

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, March 20, 2020 4:03 PM
To: Littrell, Kyle
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Deferral Denied - XTO - Pickett Draw Fed #1 (Incident #NAB1919955454)
Attachments: Deferral Denied - XTO - Pickett Draw Fed #1 - (Incident #NAB1919955454).pdf

Kyle,

We have received your Deferral Request Addendum for **Incident #NAB1919955454 Pickett Draw Fed #1**, thank you. This Deferral Request is denied.

- Three additional potholes were advanced to investigate background chloride concentrations at the site. An average was established for the 3 background soil sample locations of 974 mg/kg for chlorides.
- Reserve Pits were discussed on this week's environmental conference call. If a spill leaks into a reserve pit, the pit must be sampled and delineated. It is impossible to distinguish between legacy pit contaminants and contaminants from a new release. Soil sample locations SS01, SS02, and SS03 need to be delineated to 974 mg/kg for chlorides and 100 mg/kg for TPH. The pit near SS01 is totally enveloped by the release and will need to be delineated deeper. The pit between soil sample locations SS02 and SS03 will need to be delineated also. If a liner is encountered, sample underneath it and continue forward with the delineation process.
- SW05 and SW12 sample locations can be deferred, since they are within 10 feet of an active wellhead and within 2 feet of an active pipeline.
- Sample PH03, PH04, PH05, PH06, PH10, FS16, FS20, FS21, FS24, and FS26 appear to be in the pasture and must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 974 mg/kg (average background sample) and less than 100 mg/kg for TPH. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 "Closure Criteria for Soils Impacted by a Release" included in the spill rule <http://164.64.110.134/parts/title19/19.015.0029.html>
- Please finish the delineation process and resubmit the deferral request to the payment portal after completion.

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
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Energy, Minerals, and Natural Resources
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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.