

## Collins, Karen, EMNRD

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**From:** Billings, Bradford, EMNRD  
**Sent:** Tuesday, December 8, 2020 4:13 PM  
**To:** 'Jharris2@concho.com'  
**Subject:** Blue Thunder 5 Fed Comm #006H2RP-4795 - nAB1816336550

12/08/2020

Jacqui Harris – Concho

Dear Jacqui,

After review of report date 10/20/2020 from Concho and review of allied data and information the following:

- 1) I cannot find in my files any indication that I received a work plan for this release, although there is email indicating that I should have from BBC and other OCD employee(s).
- 2) Analytical data provided does not show full attainment of closure criteria under new Part 29 Rule. Specifically, it appears that there are two areas (CS Bottom -3 and CS Bottom -4 that, at 4 foot depth that remain above required 600 mg/Kg chloride value mandated in upper most four for excavation. Values reported at 866 and 881 respectively. This assumes these areas are in or abutting "pasture"
- 3) Additionally, the rule requires a depth to water evaluation, and when using current wells on record, they are to be within ½ mile of release. The nearest well cited in report was at 0.67 miles.

Despite these issues and in consideration of how near mandated values current values are, and that nearest well is relatively close to ½ mile, and the quantity of lost release and location of spillage, the following:

For this release at this location and with quantity of fluid lost and work accomplished to date, in this circumstance alone, the Oil Conservation Division will APPROVE closure of this release RP/incident.

Please be advised that this is unique and Part 29, especially if done "at risk" needs to be strictly adhered too for closure.

This release will be closed in OCD incident data base today. It may take some time for it to appear in imaged file.

Please keep a copy of this communication, as no PAPER copy will follow.

Sincerely,

Bradford Billings

**Bradford Billings** • Enviro. Spec. A  
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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

