

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Wednesday, July 12, 2017 9:29 AM
To: Aaron Pachlhofer
Cc: Bratcher, Mike, EMNRD
Subject: RE: Fasken Oil and Ranch * Gossett "20" #3H Battery release on 4/12/17 * 2RP-4176

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

Aaron,

I want to quickly summarize what was discussed on our phone conversation from a few weeks ago. So in light of moving this project forward OCD has agreed to allow for a site ranking of 0-9 at this location which would thus set remediation standards as such, benzene 10ppm, total BTEX 50ppm, and TPH 5000ppm. Chlorides are to be remediated to a standard of 600ppm. Please note that OCD does reserve the right to request that operators drill and identify depth to ground water in circumstances when depth to ground water is not documented or defined within a reasonable proximal distance to the release site.

The proposal for remediation of the above referenced release is approved. Placement and rotation of contaminated soil and pea gravel atop of a plastic liner (of 20mil thickness or greater) on location is approved however a time frame of no longer than 90 days will be placed on this project and final confirmation lab samples will be required to be provided and approved of before any backfill is to occur of this material. Please advise once remedial activities have been scheduled.

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
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Aaron Pachlhofer [mailto:aaronp@forl.com]
Sent: Friday, May 19, 2017 9:52 AM

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

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

Crystal,

I disagree with you on the elevation of the well. As I plot it, I show the elevation on a USGS topo to be approximately 3475 ft and the elevation of my battery at approximately 3495 ft. If I trust google earth (I don't), it tells me that the elevation of my battery is 3506 ft and the plotted well location is 3486 ft.

See for yourself:

Well - 32.562732°, -104.493941°

Battery - 32.558008°, -104.498731°

I will do what I can to located well RA 05227. As I previously noted, the well plots in the middle of a pad, about 20 feet from a gas well (not one of Fasken's).

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

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

Sent: Tuesday, May 09, 2017 12:45 PM

To: Aaron Pachlhofer <aaronp@forl.com>

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

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

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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 it's 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
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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>

Cc: Bratcher, Mike, EMNRD <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

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

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