Dear Ms. Blaney:

Please be advised that the Responsible Operator is not precluded from immediate corrective actions to the impacted area.

NMOCD approves of the proposed excavation for hydrocarbon-impacted soil for 1RP-4763. Complete delineation (vertical and horizontal) of the areas represented by S1 and S2, respectively outside and inside heater treater, is still required as stated in the email below, dated from August 28, 2017. Please confirm.

Thanks, Olivia

From: Blaney, Karolina [mailto:Karolina.Blaney@wpxenergy.com]
Sent: Thursday, August 31, 2017 9:09 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Raley, Jim <James.Raley@wpxenergy.com>
Subject: WPX/RKI Toro 22-1 revised characterization plan

Good morning Olivia,

Attached is the revised characterization plan. We would like to excavate the hydrocarbon impacts as soon as possible so please let me know if you're OK with that part of the plan. Thank you,

Karolina Blaney

Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 karolina.blaney@wpxenergy.com

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Monday, August 28, 2017 3:02 PM
To: Blaney, Karolina <<u>Karolina.Blaney@wpxenergy.com</u>>
Cc: Raley, Jim <<u>James.Raley@wpxenergy.com</u>>
Subject: [EXTERNAL] RE: WPX/RKI Toro 22-1 C-141

CAUTION: This email was sent from an EXTERNAL source. Use caution when clicking links or opening attachments.

Dear Ms. Blaney:

In general, a release characterization plan includes a minimum of these items to facilitate review as detailed in the COAs attached to the reviewed initial C141, which was assigned the identifier 1RP-4763:

1. Scaled, preferably digital, map of the site with location of release, locations of proposed or actual sample points, and dimensions of the release demarcated. Mark on the map or provide a table on a subsequent page of sample points and respective GPS coordinates.

Provided for preliminary samples.

 A) Documentation of depth to groundwater search. Go to <u>http://nmwrrs.ose.state.nm.us/nmwrrs/waterColumn.html</u> You may search with PLSS, but optimally use the UTM NAD83 radius search. Use the UTM conversion tool to get GPS coordinates in lat/long degrees into UTM coordinates. Use a radius of 2000 m and 5000 m. Output the report in pdf format. Check the Chevron Trend Map for Lea County as well and use the conservative value from both sources to determine water table depth.

B) Check on a topographical map and report distance to surface water body and water source.

Point #2 guides delineation and remediation levels.

3. Tabulate field and analytical results for chlorides, BTEX, and TPH with IDs and depth of samples. Put the lab analyticals and chain of command afterwards or in an appendix.

Provided from preliminary samples.

- 4. Georeferenced photos in tiff, jpg, jpeg etc. format if available. This is easiest if photos are taken with a smartphone with GPS location activated. Otherwise, provide photos that were taken from the same spot pre- and post- immediate cleanup.
- 5. Attach a copy of the reviewed initial C141.

Given the proximity of the water wells (1 within 1000 ft.) and depth to groundwater for this release (average 32 ft.), NMOCD requires complete vertical and horizontal delineation. In addition to the 1992 guidelines for Benzene, BTEX, and TPH, permissible chloride levels for vertical delineation are 250 mg/kg obtained and maintained for 10 ft. further in depth. Permissible chloride levels for horizontal characterization of the release is 600 mg/kg. Laboratory analyses are required for the depths at which permissible chloride, BTEX, and TPH levels are obtained and maintained.

Please confirm or inform if additional clarification is required.

Thanks, Olivia

From: Blaney, Karolina [mailto:Karolina.Blaney@wpxenergy.com]
Sent: Friday, August 25, 2017 1:24 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Cc: Raley, Jim <<u>James.Raley@wpxenergy.com</u>>
Subject: RE: WPX/RKI Toro 22-1 C-141

Good afternoon Ms. Yu,

Attached is the characterization plan for the Toro 22-1 spill. Please let me know if you have any questions or comments. Thank you and have a great weekend,

Karolina Blaney

Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 karolina.blaney@wpxenergy.com

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Thursday, July 27, 2017 12:07 PM
To: Blaney, Karolina <<u>Karolina.Blaney@wpxenergy.com</u>>
Subject: [EXTERNAL] RE: WPX/RKI Toro 22-1 C-141

CAUTION: This email was sent from an EXTERNAL source. Use caution when clicking links or opening attachments.

Dear Ms. Blaney:

The 1RP for this incident is

					30-025-	19S-35E-	
4763	7/27/2017	А	WPX/RKI	Toro 22-1	34710	22E	7/9/2016

Please note that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 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.

From: Blaney, Karolina [mailto:Karolina.Blaney@wpxenergy.com]
Sent: Monday, July 24, 2017 8:02 AM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Subject: RE: WPX/RKI Toro 22-1 C-141

Good morning, Attached is the C-141 report for the Toro 22-1 oil spill. Please let me know if you have any suggestions or need any additional information. Thank you,

Karolina Blaney

Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 karolina.blaney@wpxenergy.com

From: Blaney, Karolina Sent: Monday, July 10, 2017 7:25 AM To: 'Olivia.Yu@state.nm.us' <<u>Olivia.Yu@state.nm.us</u>> Subject: WPX/RKI Toro 22-1 spill notification

Good morning,

WPX had a small spill yesterday, 7/9/17 at 7:50am at the Toro 22-1 well pad. API 30-025-34710. The cause of this spill is equipment failure; the back-pressure valve failed to relieve pressure on the heater treater causing the PRV to pop off. Approximately 12 bbls of oil was spilled with 10 bbls recovered. All fluids stayed on location.

The C-141 report will be submitted to you in the next 15 days, however, please do not hesitate to call me if you have any questions or concerns.

Thank you and have a great day,

Karolina Blaney Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 karolina.blaney@wpxenergy.com