

From: [Billings, Bradford, EMNRD](#)
To: [Littrell, Kyle](#)
Subject: RE: North Seven Rivers Queen Transfer Line – 1RP-4436/nJXK1625629266
Date: Wednesday, February 10, 2021 2:50:00 PM

02/10/2021

Kyle Littrell – XTO

Re: 1RP-4436/nJXK1625629266

Dear Kyle,

Thank you for pointing out a data mis-interpretation on my part. This did not include the groundwater discussion you have provided. Nonetheless, the outcome is the same and is now adjusted.

This incident is now CLOSED in OCD data base. Please keep a copy of this communication for your files as no PAPER copy will follow.

Thank you for your efforts, and I apologize for previous determination on need for boring.

Sincerely,

Bradford Billings
EMNRD/OCD

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: Littrell, Kyle <kyle.littrell@exxonmobil.com>
Sent: Wednesday, February 10, 2021 12:27 PM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] North Seven Rivers Queen Transfer Line – 1RP-4436/nJXK1625629266

Bradford,

In response to your denial of the subject site, XTO provides the following additional information/clarification and requests you reconsider the closure for approval. The reason provided by you for denial and our response to the denial is provided below.

North Seven Rivers Queen Transfer Line – 1RP-4436/nJXK1625629266

Reason for denial: OCD requires a boring to 51 feet or groundwater to verify DTW evaluation. When completed send data in an addendum report. If dry to 51 feet then OCD can close.

Response:

- Regardless of the depth to water determination, the most stringent closure criteria applied to the site due to the release occurring in an off-pad pasture area. Laboratory analytical results for all soil samples collected within and around the release/historical excavation extent were below the most stringent closure criteria for benzene, BTEX, TPH, and chloride (maximum chloride concentration of 238 mg/kg, hydrocarbons were non-detect).
- Depth to water evaluation:
 - The closest permitted water well with depth to water data is USGS well 322443103134001 located 0.64 miles southeast of the site with a depth to water of 118' bgs. Elevation at the water well location is approximately 8 feet lower in elevation than the Site.
 - Additional wells in every other direction from the site indicate a regional depth to groundwater trend greater than 100' bgs:
 - NMOSE well 00763, depth to water 137', measured in 1991, 0.86 miles east
 - USGS 322531103153401, depth to water 198.78', measured in 1996, 1.5 miles west
 - USGS 322637103134501, depth to water 150.88', measured in 1996, 1.9 miles north
 - The regional trend does not support shallow groundwater less than 100 feet bgs at the Site. There are no regional or site-specific hydrological conditions, such as wetlands, surface water, or vegetation that suggest the Site is conducive to shallow groundwater.

Based on the fact that regional data provides a consistent trend to indicate groundwater is deep and remediation to the most stringent standard was confirmed in sampling data, there is no risk to groundwater at this location and a soil boring seems unnecessary. Can you reconsider your denial of the closure request for the North Seven Rivers Queen Transfer Line (1RP-4436/nJXK1625629266)? Thanks for your consideration in this matter. –Kyle

Kyle Littrell
Environmental Manager
Permian and Delaware Business Units

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kyle.littrell@exxonmobil.com

From: Billings, Bradford, EMNRD [<mailto:Bradford.Billings@state.nm.us>]

Sent: Tuesday, February 2, 2021 5:48 PM

To: Littrell, Kyle <kyle.littrell@exxonmobil.com>

Subject: Decisions on Numerous Sites/Incidents/Releases

External Email – Think Before You Click

2/2/2021

Kyle Littrell – XTO Energy

Hello,

If this communication needs to be forwarded to others within XTO organizational structure, please do so, and thank you! Please incorporate incident numbers in all communication on locations.

RE:

1. 1RP-2239/nRM2101347620 Former State K BATT - Remediation Plan is approved with one CONDITION. As the Oil Conservation Division (OCD) is not sufficiently convinced of depth to water (DTW) evaluation offered in plan, we require a boring be placed near release area(s) to a depth of 51 feet below ground surface (BGS) or groundwater, whichever comes first. Data may generate a change in offered plan so it is suggested this occur before proceeding with remediation.
2. Golden & Fed Batt #1 (inclusive) - 2RP-521/nKMW1025646177 + 2RP-633/nKMW110629393 + 2RP-2082/nJMW1333053660 + 2P-2439/nAB1422637219 are DEFERRED as per offered report.
3. PLU 200 Flow Line – 2RP-2163/nBGB2103248980 – Incident is CLOSED.
4. PLU Ross Ranch #33-25-30 BATT – 2RP4508/nAB1734036542 – Incident is CLOSED.
5. JRU DI #1 – 2RP-4826/nAB1817350327 – Incident is CLOSED.
6. JRU Unit 48 BATT – 2RP-1142/nMLB1215226744 + 2RP-2556/nAB142933358 - Need an addendum. OCD requires a boring to 51 feet or groundwater to verify DTW evaluation. When completed send data in an addendum report. If dry to 51 feet then OCD can close both releases. Can send to me on email, no need to go through pay portal again.
7. Golden Child Central Tank BATT – 2RP-4636/nBGB2103251010 – Incident is CLOSED.
8. Corral Canyon Fed #4H – 2RP-3713/nHMP1615523982 – Incident is CLOSED.
9. PLU Delaware C SWD BATT/Delaware Tank BATT – 2RP-1205/nJMW1219345739 + 2RP-1304/nJMW1228428008 + 2RP-1305/nJMW1228429248 + 2RP-1383/nJMW1231129593 + 2RP-2264/nHMP1441828179 – CLOSURE is DENIED. Depth to groundwater needs a better evaluation, and suggest a bore hole to 51 feet BGS to verify. Also there needs to be more subsurface soil sampling done at deeper intervals. Over 1000 barrels of produced water was not recovered, and though there was some scraping of surface soils, it has been several years since these multiple releases and OCD needs to be comfortable that the chloride in soils potential has been assessed at possible leaching depths.
10. Thriller BWC Fed. 001H – 2P-4915/nMAP1822341832 – Incident is CLOSED.
11. North Seven Rivers Queen Transfer Line – 1RP-4436/nJXK1625629266 - - Need an addendum. OCD requires a boring to 51 feet or groundwater to verify DTW evaluation. When completed

send data in an addendum report. If dry to 51 feet then OCD can close both releases. Can send to me on email, no need to go through pay portal again.

Incidents above indicated as closed are closed in data base. Other incidents are awaiting final outcome, forms received will be placed in imaged file soon.

Please keep a copy of this communication, as NO paper copy will follow.

OCD appreciates your efforts.

Bradford Billings • Enviro. Spec. A
Environmental Bureau
EMNRD - Oil Conservation Division
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505.670.6549. |bradford.billings@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>

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