

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Monday, June 10, 2019 7:24 AM
To: 'Ashley Ager'
Cc: Littrell, Kyle; Tacoma Morrissey; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; jamos@blm.gov
Subject: Deferral Approval - XTO - Poker Lake Unit 52 Battery (2RP-5314) 3.3.19
Attachments: Deferral Approval - XTO - Poker Lake Unit 52 Battery - (2RP-5314) 6.4.19.pdf

Ashley,

I took a second look at this plan and decided to Approve the deferral with the following conditions: All the floor samples be excavated to a depth that contamination amounts are under the limit.

One issue we have with deferrals is that some deferred sample points aren't fully delineated. Potholes are drilled in the spill site, but not necessarily near the deferred sample point where contaminants are left in place. So, there's a bit of a judgement call of whether a pothole 30-40 feet away is really representative of what's going on at the deferred sample point. In this case the PH01 sample point is within about 10-15 feet of the deferred "SW03" sample point.

In the future, with XTO doing so many of these deferrals, please try to make sure that one of the deeper potholes if possible is nearby to the deferred sample point(s), so we can gauge how deep the contaminants go and what will be left in place.

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: Ashley Ager <aager@ltenv.com>
Sent: Thursday, June 6, 2019 3:52 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Tacoma Morrissey <tmorrissey@ltenv.com>; Bratcher, Mike, EMNRD

<mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; jamos@blm.gov

Subject: [EXT] RE: Deferral Denied - XTO - Poker Lake Unit 52 Battery (2RP-5314) 3.3.19

Hi Robert,

Are pothole samples PH01A @ 10' and PH03B @ 6' insufficient for vertical delineation? Both of those samples are clean at depth. If you need more, can you provide some guidance on additional samples you would require for deferral? Feel free to call me if it's easier to discuss.

Thanks,
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: Tuesday, June 4, 2019 11:49 AM

To: Ashley Ager <aager@ltenv.com>

Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Tacoma Morrissey <tmorrissey@ltenv.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; jamos@blm.gov

Subject: Deferral Denied - XTO - Poker Lake Unit 52 Battery (2RP-5314) 3.3.19

Ashley,

We have received your deferral request for (2RP-5314) Poker Lake Unit 52 Battery, thank you. The deferral request is denied.

Before we can approve a deferral the spill needs to be vertically delineated. All of the Floor samples are over the limit in either Chlorides and/or TPH. The OCD request that samples be taken to a depth that contamination amounts are under the limit.

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

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From: Ashley Ager <aager@ltenv.com>

Sent: Friday, May 31, 2019 3:10 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; jamos@blm.gov

Cc: Littrell, Kyle <Kyle.Littrell@xtoenergy.com>; Tacoma Morrissey <tmorrissey@ltenv.com>

Subject: [EXT] Deferral Request - PLU 52 Battery (2RP-5314)

On behalf of XTO, attached is a deferral request for the PLU 52 Battery (2RP-5314) for your review.

Thank You,
Ashley



Ashley Ager

Senior Geologist/Vice President of Regional Offices

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