

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Monday, April 30, 2018 7:57 AM  
**To:** Raley, Jim; Tucker, Shelly  
**Cc:** Blaney, Karolina  
**Subject:** RE: Ross Draw Unit 14 - Final C-141

RE: RKI/WPX \* Ross Draw Ut 14 \* **2RP-2812** \* DOR: 2/11/15

OCD concurs with BLM **denial of closure request**. Please provide intent for this resolution of this release.

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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:** Tucker, Shelly <stucker@blm.gov>  
**Sent:** Thursday, March 22, 2018 11:57 AM  
**To:** Raley, Jim <James.Raley@wpenergy.com>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Blaney, Karolina <Karolina.Blaney@wpenergy.com>  
**Subject:** Re: Ross Draw Unit 14 - Final C-141

RE: Ross Draw Unit 14 \*\* DOR 02.11.2015

Upon review of the closure report submitted, BLM **denies** the closure based on lack of data and information.

1. Sample BH17-01 - what were the results? I do not see them listed.
2. Sample BH17-02 - you are only showing the results beginning at 4'. Did you remove the top 4'? If not, what are the delineation numbers from surface to 4'?
3. Sample BH17-03 - you are only showing the results beginning at 2'. Did you remove the top 2'? If not, what are the delineation numbers from surface to 2'?
4. Sample BH17-05 - you are only showing the results beginning at 4'. Did you remove the top 4'? If not, what are the delineation numbers from surface to 4'?
5. Sample BH17-06 - you are only showing the results beginning at 4'. Did you remove the top 4'? If not, what are the delineation numbers from surface to 4'?

Looking at the lab report, you only had one sample analyzed for TPH and BTEX and that was BH17-02 at 4'. This release, according to the C-141, was an oil and water mix from the wellhead. Why were the other samples not analyzed to verify the existence or nonexistence of TPH and BTEX?

Also, according to the spill map within your closure, it shows the release was localized from the wellhead towards the facility, but your sample pattern does not support that. Why?

Lastly, looking at Google Earth shows surface disturbance, indicative of a release off site. According to BLM records, no authorization for off-site surface disturbance was authorized, nor were any releases reported to the BLM. Staining from the wellhead to off location is visible... Do you have knowledge of what has occurred?



If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
O&G Spill/Release Coordinator

Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues

with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Thu, Jan 25, 2018 at 8:53 AM, Raley, Jim <[James.Raley@wpxenergy.com](mailto:James.Raley@wpxenergy.com)> wrote:

Re: RKI Exploration/WPX \* Ross Draw Unit 14 \* 30-015-25208 \* 2RP-2812

Please find attached final C-141 and closure report for incident that occurred 2-11-2015.

Jim Raley | Environmental Specialist - Permian Basin

5315 Buena Vista Dr., Carlsbad, NM 88220

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