

Bratcher, Mike, EMNRD

From: Aaron Pachlhofer <aaronp@forl.com>
Sent: Wednesday, October 18, 2017 3:31 PM
To: Bratcher, Mike, EMNRD
Subject: RE: Fasken El Paso Federal No. 12 and Gossett 20 spills
Attachments: 7H24008 PBELSTD_NELAC_COC_PDF_NEW.rev1 (1) FINAL 08 28 17 1553.pdf; c-141 final.pdf

Mike,

I have to apologize to you and admit that there were a couple of mistakes in the report. In order of your comments:

That should have read "Sample results before removal". It was excavated to about 1 foot below surface. Please note that most everything removed was pea gravel.

- The samples were collect at the surface and 1 foot. Not sure who I made the comment to but it was to the effect "hard to collect samples 1 inch apart!"
- Yes, that material was removed. Roughly one foot of material was removed as noted in the report. It was mostly pea gravel.
- Yes. I thought I sent the lab report from the stock pile to you, but here it is again as an attachment. We plan to return the excavated material to the excavation.

As a final comment: we really aren't even sure if this was a reportable spill. Aside from the small amount of oil that was spilled, we don't know how much water was spilled. This occurred in the middle of a bad storm. We did remove a lot of water from the containment, but I think that the lack of chloride in my surface samples show that it was probably rain water, and not produced water.

An updated C-141 is attached.

Thanks,



Aaron Pachlhofer, P.G.
Environmental Coordinator
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From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, October 18, 2017 2:13 PM
To: Aaron Pachlhofer <aaronp@forl.com>
Subject: RE: Fasken El Paso Federal No. 12 and Gossett 20 spills

Aaron,

For the Gossett site, the closure report lists "Sample results after the initial removal were:" and then it shows S-1 Surface, S-1 1", S-2 Surface S-2 1".

I have some questions:

- Was the next sample under Surface taken at one inch or one foot? The report suggests one foot, but the data and chain of custody sheet show one inch.
- S-2 Surface returned a value of 9680 mg/kg. Was that removed?
- I believe you did a bio-remediation on everything excavated, including gravel. Is there any analytical data on that material?

Thanks,

Mike Bratcher
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575-748-1283 Ext 108

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]

Sent: Monday, October 2, 2017 10:26 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: Fasken El Paso Federal No. 12 and Gossett 20 spills

Mike,

Doc Oberding and I had discussed the soil stockpiles remaining at both of these tank batteries, since the concentrations in the excavations were below limits. Two samples from each stockpile were collected. The lab reports for each are attached. I have also attached the original closure requests that I sent to Crystal.

I would like to return the pea gravel to the inside of the firewall at the Gossett.

I would like to allow our operations personnel to re-use the stockpile at the El Paso Federal No .12 at their discretion.

Please call or email with any questions,



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