

From: [Billings, Bradford, EMNRD](#)
To: ["Adrian_Baker@xtoenergy.com"](mailto:Adrian_Baker@xtoenergy.com)
Subject: XTO RP Closure"s Nine in Total (2RP"s -4643, -4823, -2163, -3947, -3153, -4508, -4826, -2418 and -4469
Date: Thursday, March 5, 2020 2:06:00 PM

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3/5/2020

Adrian Baker – XTO

Re: Recent Submittal of Numerous Requests for Closure – All are 2RP's – 4643, 4823, 2163, 3947, 3153, 4508, 4826, 2418 and 4469

Please keep a copy of this communication, as NO paper copy will follow. All information and decision process on the above mentioned sites will be uploaded soon into data base and imaging.

Closure requests for all nine of the above listed RP's are APPROVED by the Oil Conservation Division (OCD).

Please note the following comments for future use and reference. Several of the above site reports do not have particularly adequate depth to water evaluations. Currently, OCD mandates wells used for evaluation must be no more than ½ mile from point of release, and whatever ground water data is derived from these wells must be less than 30 years old. This was not always the case for some of the submitted sites, but final data set was sufficient for assessment of closure. Please attend this more closely in future.

Also, please consider the following: It is likely, that in the near future the OCD will be adopting a new position relative to medium karst location of releases. It has been the opinion of the BLM recently that they consider all medium karst locations as "unstable". It is likely that the OCD will soon adopt this position. If so, it would mandate the uppermost data set from Table 1 in Part 29 Rule on spills for evaluation of release. This position would have affected several of the above sites. If this position is taken it will be made known to industry. This is merely a heads-up for your reference.

OCD appreciates your efforts.

Sincerely,

Bradford Billings

EMNRD/OCD

Santa Fe

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