

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Friday, April 17, 2020 8:52 AM  
**To:** 'Chris McKisson'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** Ashley Ager; blm\_nm\_cfo\_spill@blm.gov; James.Raley@wpenergy.com  
**Subject:** RE: NRM1931859826 ROSS DRAW UNIT #011 @ 30-015-24307 2RP-5698

Hi Chris,

Thank you for the explanation. I read the report several times and it wasn't clear, for me, if the impacted soil was effectively removed at sample points SW08 and SW04. Please include the clarification in the report. I would also like to request that RDU 38 information be removed from the report and include the clarification regarding FS04 Chain of Custody. This documentation is required by the rule; 19.15.29.11.A.5.(d). Please, resubmit the corrected report via OCD's fee portal and let me know the PO#.

Thank you,

Victoria Venegas  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 748-1283  
[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@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.

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**From:** Chris McKisson <cmckisson@ltenv.com>  
**Sent:** Friday, April 17, 2020 8:25 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>  
**Cc:** Ashley Ager <aager@ltenv.com>; blm\_nm\_cfo\_spill@blm.gov; James.Raley@wpenergy.com  
**Subject:** [EXT] RE: NRM1931859826 ROSS DRAW UNIT #011 @ 30-015-24307 2RP-5698

Victoria,

We received your denial of this report and would like to provide clarification in response to your comments. Can you please review our clarifications below and determine if they are sufficient for you to reconsider the denial?

- *Two sidewall samples don't meet the closure criteria for this site. Sample SW04\* is over the limit for TPH and BTEX. Sample SW08\* is over the limit for TPH.*
  - This is correct. However; the soil represented by SW08 and SW04 was eventually excavated. We attempted to explain this in the EXCAVATION SOIL SAMPLING section: "Sidewall samples (SW04 through SW06) represented discrete samples collected from soil support pillars intended to be left in place to provide surface flowline and aboveground equipment stability. The pillars were eventually excavated following the removal of the lines and equipment coordinated by WPX. Final composite floor samples

(FS01 through FS08) were collected to confirm impacted soil removal and compliance with NMOCD Closure Criteria.” Discrete soil sample SW04 was effectively replaced by floor samples FS01 and FS04A once the soil support pillar was removed. Sidewall sample SW08 was replaced by SW10 to confirm removal of identified YPH impacts.

- *The Chain of Custody provided for sample FS04 -page 94-, corresponds to an XTO project. (?)*
  - This was an oversight of field staff using an incorrect COC template containing XTO contact information. However, as documented in the Project Information section on the same COC, this sample was submitted for WPX’s RDU11 project corresponding to 2RP-5698.
- *From page 123 to page 143, the report include lab data for project RDU 38 and From page 160 to page 205, the report include lab data for project RDU 38.*
  - This is the result of an error during report compilation. Additional lab data was inadvertently added to this report that is unrelated to this project. All laboratory data for the RDU11 was included, and these data are inconsequential to the report.

I hope these clarifications help. If you have additional questions, please let me know.

Chris McKisson  
West Slope Manager  
Project Environmental Scientist  
(970) 285-9985 office  
(970) 620-5743 cell

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**From:** Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Sent:** Thursday, April 16, 2020 5:56 PM  
**To:** Chris McKisson <[cmckisson@ltenv.com](mailto:cmckisson@ltenv.com)>  
**Subject:** FW: NRM1931859826 ROSS DRAW UNIT #011 @ 30-015-24307 2RP-5698

**Ashley Ager**  
**Vice President of Regional Offices**

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**From:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>  
**Sent:** Thursday, April 16, 2020 5:53 PM  
**To:** Raley, Jim <[James.Raley@wpxenergy.com](mailto:James.Raley@wpxenergy.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Eads, Cristina, EMNRD <[Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)>  
**Cc:** Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>; [blm\\_nm\\_cfo\\_spill@blm.gov](mailto:blm_nm_cfo_spill@blm.gov)  
**Subject:** NRM1931859826 ROSS DRAW UNIT #011 @ 30-015-24307 2RP-5698

**NRM1931859826 ROSS DRAW UNIT #011 @ 30-015-24307 2RP-5698**

Mr. Raley,  
The OCD has denied the submitted Closure Plan C-141 for incident # NRM1931859826 ROSS DRAW UNIT #011 @ 30-015-24307 2RP-5698 for the following reasons:

- Two sidewall samples don't meet the closure criteria for this site. Sample SW04\* is over the limit for TPH and BTEX. Sample SW08\* is over the limit for TPH.
- The Chain of Custody provided for sample FS04 -page 94-, corresponds to an XTO project. (?)
- From page 123 to page 143, the report include lab data for project RDU 38.
- From page 160 to page 205, the report include lab data for project RDU 38.

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through the fee portal.

Thank you,

Victoria Venegas  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 748-1283  
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