

From: [Weaver, Crystal, EMNRD](#)
To: ["Littrell, Kyle"; "Ruth, Amy"](#)
Cc: [Bratcher, Mike, EMNRD](#); ["MNaranjo@slo.state.nm.us"](#); [Honea, Tammy](#)
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17
Date: Friday, January 19, 2018 9:31:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[1. 4527 - COAs and signed C-141 Initial.pdf](#)

RE: XTO * Nash Draw #42 Tank Battery (API used is for Nash Unit #42) * 30-015-37194 * 2RP-4527

Amy,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval (COA). The OCD tracking number for this event is 2RP-4527, please refer to this tracking number on any and all submissions sent in to the OCD. Please remit a site characterization plan (see COA document included in attachment) or advise OCD of plan of action by no later than 1/24/18.

Thank you,

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: Weaver, Crystal, EMNRD
Sent: Friday, December 22, 2017 12:47 PM
To: 'Littrell, Kyle' <Kyle_Littrell@xtoenergy.com>; Ruth, Amy <Amy_Ruth@xtoenergy.com>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Amy please note:

I am only sending this email reminding that the picture portion of the process mentioned below seems to be what remains to be done for this release, along with getting the data back from the lab. Photos, data and a statement that all the fill material was removed from the battery are absolutely

fine to be provided along with the Final C-141 form submission. All other requested tasks mentioned below appear to be already within the Initial C-141 form. Thank you.

*When an Initial/Final C-141 (in this case you only sent in an Initial C-141) is submitted for a release that is stated to be fully contained within secondary lined containment, OCD is asking that operators provide a written statement within the Initial/Final C-141 (**attesting to the integrity of the liner and stating that you yourself or another member of your organization ((that has been informed/educated on what to look for)) have inspected the liner, also if the containment involves any fill material OCD needs a statement on the form saying that all fill was removed and replaced**).*

Aside from that request, OCD is also requesting for all operators to include two or 3 photos in the body of the email they send to us showing the condition of the battery before and after it was remediated/inspected. So what I mean by that is take the photos and drop them straight into the body of the email (just paste it right before where you have your signature block with your name and your title description). We want to ask all operators to include those since we have asked some of them to do so. So please if you could just drop us a few photos for this location, not as attachments but straight into the email, that would be awesome. One shot of the location sign and then like I said 2 or so more to represent how the battery/lined containment area looks pre and post.

If you have any questions or concerns regarding this request please let us know.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

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Fax: 575-748-9720

From: Littrell, Kyle [mailto:Kyle_Littrell@xtoenergy.com]

Sent: Wednesday, December 20, 2017 3:45 PM

To: Ruth, Amy <Amy_Ruth@xtoenergy.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Groves, Amber <agroves@slo.state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Crystal,

Corrected and attached for your review. Thanks for your patience. --Kyle

From: Ruth, Amy
Sent: Wednesday, December 20, 2017 2:11 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Crystal,

XTO will resubmit with all corrections made so it can be properly processed. We will send this afternoon instead of tomorrow.

With thanks,

Amy C. Ruth

Delaware Basin Division

Environmental Coordinator

3104 E. Greene Street | Carlsbad, NM 88220 | M: 432.661.0571 | O: 575.887.7329



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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Wednesday, December 20, 2017 1:04 PM
To: Ruth, Amy; Littrell, Kyle
Cc: Groves, Amber; Bratcher, Mike, EMNRD
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Amy,

I am fine with processing it as "accepted for record only" unless XTO would rather it be corrected and resubmitted. I corrected the surface and minerals owner on the form already as well. However, if you all would rather resubmit just let me know and I will hold off on processing.

Thank you kindly,

Crystal Weaver

Environmental Specialist

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811 S. 1st Street

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From: Ruth, Amy [mailto:Amy_Ruth@xtoenergy.com]

Sent: Wednesday, December 20, 2017 12:56 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Littrell, Kyle <Kyle_Littrell@xtoenergy.com>

Cc: Groves, Amber <agroves@slo.state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Good Afternoon Everyone,

My sincere apologies for the mix up on the placing of land ownership to Federal instead of State. It seems this C-141 had issues from the beginning, but that can be remedied very readily. We are prepared to re-send tomorrow.

Crystal,

I left a voicemail this morning just to make sure I understood correctly. As to the 4 gallons that was mentioned in the body of the C-141, we want to clarify that is the volume of fluid that was measured impacting the ground outside containment. I understand that what needs to be on the initial C-141 volume boxes is a volume of 350 B and 4 gal released with 350 B recovered? And yes, that amount of ground impact measured outside the containment was so little that we had someone on hand to shovel it out and had that area sampled (and to the lab for analyses). This immediate action was to address that part of the issue as quickly as possible to prevent migration of constituents, and was done with all adherence to proper sampling regs. Rest assured our purpose is always to remediate to OCD standards. Please call me with any concerns as I hope to have answered your questions and to provide an acceptable initial C-141...

Respectfully,

Amy C. Ruth

Delaware Basin Division

Environmental Coordinator

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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Wednesday, December 20, 2017 11:20 AM
To: Ruth, Amy; Littrell, Kyle
Cc: Groves, Amber; Bratcher, Mike, EMNRD; Jim Amos; Tucker, Shelly
Subject: FW: Release Notification - Nash 42 Tank Battery 12-4-17

Hello all,

I am forwarding this Initial C-141 submission on the Amber Groves from the State Land Office, cause now that the coordinates of the spill have been concluded upon, it is now evident that this spill has occurred in the same tank battery area as the spill from case number 2RP-3976 and 2RP-4235 which we all had concluded on during the process of those cases that this location was in fact on State Land Office land and not Federal surface. This was concluded to also be SLO mineral rights as well, please see email I have attached above from Amber Groves. Please make sure to include Amber/SLO on anything else that is submitted regarding this release and any releases at this location in the future.

Also according to what is stated on the C-141 form it would appear that some remediation efforts have already been conducted. OCD would like to state that all production fluid releases are to be properly delineated and remediated to OCD standards. This is a reportable release so laboratory sampling will need to be provided to OCD and will require that it be based on OCD rules, regs and COA expectations. Also if fluids made contact with the ground, i.e. outside of secondary containment, then a statement of full volume recovery of 350bbls lost and 350bbls recovered is not something that OCD can accept for approval on a C-141 Initial form. This form will have to be accepted for record only. Is the 4 gallons supposed to be all that hit the ground or does the statement on the form where it says "...sent approximately 4 gallons of oil down the vent line into the VRU skid causing it to overflow to the ground" indicate that more than 4 gallons was lost that impacted the ground? Please advise.

If you have any questions or concerns please contact either myself or Mike Bratcher here in the OCD District II Office.

Thank you,

Crystal Weaver

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

From: Ruth, Amy [mailto:Amy_Ruth@xtoenergy.com]
Sent: Wednesday, December 20, 2017 9:55 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Jim Amos <jamos@blm.gov>
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Good Morning Crystal,

Please find attached, the revised initial form C-141 with corrected GPS coordinates. These will reflect the same position as the legal information for the release location. Again, thanks for your help!

Respectfully,

Amy C. Ruth

Delaware Basin Division
Environmental Coordinator
3104 E. Greene Street | Carlsbad, NM 88220 | M: 432.661.0571 | O: 575.887.7329



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From: Ruth, Amy
Sent: Tuesday, December 19, 2017 3:33 PM
To: 'Weaver, Crystal, EMNRD'; Bratcher, Mike, EMNRD; Tucker, Shelly; Jim Amos
Cc: Littrell, Kyle
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Hi Crystal,

My apologies, the GPS coordinates appear to be incorrect. Thank you for the correction. We will get that remedied forthwith and re-send. Hope your day is good ☺

Respectfully,

Amy C. Ruth

Delaware Basin Division

Environmental Coordinator

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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Tuesday, December 19, 2017 3:17 PM
To: Ruth, Amy; Bratcher, Mike, EMNRD; Tucker, Shelly; Jim Amos
Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Hello Amy,

Quick question the release shows up in Section 3 of 25S 30E Unit Letter O based on the coordinates provided on the C-141. However, the API location used is what is entered in the legal description of the form and that is in Section 18 of 23S 30E Unit Letter E. That is two entire township and range squares away from one another. Is the battery that far from the API well location that was provided? Also both legal description and coordinates should be entered in on the C-141 as locations of the spill.

This form can not be processed until this is concluded.
Please advise.

Thank you,

Crystal Weaver

Environmental Specialist

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From: Ruth, Amy [mailto:Amy_Ruth@xtoenergy.com]

Sent: Monday, December 18, 2017 12:15 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Jim Amos <jamos@blm.gov>

Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Foust, Bryan <Bryan_Foust@xtoenergy.com>; McSpadden, Wes <Wes_McSpadden@xtoenergy.com>; Sanders, Toady <Toady_Sanders@xtoenergy.com>; Fuqua, Danny <Danny_Fuqua@xtoenergy.com>

Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

Good Afternoon,

Please find attached, the initial form C-141 regarding the referenced spill event. Thank you for your help and please call with any questions.

Respectfully,

Amy C. Ruth

Delaware Basin Division

Environmental Coordinator

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From: Ruth, Amy

Sent: Tuesday, December 05, 2017 9:48 AM

To: 'Mike Bratcher'; 'Crystal EMNRD Weaver'; Tucker, Shelly; 'Jim Amos'

Cc: Littrell, Kyle; Foust, Bryan; McSpadden, Wes; Sanders, Toady; Fuqua, Danny

Subject: RE: Release Notification - Nash 42 Tank Battery 12-4-17

My apologies everyone,

The notification below should be in reference to the Nash 42 Tank Battery (API for Nash Unit #042 30-015-37194).

From: Ruth, Amy

Sent: Tuesday, December 05, 2017 9:06 AM

To: Mike Bratcher; Crystal EMNRD Weaver; Tucker, Shelly; Jim Amos

Cc: Littrell, Kyle; Foust, Bryan; McSpadden, Wes; Sanders, Toady; Fuqua, Danny

Subject: Release Notification - PLU Big Sinks 3-25-30 Battery 12-4-17

Good Morning Everyone,

Please be informed that yesterday at approximately 10:30 am XTO discovered an accidental release of fluid from the PLU Big Sinks 3-25-30 Battery (API for PLU CVX JV BS #016H 30-015-40581) of an amount in excess of 25 barrels. We will include details with the submission of a form C-141. As always, we appreciate your help and feel free to call me with any questions or concerns.

Respectfully,

Amy C. Ruth

Delaware Basin Division

Environmental Coordinator

3104 E. Greene Street | Carlsbad, NM 88220 | M: 432.661.0571 | O: 575.887.7329



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