

Venegas, Victoria, EMNRD

From: Weaver, Crystal <caweaver@blm.gov>
Sent: Friday, April 26, 2019 1:45 PM
To: adrian_baker@xtoenergy.com
Cc: Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Venegas, Victoria, EMNRD; jamos@blm.gov; Ashley Ager; Littrell, Kyle
Subject: [EXT] Re: [EXTERNAL] Urgent - Work Plan - JRU 10/2RP-3179, 2RP-3464, and 2RP-5243

Hello all,

BLM concurs with OCD that prior to any further authorizations that additional delineation and more concise intervals of data would be required.

Why was delineation stopped at PH02A at a depth of 42' when lab results showed 92.3mg/kg for total BTEX and 6140mg/kg for total TPH? The work plan documents LTE's site characterization assessment and states that due to site specific factors a full delineation of the most stringent level is required for this project (documented as referencing OCD's Table 1 from their spill rule under the category of <50 feet ground water).

Also I cross checked the depth to ground water data myself. For this area it was found that while the work plan did mention depth to groundwater data for well C-2492-POD2 being depth to water (dtw) of 125 ft bgs, however, the work plan failed to mention well C-2492 which is closer to the spill site (but not very far from C-2492-POD2) had recorded depth to water at 85 ft bgs and the difference in elevation of surface from the location of the spill and the location of that well is something approx. to 10ft. according to what Google Earth states (accuracy on elevation is debatable). Installation of triangulated placement of monitoring wells may need to be considered here if for no other reason then to at least rule out the possibility that groundwater impact occurred.

BLM interpreted that the review of this work plan was urgent due to the tank battery currently being removed. However, BLM also interprets that since the tank battery has been removed that XTO should take advantage of the opportunity to further investigate the area both vertically and horizontally where the tanks once were since it can be derived from the data that residual fluid loss over time may have likely been a concern here regarding how much contaminants are present at the depths shown. Replacement of the battery in this same exact spot on the pad will most likely not be something that BLM would authorize anytime soon. Therefore, relocation of this battery appears to be appropriate to discuss if there is urgency to put things back into production currently while the battery's original location receives further attention.

In addition regarding further investigation concerns, BLM would like to request that more representative investigation efforts regarding delineation and sampling be made around the area demarked by the black X (on the provided site map) that indicates the approx. origination of the other two points of release for the older releases. SS1 showed high TPH 8300mg/kg and total BTEX 139mg/kg at the 0.5' increment and then no data around that area was further provided.

Finally, although delineation is still not complete, currently as things stand, the remediation solution prescribed for this release does not seem adequate in regards to being the most effective for mitigating this site. Additional or alternate proposed efforts will need to be provided.

If further questions or concerns are needing to be addressed with the BLM please contact myself or Jim Amos.

Thank you,

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"3 percent of the water on this planet is considered freshwater. Of that 3 percent only 1 percent is considered accessible, meaning the majority of the remaining 2 percent is trapped in glaciers or snowfields." - National Geographic

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On Fri, Apr 12, 2019 at 3:27 PM Adrian Baker <abaker@ltenv.com> wrote:

All,

Attached is a Work Plan for a recent release and two historical releases at JRU 10/2RP-3179, 2RP-3464, and 2RP-5243. XTO removed the tank battery and needs to replace the tanks as soon as possible for production purposes. Can you please review as quickly as possible?

Thank you



Adrian Baker

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