

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Monday, July 13, 2020 11:09 AM
To: 'Littrell, Kyle'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; CFO_Spill, BLM_NM
Subject: RE: Closure Denied - XTO - BEU 156 (BEGS) CS - (Incident #NRM2002948523)

Kyle,

With no wells located within 0.5 mile radius from the release location, the spill would need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. Sample location BH01 would need to be below closure criteria standards of 600 mg/kg for chlorides and 100 mg/kg for TPH.

The OCD doesn't expect XTO to dig out the rock below the liner. We would just need the last 4 bullet points below address:

- If the rock is immovable and target depth cannot be reached, use a hydrovac to clean the contaminated soil off of the rock surface and outline specific locations and steps taken on the Closure Report.
- Use a rotary drill to drill a 18"-24" hole into the rock, pull sample to ensure contaminants haven't permeated deep through the rock surface.
- layer the cleaned rock with Micro-Blaze or liquid with microbial strains, surfactants and nutrients designed to digest organics and hydrocarbons.
- Back-fill with clean material

Sounds like there isn't much soil on the bedrock, so it shouldn't take to much effort to remove the loose soil, sample the rock with a rotary drill, and spray with Micro-Blaze if the BLM allows.

Let us know the results.

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) 748-1283
Robert.Hamlet@state.nm.us

From: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Sent: Friday, July 10, 2020 3:05 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>
Subject: [EXT] RE: Closure Denied - XTO - BEU 156 (BEGS) CS - (Incident #NRM2002948523)

Good Afternoon Robert,

We are looking for additional clarification on this site. This was a release into a lined secondary containment. We recovered the released fluids, but the subsequent liner inspection failed. We collected a sample from 0.75 feet beneath the liner in the area it was compromised by hand auger. Even though we met refusal at bedrock, the sample we were able to retrieve of the sediment just above the bedrock met closure standards for benzene, BTEX, TPH, and chloride. We do not believe the bedrock needs to be remediated as described in your email.

It's not very obvious in the report because construction of the site is newer than the background aerial photos on the maps and our photos focused on the spot in the liner that was compromised, but please also note that the sample was collected under a lined containment around active production equipment. Without major facility deconstruction, we cannot remove the bedrock, clean the soil off the top of the bedrock with a hydrovac, or use a rotary drill in the affected location.

Finally, if it was necessary to remediate the bedrock, can you tell me when the NMOCD developed the process described below and where it is published/posted for industry use? Thanks. –Kyle

Kyle Littrell

Safety, Health & Environmental Supervisor
Permian Business Unit

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From: Hamlet, Robert, EMNRD [<mailto:Robert.Hamlet@state.nm.us>]
Sent: Friday, June 12, 2020 9:38 AM
To: Littrell, Kyle <Kyle_Littrell@xtoenergy.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>
Subject: Closure Denied - XTO - BEU 156 (BEGS) CS - (Incident #NRM2002948523)

External Email - Think Before You Click

Kyle,

We have received your closure report and final C-141 for **Incident #NRM2002948523 BEU 156 (BEGS) CS**, thank you. This closure is denied. The OCD has a process in place for rock refusal, during the remediation process to satisfy the OCD and State of New Mexico.

- If rock refusal interferes with the remediation process, use a back-hoe/track-hoe to remove the rock.
- If the rock is immovable and target depth cannot be reached, use a hydrovac to clean the contaminated soil off of the rock surface and outline specific locations and steps taken on the Closure Report.
- Use a rotary drill to drill a 18"-24" hole into the rock, pull sample to ensure contaminants haven't permeated deep through the rock surface.
- layer the cleaned rock with Micro-Blaze or liquid with microbial strains, surfactants and nutrients designed to digest organics and hydrocarbons.
- Back-fill with clean material

This makes the OCD and Operators accountable to the State of New Mexico in saying they've done everything possible to clean up the contaminants, when rock refusal interferes with remediation process.

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
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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.