

## Hamlet, Robert, EMNRD

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**From:** Hamlet, Robert, EMNRD  
**Sent:** Wednesday, August 21, 2019 1:32 PM  
**To:** 'Ashley Ager'  
**Cc:** Littrell, Kyle; Baker, Adrian; Tacoma Morrissey; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; jamos@blm.gov  
**Subject:** Deferral Denied - XTO - Ross Draw 3031 Battery - (2RP-5330) 3-10-2019  
**Attachments:** Deferral Denied - XTO - Ross Draw 3031 Battery - (2RP-5330) 8.21.19.pdf

Ashley,

We have received your Deferral Request for **2RP-5330 Ross Draw 3031 Battery**, thank you. This Deferral Request is denied.

Floor sample [FS01@0.5'](#) still has an extremely high TPH value of 7,130 (mg/kg). This sample area appears to be the most accessible of all the sample points looking at the Google Earth images. If there is equipment or flow lines inhibiting excavation please send us some pictures. Otherwise, we will need to see much lower TPH levels on this Floor sample before we can approve a deferral request.

Please let me know if you have any further questions.

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.

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**From:** Ashley Ager <aager@ltenv.com>  
**Sent:** Tuesday, August 20, 2019 3:38 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Cc:** Littrell, Kyle <Kyle\_Littrell@xtoenergy.com>; Adrian Baker <abaker@ltenv.com>; Tacoma Morrissey <tmorrissey@ltenv.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; jamos@blm.gov  
**Subject:** [EXT] RE: Deferral Denied - XTO - Ross Draw 3031 Battery - (2RP-5330) 3-10-2019

Robert,

Please see the attached addendum to the original deferral request at the Ross Draw 3031 Battery (2RP-5330). The addendum describes additional work conducted on site and subsequent sampling results. We have also uploaded this to the NMOCD portal (PO#: G905M-190820-C-1410).

Thank You,  
Ashley

**Ashley Ager**  
**Vice President of Regional Offices**

(970) 385-1096 office  
(970) 946-1093 mobile

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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Tuesday, June 18, 2019 3:56 PM  
**To:** Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Cc:** Littrell, Kyle <[Kyle.Littrell@xtoenergy.com](mailto:Kyle.Littrell@xtoenergy.com)>; Tacoma Morrissey <[tmorrissey@ltenv.com](mailto:tmorrissey@ltenv.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov)  
**Subject:** Deferral Denied - XTO - Ross Draw 3031 Battery - (2RP-5330) 3-10-2019

Ashley,

Due to the sensitive nature of the spill site, the OCD denies the deferral request at this time. The site is <50 to groundwater and high karst, which will require additional excavation. The TPH levels are extremely high and need to be addressed. Please attempt to remove as much as possible (12"+) with shovels and/or a hydrovac and resample. The OCD may be able to defer the SS01 through SS04 sample points if TPH levels are decreased substantially, but still over the limit. The sample points that are still over the limit would need to be treated with Micro-Blaze or liquid with microbial strains, surfactants and nutrients designed to digest organics and hydrocarbons.

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)

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**From:** Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Sent:** Friday, June 7, 2019 2:08 PM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>;

Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov)  
Cc: Littrell, Kyle <[Kyle\\_Littrell@xtoenergy.com](mailto:Kyle_Littrell@xtoenergy.com)>; Tacoma Morrissey <[tmorrissey@ltenv.com](mailto:tmorrissey@ltenv.com)>  
Subject: [EXT] Deferral Request - Ross Draw 3031 Battery (2RP-5330)

On behalf of XTO, attached is a deferral request for the Ross Draw 3031 Battery (2RP-5330) for your review.

Thank You,  
Ashley



Ashley Ager  
Senior Geologist/Vice President of Regional Offices  
970.946.1093 *cell*  
970.385.1096 *office*  
848 East Second Avenue, Durango, CO 81301  
[www.ltenv.com](http://www.ltenv.com)



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