

From: Ashley Ager
To: [Weaver, Crystal, EMNRD](#); jamos@blm.gov; stucker@blm.gov
Cc: [Littrell, Kyle](#)
Subject: PLU Phantom Banks 20-25-31/2RP-4486
Date: Thursday, November 30, 2017 11:27:06 AM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[PLU Phantom Banks 20-25-31_2RP-4486_Proposed Work Plan.pdf](#)

Crystal,

On behalf of XTO Energy, I have attached a proposed work plan for the PLU Phantom Banks 33-25-30/2RP-4486 for your review.

Thank You,
Ashley

Ashley Ager, M.S., P.G.
Director of Regional Offices



LT Environmental, Inc.
848 East 2nd Avenue
Durango, Colorado 81301
(970) 385-1096 office
(970) 946-1093 mobile
www.ltenv.com

Connect with us:



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COMPLIANCE / ENGINEERING / REMEDIATION

LT Environmental, Inc.

3300 North A Street
Building 1, Suite 103
Midland, Texas 79705
432-704-5178

November 30, 2017

Ms. Crystal Weaver
New Mexico Oil Conservation Division
811 S. First Street
Artesia, New Mexico 88210

**RE: Proposed Work Plan
PLU Phantom Banks 20-25-31 Battery
2RP-4486
XTO Energy, Inc.
Eddy County, New Mexico**

Dear Ms. Weaver:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), proposes the following work plan to investigate impacted soil at the PLU Phantom Banks 20-25-31 Battery (Site) in response to a release of approximately 11 barrels (bbls) of produced water from a saltwater disposal pipeline on November 11, 2017. XTO recovered 1 bbl of liquids as reported to the New Mexico Oil Conservation Division (NMOCD) on a Release Notification and Corrective Action Form C-141 dated November 14, 2017. This work plan addresses residual impact to soil and is being submitted in response to the conditions of approval from the NMOCD documented on the C-141.

BACKGROUND

The Site is located in the northwest quarter of the northwest quarter of Section 20 within Township 25 South and Range 31 East in Eddy County, New Mexico. Depth to groundwater at the Site is estimated to be greater than 100 feet. The nearest permitted water well is C03781POD1, located approximately 2 miles west of the Site with a depth to water listed as 325 feet. Additionally, the groundwater potentiometric map used by NMOCD for Eddy County indicates groundwater is greater than 100 feet deep at the Site. The closest surface water to the Site is a dry stream located approximately 2 miles west of the release area. Based on these criteria, the New Mexico Oil Conservation Division (NMOCD) site ranking for remediation action levels is a 0 and the following remediation action levels apply: 10 milligrams per kilogram (mg/kg) benzene, 50 mg/kg benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 5,000 mg/kg total petroleum hydrocarbons (TPH). Based on depth to groundwater greater than 100 feet, LTE proposes a site-specific chloride action level of 600 mg/kg or within range ($\pm 10\%$) of background concentrations.

PROPOSED DELINEATION

XTO will map the impacted area based on visual observations of soil staining. To investigate soil impact, XTO will collect soil samples at the surface of the release to characterize lateral extent,



Weaver, C.
Page 2

then advance a borehole as necessary in the center of the impacted area to delineate the total depth of impact. Boreholes may be advanced to the north, east, west, and south until lateral extent is defined. Continuous soil samples will be logged and described using the Unified Soil Classification System (USCS) to delineate potential hydrocarbon and saltwater impacts. The intervals from immediately beneath the ground surface and then every five feet thereafter will be screened for volatile aromatic hydrocarbons as well as any soil that is stained or has a hydrocarbon odor using a photo-ionization detector (PID). The soil borings will be advanced until one of three conditions are met: groundwater is encountered, auger refusal, or field screening indicates the extent of hydrocarbon soil impact is below NMOCD standards based on site ranking. All surface soil samples will be submitted to a certified laboratory for analysis of BTEX by United States Environmental Protection Agency (EPA) Method 8021, TPH – gasoline range organics (GRO), diesel range organics (DRO), and motor oil range organics (MRO) by EPA Method 8015, and chloride by EPA Method 300.1. In boreholes, soil samples with the highest PID result and a bottom hole sample will be submitted for laboratory analysis. XTO will collect at least one background soil sample for analysis of chloride by EPA Method 300.1.

REPORTING

XTO will prepare a report documenting all field activities and describing results for submittal to the NMOCD. The report will include site maps and a table of laboratory analytical results. Based on the results of the delineation, XTO will propose an appropriate remediation strategy.

SCHEDULE

XTO will complete the delineation within four weeks of the date of approval of this work plan by NMOCD. The report will be submitted to the NMOCD within two weeks of receipt of laboratory analytical results.

LTE appreciates the opportunity to provide this proposed work plan to the NMOCD. If you have any questions or comments regarding this plan, do not hesitate to contact me at (970) 385-1096 or via email at aager@ltenv.com or Kyle Littrell at XTO at (970) 317-1867 or Kyle_Littrell@xtoenergy.com.

Sincerely,
LT ENVIRONMENTAL, INC.

A handwritten signature in black ink that reads "Ashley L. Ager". The signature is written in a cursive, flowing style.

Ashley L. Ager, M.S., P.G.
Senior Geologist

Cc: Kyle Littrell, XTO



From: [Weaver, Crystal, EMNRD](#)
To: ["Ruth, Amy"; Bratcher, Mike, EMNRD; "Tucker, Shelly"; "Jim Amos"](#)
Cc: ["Littrell, Kyle"; "McSpadden, Wes"; "Sanders, Toady"; "Foust, Bryan"](#)
Subject: RE: Initial Form C-141 - PLU Phantom Banks 20-25-31 Battery 11-2-17
Date: Thursday, December 7, 2017 11:37:00 AM
Attachments: [image001.png](#)

Amy,

I see that a work plan is already in our queue to review for this release. So as far as the follow up request below is concerned please disregard.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Weaver, Crystal, EMNRD
Sent: Thursday, December 7, 2017 11:35 AM
To: 'Ruth, Amy' <Amy_Ruth@xtoenergy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Jim Amos <jamos@blm.gov>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; McSpadden, Wes <Wes_McSpadden@xtoenergy.com>; Sanders, Toady <Toady_Sanders@xtoenergy.com>; Foust, Bryan <Bryan_Foust@xtoenergy.com>
Subject: RE: Initial Form C-141 - PLU Phantom Banks 20-25-31 Battery 11-2-17

RE: XTO (BOPCO) * PLU Phantom Banks 20-25-31 Battery (API used is 30-015-40764) * 2RP-4486

Amy,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval (COA). The OCD tracking number for this event is 2RP-4486, please refer to this tracking number on any and all submissions sent in to the OCD. Please remit a site characterization plan (see COA document included in attachment) or advise OCD of plan of action by no later than 12/14/17.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Ruth, Amy [mailto:Amy_Ruth@xtoenergy.com]
Sent: Tuesday, November 14, 2017 1:23 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Jim Amos <jamos@blm.gov>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; McSpadden, Wes <Wes_McSpadden@xtoenergy.com>; Sanders, Toady <Toady_Sanders@xtoenergy.com>; Foust, Bryan <Bryan_Foust@xtoenergy.com>
Subject: Initial Form C-141 - PLU Phantom Banks 20-25-31 Battery 11-2-17

Good Afternoon,

Please find attached, the initial C-141 for an accidental release of fluid from our referenced facility. As always, thank you for your help and call me with any questions. Have a good evening.

Respectfully,

Amy C. Ruth

Delaware Basin Division
Environmental Coordinator
3104 E. Greene Street | Carlsbad, NM 88220 | M: 432.661.0571 | O: 575.887.7329



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From: [Weaver, Crystal, EMNRD](#)
To: [Ruth, Amy](#); [Bratcher, Mike, EMNRD](#); [Tucker, Shelly](#)
Cc: [Littrell, Kyle](#); [Jody Walters](#); [Ashley Ager](#)
Subject: RE: Termination Request Poker Lake Unit 158 Battery, 2RP-2297 and 2RP2762
Date: Tuesday, February 6, 2018 1:21:00 PM
Attachments: [image001.png](#)

Hello all,

I just re-read this today and I wanted to make sure I clarify as much as possible.

XTO is approved to just skip forward and start sampling and discovery efforts for the projects that Ashley Ager sent the generalized sampling plans on:

PLU Phantom Banks 20-25-31 *2RP-4486
PLU Pierce Canyon #33 * 2RP-4460
Sizzler State #1H * 2RP-4469
PLU Ross Ranch 33-25-30 * 2RP-4450, 2RP-4508
PLU Big Sinks 3-25-31 * 2RP-4470
PLU #432 * 2RP-4466
Nash Unit #38 * 2RP-4451

***** you all are approved to skip past those generalized sampling plans, but OCD would prefer that you all still present work plans on these projects once sampling and discovery efforts are completed.*****

In the future you all can skip sending those generalized sampling plans (like the ones Ashley had sent for the projects above) and XTO can just get out and start working on their spill response efforts which would include:

- Obviously immediate response: scrapping off the wet contaminated soil, GPS of spill plume, plotting ideal sample point locations etc.
- As well as, *((as long as XTO feels confident about what OCD is looking for based on OCD COAs, Rules and Regs, RRALs etc. XTO can move forward (at risk) on))* collecting samples and performing other preliminary tasks that XTO may need to accomplish in order to get themselves ready to write up a work plan. Albeit they have permission from land owners – private, BLM or SLO prior to performing any sampling dirt work.
- OCD would like XTO to provide advance notification (at least 48 hours and sample preferable during business hours) of when they plan to sample
- OCD prefers that any excavation/remediation efforts begin after XTO has an approved work plan in place.

If any of this needs further clarification please let me know.

Thank you,

Crystal Weaver

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811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Weaver, Crystal, EMNRD
Sent: Friday, February 2, 2018 4:54 PM
To: Ruth, Amy <Amy_Ruth@xtoenergy.com>; Bratcher, Mike, EMNRD
<mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Jody Walters <sjwalters@basinenv.com>; Ashley
Ager <aager@ltenv.com>
Subject: RE: Termination Request Poker Lake Unit 158 Battery, 2RP-2297 and 2RP2762

Hello all,

Mike is going to be out for a while so I will try and get this PLU #158 looked at for sure next week. As well as some of the others that are on Kyle's list (that he sent today attached to his email that details what was discussed at the meeting on 2/1/18 – I attached Kyle's list above). Keep in mind that I will do what I can to get the projects looked at as soon as possible but advancing them from their spot in the que wont be something I am able to do for all of the projects on Kyle's list. As I said I will do what I can though.

Kyle and I just talked on the phone right now and agreed that going forward the ones on Kyle's list where Ashley has written just the generalized sampling plans for those OCD would like XTO to move forward albeit that they provide advance notification (at least 48 hours and sample preferable during business hours) of when they plan to sample or dig and at what locations for what 2RP cases and that they of course have prior approval from either the BLM, SLO or private land holders before they begin their efforts.

Thank you for your patience and if that needs to be clarified at all please let me know.

Thanks again,

Crystal Weaver

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From: Ruth, Amy [mailto:Amy_Ruth@xtoenergy.com]
Sent: Thursday, January 18, 2018 8:32 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Jody Walters <sjwalters@basinenv.com>; Robbie Runnels <rrunnels@basinenv.com>
Subject: RE: Termination Request Poker Lake Unit 158 Battery, 2RP-2297 and 2RP2762

Good Morning,

Following up on my conversation with Mr. Bratcher from the week before last, I was wondering if this termination request has been reviewed yet. I'm aware that we all have much to do and don't mean to be a pest! If you should have any questions about it, please call me anytime. We are awaiting your approval to backfill before we can move forward with other projects there.

Thanks so much for your help!

Amy C. Ruth

Delaware Basin Division
Environmental Coordinator
3104 E. Greene Street | Carlsbad, NM 88220 | M: 432.661.0571 | O: 575.689.3380



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From: Robbie Runnels [<mailto:rrunnels@basinenv.com>]
Sent: Friday, December 15, 2017 3:45 PM
To: mike.bratcher@state.nm.us; Weaver, Crystal, EMNRD; Tucker, Shelly
Cc: Ruth, Amy; Littrell, Kyle; Jody Walters
Subject: Termination Request Poker Lake Unit 158 Battery, 2RP-2297 and 2RP2762

Mr. Bratcher,

Attached is the Termination Request for the aforementioned site. We would like to backfill this location as soon as possible. Please let me know if you have any questions or concerns.

Best Regards,

Robbie Runnels

Project Manager
Basin Environmental Service Technologies
3100 Plains Hwy.
P.O. Box 301
Lovington, NM 88260
p. 575-396-2378 m. 575-441-5598
f. 575-396-1429
rrunnels@basinenv.com

From: [Weaver, Crystal, EMNRD](#)
To: [Ruth, Amy](#); [Bratcher, Mike, EMNRD](#); [Tucker, Shelly](#)
Cc: [Littrell, Kyle](#); [Jody Walters](#); [Ashley Ager](#)
Subject: RE: Termination Request Poker Lake Unit 158 Battery, 2RP-2297 and 2RP2762
Date: Tuesday, February 6, 2018 2:02:00 PM
Attachments: [image001.png](#)

Hello all,

Also I left out one detail.

Per our conversation during the meeting on 2/1/18 and during a phone call Kyle and I had on 2/6/18, OCD is fine with XTO moving forward on any project (albeit they have permission from land owners – private, BLM or SLO etc., and have done their 811 call prior to performing any dirt work) all the way to the closure stage as long as XTO is fully aware that all work done would be on an at risk basis and may require follow up if OCD deems that actions taken were unsatisfactory to meeting OCD COA and Rules and Regs requirements.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
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Amy C. Ruth

Delaware Basin Division

Environmental Coordinator

3104 E. Greene Street | Carlsbad, NM 88220 | M: 432.661.0571 | O: 575.689.3380



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Best Regards,

Robbie Runnels

Project Manager
Basin Environmental Service Technologies
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P.O. Box 301
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f. 575-396-1429
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District II
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Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 385787

CONDITIONS

Operator: BOPCO, L.P. 6401 Holiday Hill Rd Midland, TX 79707	OGRID: 260737
	Action Number: 385787
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

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