

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** [Ashley Ager](#)  
**Cc:** [Littrell, Kyle](#); [Bratcher, Mike, EMNRD](#); [Honea, Tammy](#); [MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us); [stucker@blm.gov](mailto:stucker@blm.gov)  
**Subject:** RE: Los Medanos 36-23-30 State Tank Battery/2RP-4114  
**Date:** Friday, January 26, 2018 11:06:00 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Los Medanos 36-23-30 State TB Proposed Delineation Work Plan.pdf](#)  
[1. 4114 - COAs & signed C-141 intial.pdf](#)

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RE: XTO (BOPCO) \* Los Medanos 36-23-30 State Battery \* 30-015-40371 \* 2RP-4114

Kyle/Ashley,

Your Proposed Sampling Work Plan is approved with the following conditions/advisements:

- Approximately 30 ft.+/- south of your location the surface ownership transitions from State Land Office (SLO) land into Bureau of Land Management (BLM) land. Since no diagram was provided of this release and no delineation has occurred yet, there is some uncertainty on the extent of the spill plume, however it is stated on the Initial C-141 that "408sqft of pasture south of the containment" was impacted. Therefore, until a full delineation is completed and a diagram is provided OCD would like to request that the BLM be included on all submissions for this project. I also note that for whatever reason SLO was not tagged on your email submission of this sampling plan. So I will also request that you maintain inclusion with SLO on all submissions for this project. I added them back in again as well.
- I have no idea what ED02095 water well is, I am thinking you were referring to the OSE's permitted well that is labeled C-2095. If that is not correct please feel free to provide further explanation. Depth to ground water data is limited and it seems it is particularly limited in this area. Proper identification of depth to ground water that is representative of that specific location would obviously be more confirmatory on what actual depth to ground water is for that location. If later that matter needs to be further explored OCD will advise. However, for now, a site ranking of 0 will be considered applicable.
- This release is over a year old now. Hopefully there was a fence around this excavation since you said it has been left open since the pipeline repair. No samples will be accepted from the open hole exposed area because the timeframe that the excavation has been left open renders the samples unrepresentative. Delineation will begin from the bottom of that hole starting at no less than 1' below surface and 1' horizontally into any of the sidewalls. Composite sampling will not be permitted during the delineation and discovery process. Discrete laboratory samples will be required to show that this release is fully defined and that will be achieved by delineating until laboratory data aligns with required site specific target clean up levels. Delineation must fully define the extent of the contamination plume both vertically and horizontally.
- You are welcome to take background samples, however, determination on location of background samples is subject to OCD discretion. If OCD feels that the location or representation of the so called background sample needs to be readdressed resampling may be required. Also background samples need to be at like depth in order to be representative.

Please proceed with your sampling effort and make sure to align the work plan with the requirements that OCD has mentioned above. We look forward to hearing back from you within the less than 2 month timeframe that is stated in this work plan, where by then we shall see where this project is at for its next step.

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.

If you have any questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

## Crystal Weaver

Environmental Specialist

OCD – Artesia District II

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**From:** Ashley Ager [mailto:aager@ltenv.com]

**Sent:** Thursday, November 16, 2017 3:47 PM

**To:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

**Cc:** Littrell, Kyle <Kyle\_Littrell@xtoenergy.com>

**Subject:** Los Medanos 36-23-30 State Tank Battery/2RP-4114

Good Afternoon Crystal,

On behalf of XTO Energy, I have attached a sampling work plan for the Los Medanos 36-23-30 State Tank Battery/2RP-4114 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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