

**From:** Bratcher, Mike, EMNRD  
**To:** [Greg Boans](#); [Chace Walls \(cwalls@jdmii.com\)](#)  
**Cc:** [Dawson, Scott, EMNRD](#); [Griswold, Jim, EMNRD](#); [Sanchez, Daniel J., EMNRD](#); [Dade, Randy, EMNRD](#); [Patterson, Heather, EMNRD](#)  
**Subject:** FW: Hackberry State 1 Release  
**Date:** Wednesday, July 23, 2014 8:25:00 AM  
**Attachments:** [HackberryExtensionRequest07.21.14.pdf](#)

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RE: Murchison O&G \* Hackberry St. 001 \* 30-015-34803 \* O-17-18s-23e \* Eddy County, New Mexico

NMOCD Reference Number: 2RP-2347

**155 bbl produced fluid release on 5/19/2014 \* No fluid recovered, 155 bbl net loss to the ground**

Release site is located in a mapped "High" cave/karst area based on **current** BLM map.

Mr. Boans,

Per my correspondence with Murchison Oil & Gas on June 17, 2014 and July 16, 2014, OCD is requesting Murchison Oil & Gas to perform a delineation of the release site, utilizing conventional methods, including an approved laboratory analyses of samples obtained from the site. OCD has cooperated with Murchison Oil & Gas by granting the previously requested extension. Again, the delineation process is to commence not later than July 31, 2014, lab data should be presented to OCD not later than August 22, 2014, with a remediation proposal submitted to OCD not later than September 15, 2014. OCD has not requested an "extensive excavation" as your contractor has inferred. If, after a complete delineation of the site, and, Murchison Oil & Gas can show to OCD's satisfaction, that the delineated site poses no threat to ground water, surface water, human health, or the environment, OCD will consider all options available for disposition of this release event.

Please advise your contractor to not include me in any future correspondence regarding the delineation of this site, unless it is to provide 48 hour notification of the delineation event. Arguments concerning not delineating this site must be made to the Santa Fe Office, or, Murchison Oil & Gas may request a hearing on the matter.

If you have any questions or concerns, please contact me.

**Mike Bratcher**  
**NMOCD District 2**  
**811 S. First Street**  
**Artesia, NM 88210**  
**O: 575-748-1283 X108**  
**C: 575-626-0857**  
**F: 575-748-9720**

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**From:** Kristin Pope [mailto:kristin@rthicksconsult.com]

**Sent:** Monday, July 21, 2014 4:57 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Patterson, Heather, EMNRD; 'Greg Boans'; 'Chace Walls'; 'Randy Hicks'; Griswold, Jim, EMNRD; Martin, Ed  
**Subject:** RE: Hackberry State 1 Release

Mr. Bratcher,

Please find the attached letter and groundwater map from R.T. Hicks Consultants submitted as an effort to encourage a dialog regarding the response to releases confined to the pads of active facilities.

We thank you for your consideration of this request.

**Kristin Pope**  
**R.T. Hicks Consultants**  
**Carlsbad Field Office**  
**575.302.6755**

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**From:** Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]  
**Sent:** Wednesday, July 16, 2014 9:09 AM  
**To:** Kristin Pope  
**Cc:** Patterson, Heather, EMNRD; Greg Boans; Chace Walls; Randy Hicks; Griswold, Jim, EMNRD  
**Subject:** RE: Hackberry State 1 Release

Ms. Pope,

OCD will require a complete vertical and horizontal delineation of the site utilizing conventional methods, ie, obtaining representative samples from all impacted areas and having those samples analyzed at an OCD approved lab. The delineation process is to commence not later than July 31, 2014 and continue until the delineation is complete. OCD is to be notified 48 hours prior to commencement of the delineation process. The results of the lab analyses are to be provided to OCD upon completion by the lab. This should be accomplished, and OCD should have the analytical data, not later than August 22, 2014. Murchison may then have until September 15, 2014 to submit a proposal for remediation of the site. This provides for the 60 day extension as requested, and provides OCD with the required data. OCD will not consider any type of risk-based closure for the site without the delineation data.

If you have any questions or concerns, and for notification, please contact me.

**Mike Bratcher**  
**NMOCD District 2**  
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**From:** Kristin Pope [<mailto:kristin@rthicksconsult.com>]  
**Sent:** Tuesday, July 15, 2014 12:55 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Patterson, Heather, EMNRD; Greg Boans; Chace Walls; Randy Hicks  
**Subject:** RE: Hackberry State 1 Release

Mr. Bratcher,

On behalf of Murchison, we respectfully request a 60-day extension to submit a proposed plan. We are in the process of working with BLM to develop a protocol for a similar situation. We hope to apply this protocol to all facilities to satisfy NMOCD, SLO, and BLM and 60 more days should give us enough time to finalize this plan.

Depth to groundwater is approximately 450 ft with the nearest well a bit more than a mile away from the Hackberry State #1. The release was confined to the location. We believe an extension of 60 days will not endanger freshwater, public health, or the environment. We appreciate your consideration of this request. Thank you.

Kristin Pope  
R.T. Hicks Consultants  
Carlsbad Field Office  
575.302.6755

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**From:** Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]  
**Sent:** Tuesday, June 17, 2014 9:10 AM  
**To:** Greg Boans; 'Kristin Pope' ([kristin@rthicksconsult.com](mailto:kristin@rthicksconsult.com))  
**Cc:** Patterson, Heather, EMNRD  
**Subject:** Hackberry State 1 Release

RE: Murchison O&G \* Hackberry St. 001 \* 30-015-34803 \* O-17-18s-23e \* Eddy County, New Mexico

155 bbl net produced water release on 5/19/2014

Mr. Boans,

NMOCD is in receipt of an Initial Report form C-141 for the above referenced produced fluid release. The C-141 will not be approved as submitted. It will be accepted for record and entered into OCD database, showing as an open non-compliance issue. OCD will require Murchison to perform a vertical and horizontal delineation of the site, and submit a remediation proposal based on the delineation results and site ranking. The form C-141 will be processed today, June 17, 2014. Murchison will have 30 days to complete the delineation and submit a proposal.

If you have any questions or concerns, please contact me.

**Mike Bratcher**

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