

## Bratcher, Mike, EMNRD

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**From:** Mark Larson <Mark@laenvironmental.com>  
**Sent:** Friday, July 21, 2017 7:24 AM  
**To:** Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; 'McMinn, Dudley'; 'Williams, Luke'  
**Subject:** FW: 2RP-3976 and 2RP-4235 - Nash Draw 42 CTB Delineation Report and Delineation Plan, June 30, 2017  
**Attachments:** Table 1 - Nash Draw #42 CTB Assessment Soil Samples Analytical Summary, March 15, 2017..pdf

Crystal,

The following is submitted on behalf of XTO Energy, Inc. (XTO) in response to your questions below:

**Question:** All sampling mentioned in the current work plan (happened on 3/13/17 and 3/14/17) is sampling that relates to the original spill that occurred back on 10/27/16 (2RP-3976) correct? How can a depth of excavation be determined for the new spill area (spill that occurred on 6/14/17, 2RP-4235; which was stated in the C-141 as both oil and produced water fluids were released) without any additional sampling being done on its behalf prior to excavation?

**Response:** *it is my opinion that the depth of excavation will be similar to what is proposed since the initial spill was mostly crude oil with an small amount of produced water and the recent spill is mostly produced water with a small amount of crude oil. Soil will be excavated until total petroleum hydrocarbons (TPH) as determined by EPA SW-846 Method 8015 for GR, DRO and ORO is below the RRAL (1,000 mg/Kg The confirmation samples will be analyzed Method 300. Additional vertical samples will be collected to delineate chloride to 600 mg/Kg.*

**Question:** Holes in the liner are shown in the photographs provided. What is the status of the liner in those areas following spill 1 but prior to spill 2? OCD will require sampling in any areas where there were holes in the liner.

**Response:** *The area east of the tank battery covered by the initial spill is unlined. The recent spill east of the tank battery occurred the lined area where holes are shown in the liner. Soil samples will be collected from the lined area covered by the spill where holes are observed. The soil samples will be will be analyzed for TPH as determined by EPA SW-846 Method 8015 for GR, DRO and ORO and chloride by Method 300. Soil will be excavated until TPH in bottom sample and sidewall samples where the excavation exceeds 2 feet is below the RRAL (1,000 mg/Kg). Additional vertical samples will be collected to delineate chloride to 600 mg/Kg.*

**Question:** Also at sample point DP-11 chloride results show at 702ppm at a depth of 5-6ft, as you mentioned, so you would need to resample there or continue to delineate till chlorides show clean.

**Response:** *A backhoe may be used to confirmed the chloride concentration in soil at DP-11, 5 – 6 feet. The sample will be analyzed by Method 300. Additional vertical samples will be collected to delineate chloride to 600 mg/Kg.*

**Question:** also just noticed one last thing, the label on your Table 1 says that the table is for 2RP-1486, is that a typo?

**Response:** *Good catch! I used an earlier table as a template and didn't change the remediation permit number. Please find the corrected table attached.*

Question: also just noticed one last thing, the remediation permit number you refer to for the recent spill (2RP-4235), is that a typo?

Response: *This remediation permit (2RP-4235) is for a release at the Devon Energy Production Company Cotton Draw Unit 84! It appears the 3 and 5 were juxtaposed and should be 2RP-4253.*

Please contact Dudley McMinn with XTO Energy at (432) 682-8873 or [Dudley\\_McMinn@xtoenergy.com](mailto:Dudley_McMinn@xtoenergy.com) or me if you have questions.

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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]  
**Sent:** Thursday, July 13, 2017 2:07 PM  
**To:** Mark Larson; Bratcher, Mike, EMNRD; 'Tucker, Shelly'  
**Cc:** 'McMinn, Dudley'; 'Williams, Luke'  
**Subject:** RE: 2RP-3976 and 2RP-4235 - Nash Draw 42 CTB Delineation Report and Delineation Plan, June 30, 2017

XTO \* Nash #42 Tank Battery \* 30-015-37194 \* 2RP-3976 & 2RP-4253

Hello all,

Thank you for the submission of this most recent plan and for the submission of the prior one as well. OCD is fine with the idea of remediating both spills at the same time while you have equipment and workers mobilized, etc. and we are fine with both releases being written about in the same work plan and closure report etc., however, the spills will still be treated as separate cases as far as each will be referred to by its individual tracking number and DOR, and each will have to be closed out on our end as individual incidents. So each will need final C-141s.

With that being said, I have looked things over and I have a few questions for you all:

- All sampling mentioned in the current work plan (happened on 3/13/17 and 3/14/17) is sampling that relates to the original spill that occurred back on 10/27/16 (2RP-3976) correct? How can a depth of excavation be determined for the new spill area (spill that occurred on 6/14/17, 2RP-4235; which was stated in the C-141 as

both oil and produced water fluids were released) without any additional sampling being done on its behalf prior to excavation?

- Holes in the liner are shown in the photographs provided. What is the status of the liner in those areas following spill 1 but prior to spill 2? OCD will require sampling in any areas where there were holes in the liner.
- Also at sample point DP-11 chloride results show at 702ppm at a depth of 5-6ft, as you mentioned, so you would need to resample there or continue to delineate till chlorides show clean.

I look forward to receiving a response to my questions/requests.

If you have any need for clarification or have any questions of your own please contact myself or Mike Bratcher here at the District II Office.

Thank you,

## Crystal Weaver

Environmental Specialist

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**From:** Mark Larson [<mailto:Mark@laenvironmental.com>]

**Sent:** Monday, July 3, 2017 4:06 PM

**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>; 'Tucker, Shelly' <[stucker@blm.gov](mailto:stucker@blm.gov)>

**Cc:** 'McMinn, Dudley' <[Dudley\\_McMinn@xtoenergy.com](mailto:Dudley_McMinn@xtoenergy.com)>; 'Williams, Luke' <[Luke\\_Williams@xtoenergy.com](mailto:Luke_Williams@xtoenergy.com)>

**Subject:** Re: 2RP-3976 and 2RP-4235 - Nash Draw 42 CTB Delineation Report and Delineation Plan, June 30, 2017

Mike/Crystal/Shelly,

Larson & Associates, Inc. (LAI) submits the delineation report and remediation plan for a crude oil spill at the XTO Energy, Inc. (XTO) Nash Draw 42 CTB. Since submitting the plan on May 23, 2017, XTO reported another spill at the facility on June 14, 2017, prior to receiving OCD approval of the remediation plan for the crude oil spill. XTO would like the OCD to consider allowing remediation of both spills under the remediation plan presented herein. Please contact Dudley McMinn with XTO Energy at (432) 682-8873 or [Dudley\\_McMinn@xtoenergy.com](mailto:Dudley_McMinn@xtoenergy.com) or me if you have questions.

Link: <https://files.acrobat.com/a/preview/aac0757d-4e60-4e7d-b88c-f8ac9693cab9>

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**From:** Mark Larson  
**Sent:** Tuesday, May 23, 2017 8:24 AM  
**To:** 'Bratcher, Mike, EMNRD'; 'Weaver, Crystal, EMNRD'  
**Cc:** 'McMinn, Dudley'; 'Williams, Luke'  
**Subject:** Re: XTO CTB 42 Revised Delineation Report

Mike/Crystal,

Please use the link below to download the revised delineation report for 2RP-3976. The report was revised to include additional photographs for exposing the liner inside the firewall. Please contact Dudley McMinn with XTO Energy at (432) 682-8873 or [Dudley\\_McMinn@xtoenergy.com](mailto:Dudley_McMinn@xtoenergy.com) or me if you have questions.

Link: <https://files.acrobat.com/a/preview/af3a731c-13d6-4830-8201-6944cbd5f9aa>

Respectfully,

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