

From: [Yu, Olivia, EMNRD](#)
To: "Ashley Ager"; [Adrian Baker](#)
Cc: [Littrell, Kyle](#); stucker@blm.gov
Subject: RE: Sharp Nose Federal 1RP-4771
Date: Monday, February 12, 2018 11:51:00 AM
Attachments: image005.png
image001.png
image003.png
image004.png

Ms. Ager:

Please be advised that PID readings are accepted for information only, unless validated with split samples to the an accredited laboratory.

NMOCD approves of the subsequent sampling at the area represented by SP1 for 1RP-4771. Laboratory analyses must demonstrate permissible levels of at least 2 samples in depth (depth obtained clean and depth maintained at least 2 ft. further).

NMOCD also agreed to the merging of 1RP-4771 and 1RP-4815 into one report, on the condition that impacted area for each respective 1RP is explicitly defined.

Like approval from BLM required.

Thanks,
Olivia

From: Ashley Ager [mailto:aager@ltenv.com]
Sent: Tuesday, February 6, 2018 2:20 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Adrian Baker <abaker@ltenv.com>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; stucker@blm.gov
Subject: RE: Sharp Nose Federal 1RP-4771

Olivia,

XTO has reviewed your questions below and after conducting additional data searches, we are able to provide the following response to your questions. The fieldwork was conducted by a different consultant during the transition of ownership from Bopco to XTO and we do not have additional field notes that may clarify some of the sampling procedures. See our responses in red below:

1. Where is the location of SP-7? **The location of SP-7 has been added to the site map (Figure 2) and included in the attached revised report.**
2. Were there any field data between surface samples and bottom depths at SP-1, S2, or SP3? **XTO does not have any additional field data documenting field observations.**
3. Total TPH did not include MRO fraction. If the proposed remedial plan is no excavation required, then confirmatory samples at the area represented by SP1 will be required to verify Total TPH (GRO, DRO, MRO) concentration is ≤ 5000 mg/kg. **The lab was unable to rerun the**

report to include the MRO fraction. As such, XTO will collect additional samples at SP1. XTO will use a hand auger to advance a borehole at SP1 and collect samples at the surface and then every 2 feet for field screening using a PID. The surface sample and subsurface samples that indicate hydrocarbon impact (greater than 100 ppm PID results) will be submitted for laboratory analysis to confirm vertical extent of impact. XTO will analyze the laboratory samples for TPH – GRO, DRO, and MRO.

4. What is the proposed remedial action? At this time, no remedial action is proposed. Should the new sample at SP1 contain TPH (with MRO) exceeding 5,000 mg/kg, XTO will propose remediation at that time.

XTO would like to schedule the additional fieldwork concurrent with the delineation sampling approved at the same location for 1RP-4815 on Tuesday, February 13, 2018. XTO will implement the delineation work plan, which was also approved by BLM on January 29, 2018, with your clarifications.

If possible, XTO would like to combine the reporting of the field sampling work into one comprehensive report addressing both 1RP-4771 and 1RP-4815. XTO will provide the report with the new sample results within 2 weeks of receipt of laboratory analytical results. The updated report will include proposed remediation of the releases as necessary.

We will also respond in a separate email to alert you and BLM of the schedule for that work.

Thank You,

Ashley Ager
Vice President of Regional Offices

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

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, January 29, 2018 3:01 PM
To: Adrian Baker <abaker@ltenv.com>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>; stucker@blm.gov
Subject: RE: Sharp Nose Federal 1RP-4771

Dear Ms. Baker:

Please address these concerns regarding the report for 1RP-4771:

1. Where is the location of SP-7?
2. Were there any field data between surface samples and bottom depths at SP-1, S2, or SP3?
3. Total TPH did not include MRO fraction. If the proposed remedial plan is no excavation required, then confirmatory samples at the area represented by SP1 will be required to verify Total TPH (GRO, DRO, MRO) concentration is <= 5000 mg/kg.

4. What is the proposed remedial action?

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Adrian Baker [<mailto:abaker@ltenv.com>]
Sent: Wednesday, January 17, 2018 2:12 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Ashley Ager <aager@ltenv.com>; stucker@blm.gov
Subject: Sharp Nose Federal #1/1RP-4815 and 1RP-4771

Good afternoon,

On behalf of XTO energy, I have attached two documents for Sharp Nose Federal #1, a sampling event and closure request report for 1RP -4771 and a revised work plan for 1RP-4815. Based on your request to combine the two releases into one work plan, XTO did a document search and identified the sampling results for the RP-4771 that had been collected last year. We then revised the original work plan for the RP-4815 to include a site map with proposed sample locations.

Please let Kyle or Ashley or myself know if you have any questions or concerns.

Thank you
Adrian Baker
Project Geologist



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, December 5, 2017 4:39 PM
To: Ashley Ager <aager@ltenv.com>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: Sharp Nose Federal #1/1RP-4815

Ms. Ager:

NMOCD requests that a proposed delineation workplan be resubmitted for 1RP-4815 with the inclusion of an appropriately scaled map. The map (i.e., Google Earth) must have the proposed delineation sample locations demarcated with GPS coordinates and the release area outlined. Also, as there is another release on location (1RP-4771), NMOCD recommends that both 1RPs be addressed under the same workplan.

Please be advised that as the surface owner is Federal, Shelly Tucker (cc'd) need to be included in all communications. Like approval from BLM is required for all delineation and remediation activities.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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From: Ashley Ager [<mailto:aager@ltenv.com>]
Sent: Tuesday, December 5, 2017 8:43 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Subject: Sharp Nose Federal #1/1RP-4815

Olivia,

On behalf of XTO Energy, I have attached a sampling work plan for the Sharp Nose Federal/1RP-4815 for your review. I am working with Kyle Littrell, the new EH&S Coordinator for XTO's Delaware Division. Please let Kyle or myself know if you have any questions or concerns.

Thank You,
Ashley

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



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