

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Wednesday, May 8, 2019 3:23 PM
To: 'Ashley Ager'
Cc: Littrell, Kyle; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; 'jamos@blm.gov'; Mann, Ryan; Baker, Adrian; 'Crystal Weaver'
Subject: Remediation Work Plan Approval - XTO - Elk Wallow 11 State #001H Battery (2RP-4967) 8-27-2018
Attachments: Remediation Plan Approval - XTO - Elk Wallow 11 State #1H Battery - (2RP-4967) 5.8.19.pdf

Ashley,

We have received your Workplan/Remediation Proposal for **2RP-4967 Elk Wallow 11 State #1H Battery**, thank you. This Workplan/Remediation proposal is approved.

The variance is approved for collecting a 5-point composite area to represent each 1,000 square foot area. Just for future reference, the OCD is looking closely at setting a maximum 5-point composite area of:

$<50' = 400 \text{ ft}^2$

$50' < X < 100' = 600 \text{ ft}^2$

$>100' = 800 \text{ ft}^2$

Please let me know if you have any further questions.

Regards,

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

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.

From: Ashley Ager <aager@ltenv.com>
Sent: Friday, April 26, 2019 5:17 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Crystal.Weaver@state.nm.us; 'jamos@blm.gov' <jamos@blm.gov>;

Mann, Ryan <rmann@slo.state.nm.us>; Baker, Adrian <Adrian_Baker@xtoenergy.com>

Subject: [EXT] RE: Remediation Work Plan Denied - XTO - Elk Wallow 11 State #001H Battery (2RP-4967) 8-27-2018

All,

Please see the attached revised work plan for the Elk Wallow 11 State #001H Battery. This plan includes excavation of the impacted soil and replaces the original plan that was denied by NMOCD and BLM.

Thank You,
Ashley

Ashley Ager
Vice President of Regional Offices

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

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

Sent: Wednesday, March 27, 2019 1:56 PM

To: Adrian Baker <abaker@ltenv.com>

Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Subject: Remediation Work Plan Denied - XTO - Elk Wallow 11 State #001H Battery (2RP-4967) 8-27-2018

Adrian,

The proposed alternative remediation method to excavation is denied. After reviewing the Google Earth images of the immediate area, the "Dry Wash" is negligible. Please remediate by following the spill rule 19.15.29.13, which states, "The reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA method 300.0 or other test methods approved by the division. Please make the needed adjustments to the remediation plan and resubmit.

Please include pages 3, 4, and 5 for the future remediation plan.

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

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.

From: Adrian Baker <abaker@ltenv.com>
Sent: Tuesday, March 26, 2019 9:15 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>
Subject: [EXT] Third request - Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

Mike,

Attached is the Deferral Request for Elk Wallow 11 State #001H Battery/2RP-4967. The Deferral request was initially submitted to you on 11/7/2018. This email just serves as a reminder of the submitted report.

Thank you

Adrian Baker
Project Geologist/Office Manager
(432) 894-5641 cell

From: Adrian Baker
Sent: Thursday, November 29, 2018 4:45 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>; jamos@blm.gov; stucker@blm.gov
Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>
Subject: RE: Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

Maria,

We have reviewed the remediation work plan for the Elk Wallow 11 State #1 release (attached, originally submitted 11/8/18 below). The work plan for this site was not requesting a time or sampling "variance." It proposes an alternative remediation method to excavation. Since it is not a standard remediation approach, there is additional information regarding background, existing sampling data, and method. We believe including that additional detail is appropriate in this case. We have consulted with Shelly Tucker at BLM and believe this approach best fits with BLM's preference and will accomplish remediation to NMOCD standards.

Thank you

Adrian Baker
Project Geologist
(432) 894-5641 cell

From: Adrian Baker
Sent: Thursday, November 8, 2018 9:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>; jamos@blm.gov; stucker@blm.gov
Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>
Subject: RE: Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

My apologies attached is the Remediation Work Plan for Elk Wallow 11 State #001H Battery/2RP-4967.

Thank you

Adrian Baker
Project Geologist
(432) 894-5641 cell

From: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Sent: Thursday, November 8, 2018 8:13 AM
To: Adrian Baker <abaker@ltenv.com>; Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>; jamos@blm.gov; stucker@blm.gov
Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>
Subject: RE: Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

Adrian – your attachment didn't make it.

From: Adrian Baker <abaker@ltenv.com>
Sent: Wednesday, November 7, 2018 4:06 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>; jamos@blm.gov; stucker@blm.gov
Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>
Subject: [EXT] Remediation Work Plan - Elk Wallow 11 State #001H Battery/2RP-4967

All,

Attached is the Remediation Work Plan for Elk Wallow 11 State #001H Battery/2RP-4967. If you have any questions, please do not hesitate to contact myself or Kyle Littrell at XTO.

Thank you
Adrian Baker
Project Geologist



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