

From: [Weaver, Crystal, EMNRD](#)
To: ["Heather Patterson"; Bratcher, Mike, EMNRD; Tucker, Shelly \(stucker@blm.gov\)](#)
Cc: [Austin Weyant; "Amy C. Ruth"; Kyle Littrell@xtoenergy.com](#)
Subject: RE: Nash Unit #5 Work Plan
Date: Monday, April 23, 2018 2:58:00 PM
Attachments: [image001.png](#)

RE: XTO * Nash Unit #005 * 30-015-21800 * 2RP-4598

Hello all,

Since delineation is not complete at L-5 or L-3 OCD is hesitant to approve this work plan. However, it does state that excavation will continue until constituents show clean for the L-5 area. I see that a bottom hole lab confirmation sample is offered in the work plan for L-5, however OCD will need more than one bottom hole confirmation for the L-5 area as well as bottom hole confirmation for all the other sample points as well. All areas will also require a fair amount of side wall lab tested confirmation samples so that they are representative of the spill plume area size, especially since no horizontal delineation data was provided in this work plan.

Also the provided background samples need to be addressed. Background needs to be quite a ways off pad and away from the spill plume in order to be accepted as an actual background sample. Prior authorization may be required from surface land administrators but that is what OCD would need in order to accept something as a true background sample. The results from the background samples provided did come back low so we can just leave them this time but next time backgrounds samples need to be conducted as mentioned above.

OCD approves this work plan.

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, please contact Mike Bratcher and/or myself in the District II Office.

Crystal Weaver

Environmental Specialist

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From: Heather Patterson <heather.patterson@soudermiller.com>

Sent: Tuesday, March 20, 2018 2:05 PM

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

Cc: Austin Weyant <austin.veyant@soudermiller.com>; 'Amy C. Ruth' <Amy_ruth@xtoenergy.com>; Kyle_Littrell@xtoenergy.com

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Good Afternoon,

Please find the attached work plan for the release at the Nash Unit #5.

Thank you,

Heather Patterson

Staff Scientist

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