

## Venegas, Victoria, EMNRD

---

**From:** Hamlet, Robert, EMNRD  
**Sent:** Wednesday, March 27, 2019 1:56 PM  
**To:** Adrian Baker  
**Cc:** Littrell, Kyle; Ashley Ager; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD  
**Subject:** Remediation Work Plan Denied - XTO - Elk Wallow 11 State #001H Battery (2RP-4967) 8-27-2018

Adrian,

The proposed alternative remediation method to excavation is denied. After reviewing the Google Earth images of the immediate area, the "Dry Wash" is negligible. Please remediate by following the spill rule 19.15.29.13, which states, "The reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA method 300.0 or other test methods approved by the division. Please make the needed adjustments to the remediation plan and resubmit.

Please include pages 3, 4, and 5 for the future remediation plan.

Thank you,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

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 groundwater, 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, or local laws and/or regulations.

---

**From:** Adrian Baker <abaker@ltenv.com>  
**Sent:** Tuesday, March 26, 2019 9:15 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>  
**Cc:** Littrell, Kyle <Kyle\_Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>  
**Subject:** [EXT] Third request - Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

Mike,

Attached is the Deferral Request for Elk Wallow 11 State #001H Battery/2RP-4967. The Deferral request was initially submitted to you on 11/7/2018. This email just serves as a reminder of the submitted report.

Thank you

*Adrian Baker*  
Project Geologist/Office Manager  
(432) 894-5641 cell

---

**From:** Adrian Baker  
**Sent:** Thursday, November 29, 2018 4:45 PM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Pruett, Maria, EMNRD <[Maria.Pruett@state.nm.us](mailto:Maria.Pruett@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** Littrell, Kyle <[Kyle.Littrell@xtoenergy.com](mailto:Kyle.Littrell@xtoenergy.com)>; Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Subject:** RE: Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

Maria,

We have reviewed the remediation work plan for the Elk Wallow 11 State #1 release (attached, originally submitted 11/8/18 below). The work plan for this site was not requesting a time or sampling "variance." It proposes an alternative remediation method to excavation. Since it is not a standard remediation approach, there is additional information regarding background, existing sampling data, and method. We believe including that additional detail is appropriate in this case. We have consulted with Shelly Tucker at BLM and believe this approach best fits with BLM's preference and will accomplish remediation to NMOCD standards.

Thank you  
*Adrian Baker*  
Project Geologist  
(432) 894-5641 cell

---

**From:** Adrian Baker  
**Sent:** Thursday, November 8, 2018 9:40 AM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Pruett, Maria, EMNRD <[Maria.Pruett@state.nm.us](mailto:Maria.Pruett@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** Littrell, Kyle <[Kyle.Littrell@xtoenergy.com](mailto:Kyle.Littrell@xtoenergy.com)>; Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Subject:** RE: Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

My apologies attached is the Remediation Work Plan for Elk Wallow 11 State #001H Battery/2RP-4967.

Thank you  
*Adrian Baker*  
Project Geologist  
(432) 894-5641 cell

---

**From:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Sent:** Thursday, November 8, 2018 8:13 AM  
**To:** Adrian Baker <[abaker@ltenv.com](mailto:abaker@ltenv.com)>; Pruett, Maria, EMNRD <[Maria.Pruett@state.nm.us](mailto:Maria.Pruett@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** Littrell, Kyle <[Kyle.Littrell@xtoenergy.com](mailto:Kyle.Littrell@xtoenergy.com)>; Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Subject:** RE: Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

Adrian – your attachment didn't make it.

---

**From:** Adrian Baker <[abaker@ltenv.com](mailto:abaker@ltenv.com)>

**Sent:** Wednesday, November 7, 2018 4:06 PM

**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Pruett, Maria, EMNRD <[Maria.Pruett@state.nm.us](mailto:Maria.Pruett@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov)

**Cc:** Littrell, Kyle <[Kyle.Littrell@xtoenergy.com](mailto:Kyle.Littrell@xtoenergy.com)>; Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>

**Subject:** [EXT] Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

All,

Attached is the Remediation Work Plan for Elk Wallow 11 State #001H Battery/2RP-4967. If you have any questions, please do not hesitate to contact myself or Kyle Littrell at XTO.

Thank you  
Adrian Baker  
Project Geologist



LT Environmental, Inc.  
3300 North A Street, Building 1, #103  
Midland , Texas 79705  
(432) 704-5178 office  
(432) 894-5641 cell  
(432) 704-5179 fax  
[www.ltenv.com](http://www.ltenv.com)

Connect with us:   

*This message and any attached files are privileged, confidential, and intended solely for the use of the addressee. If you have received this by mistake, please let us know by reply e-mail and delete it from your system; you may not copy, disclose, disseminate, use or rely upon its content for any use. E-mail transmissions cannot be guaranteed to be secure, error-free, or free of viruses. The sender and LTE therefore do not accept liability for any of these described issues. The comments and opinions expressed herein are those of the author and not necessarily of LTE. Thank you.*



Please consider the environment before printing this e-mail.