

From: [Bratcher, Michael, EMNRD](#)
To: [Tacoma Morrissey](#); [ocdonline, emnrd, EMNRD](#)
Cc: [robert.d.woodall@exxonmobil.com](#); [Brown, Colton S](#); [ashley.a.mcafee@exxonmobil.com](#); [Ben Belill](#); [Smith, Cory, EMNRD](#)
Subject: RE: [EXTERNAL] XTO- Denial Response - Corral Canyon Federal Com #016H (nMAP1823050748/2RP-4929)
Date: Tuesday, May 20, 2025 8:02:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Tacoma Morrissey et al.,

The rejection of App ID 188272 associated with the referenced incident number (nMAP1823050748), was rejected based on data provided in the July 19, 2019 Closure Request formulated by LTE Environmental, Inc (LTE) on behalf of XTO Energy, Inc (XTO) and submitted to OCD by XTO on 2/20/2023, (over two years after it was formulated). If XTO now has new data that it believes may be relevant to the project, a complete, alternative report will need to be formulated and submitted to OCD through OCD Online Permitting. It is noted that the date of discovery for this release is listed as 8/3/2018, making this release over seven years old. Failure to meet deadlines on XTO's part is a compliance issue and began ninety days after the date of discovery for this release and continues today.

Regards,

Mike Bratcher

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From: Tacoma Morrissey <tmorrissey@ensolum.com>
Sent: Monday, May 19, 2025 9:35 PM
To: [ocdonline, emnrd, EMNRD <emnrd.ocdonline@emnrd.nm.gov>](#); [Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>](#)
Cc: [robert.d.woodall@exxonmobil.com](#); [Brown, Colton S <colton.s.brown@exxonmobil.com>](#); [ashley.a.mcafee@exxonmobil.com](#); [Ben Belill <bbelill@ensolum.com>](#)
Subject: [EXTERNAL] XTO- Denial Response - Corral Canyon Federal Com #016H (nMAP1823050748/2RP-4929)

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To whom it may concern,

XTO Energy, Inc. (XTO) submitted a Closure Request for the Corral Canyon Federal Com #016H (Incident Number nMAP1823050748) to the NMOCD on July 19, 2019.

NMOCD denied the Closure request on February 20, 2023, for the following reason:

- Confirmation samples exceed the NMOCD Table I limits for Depth to Water of <50'. Please confirm depth to groundwater. Please resubmit through the OCD permitting page by 05/21/2023.

XTO's environmental department did not receive the denial email from the NMOCD and inadvertently missed the 05/21/2023 response deadline. XTO became aware of the denial through an audit listing this release, among others, as outstanding. The "XTO 2018 Incidents requiring immediate action" list was sent to XTO by Mr. Cory Smith on May 5, 2023. However, XTO believes closure approval is warranted for Incident Number nMAP1823050748. Please see the below additional information and clarification regarding the Site in response to the February 20, 2023, NMOCD denial.

- The groundwater well referenced in the July 19, 2019, Closure Request had a recorded depth to groundwater of 40 feet below ground surface (bgs). Based on depth to groundwater <50', the most stringent Table I Closure Criteria *were* applied to Site during remediation activities, as requested in the denial language (regardless of the well being over a mile from the Site).
- As presented in the Closure request, the confirmation soil samples collected from the sidewalls and floor of the *final* excavation extent were compliant with the most stringent NMOCD Table I Closure Criteria.
 - Floor samples FS19, FS28, FS31, and FS53 through FS55 *initially* exceeded the most stringent Table I Closure Criteria. Following removal of additional soil from the floor of the excavation, subsequent floor samples FS19A, FS28B, FS31B, and FS53A through FS55A were compliant with the most stringent Table I Closure Criteria (analytical data was provided in Table 1 of the Closure Request).
- Additionally, new depth to groundwater data is available since the submittal of the original 2019 *Closure Request*. The closest permitted groundwater well is NMOSE well C-04324-POD 8, located on the same pad as the Site and approximately 600 feet east of the historical release area. The well was drilled to a depth of 69 feet during July 2019 and groundwater was encountered at a depth of 65 feet. The well was plugged during January 2022.
- Based on confirmed depth to groundwater at the Site between 51'-100' bgs, the Closure Criteria applied to the Site and presented in the 2019 Closure Request are more stringent than would currently be required.

XTO believes remediation of Incident Number nMAP1823050748 was completed in accordance with

19.15.29 NMAC and no further remediation is required. Based on the additional information and clarifications provided above, on behalf of XTO, I request NMOCD reconsider approval for closure of Incident Number nMAP1823050748.

Thank you for your time and consideration,



Tacoma Morrissey

Associate Principal

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CONDITIONS

Action 465153

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 465153
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
mbratcher	None	5/20/2025