

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Thursday, July 25, 2019 10:32 AM  
**To:** 'Ashley Ager'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; jamos@blm.gov  
**Cc:** Kyle\_Littrell@xtoenergy.com; Tacoma Morrissey; Dan Moir; dmckinne@blm.gov  
**Subject:** RE: Revised Remediation Work Plan - James Ranch Unit #10 Battery / 2RP-3179, 2RP-3464, and 2RP-5243  
**Attachments:** C141 Remediation - James Ranch Unit #10 Battery (2RP-5243) 7.25.19.pdf; C141 Remediation - James Ranch Unit #10 Battery (2RP-3179) 7.25.19.pdf; C141 Remediation - James Ranch Unit #10 Battery (2RP-3464) 7.25.19.pdf

### RE: Revised Remediation Work Plan - James Ranch Unit #10 Battery / 2RP-3179, 2RP-3464, and 2RP-5243

Ms. Ager,

OCD has received the Revised Remediation Work Plan for - James Ranch Unit #10 Battery / 2RP-3179, 2RP-3464, and 2RP-5243, thank you. This work plan proposal is DENIED for the following reasons (see attachment 14.OCD mb response 4.29.19 and email below👉):

**From:** Bratcher, Mike, EMNRD

**Sent:** Monday, April 29, 2019 8:23 AM

**To:** Ashley Ager (aager@ltenv.com); caweaver@blm.gov

**Cc:** Hamlet, Robert, EMNRD; adrian\_baker@xtoenergy.com; Littrell, Kyle; Venegas, Victoria, EMNRD; Billings, Bradford, EMNRD; jamos@blm.gov; McKinney, Deborah

**Subject:** RE: [EXT] Re: [EXTERNAL] RE: Urgent - Work Plan - JRU 10/2RP-3179, 2RP-3464, and 2RP-5243  
Good Morning,

A meeting to discuss this site may be appropriate at some point, however, it may be problematic to get it scheduled. I will attempt to provide an **outline of what minimally, OCD is going to require at this site.** If BLM is in agreement, this may allow XTO to have some idea of a path forward, and continue the work and/or scheduling as required.

- Actual depth to groundwater will need to be established, by installation of a monitor well. I would suggest completing it in a manner that will allow for potential long term monitoring. There may some data available that establishes gradient. If not, this will need to be established by the installation of other water well borings as necessary to establish gradient. The completed water well needs to be installed down gradient, and in very close proximity to the impacted battery site.
  - A more complete delineation of impact needs to be performed. OCD would request a minimum of two borings be installed in the battery area, in what would be the more highly impacted areas. Samples are to be obtained at five feet intervals throughout the delineation. The purpose is to have a more precise idea of the levels and volume of hydrocarbon impact that exist. Sampling for chloride will be required as well.
  - **Based on data already obtained, a four feet excavation and liner installation will not be an acceptable remedial proposal for this site. A deeper excavation will likely be required, along with a proposed method for mitigating the deeper impact that may not be practicable to excavate. Of particular concern, is the lighter end hydrocarbons that have been determined to exist at significant depths.**
  - I would expect this to potentially be a long term project, so if XTO needs to return the well to production, the battery will need to be rebuilt in a different area of the well pad. Allow for potential deep excavations and monitoring at the impacted site when deciding on position of a new battery, if that is what XTO chooses to do. BLM will need to be consulted if additional surface disturbance is required.
- If you have any questions or concerns, please let me know, but hopefully this will allow work to continue on this project. Please coordinate with OCD and BLM moving forward. If XTO still believes a meeting is required prior to moving forward, please advise and we will attempt to accommodate as soon as possible.

Thank you,  
Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

If you have any questions, please call or email District II supervisor.  
Thank you,

Victoria Venegas  
EMNRD  
OCD-District II  
811 S First St. Artesia  
NM 88210  
[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:** Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>  
**Sent:** Friday, June 28, 2019 10:26 PM  
**To:** 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)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; [jamos@blm.gov](mailto:jamos@blm.gov)  
**Cc:** Kyle\_Littrell@xtoenergy.com; Tacoma Morrissey <[tmorrissey@ltenv.com](mailto:tmorrissey@ltenv.com)>; Dan Moir <[dmoir@ltenv.com](mailto:dmoir@ltenv.com)>  
**Subject:** [EXT] RE: Revised Remediation Work Plan - James Ranch Unit #10 Battery / 2RP-3179, 2RP-3464, and 2RP-5243

All,

The C141s for these sites are attached here.

**Ashley Ager**  
**Senior Geologist**

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

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**From:** Dan Moir <[dmoir@ltenv.com](mailto:dmoir@ltenv.com)>  
**Sent:** Friday, June 28, 2019 10:15 PM  
**To:** [mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us); [Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us); [Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us); [jamos@blm.gov](mailto:jamos@blm.gov); [Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)  
**Cc:** Ashley Ager <[aager@ltenv.com](mailto:aager@ltenv.com)>; [Kyle\\_Littrell@xtoenergy.com](mailto:Kyle_Littrell@xtoenergy.com); Tacoma Morrissey <[tmorrissey@ltenv.com](mailto:tmorrissey@ltenv.com)>  
**Subject:** Revised Remediation Work Plan - James Ranch Unit #10 Battery / 2RP-3179, 2RP-3464, and 2RP-5243

All,

On behalf of XTO, the Revised Remediation Work Plan for two historical releases (2RP-3179 and 2RP-3464) and one recent release (2RP-5243) at the James Ranch Unit #10 Battery is attached for your review.

Please let me know if you have any questions.

Respectfully,

Daniel R. Moir, P.G.  
Senior Geologist / Permian Basin Office Manager



COMPLIANCE / ENGINEERING / REMEDIATION

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