

From: [Hamlet, Robert, EMNRD](#)
To: [Robert Nelson](#)
Cc: [Halie Butler](#); [Mark Larson](#); [Daniel St. Germain](#)
Subject: RE: [EXTERNAL] Select Energy - Boo Radley Com 701H, 702H, 703H Variance Approval
Date: Monday, August 29, 2022 10:15:00 AM
Attachments: [image003.png](#)

Robert,

I discussed this incident with Mike Bratcher and he is allowing the remediation plan to be conditionally approved without the groundwater impact study. It will require soil sample locations S-1 and S-2 to be excavated to 10 feet below ground surface. All other sample locations will need to be delineated/excavated to the strictest closure criteria standards. Confirmation samples should be collected every 200 ft². Samples must be analyzed for all constituents listed in Table I of 19.15.29.12 NMAC. The work will need to occur in 90 days.

I will add this email to the incident file and incident events for future reference.

Regards,

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Robert Nelson <rnelson@laenvironmental.com>
Sent: Friday, August 26, 2022 9:49 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Halie Butler <HButler@selectenergy.com>; Mark Larson <Mark@laenvironmental.com>; Daniel St. Germain <dstgermain@laenvironmental.com>
Subject: [EXTERNAL] Select Energy - Boo Radley Com 701H, 702H, 703H Variance Approval

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Hello Mr. Hamlet,

Larson & Associates, Inc. (LAI) on behalf of Select Energy Services (Select) requests a variance for the installation of a groundwater bore at the Boo Radley Com 701H, 702H, 703H (nAPP2135052895) (Site) in Eddy County, New Mexico. On July 12, 2022, Select received notification from the NMOCD

that the delineation report and remediation plan was conditionally approved and stated the following “...**Additionally, (3) Boreholes should be dropped and converted to monitoring wells as fluid is encountered. This will allow Select Energy to verify that there is no groundwater impact. Borehole 1 should be near the S-1 location to compare to the “Up Gradient Boring Location” and the “Down Gradient Boring Location”. Soil sampling will need to take place in 5’ increments during the drilling process of the boreholes. S-1 is over the limit at 30’ and the capillary fringe was encountered at about 40 feet below ground surface (bgs) at sample location S-1. Please make sure borehole locations are pre-approved by OCD before drilling takes place.**

ConocoPhillips (COP) recently notified Select that on November 16, 2021, a COP contractor drilled a groundwater bore to approximately fifty-nine (59) feet below ground surface (bgs) about 0.39 miles southeast from the Site. The bore was gauged 72 hours after installation and was dry. Based on this information, LAI on behalf of Select requests a variance approval from the NMOCD to forego groundwater monitoring wells at the Site and proceed with remediation according to the NMOCD approved remediation plan without conditions. Please find attached the soil boring log. If you have any questions or require any additional information please let Halie Butler with Select Energy at HButler@selectenergy.com, Mark Larson at Mark@laenvironmental.com, Daniel St. Germain at dstgermain@laenvironmental.com, or me know.

Thank you,

Robert Nelson
Sr. Geologist
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