

From: [Yu, Olivia, EMNRD](#)
To: ["Aaron Pachlhofer"](#)
Subject: RE: Ling Battery Spill C-141
Date: Monday, October 16, 2017 7:35:00 AM
Attachments: image001.png

Good morning Mr. Pachlhofer:

Thank you for the information regarding 1RP-4842. Laboratory analyses of confirmation samples must include both TPH extended and BTEX. Samples from the base of the excavated area must demonstrate permissible levels. If values of TPH or BTEX exceed permissible levels at 1 ft. bgs, then the release area not under the tanks will also be deferred.

Georeferencing refers to the location of the photos. If a cell phone is used to take photos, turn on the location access option. Although not preferred, if the filename will be used as documentation of the time stamps, please submit photos in their original format as attachments to an email message. There are also apps that would display the GPS coordinates and date on the photos themselves.

Olivia

From: Aaron Pachlhofer [mailto:aaronp@forl.com]
Sent: Friday, October 13, 2017 3:55 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Ling Battery Spill C-141

Olivia, the lab was supposed to run TPH on 8015. Not sure why they ran TX1005...you'll note that the chain of custody requests 8015M.

I will collect all 6 grab samples as you direct. But you should have already noted during your site visit that the affected area is relatively small AND has three 500 BBL storage tanks in the middle of it; so collecting a total of 6 samples is a bit of overkill. Will TPH only be OK, or would you like BTEX as well?

Please note that we will excavate to a maximum of 1 foot, but we will not remove more soil than is necessary.

I will use a scaled aerial photo with the release area outlined. All samples collected will be noted at the locations they are collected, as has already been provided.

Please define georeferencing a photo. Furthermore my camera will not provide a time stamp on the picture itself, but it does encode the time in the file name of the picture.

I plan to complete this work next week. I will let you know what day and time the work will begin.

Thanks,



Aaron Pachlhofer, P.G.
Environmental Coordinator
Fasken Oil and Ranch, Ltd.
6101 Holiday Hill Road
Midland, TX 79707
432-687-1777 Office
830-377-9190 Cell

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, October 13, 2017 4:18 PM
To: Aaron Pachlhofer <aaronp@forl.com>
Subject: RE: Ling Battery Spill C-141

Mr. Pachlhofer:

Thank you for your prompt response. NMOCD will approve of the delineation/remediation plan for 1RP-4842 with these conditions:

1. A minimum of 4 samples (cardinal directions) at the edges of the release area to complete horizontal delineation and release characterization.
2. At least 2 bottom confirmation samples at the proposed 1 foot excavation.
3. Provide a scaled map with the release area outlined and locations of the confirmation samples demarcated.
4. Use Method 8015 for TPH extended for laboratory analyses. TX 1005 is not an approved NMOCD method.
5. Georeferenced and dated photos documenting the remedial activities.

Furthermore, based on the provided data, NMOCD agrees that chloride testing will not be necessary for subsequent samples.

Please confirm or inform if clarification is required.

Thanks,
Olivia

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]
Sent: Friday, October 13, 2017 2:46 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Ling Battery Spill C-141

Right. As soon as you approve this work plan, I can get started.



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, October 13, 2017 3:44 PM
To: Aaron Pachlhofer <aaronp@forl.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Ling Battery Spill C-141

Mr. Pachlhofer:

Thank you for the supplemental information. The usual definition of preclude applies. FYI, the statement is a standard reply to Responsible Operators that an approval from NMOCD is not necessary before any removal of impacted soil or standing fluids.

Olivia

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]
Sent: Friday, October 13, 2017 2:14 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Ling Battery Spill C-141

And BTW...unless you want another spill at that battery; equipment cannot be used inside that firewall due to the amount of buried piping. That would be dangerous. That is why the excavator is doing nothing. All this had to be completed by hand.



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, October 13, 2017 2:47 PM
To: Aaron Pachlhofer <aaronp@forl.com>
Subject: RE: Ling Battery Spill C-141

Mr. Pachlhofer:

I stopped by the Fasken Ling Com battery yesterday and noticed a small excavator on site. Please be advised that NMOCD does not preclude the Responsible Operator from immediate clean-up of impacted soil.

Thanks,
Olivia

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]
Sent: Thursday, October 12, 2017 7:40 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Ling Battery Spill C-141

No worries. I should have lab results today, so I should be able to get a work plan to you.



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, October 12, 2017 8:15 AM
To: Aaron Pachlhofer <aaronp@forl.com>
Subject: RE: Ling Battery Spill C-141

Good morning Mr. Pachlhofer:

Noted. Thanks for the revised C-141, but an annotated one will not be sent back to you.

Thanks,
Olivia

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]
Sent: Wednesday, October 11, 2017 4:21 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Ling Battery Spill C-141

Not sure why I put Ling #2 on there, chalk that up to a typo.

The battery is the Ling Federal (Commingled). It is on the same well pad with our Ling Federal 3 well. Attached is a revised C-141 to reflect the proper battery name. I have also attached a picture of the sign at the battery for your reference.



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, October 11, 2017 12:18 PM
To: Aaron Pachlhofer <aaronp@forl.com>; Shelly Tucker <stucker@blm.gov>
Subject: RE: Ling Battery Spill C-141

Dear Mr. Pachlhofer:

Please be advised that the initial notification was for Ling Federal #3 tank battery. Please verify.

The 1RP for this incident is

4842	10/11/2017	A	Fasken Oil	Ling Federal #2 battery		19S-34E-31B	10/11/2017
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Please note that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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.

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]
Sent: Tuesday, October 10, 2017 3:27 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Subject: Ling Battery Spill C-141

Olivia and Shelly,

Please find C-141 attached. Please note that we do not have the police report yet, but I will forward it as soon as I have it.

Thanks,



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From: Eng Copier

Sent: Tuesday, October 10, 2017 4:21 PM

To: Aaron Pachlhofer

Subject: Attached Image