

From: Hamlet, Robert, EMNRD
To: "Raley, Jim"; Ashley Ager
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Billings, Bradford, EMNRD
Subject: Remediation Conditional Approval - WPX - Swearingin #1 - (Incident #NAB1927155176) (2RP-5628)
Date: Thursday, November 19, 2020 1:38:00 PM
Attachments: image002.png
image003.png
Remediation Conditional Approval - WPX - Swearingin #1.pdf

Jim,

Sorry it took a few days to get back to you. We've had a couple discussions on this particular release the last few days in our environmental meetings. We have received your Workplan/Remediation Proposal for Incident #NAB192715517 Swearingin, thank you. This Workplan/Remediation proposal is approved with the following conditions:

- OCD requests additional background samples be obtained, preferably north of sample point BGO1 since it is located in a spot void of vegetation. Please obtain samples at bgs 3', 6', 9' and 12' intervals.
- Remediation of the Site will need to be completed through excavation of all remaining impacted soil containing chloride concentrations above the observed background concentrations. It is important that the excavated soil is below the observed background sample values at each 3 foot increment discussed above.
- Upon completion of excavation activities, closure samples will need to be obtained per 19.15.29 NMAC. Please do not backfill excavations without prior approval. OCD would like to evaluate the analytical data prior to backfill. Please advise once that analytical data has been received.
- After the sample data has been reviewed, the project will be reevaluated for possible additional requirements.
- Please, keep us informed of the results and let us know if you have any questions.

Regards,

Robert Hamlet • Environmental Eng. Tech. III
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
505.748.1283 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



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.

From: Raley, Jim <James.Raley@wpxenergy.com>
Sent: Monday, November 16, 2020 3:12 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Ashley Ager <aager@ltenv.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>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] RE: [EXTERNAL] RE: Remediation Denied - WPX - Swearingin #1 - (Incident #NAB1927155176) (2RP-5628)

Robert,

Thank you for continuing to review and discuss the Incident #NAB1927155176 Swearingin #1.

WPX would like to request a virtual call to discuss the data and additional groundwater sampling request. Would it be possible to have a call before the end of the month?

Jim Raley | Environmental Specialist - Permian Basin
5315 Buena Vista Dr., Carlsbad, NM 88220
C: (575)689-7597 | james.ralej@wpxenergy.com
WPXENERGY

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Friday, November 6, 2020 10:08 AM
To: Raley, Jim <james.ralej@wpxenergy.com>; Ashley Ager <aager@ltenv.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>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXTERNAL] RE: Remediation Denied - WPX - Swearingin #1 - (Incident #NAB1927155176) (2RP-5628)

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Jim,

As you know, chlorides move down the soil column fairly rapidly depending on the soil type. This spill occurred almost 15 months ago. The picture that we're seeing now might not be the full picture. The OCD needs to take precautions and verify that chlorides didn't impact groundwater. This spill encompasses a large area on and off the pad. With high chlorides this close to the groundwater and the area being very close to the river, the OCD would like a groundwater sample taken. A shallow borehole will need to be drilled to 20 feet, temporary casing installed, and a groundwater sample taken. The groundwater sample will need to be analyzed for TDS. Please, keep us informed of the results.

Regards,

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

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From: Raley, Jim <James.Raley@wpxenergy.com>
Sent: Thursday, November 5, 2020 4:11 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Ashley Ager <aager@ltenv.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>; Billings, Bradford, EMNRD

<Bradford.Billings@state.nm.us>

Subject: [EXT] RE: Remediation Denied - WPX - Swearingen #1 - (Incident #NAB1927155176) (2RP-5628)

Robert,

Thank you for continuing to review and discuss the Incident #NAB1927155176 Swearingen #1. Please see the below response to your previous email, dated October 29th, 2020.

All soil borings were abandoned by filling the borings with hydrated bentonite; there is no way to currently get a groundwater sample. A temporary well casing was installed in SB01 to allow the groundwater table to equilibrate and obtain a measurement but has since been removed. WPX believes soil impacted by this release did not migrate to groundwater based on the analytical data provided from the terminal samples collected from CH01 and SB01, both of which are at least 7 feet shallower than identified depth to groundwater.

For clarification, is the OCD not accepting vertical delineation data to demonstrate groundwater has not been impacted? Our goal is to not activate or create potential conduits by continuing to bore at a site with shallow groundwater. We would like to proceed with the proposed remediation plan, targeting the agreed 1300 mg/kg for background chlorides and composite sampling of the standard 200ft2. Should excavation depth begin to approach groundwater, additional measures can be considered at that time.

Jim Raley | Environmental Specialist - Permian Basin
5315 Buena Vista Dr., Carlsbad, NM 88220
C: (575)689-7597 | james.raley@wpxenergy.com


From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Sent: Thursday, October 29, 2020 11:28 AM

To: Raley, Jim <james.raley@wpxenergy.com>; Ashley Ager <aager@ltenv.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>; Billings, Bradford, EMNRD

<Bradford.Billings@state.nm.us>

Subject: [EXTERNAL] RE: Remediation Denied - WPX - Swearingen #1 - (Incident #NAB1927155176) (2RP-5628)

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Jim,

I don't agree or disagree with your assumption pertaining to groundwater impact. Since, SB1 hit groundwater at 19.8' and has been temporarily cased, a groundwater sample will probably need to be collected and analyzed for TDS? After we see the results, we can move forward with outlining what type of remediation needs to be accomplished. Please, keep us informed of the results.

Thanks,

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

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From: Raley, Jim <james.raley@wpxenergy.com>

Sent: Tuesday, October 27, 2020 12:30 PM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Ashley Ager <aager@ltenv.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>; Billings, Bradford, EMNRD

<Bradford.Billings@state.nm.us>

Subject: [EXT] RE: Remediation Denied - WPX - Swearingen #1 - (Incident #NAB1927155176) (2RP-5628)

Robert,

Thank you for reviewing the remediation plan submitted for **Incident #NAB1927155176 Swearingen #1**. Below is our response to denial of the proposed remediation plan; attached is relevant maps and lab information supporting our response.

- A variance for each composite sample not exceeding 500 ft2 is denied. **WPX accepts this condition and will collect confirmation composite samples at a 200 square foot frequency.**
- The only background sample that follows current protocol is BG01. The other boreholes are on an active well pad or sandwiched between roads and the well pad. The clarification states, "A grab, not composite, sample(s) should be gathered in areas undisturbed by oil and gas activities, nominally uphill from the release area, and no closer than 50 feet but no farther than 100 feet from the lateral and horizontal extents of a release's impact. The Chloride value of 1,300 mg/kg will be the background value that the release should be horizontally/vertically delineated too. **WPX agrees to a background value of 1,300 mg/kg for chloride for remediation. During excavation, WPX will conduct field screening to direct progress. Remediation to 1,300 mg/kg chloride laterally and vertically will be confirmed with laboratory analytical results from excavation confirmation samples collected from the sidewalls and floor at the above-stated frequency.**
- 3 groundwater (monitoring) wells will be required. One in the center of the release, one down gradient, and one up gradient to be used for collecting groundwater samples. The monitoring well up gradient will be placed off pad north of pothole PH07. Convert pothole PH02 to a monitoring well or drill one in very close proximity to this location for the one in the center of the release. Finally, drill a monitoring well about 50 feet southwest of PH09 off pad for the down gradient monitoring well. The groundwater is most likely moving from north to south down toward the river. **WPX disagrees with NMOCD's presumption that groundwater is impacted and requests NMOCD reconsider the requirement to install monitoring wells based on the following clarification and additional information. The vertical extent of impacted soil was defined at PH02 by a sample collected from 10 feet to 12.2 feet bgs in SB01. That sample contained 1,130 mg/kg chloride, which is below the background directed by NMOCD of 1,300 mg/kg. Similarly, vertical delineation was achieved in other potholes and boreholes within the release extent including PH03, PH04, and SB06. WPX acknowledges that the terminal sample collected from SB02 (at the location of PH01) exceeds NMOCD's background concentration. As such, WPX collected additional samples the week of October 5, 2020. Investigative core drilling was conducted utilizing a Shaw Portable Core Drill near PH01/SB02 to supplement vertical delineation within the release source and northeast of PH07 (see attached map). Coreholes were advanced to a total depth of 14 feet below ground surface at CH01 and CH02. Samples were collected for laboratory analysis from the bottom of those coreholes. The laboratory analytical results for chloride indicates the vertical extent of impact at PH01/SB02 is just below 11 feet, similar to the previous findings in SB01. No saturated soil was identified in any borehole except the borehole drilled to investigate groundwater. Saturated soil appeared at 19 feet bgs in that borehole and groundwater was measured at approximately 19.7 feet bgs. Those results suggest there is greater than 7 feet of soil between the deepest observed impacted soil and groundwater. Similarly, the laboratory analytical results from CH02 indicate impacted soil near PH07 does not extend to the depth of groundwater. Migration of residual chloride concentrations is likely restricted by the noted conglomerate layer. Vertical delineation to 1,300 mg/kg chloride or below has been achieved within the release extent.**

Based on this information, WPX requests to proceed as soon as possible with the original remediation work plan under the condition that background chloride is 1,300 mg/kg for chloride. Additional areas exceeding this value will be addressed simultaneously with remediation activities.

Jim Raley | Environmental Specialist - Permian Basin
5315 Buena Vista Dr., Carlsbad, NM 88220
C: (575)689-7597 | james.raley@wpxenergy.com


From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Sent: Monday, September 28, 2020 3:29 PM

To: Raley, Jim <james.raley@wpxenergy.com>; Ashley Ager <aager@ltenv.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>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

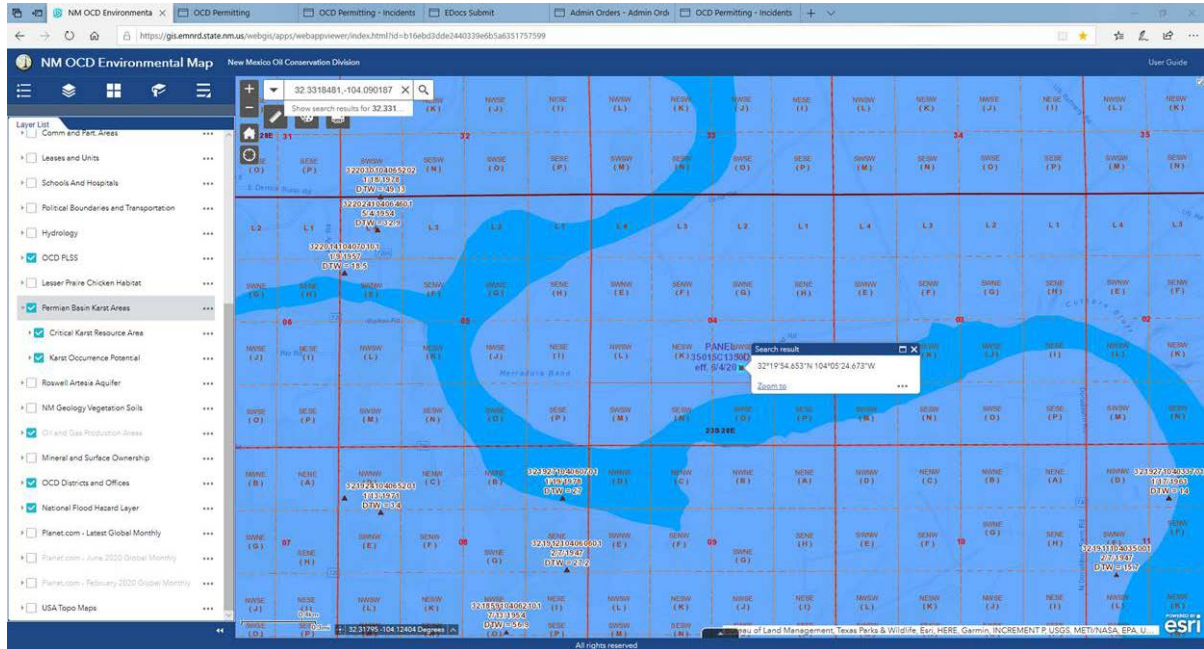
Subject: [EXTERNAL] Remediation Denied - WPX - Swearingen #1 - (Incident #NAB1927155176) (ZRP-5628)

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James and Ashley,

We have received your Workplan/Remediation Proposal for Incident #NAB1927155176 Swearingen #1, thank you. This Workplan/Remediation proposal is denied. Sometime in the near future we will all need to get on a call and discuss this release. With high chloride levels on potholes PH01 and PH02 at 8' and 8.5' and the groundwater table measured at 19.8', it's likely groundwater has been impacted. I will try to get Brad Billings to join the call and assist in answering any questions.

- A variance for each composite sample not exceeding 500 ft2 is denied.
- The only background sample that follows current protocol is BG01. The other boreholes are on an active well pad or sandwiched between roads and the well pad. The clarification states, "A grab, not composite, sample(s) should be gathered in areas undisturbed by oil and gas activities, nominally uphill from the release area, and no closer than 50 feet but no farther than 100 feet from the lateral and horizontal extents of a release's impact. The Chloride value of 1,300 mg/kg will be the background value that the release should be horizontally/vertically delineated too."
- 3 groundwater (monitoring) wells will be required. One in the center of the release, one down gradient, and one up gradient to be used for collecting groundwater samples. The monitoring well up gradient will be placed off pad north of pothole PH07. Convert pothole PH02 to a monitoring well or drill one in very close proximity to this location for the one in the center of the release. Finally, drill a monitoring well about 50 feet southwest of PH09 off pad for the down gradient monitoring well. The groundwater is most likely moving from north to south down toward the river.



- Please apply for the permits on the 3 monitoring wells with the OSE Office as quickly as possible. A 90 extension will be granted to apply for the permits and to move forward on drilling the monitoring wells. Samples will need to be taken as quickly as possible after the monitoring wells are installed. This will give us insight into the groundwater impact and whether additional steps need to be taken.

Please let me know if you have any further questions.

Regards,

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

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