

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** ["zach.robins@rxsoil.solutions"; Bratcher, Mike, EMNRD](#)  
**Cc:** [Tucker, Shelly; "Littrell, Kyle"; "Ruth, Amy"; stan.mickle@rxsoil.solutions; Nick Rich; George Schott; Griswold, Jim, EMNRD; Billings, Bradford, EMNRD](#)  
**Subject:** RE: 2RP-3980 Sampling Proposal  
**Date:** Tuesday, April 17, 2018 12:27:00 PM

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RE: BOPCO, LP (Currently operated by XTO) \* PLU 78 & PLU 139 \* 2RP-3980 & 2RP-3503 \*  
DOR:11/3/16 & 1/12/16

Hello all,

Sorry OCD is just getting around to looking this one over.

However, we do have a few things to address regarding this project.

It is hard to follow what the work plan states will be constructed regarding the treatment area, so OCD at this point for clarity sake, needs to ask is this site intended to be an above ground engineer constructed treatment cell or is this an in-ground lined treatment cell?

Has the soil that was proposed to be placed in as backfill for the 2RP-3503 site been removed already from the proposed area outlined in green in Figure 4 of the work plan you all sent to us on 11/9/17?

If so then at least 3 lab data supported discrete sampling tests of that soil will need to be done before it is allowed to be backfilled into the PLU 139 2RP-3503 location. If it has already been backfilled please advise OCD of this.

Also again on this project just like the work plan that was sent in for the 2RP-3790 project... Anything submitted to any member of the OCD Environmental team whether it be correspondence or proposals or photos or diagrams is considered as public record and will need to be recorded as such. If anything has been sent in that is not wished to be made public then any party who has submitted such correspondence will need to be explicit in their indication of what is not meant to be public. OCD needs submittals to be in a format that is public appropriate especially if the submittal is a work plan, report, map, data, etc. OCD is tasked with maintaining a public recording of Administrative and Environmental Orders/Permits cases.

Upon receipt of answers and clarification on the items mentioned above OCD will then be able to review the diagrams sent to us as attachments to the email that is included below (sent to OCD on 2/7/18).

Thank you,

**Crystal Weaver**

Environmental Specialist  
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**From:** zach.robbins@rxsoil.solutions <zach.robbins@rxsoil.solutions>  
**Sent:** Wednesday, February 7, 2018 10:04 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; 'Littrell, Kyle' <Kyle\_Littrell@xtoenergy.com>; 'Ruth, Amy' <Amy\_Ruth@xtoenergy.com>; stan.mickle@rxsoil.solutions; Nick Rich <nick.rich@rxsoil.solutions>; George Schott <george.schott@rxsoil.solutions>  
**Subject:** 2RP-3980 Sampling Proposal

Mike,

RXSoil is requesting your approval for our sampling plan for the remediation of XTO's PLU 078. This sampling plan identifies sample points throughout our treatment cells to be sent for third-party lab testing to be used for closure (when all contamination levels are below thresholds). In addition to these points, we will also supplement with field screenings throughout our treatment to drive our real-time reporting.

The first map, "Excavation Samples", includes confirmation samples to ensure all contaminated material has been excavated.

The second map, "Remediation Samples", shows where we will sample during remediation to ensure all material is below all thresholds.

**This email serves to request your approval for our testing plans.** Feel free to reach out with any questions or comments.

Thanks,  
Zach

**Zach Robbins | Technical and Engineering Analyst | RXSoil, Inc.**  
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**\*\*Dimensions listed on maps are approximations to be used for scale and do not reflect exact size of cells**