

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** ["Aaron Pachlhofer"](#)  
**Cc:** [Bratcher, Mike, EMNRD](#)  
**Subject:** RE: Fasken Gossett "20" 3H Battery Spill Report  
**Date:** Monday, August 21, 2017 11:32:00 AM  
**Attachments:** [image001.png](#)

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Fasken Oil and Ranch \* Gossett "20" #3H Battery \* **2RP-4176** \* DOR: 4/12/17 & Fasken Oil & Ranch  
\* El Paso Fed 12 \* **2RP-4155** \* DOR: 3/25/17

Aaron,

Here is where OCD is at currently regarding both of the two release sites listed above. OCD has been flexible and considerate of your requests throughout the existence of these releases via groundwater analysis, accepted and worked with work plans that came to OCD in pieces, authorized bio remediation piles on site for both of these releases, etc.

However, please note that OCD will not be held responsible by Fasken Oil and Ranch, or any other operator, to provide advisement or training of *proper sampling technique* or *offer up some standardized sampling procedure*. Fasken Oil and Ranch needs to make the decision for themselves on how to proceed with these projects or Fasken Oil and Ranch needs to hire a third party Environmental Contractor to do so. Aside from that **OCD does expect, as has been stated previously, that more than one sample needs to be collected from each of your bio remediation piles.** How Fasken Oil and Ranch decides to interpret that and proceed will be up to you all. OCD will engage in no further comment or negotiation regarding the matter.

Thank you,

## Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1<sup>st</sup> Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

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**From:** Aaron Pachlhofer [mailto:[aaronp@forl.com](mailto:aaronp@forl.com)]  
**Sent:** Monday, August 21, 2017 7:17 AM  
**To:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>  
**Subject:** RE: Fasken Gossett "20" 3H Battery Spill Report  
**Importance:** High

Is reaching you on your cell phone a better option?



Aaron Pachlhofer, P.G.  
Environmental Coordinator  
Fasken Oil and Ranch, Ltd.  
6101 Holiday Hill Road  
Midland, TX 79707  
432-687-1777 Office  
830-377-9190 Cell

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**From:** Aaron Pachlhofer  
**Sent:** Friday, August 18, 2017 10:02 AM  
**To:** 'Weaver, Crystal, EMNRD' <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>  
**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Subject:** RE: Fasken Gossett "20" 3H Battery Spill Report

Crystal,

For small stockpiles such as this one and the El Paso Federal 12, one sample for BTEX/TPH should be sufficient.

What I do not want is to collect one sample from each stockpile and you ask for more analysis after I send the lab reports to you. It is an approximate 5.5 hour round trip for me to get to the EL Paso Federal 12—add another hour to that if I include the Gossett in that trip....I'll basically use a day to go collect samples. With that in mind, I really don't want you to ask me for additional samples that would require an additional trip: it simply uses a huge amount of time when we can make a plan now and avoid an extra trip.

So PLEASE, lets discuss now....

Thanks,



Aaron Pachlhofer, P.G.  
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Fasken Oil and Ranch, Ltd.  
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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]  
**Sent:** Friday, August 18, 2017 9:35 AM  
**To:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>  
**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Subject:** RE: Fasken Gossett "20" 3H Battery Spill Report

Aaron,

Please make the sampling decision for yourself and then we will determine based on your results if it is sufficient.

Thank you,

## Crystal Weaver

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**From:** Aaron Pachlhofer [<mailto:aaronp@forl.com>]  
**Sent:** Friday, August 18, 2017 8:29 AM  
**To:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>  
**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Subject:** RE: Fasken Gossett "20" 3H Battery Spill Report

Crystal,

As with El Paso Federal 12:

I am requesting acknowledgement of completion/closure on the clean-up portion of the spill, not the stockpile or disposal of the stockpile.

I am quite sure the concentrations have attenuated. I will comment that most of the material that was removed at the Gossett is pea gravel, so analysis might be a bit tough....the lab can't 'wash' pea gravel to get the sample extracted for analysis. As with El Paso Federal 12, I think we will just send the stockpile for disposal if concentrations are too high—but I doubt it with this one. Like the other

spill: Do you want one composite sample (what was previously collected), or a specific number of grab samples? This is also a very small stockpile; roughly approximately 10 to 15 yards. Since it is a small amount of pea gravel, I think operations would like to re-use onsite, assuming the analysis passes muster.

Thanks,



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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

**Sent:** Thursday, August 17, 2017 4:04 PM

**To:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>

**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Subject:** RE: Fasken Gossett "20" 3H Battery Spill Report

Fasken Oil and Ranch \* Gossett "20" #3H Battery release on 4/12/17 \* 2RP-4176

Aaron,

Your request for closure for this release is denied. OCD will not be approving closure requests prior to the receipt of analytical data. Please note that more than one sample on a bio remediation pile will be required.

If you have any questions or concerns please contact myself or Mike Bratcher here at the District II OCD Office.

## Crystal Weaver

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**From:** Aaron Pachlhofer [<mailto:aaronp@forl.com>]  
**Sent:** Wednesday, July 19, 2017 4:37 PM  
**To:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>  
**Subject:** Fasken Gossett "20" 3H Battery Spill Report

Crystal, please see attached.



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