From: Weaver, Crystal, EMNRD
To: "John Farrell"; Bratcher, Mike, EMNRD
Cc: "Ruth, Amy"; agroves@slo.state.nm.us; "Jody Walters"; "Robbie Runnels"
Subject: RE: Corrective Action Plan for JRU 29 SWD
Date: Friday, March 9, 2018 12:25:00 PM

RE: XTO (BOPCO OGRID 260737) * James Ranch Unit 29 SWD Battery (API utilized is for JRU #29 well 30-015-27735) * 2RP-2726, 2RP-3082, 2RP-3302, 2RP-3726 , and 2RP-4040

Hello all,

I believe I also attended the meeting that John mentioned that occurred on 10/4/17 and upon review of the existing files OCD has for these case numbers mentioned above I feel I am as equipped as anyone else to provide a review of this project, unless there are any emails going back and forth on it that I do not know about because they were only with Mike Bratcher. So if no emails of that nature exist then we should be good.

First off I wanted to say this is a well written work plan. Thank you for that. Explanations and history that is provided in the plan helps out a lot. Also the email body of the email that this work plan was sent with helps out cause it summarizes what XTO interpreted from what was discussed during the meeting we had with you all.

In review of the work plan and meeting summary notes OCD approves this work plan but needs to include/request the following additions/conditions:

- It appears that data for each sample point in the Excel data table is all field data up until the last deepest depth sample taken for each sample point which each of those samples appears to have been sent in for laboratory testing confirmation. Since the remediation proposal for this location is to perform the 4ft removal with liner placement, OCD normally must acquire lab tested samples for the whole delineation of each sample point that show from start to finish what we have in the soil column until target clean delineation numbers are reached.
    - However, due to how long this work plan has sat and other factors OCD will accept confirmation samples produced during the excavation process instead of requesting that the delineation data be recollected. So starting of course below the 4ft depth OCD needs you all to have lab data tested for all RRAL and COA required constituents until they show clean based on site ranking score clean up levels and chloride delineation requirement. The sampling that gets submitted to the lab can start below the 4ft mark as I mentioned but the samples need to be in 1ft intervals and need to be tested for TPH for extended range (GRO+DRO+MRO; C_6 thru C_{36}) using method 8015, Benzene results of 10ppm or less and total BTEX of 50ppm or less tested via either Method 8260 or 8021, and chlorides are to be 600ppm or less using EPA Method 300.0 testing.
    - I understand that during the reporting phase via C-141s for all of these spills it was stated on the forms that produced water was the only production fluid lost each time. However, produced water is regularly known to have many contaminants in it and OCD asking for verification that BTEX and TPH are not an issue is standard procedure. I believe we discussed all of this during the meeting of 10/4/17. . . Correct me if I am

wrong on that. If we didn't discuss then I may be getting another meeting mixed up with this one, but it is no matter cause it is still being requested now.

- Also when I do a ground water assessment study, on my end, I find the closest well (with depth to water data) to the location is actually one with documentation of shallower depth to water than a lot of the other ground water wells that are farther away from your location. OSE cites depth to ground water for well C-2492 at 85ft. So based on that assessment OCD will assess a site ranking score for this location of 10, which only changes the target levels for TPH, which will now need to be at 1000ppm or less.

- Furthermore, because the occurrence of spills at this location total 5 over the span of time from 2014- now, and are now all being dealt with in a group project OCD feels justified in saying that based on depth to ground water having the potential to be less than 100ft for this site, we will need some additional confirmation sample points to be collected during the excavation process for this spill plume area. Please generate an additional confirmation sample point somewhere between your existing SP-5 and SP-7 and if practicable somewhere directly south of the battery but still on the pad.

- Also as you all have offered full delineation for chlorides at your SP-4 and SP-7 still needs to proceed as you all have indicated you are prepared to do.

- Please provide OCD notification of when this project has been mobilized to begin remediation efforts.

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.

If you have any questions or concerns, and for notification of moblization of equipment, please contact Mike Bratcher and/or myself in the District II Office.

Crystal Weaver

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From: John Farrell [mailto:jfarrell@basinenv.com]
Sent: Friday, December 15, 2017 11:41 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: 'Ruth, Amy' <Amy_Ruth@xtoenergy.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; agroves@slo.state.nm.us; 'Jody Walters' <sjwalters@basinenv.com>; 'Robbie Runnels' <rrunnels@basinenv.com>
Subject: Corrective Action Plan for JRU 29 SWD

Dear Mr. Bratcher:

Attached, please find the Corrective Action Plan (CAP) for the XTO JRU 29 SWD facility in Eddy County, New Mexico.

To review, during our meeting on October 4, 2017, Basin Environmental/XTO stated the JRU 29 SWD CAP was preliminary and that it would be updated; that a regional Groundwater Trend Map would be used to determine depth to groundwater at the site; that there will be further delineation of chlorides at Test Trenches 4 and 7 using excavation equipment; and, in pasture areas impacted by the spills, Basin will remove a previously existing liner and place a new liner using methods described in the CAP.

Per NMOCD request, as part of the CAP, Basin has placed data from field and laboratory testing into a Microsoft Xcel ® Spreadsheet to facilitate ease of review. Please note that Basin used the 600mg/kg chloride level discussed at the meeting as the benchmark indicating that cleanup has been achieved.

CAP SUMMARY: the CAP proposes some additional delineation of chlorides at two of the test trench points, soil removal to a depth of approximately 4 feet and placement of a liner over the area of contamination in pasture areas and grading to local contours. The plan also calls for removal of 1 foot of caliche on the chloride impacted pad area followed by replacement with un-impacted caliche and compaction to complete the remedial process. Currently, excavation of impacted soil and installation of liners is the best available technology to further prevent migration of contaminants downwards towards the water table.

Please review the attached CAP and provide any comments to Amy Ruth of XTO with copies to Jody Walters, Robbie Runnels and John Farrell of Basin Environmental Service Technologies.

Sincerely,

John P. Farrell P.G.
Project Manager
Basin Environmental Service Technologies, LLC

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