

**From:** Mann, Ryan  
**To:** [Hernandez, Christina, EMNRD](#); [Mark Larson](#); [Yu, Olivia, EMNRD](#)  
**Cc:** ["Pennington, Shelby"](#)  
**Subject:** RE: 1RP-4831 - Delineation Report, EMSU Well #101 Flow Line Leak, XTO Energy, Inc., July 5, 2018  
**Date:** Tuesday, July 24, 2018 2:47:55 PM

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NMSLO approves of the plan with no additional concerns. No entry permit will be necessary.

Ryan Mann  
Remediation Specialist  
Field Operation Division  
(575) 392-3697  
(505) 699-1989  
New Mexico State Land Office  
2827 N. Dal Paso Suite 117  
Hobbs, NM 88240

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**From:** Hernandez, Christina, EMNRD [mailto:[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)]  
**Sent:** Friday, July 20, 2018 2:02 PM  
**To:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>; Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Mann, Ryan <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>  
**Cc:** 'Pennington, Shelby' <[Shelby\\_Pennington@xtoenergy.com](mailto:Shelby_Pennington@xtoenergy.com)>  
**Subject:** RE: 1RP-4831 - Delineation Report, EMSU Well #101 Flow Line Leak, XTO Energy, Inc., July 5, 2018

Dear Mr. Larson:

When citing USGS records for a particular day (i.e. July 5, 2018) it is helpful to include documentation of those records in your report. Additionally, photo documentation of field reconnaissance of water monitoring wells is also helpful.

NMOCD approves of the delineation completed for 1RP-4831 and the proposed remediation with these clarifications:

- 1) Sidewall AND bottom confirmation samples taken for all proposed excavation areas and must be no greater than 50 ft apart.
- 2) Laboratory analyses must include Benzene, BTEX, and extended TPH.
- 3) On an appropriately scaled map, demarcate confirmation sample locations with GPS coordinates.
- 4) Include dated photo documentation of delineation and remediation in the subsequent report.

Like approval from NMSLO required. Additional stipulations regarding right of entry may exist. NMSLO may verify.

Thanks,

Christina Hernandez  
EMNRD-OCD  
Environmental Specialist  
1625 N. French Drive  
Hobbs, NM 88240  
575-393-6161 x111  
[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@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 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.

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**From:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>  
**Sent:** Friday, July 13, 2018 4:44 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Hernandez, Christina, EMNRD <[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)>; 'rmann@slo.state.nm.us' <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>  
**Cc:** 'Pennington, Shelby' <[Shelby\\_Pennington@xtoenergy.com](mailto:Shelby_Pennington@xtoenergy.com)>  
**Subject:** Re: 1RP-4831 - Delineation Report, EMSU Well #101 Flow Line Leak, XTO Energy, Inc., July 5, 2018

Dear Ms. Yu, Ms. Hernandez and Mr. Mann,  
Larson & Associates, Inc. (LAI), on behalf of XTO Energy, Inc. (XTO), submits the attached delineation report for a produced water leak from a flowline connected with the EMSU Well #101 in Lea County, New Mexico. The spill occurred where the flowline crosses a pipeline right of way where a contractor for the pipeline company accidentally cut the line. XTO proposes the following remedial actions in response to the spill:

- Expand excavation where flowline was repaired to the north, south and west laterally between about 5 to 10 feet from current excavation boundary to the current excavation depth;
- Collect confirmation sidewall samples at approximately 2 feet bgs and analyze for chloride by EPA Method 300;
- Excavate soil from area around DP-4 for approximately 15 x 15 feet, depending on pipelines, to approximately 4 feet bgs and collect confirmation sidewall (north, south, east and west) at approximately 2 feet bgs and bottom sample at approximately 4 feet bgs and analyze for chloride by EPA Method 300;
- Excavate soil from area around DP-6 for approximately 10 x 10 feet to approximately,

depending on pipelines, to 1 foot bgs and collect confirmation sidewall (north, south, east and west at approximately 0.5 feet bgs and bottom sample at approximately 1 foot bgs and analyze for chloride by EPA Method 300;

- Dispose of excavated soil at Sundance (Parabo) disposal;
- Assuming no further soil excavation is required backfill excavations with clean soil and seed with BLM Mix No. 3.

Your approval of the delineation report and proposed remediation plan are appreciated. Please contact Shelby Pennington with XTO at (432) 682-8873 or email [Shelby\\_Pennington@xtoenergy.com](mailto:Shelby_Pennington@xtoenergy.com) or me if you have questions.

Respectfully,

Mark J. Larson, P.G.  
President/Sr. Project Manager  
507 N. Marienfeld St., Suite 205  
Midland, Texas 79701  
(432) 687-0901 ( O )  
(432) 556-8656 ( C )



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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Tuesday, November 28, 2017 4:59 PM  
**To:** Mark Larson; 'Groves, Amber'  
**Cc:** 'Williams, Luke'; 'Donald, Patricia'  
**Subject:** RE: Re: 1RP-4831 - Delineation Plan, EMSU Well #101 Flow Line Leak, XTO Energy, Inc., October 15, 2017

Mr. Larson:

Please address these concerns regarding the proposed delineation plan for 1RP-4831:

1. The topographic map for Figure 1 indicated water tanks rather than the nearest NMOSE freshwater well. Please provide documentation for the water well in Section 30P- 20S- 37E. Based on the GPS coordinates of the release location, the nearest NMOSE well with depth to groundwater (L04410)- approximately 5300 ft. Northeast- indicates depth at 35 ft.
2. Please be advised that based on verification of depth to groundwater, the additional depth to maintain permissible chloride levels of 600 mg/kg may differ.

3. On an appropriately scaled map, please indicate the dimensions of the pipeline trench and which sample points are within the trench.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto: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.

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**From:** Mark Larson [<mailto:Mark@laenvironmental.com>]  
**Sent:** Monday, November 27, 2017 2:39 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; 'Groves, Amber' <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>  
**Cc:** 'Williams, Luke' <[Luke\\_Williams@xtoenergy.com](mailto:Luke_Williams@xtoenergy.com)>; 'Donald, Patricia' <[Patricia\\_Donald@xtoenergy.com](mailto:Patricia_Donald@xtoenergy.com)>  
**Subject:** FW: Re: 1RP-4831 - Delineation Plan, EMSU Well #101 Flow Line Leak, XTO Energy, Inc., October 15, 2017

Hello Olivia,

This message is submitted on behalf of XTO Energy, Inc. (XTO) as a follow up to the email sent on October 9, 2017, conveying the delineation plan for 1RP-4831, and approval to delineate the spill according to the attached plan? Please contact Luke Williams with XTO at (432) 682-8873 or email [Luke\\_Williams@xtoenergy.com](mailto:Luke_Williams@xtoenergy.com) or me if you have questions.

Respectfully,

Mark J. Larson, P.G.  
President/Sr. Project Manager  
507 N. Marienfeld St., Suite 205  
Midland, Texas 79701  
(432) 687-0901 ( O )  
(432) 556-8656 ( C )



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**From:** Mark Larson  
**Sent:** Thursday, October 19, 2017 5:41 PM  
**To:** 'Yu, Olivia, EMNRD'  
**Cc:** 'Williams, Luke'; Sarah Johnson  
**Subject:** Re: 1RP-4831 - Delineation Plan, EMSU Well #101 Flow Line Leak, XTO Energy, Inc., October 15, 2017

Dear Ms. Yu,

Larson & Associates, Inc. (LAI), on behalf of XTO Energy, Inc. (XTO), submits the attached delineation plan for a produced water leak from the flow line from EMSU Well #101. Please contact Luke Williams with XTO at (432) 682-8873 or email [Luke\\_Williams@xtoenergy.com](mailto:Luke_Williams@xtoenergy.com) or me if you have questions.

Respectfully,

Mark J. Larson, P.G.  
President/Sr. Project Manager  
507 N. Marienfeld St., Suite 205  
Midland, Texas 79701  
(432) 687-0901 ( O )  
(432) 556-8656 ( C )



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