closure report.
- Federal sites will require like approval from BLM.
- Please advise once remedial activities have been scheduled.

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

Mike Bratcher

NMOCD District 2

811 S. First St.

Artesia NM 88210

575-748-1283 Ext 108

mike.bratcher@state.nm.us

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: Shoemaker, Mike [mailto:Mike.Shoemaker@dvn.com]

Sent: Wednesday, May 24, 2017 9:49 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Sheldon Hitchcock <slhitchcock@talonlpe.com>; 'stucker (stucker@blm.gov)' <stucker@blm.gov>

Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; David Adkins <dadkins@talonlpe.com>

Subject: RE: [EXTERNAL] RE: Devon Energy: Ore Ida 14 Fed #10 |30-015-29290|2RP-4123 & 2RP-3222|

Mike,

The production equipment on the pad (in the red area) will not be removed so the excavation would occur around the equipment.

Thanks,

Mike Shoemaker

EHS Representative

Devon Energy Corporation

6488 Seven Rivers Highway

Artesia, New Mexico 88210

575-746-5566 Office

575-513-5035 Mobile



From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Wednesday, May 24, 2017 9:07 AM
To: Sheldon Hitchcock <slhitchcock@talonlpe.com>; 'stucker (stucker@blm.gov)' <stucker@blm.gov>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Shoemaker, Mike <Mike.Shoemaker@dvn.com>; David Adkins <dadkins@talonlpe.com>
Subject: [EXTERNAL] RE: Devon Energy: Ore Ida 14 Fed #10 [30-015-29290|2RP-4123 & 2RP-3222|

RE: Devon Energy * Ore Ida 14 Fed 10 * 2RP-3222 & 2RP-4123

Sheldon/Mike,

Is the production equipment on the pad (in the red area on the site map) going to be moved, or will the proposed excavation be around that equipment?

Thanks,

Mike Bratcher

NMOCD District 2

811 South First Street

Artesia NM 88210

575-748-1283 Ext 108

mike.bratcher@state.nm.us

From: Sheldon Hitchcock [<mailto:slhitchcock@talonlpe.com>]

Sent: Tuesday, May 23, 2017 11:56 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'stucker (stucker@blm.gov)' <stucker@blm.gov>

Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Shoemaker, Mike

<Mike.Shoemaker@dvn.com>; David Adkins <dadkins@talonlpe.com>

Subject: Devon Energy: Ore Ida 14 Fed #10 |30-015-29290|2RP-4123 & 2RP-3222|

Mike & Shelly,

The Ore Ida 14 Fed #10 currently has two open RP's. 2RP-3222 from August 21, 2015. This release was a from a tank overflow into the lined battery. They lost approximately 85bbls and recovered 60bbls. The second open RP is 2RP-4123 this release was the result of a lightning strike which occurred on February 13, 2017. Approximately 123bbls of PW were lost as a result of this release, 120bbls were recovered. At this point I have the impacted area on the location horizontally delineated and vertically delineated to below RRAL's at all but one sample location (data table below and site plan attached). I am still waiting on data from our delineation to 250 mg/kg. I will follow up with that data when I receive it. Soil sampling was not possible in the battery due to the infrastructure (tanks, utilities, liner, etc.). However due to the lightning strike the tank battery is going to be rebuilt. Obviously coordinating the remediation, battery construction, and limiting down time present some logistical issues. Therefore I would like to propose the following in order to expedite the process.

Ground water is approximately 150-feet below ground surface (BGS)

1. The impacted area on the location in the vicinity of sample location S-1 will be excavated to a depth of 1-foot, S-2 will be excavated to a depth of 2-feet, and S-3 will be excavated to a depth of 4-feet. A liner will be installed at the bottom of the S-3 excavation in order to encapsulate the remaining chloride impacts.
2. Once the tanks and other equipment are removed from the battery area we will mobilize a backhoe to the location and collect soil samples within this area. Vertical delineation for chlorides will be conducted

until the target concentration of 250 mg/kg is achieved or we reach the maximum depth possible with the backhoe. Should chloride impacts be above the NMOCD remediation guideline of 1,000 mg/kg at a depth greater than 4-feet BGS we will excavate the battery area to a depth of 4-feet BGS and install a liner to encapsulate the remaining chloride impacts.

As usual we will pad the liner(s) to protect from puncture and backfill with caliche. Please let me know what your thoughts are on this proposal.

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0	<0.300	1440	<10.0	24.2
S-1	1	--	976	--	--
S-1	2	--	1070	--	--
S-1	3	--	656	--	--
S-1	4	--	512	--	--
S-1	5	--	368	--	--
S-2	0	<0.300	14000	<10.0	<10.0
S-2	1	--	2320	--	--
S-2	2	--	992	--	--
S-2	3	--	816	--	--
S-2	4	--	1040	--	--
S-2	5	--	864	--	--
S-3	0	<0.300	16000	<10.0	<10.0
S-3	1	--	2960	--	--
S-3	2	--	5200	--	--
S-3	3	--	4800	--	--
S-3	4	--	4000	--	--
S-3	5	--	2840	--	--
S-4	0	--	160	--	--
S-5	0	--	160	--	--
S-6	0	--	32	--	--

Respectfully,

Sheldon Hitchcock

Project Manager

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