Venegas, Victoria, EMNRD

From: Ashley Ager <aager@ltenv.com>
Sent: Friday, April 26, 2019 3:00 PM
To: Hamlet, Robert, EMNRD; Baker, Adrian
Cc: Littrell, Kyle; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; caweaver@blm.gov; jamos@blm.gov; Billings, Bradford, EMNRD; 'jamos@blm.gov'; McKinney, Deborah
Subject: [EXT] RE: Urgent - Work Plan - JRU 10/2RP-3179, 2RP-3464, and 2RP-5243

All,

I've pulled both Crystal's and Robert's responses into one email so that we could address each comment in one effort. Please see the text in blue below. Although I attempted to respond to each comment, would it be prudent to set up a meeting to work through the issues given the number of comments and concern expressed by the regulators? We'd like to better understand the expectations. Discussing potential options for moving forward is probably easier than emailing back and forth. Would NMOCD and BLM be available for a meeting in the next two weeks?

Thank You,
Ashley

Ashley Ager
Vice President of Regional Offices

(970) 385-1096 office
(970) 946-1093 mobile

From: Weaver, Crystal <caweaver@blm.gov>
Sent: Friday, April 26, 2019 1:45 PM
To: adrian_baker@xtoenergy.com
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; jamos@blm.gov; Ashley Ager <aager@ltenv.com>; Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Subject: Re: [EXTERNAL] Urgent - Work Plan - JRU 10/2RP-3179, 2RP-3464, and 2RP-5243

Hello all,

BLM concurs with OCD that prior to any further authorizations that additional delineation and more concise intervals of data would be required.

Why was delineation stopped at PH02A at a depth of 42' when lab results showed 92.3mg/kg for total BTEX and 6140mg/kg for total TPH? The work plan documents LTE's site characterization assessment and states that due to site specific factors a full delineation of the most stringent level is required for this project (documented as referencing OCD's Table 1 from their spill rule under the category of <50 feet ground water).
PH02 is not the vertical delineation point. PH02 was advanced with a track hoe to the maximum depth possible with the available equipment on site. When total depth of the impacted soil could not be identified, LTE had to abandon the pothole and utilize a drill rig to go deeper. BH01 was drilled with a hollow stem auger rig and is the vertical delineation point in the center of the impacted area. It was drilled to 80 feet bgs, sampled and field screened every 5 feet, and 2 samples were submitted for laboratory analysis – the soil with the highest field screening result at 35 feet bgs and the bottom of the borehole at 80 feet bgs. The sample collected at 80 feet bgs was clean and represents vertical delineation at the Site.

Also I cross checked the depth to ground water data myself. For this area it was found that while the work plan did mention depth to groundwater data for well C-2492-POD2 being depth to water (dtw) of 125 ft bgs, however, the work plan failed to mention well C-2492 which is closer to the spill site (but not very far from C-2492-POD2) had recorded depth to water at 85 ft bgs and the difference in elevation of surface from the location of the spill and the location of that well is something approx. to 10ft. according to what Google Earth states (accuracy on elevation is debatable). Installation of triangulated placement of monitoring wells may need to be considered here if for no other reason then to at least rule out the possibility that groundwater impact occurred.
BH01 was drilled to 80 feet bgs on site and no saturated sediments representative of the presence of groundwater was encountered. The borehole was left open for more than 24 hours and no groundwater filled in.

BLM interpreted that the review of this work plan was urgent due to the tank battery currently being removed. However, BLM also interprets that since the tank battery has been removed that XTO should take advantage of the opportunity to further investigate the area both vertically and horizontally where the tanks once were since it can be derived from the data that residual fluid loss over time may have likely been a concern here regarding how much contaminants are present at the depths shown. Replacement of the battery in this same exact spot on the pad will most likely not be something that BLM would authorize anytime soon. Therefore, relocation of this battery appears to be appropriate to discuss if there is urgency to put things back into production currently while the battery's original location receives further attention.
LTE and XTO believe vertical and lateral delineation has been achieved with boreholes BH01 – BH06.

In addition regarding further investigation concerns, BLM would like to request that more representative investigation efforts regarding delineation and sampling be made around the area demarked by the black X (on the provided site map) that indicates the approx. origination of the other two points of release for the older releases. SS1 showed high TPH 8300mg/kg and total BTEX 139mg/kg at the 0.5' increment and then no data around that area was further provided.
All soil represented by soil sample SS1 has been excavated. Soil within the black dashed line has been removed to 4 feet bgs. Subsurface samples near the black X include PH01 at 6’ bgs approximately 20 feet to the southwest, BH01, BH05, and BH06 approximately 30 feet to the southeast, northeast, and west respectively. Samples were collected every 5 feet in each of those boreholes for field screening and two samples from each were submitted for laboratory analysis. In addition, excavation sidewall samples nearest the black X, SW02 and SW04, were collected after removing the top four feet of soil and laboratory analytical results of those samples were clean.

Finally, although delineation is still not complete, currently as things stand, the remediation solution prescribed for this release does not seem adequate in regards to being the most effective for mitigating this site. Additional or alternate proposed efforts will need to be provided.
Soil impact extends from approximately 4 feet to 75 feet bgs. The depth of impacted soil makes excavation/removal impractical due to the benching and shoring that would be required. Disturbance of unaffected areas would be significant and would result in additional environmental impact. The affected soil is characterized by both elevated hydrocarbons and chloride. While the hydrocarbons can be addressed in situ, the chloride cannot. Based on the depth of the impact, presence of elevated chloride, and documentation of clean soil above groundwater, LTE proposed capping the remaining impact and leaving it in place. If that plan is not acceptable, would BLM consider *in situ* measures that only address hydrocarbon concentrations and not chloride, or does BLM expect excavation of the soil to the depths identified?

If further questions or concerns are needing to be addressed with the BLM please contact myself or Jim Amos.

Thank you,

Crystal Weaver
Environmental Protection Specialist
BLM - Carlsbad, NM
Desk: 575-234-5943
Cell: 575-200-0426
caweaver@blm.gov

BLM Carlsbad Field Office
620 E. Greene Street
Carlsbad NM 88220

"3 percent of the water on this planet is considered freshwater. Of that 3 percent only 1 percent is considered accessible, meaning the majority of the remaining 2 percent is trapped in glaciers or snowfields." - National Geographic

---

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Wednesday, April 24, 2019 9:22 AM
To: Adrian Baker <abaker@ltenv.com>
Cc: Ashley Ager <aager@ltenv.com>; Littrell, Kyle <Kyle_Littrell@xtoenergy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; caweaver@blm.gov; jamos@blm.gov; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; 'jamos@blm.gov' <jamos@blm.gov>; McKinney, Deborah <dmckinne@blm.gov>
Subject: RE: Urgent - Work Plan - JRU 10/2RP-3179, 2RP-3464, and 2RP-5243

Adrian,

I'm glad that you removed the tank battery. The depth of contamination on this site is significant. A couple of things need to be addressed. First, the OCD needs soil samples taken on the boreholes at 5 ft increments to a depth the organics are under the limit. We need a clearer picture of the whole interval, not just at 20 and 42 ft. Essentially, the site hasn't been fully delineated if the bottom sample is still "hot". Second, the depth of the contamination on this site might require close inspection of the tanks to verify their durability.
We agree that data from the potholes did not delineate the impacted soil, so we utilized a drill rig to delineate. BH01, drilled at the center of the release footprint, documented vertical delineation with a clean sample obtained from 80 feet bgs. A borehole log for BH01 is included in the report and field screening with the laboratory analytical data indicate the soil is impacted from just below 4' bgs to approximately 75' bgs. All boreholes (BH01 through BH06) were sampled every 5 feet, described, and field screened. We conducted laboratory analysis on the samples collected from the intervals with the highest field screening result and from the bottom of each borehole. Lateral delineation was achieved with boreholes BH02 through BH06. The initial potholing data is only presented to document all work conducted on site and to supplement borehole data within the impacted area.

Regarding the comment about tank inspection, are you asking that we provide construction information about the new tanks that will be set above the impacted area?
XTO intends to replace the problematic water tank and all other tanks will be integrity tested prior to reinstallation.

Please let me know if you have any questions.

Thanks,

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

From: Adrian Baker <abaker@ltenv.com>
Sent: Friday, April 12, 2019 3:25 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; caweaver@blm.gov; jamos@blm.gov
Cc: Ashley Ager <aager@ltenv.com>; Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Subject: [EXT] Urgent - Work Plan - JRU 10/2RP-3179, 2RP-3464, and 2RP-5243
Importance: High

All,

Attached is a Work Plan for a recent release and two historical releases at JRU 10/2RP-3179, 2RP-3464, and 2RP-5243. XTO removed the tank battery and needs to replace the tanks as soon as possible for production purposes. Can you please review as quickly as possible?

Thank you

LT Environmental, Inc.
Advancing Opportunity
25 YEARS

Adrian Baker
Project Geologist/Office Manager
432.894.5641 *cell*
432.704.5178 *direct*
3300 N "A" Street, Building 1, Unit 103, Midland, TX 79705
www.ltenv.com