

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** ["Aaron Pachhofer"](#)  
**Cc:** [Bratcher, Mike, EMNRD](#)  
**Subject:** RE: Fasken Oil and Ranch \* Gossett "20" #3H Battery release on 4/12/17 \* 2RP-4176  
**Date:** Tuesday, May 9, 2017 11:44:00 AM  
**Attachments:** [image001.png](#)  
[OCD notation on groundwater data pertinent to release location.pdf](#)

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Hey Aaron,

Good deal on the new C-141. I will add the corrected one to the file.

In response to the rest of your materials/information provided I don't want to wear you out on your efforts cause they are good efforts, but we need something a little more official/consolidated from you that resembles a report of a proposal/work plan which would need to involve a write up that includes any other pertinent info about the release (apply a site ranking) and your proposed plan of action, along with appendixes of your site map, your water data, and your lab results.

Also as a side note: I looked over your water data and did a bit of research of my own. I attached a copy of your original OSE water analysis printout that I wrote some notes on. The attachment basically states that the first two wells on your OSE proximity search are both Artesian sourced wells (RA-5038 is mislabeled in their system as shallow source but when you read the documents associated with it, it is actually documented as an Artesian sourced well). Therefore we would then default to the nearest shallowest well documented and since the nearest shallow sourced well is not much farther from your site then the Artesian sourced wells it is reasonable to use that data as the most conservative estimate of depth to ground water from surface. Now if I include the consideration of your site elevation verses elevation at the site of the shallow sourced well I come up with a difference of 17ft. So add  $17 + 80 = 97$  ft. and thus we are still under 100 ft. So a site ranking of 10 is plausible for the release location.

Therefore, my next question to you is, where are you at in the process of your clean-up efforts for this release site?

We may need to revisit excavation of this site and show where numbers clean up to less than 1000 ppm on TPH.

Please send in your proposal/work plan and we can go from there. I am willing to entertain the idea of placing the excavated soil material on a liner and giving you a timeframe to reach attenuation by so please include that within your proposal/work plan.

Thank you kindly and let me know if you have any further thoughts or questions.

**Crystal Weaver**

Environmental Specialist

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

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**From:** Aaron Pachlhofer [mailto:aaronp@forl.com]  
**Sent:** Thursday, May 4, 2017 2:09 PM  
**To:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Subject:** RE: Fasken Oil and Ranch \* Gossett "20" #3H Battery release on 4/12/17 \* 2RP-4176

Crystal,

You were quite right. It is private surface. Attached is a revised C-141 with the property owner listed.

Also attached is a well report for depth to water and the nearest water wells. The requested searched radius was 2,000 meters. It appears that the nearest well is located around 2,000 feet away (630 meters), and that well has a depth to water of 314 feet. A well further away shows a depth to water of 80 feet, but the location of the well would need to be confirmed—I plot this well in the middle of a well pad that is approximately 20 to 25 feet lower (by USGS topo) than the elevation of my battery where the spill occurred. I feel that this point is very important because this area has a lot of topographic relief.

Finally, I have attached an image of the spill area with an outline of the affected area overlain. Both sample locations are noted.

Regarding a plan for clean up:

Please refer to the image for both sampling locations. It is quite clear that chlorides are not an issue. This spill occurred during the middle of a violent storm that deposited approximately 2 inches of rain (and large hail) during its short duration--the ground was already saturated when the spill occurred. Regardless, I am trying to determine how saline the produced water is at this battery. The issue at hand is the small amount of oil that was lost. The spill was contained within the battery, except for a small 5' x 10' mist that stained vegetation but not the ground. Inside the firewall is pea gravel that has a fair amount of oil on it. The area at S-2 is the low point inside the battery where the oil settled as the fluids were vacuumed from the contained after the spill was discovered. According to my sample results, there is not an issue below 1' (not including pea gravel thickness). Fasken will remove and dispose (or attenuate on onsite) the pea gravel and any heavily stained soil below the pea gravel. Since we have samples below 5,000 mg/kg TPH and less than 10 mg/kg BTEX

further sampling is not needed.

I will forward pictures of the removal and replacement of the pea gravel (and addition of clean soil as needed). As noted above, we would like to allow the waste material to remediate onsite. It will be placed on plastic and turned periodically to help natural attenuation.

If you like, I am happy to meet you onsite, just let me know when I can meeting you there...probably about a 30 minute drive from Artesia....

Thanks,



Aaron Pachlhofer, P.G.  
Environmental Coordinator  
Fasken Oil and Ranch, Ltd.  
6101 Holiday Hill Road  
Midland, TX 79707  
432-687-1777 Office  
830-377-9190 Cell

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

**Sent:** Thursday, April 27, 2017 5:04 PM

**To:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>

**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Subject:** Fasken Oil and Ranch \* Gossett "20" #3H Battery release on 4/12/17 \* 2RP-4176

RE: Fasken Oil and Ranch \* Gossett "20" #3H Battery release on 4/12/17 \* 2RP-4176 \* 30-015-39349

Aaron,

Hey there may I ask that you please make sure to tag both Mike Bratcher and myself on all environmental correspondence to OCD District II.

You have on your C-141 that this spill occurred on state land. When I look up the coordinates you provided I show that it is on Private surface. Can you please let us know which is correct and if the coordinates are not correct then can we get the corrected ones please. Also if this spill is on state surface then the state land office representative Amber Groves would need to be notified of this spill - [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval. The OCD tracking number for this event is 2RP-4176.

Thank you,

## **Crystal Weaver**

Environmental Specialist

OCD – Artesia District II

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Artesia, NM 88210

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