

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Friday, October 27, 2017 2:14 PM
To: Aaron Pachlhofer
Cc: Weaver, Crystal, EMNRD
Subject: RE: Fasken Gossett 20 3H

RE: Fasken Oil & Ranch * Gossett 20 3H * **2RP-4176** * DOR: 4/12/17

Aaron,

Your request for closure of the above referenced release is approved. Re-use of any impacted material is restricted to use on location only, and must be at, or below, Recommended Remediation Action Level (RRAL) for this site.

If you have any questions or concerns, please contact me.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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.

From: Aaron Pachlhofer [mailto:aaronp@forl.com]
Sent: Wednesday, October 18, 2017 3:31 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: RE: Fasken El Paso Federal No. 12 and Gossett 20 spills

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
Fasken Oil and Ranch, Ltd.
6101 Holiday Hill Road
Midland, TX 79707
432-687-1777 Office
830-377-9190 Cell

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
NMOCD District 2
811 South First Street
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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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