

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, February 13, 2020 1:59 PM
To: 'William Soderstrom'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Phillip Sanders; Kevin Ware; Nick Hines; Billings, Bradford, EMNRD
Subject: RE: Delineation and Site Characterization Report - Oilfield Water Logistics - Fulfer Saltwater Disposal Facility - (1RP-5489)

From: William Soderstrom <wsoderstrom@kje-us.com>
Sent: Thursday, February 13, 2020 11:40 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Phillip Sanders <psanders@oilfieldwaterlogistics.com>; Kevin Ware <kware@kje-us.com>; Nick Hines <nhines@oilfieldwaterlogistics.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] RE: Delineation and Site Characterization Report - Oilfield Water Logistics - Fulfer Saltwater Disposal Facility - (1RP-5489)

Robert,

Thank you for the email. See my response below.

- 1) We're required to collect a sample of produced water currently at the injection well even though it doesn't accurately reflect the concentrations from the release in April 2019? KJE delineated the release with soil borings to tool refusal and collected soil samples for laboratory analysis.
Generally, most produced water in SE New Mexico (Delaware Basin) has chlorides closer to 100,000 mg/l than 10,000 mg/l. We would have preferred that a sample be taken back in April 2019, when the release happened. If OWL wants to advocate that the produced water going down the disposal is less than 10,000 mg/l, the OCD suggests that water samples be collected weekly for the duration of 6 months, so an average can be calculated.
- 2) The surface (assumed to be top 2-4 inches) is scraped and stockpiled during emergency response activities to decrease vertical and horizontal migration. The likelihood of collecting a representative soil sample from the surface is minimal.
Please include this information in your report in the future. A subsurface sample (Example: 2 feet) does not show us what the contaminants are at the scraped ground surface.
- 3) I've attached the analytical tables for the release. The sample labeled SB-01 0-2' was collected from the zero to two foot interval, SB-01 2-4' was collected from the two to four foot interval, so on and so forth. If you'll notice, every soil sample collected was analyzed by a third party laboratory for chlorides, BTEX, and TPH. None of the previously identified samples exceeded OCD closure criteria.
We don't have any issues with Xenco Laboratories lab analysis.
- 4) What does the OCD consider to be "impervious"?
*Impervious: 1. Incapable of being penetrated <a raincoat impervious to water>
2. Incapable of being affected <impervious to anxiety>
3. OCD: Impervious liner*

Therefore, based on the date of the release (April 2019), inability to accurately reflect the chloride concentrations at the time of the release (in PW and surface soil), and laboratory analytical results below OCD closure criteria, it's my opinion the release has been delineated both horizontally and vertically pursuant to OCD regulations.

Furthermore, KJE and OWL personnel would like to schedule a face-to-face meeting to discuss this and all other open releases. These reports were submitted last summer and we're only becoming aware of project issues within the last week. Will you and Victoria please provide a date/time that works the last week of February or first week of March?

Don't hesitate to contact me with any questions or concerns.

Will

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Sent: Thursday, February 13, 2020 11:44 AM

To: William Soderstrom <wsoderstrom@kje-us.com>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Subject: Delineation and Site Characterization Report - Oilfield Water Logistics - Fulfer Saltwater Disposal Facility - (1RP-5489)

William,

We have received your Workplan/Remediation Proposal for **1RP-5489 Fulfer Saltwater Disposal Facility**, thank you. This Workplan/Remediation proposal is denied.

- We noticed that you checked "No" on the Initial C- 141 for "Is the concentration of dissolved chloride in the produced water >10,000 mg/l". Almost all water pulled out of the ground in this Delaware Basin is over 10,000 mg/l. Please collect a sample of the water before it is injected and have it lab tested for chlorides, so we have accurate analytical data. Usually, a spill of this size would have some high chlorides at the surface. If the analytical data on the water sample comes back over 10,000 mg/l, please conduct samples on the surface to verify chloride levels. The soil boring 0-2' leaves us wondering if the sample was taken at surface, 2 feet, or a composite of the interval?
- The OCD does not consider a caliche surface "impervious"
- Please include signed/dated C-141 pages 3-6 in your new report and then reload onto the Payment Portal.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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Energy, Minerals, and Natural Resources
Oil Conservation Division
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