

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Tuesday, June 18, 2019 3:56 PM
To: 'Ashley Ager'
Cc: Littrell, Kyle; Tacoma Morrissey; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; jamos@blm.gov
Subject: Deferral Denied - XTO - Ross Draw 3031 Battery - (2RP-5330) 3-10-2019
Attachments: Deferral Denied - XTO - Ross Draw 3031 Battery - (2RP-5330) 6.18.19.pdf

Ashley,

Due to the sensitive nature of the spill site, the OCD denies the deferral request at this time. The site is <50 to groundwater and high karst, which will require additional excavation. The TPH levels are extremely high and need to be addressed. Please attempt to remove as much as possible (12"+) with shovels and/or a hydrovac and resample. The OCD may be able to defer the SS01 through SS04 sample points if TPH levels are decreased substantially, but still over the limit. The sample points that are still over the limit would need to be treated with Micro-Blaze or liquid with microbial strains, surfactants and nutrients designed to digest organics and hydrocarbons.

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@state.nm.us

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 groundwater, 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, or local laws and/or regulations.

From: Ashley Ager <aager@ltenv.com>
Sent: Friday, June 7, 2019 2:08 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; jamos@blm.gov
Cc: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Tacoma Morrissey <tmorrissey@ltenv.com>
Subject: [EXT] Deferral Request - Ross Draw 3031 Battery (2RP-5330)

On behalf of XTO, attached is a deferral request for the Ross Draw 3031 Battery (2RP-5330) for your review.

Thank You,
Ashley



Ashley Ager

Senior Geologist/Vice President of Regional Offices

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