

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, August 31, 2017 6:51 AM
To: 'Sheldon Hitchcock'
Cc: David Adkins; Weaver, Crystal, EMNRD
Subject: RE: Devon Energy: Cotton Draw Unit #114 |30-015-37410| 2RP-4266| Remediation

RE: 2RP-4266

Sheldon,

Your request to backfill excavations at the above referenced release site is approved.

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: Sheldon Hitchcock [mailto:slhitchcock@talonlpe.com]
Sent: Wednesday, August 30, 2017 2:20 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: David Adkins <dadkins@talonlpe.com>
Subject: FW: Devon Energy: Cotton Draw Unit #114 |30-015-37410| 2RP-4266| Remediation

Mike,

David asked me to resend this information to you. Please see below for the details on the Cotton Draw Unit #114.

Respectfully,

Sheldon Hitchcock
Project Manager
Office: 575.746.8768
Direct: 575.616.4021
Cell: 575.689.5198
Fax: 575.746.8905
Emergency: 866.742.0742
Web: www.talonlpe.com



From: Sheldon Hitchcock

Sent: Wednesday, August 16, 2017 4:26 PM

To: 'Weaver, Crystal, EMNRD' <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'stucker (stucker@blm.gov)' <stucker@blm.gov>

Cc: Shoemaker, Mike <Mike.Shoemaker@dv.com>; David Adkins <dadkins@talonlpe.com>

Subject: RE: Devon Energy: Cotton Draw Unit #114 | 30-015-37410 | 2RP-4266 | Remediation

Crystal,

We have complete the additional sampling that you requested and the previously proposed remediation. A site map and lab reports are attached. I have also included data tables for convenience. At this time we would like your approval to backfill the site. Please let me know if you have any questions or concerns.

Remedial Activities

- The impacted area in the vicinity of sample locations S-7, S-11, and S-12 was excavated to a depth of 1-2 feet BGS.
- Confirmation soil samples were taken at sample locations S-11 and S-12.
- The impacted area in the vicinity of sample locations S-3 and S-5 was hand excavated to a depth of 1.5 feet BGS.
- Confirmation soil samples were taken at sample locations S-3 and S-5.

Initial Assessment

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0	ND	352	ND	450
S-2	0	ND	48	ND	ND
S-3	0	ND	7860	ND	63.7
S-4	0	ND	560	ND	ND
S-5	0	ND	16000	ND	4050
S-6	0	ND	48.0	ND	22.0
S-7	0	ND	3040	ND	1520
S-7	1	--	960	--	--
S-7	2	--	448	--	--
S-7	3	--	80	--	--
S-8	0	ND	272	ND	10.2
S-9	0	ND	32	ND	ND
S-10	0	ND	48	ND	198

Additional Delineation

Sample ID	Depth (feet)	Chlorides (mg/kg)
S-11	0	416
S-11	1	96
S-12	2	128
S-12	3	32
S-13	1	32
S-13	2	32
S-14	0	96
S-15	0	80

S-16	0	32
S-17	0	32
S-18	0	32

Confirmation Sampling

Sample ID	Depth (feet)	Chlorides (mg/kg)
S-3	1.5	480
S-5	1.5	48.0

Respectfully,

Sheldon Hitchcock

Project Manager

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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

Sent: Tuesday, August 1, 2017 8:49 AM

To: Sheldon Hitchcock <shitchcock@talonlpe.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'stucker (<stucker@blm.gov>)' <stucker@blm.gov>

Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>; David Adkins <dadkins@talonlpe.com>

Subject: RE: Devon Energy: Cotton Draw Unit #114 |30-015-37410| 2RP-4266| Remediation

Sheldon,

This is a pretty large volume spill 360bbls pw & 450bbls oil with only 60bbls pw & 60bbls oil recovered. Most of your sampling points represent areas outside of the spill and very few represent being within it according to the outline on your site diagram. It is not easy to make an expedited call when data is non-conclusive whether data be non-conclusive for valid reasons or not. A few more sample points within the spill plume need to be attempted before any approval is warranted.

If below grade lines are an issue, then a more delineated sample needs to be obtained in the area between S-6 and S-7, or S-1 and S-7? The originally provided site map was edited with points marked on the map where OCD expects the additional requested samples to be taken. If lines are still in the way of those areas then OCD suggests moving off from the sample point areas that were requested just until you are no longer above buried line(s) and thus capable of providing an actual delineation.

Also in the C-141 initial it is stated that the release “traveled approximately 200’ down the lease road in the barrow ditch.” OCD will require that an adjustment be made to the site map spill outline in order to include this portion of the spill and that samples also be taken along that area.

If you have any questions or concerns please contact myself and or Mike Bratcher here at the District II Office.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Sheldon Hitchcock [<mailto:slhitchcock@talonlpe.com>]
Sent: Thursday, July 27, 2017 2:47 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'stucker (stucker@blm.gov)' <stucker@blm.gov>
Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>; David Adkins <dadkins@talonlpe.com>
Subject: Devon Energy: Cotton Draw Unit #114 |30-015-37410| 2RP-4266| Remediation
Importance: High

Good Afternoon,

The Cotton Draw #114 release was caused by a lightning strike which destroyed the tank battery. Much like the Ore Ida that we just finished, we would like to expatiate the remediation at this site so that this facility can be reconstructed and put back into operation. We have conducted vertical and horizontal delineation at the site (Lab data and site map attached). Due to below grade lines I was not able to vertically delineate all of the sample locations within the impacted area. However we plan on collecting confirmation samples after these areas are excavated by hand. Our proposed remediation process is as follows.

(Site Ranking=0)

1. Excavate the impacted area in the vicinity of sample location S-7 to a depth of 1-foot BGS and backfill with caliche.
2. Hand excavate the impacted areas in the vicinity of sample locations S-3 and S-5 to a depth of 1-foot BGS. Collect confirmation soil samples to ensure that the soil in these areas is below RRAL's.
3. If the confirmation samples indicate that the areas in the vicinity of sample locations S-3 and S-5 are below RRAL's, these areas will be backfilled with caliche and top dressed with gravel.

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0	ND	352	ND	450
S-2	0	ND	48	ND	ND
S-3	0	ND	7860	ND	63.7
S-4	0	ND	560	ND	ND
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S-8	0	ND	272	ND	10.2
S-9	0	ND	32	ND	ND
S-10	0	ND	48	ND	198

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Respectfully,

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