

**From:** [Yu, Olivia, EMNRD](#)  
**To:** "Sarah Johnson"; [Shelly Tucker \(stucker@blm.gov\)](mailto:Shelly.Tucker@blm.gov)  
**Cc:** [Luke Williams@xtoenergy.com](mailto:Luke.Williams@xtoenergy.com); [Mark Larson](#)  
**Subject:** RE: 1RP-4721 XTO EMSU Well #410 Delienation Report, January 10, 2018  
**Date:** Tuesday, January 23, 2018 11:37:00 AM

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Mr. Williams:

Delineation is not completed for 1RP-4721. The historic release rationale for incompleteness is not accepted. The Responsible Operator is required to address all environmental issues on the lease, which XTO Energy has held since 2004, regardless of the time of release. Furthermore, delineation began at the end of October 2017, 5 months after the release, on sandy soil with potential for chloride movement.

In addition to HA-1, further vertical delineation is required at the areas represented by S-1, S-2, S-3, S-4, S-9, S-11, S-12, S-13.

Please be advised that even under proper storage condition, HA-1 3-4 sample analyzed on November 21, 2017, collected on October 27, 2017, was almost at the maximum allowable holding time for BTEX and TPH analyses.

Please confirm or inform for clarification.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
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575-393-6161 x113

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 ground water, 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, local laws and/or regulations.

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**From:** Sarah Johnson [mailto:[SJohnson@laenvironmental.com](mailto:SJohnson@laenvironmental.com)]  
**Sent:** Wednesday, January 10, 2018 7:28 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** [Luke\\_Williams@xtoenergy.com](mailto:Luke_Williams@xtoenergy.com); [Mark Larson <Mark@laenvironmental.com>](mailto:Mark@laenvironmental.com)  
**Subject:** 1RP-4721 XTO EMSU Well #410 Delienation Report, January 10, 2018

Dear Ms. Yu,

Larson & Associates, Inc. (LAI), on behalf of XTO Energy, Inc. (XTO), submits the attached delineation report for the produced water spill at the EMSU Well #410 (1RP-4721) in Lea County, New Mexico. Your approval of the delineation report is requested. Please contact Luke Williams with XTO at (432) 620-6729 or [luke\\_williams@xtoenergy.com](mailto:luke_williams@xtoenergy.com) or me at (432) 687-0901 (office) or (432) 664-5357 (cell) or Mark Larson if you have any questions.

Respectfully,

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