

Venegas, Victoria, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Monday, October 28, 2019 4:26 PM
To: Littrell, Kyle
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; blm_nm_cfo_spill@blm.gov
Subject: Deferral Denied - XTO - Pickett Draw Fed #1 - (2RP-5537) 6-21-2019
Attachments: Deferral Denied - XTO - Pickett Draw Fed #1 - (2RP-5537) 10.28.19.pdf

Kyle,

We have received your Deferral Request for **2RP-5537 Pickett Draw Fed #1**, thank you. This Deferral Request is denied.

There is a lot of activity in the immediate area with 4 pads within 200-300 feet of each other. The OCD would prefer to see 3 background potholes away from the 4 pads, possibly 50-100 feet south of the road in the very bottom portion of site map (figure 2, 3, and 4). Average the chlorides on the 3 potholes and use that as your naturally occurring chloride concentrations.

The majority of the spill looks like it's in the pasture. Those areas need to contain a minimum of four feet of non-waste containing, uncontaminated, earthen material. The buried pits will likely have no effect on remediation out in the pasture in this case.

SW05 and SW12 sample locations can be deferred, since they are within 10 feet of an active wellhead and within 2 feet of an active pipeline.

FS16, FS20, FS21, FS24, and FS26 appear to be in the pasture and will must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg.

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

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.