

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Monday, March 16, 2020 11:50 AM
To: James.Raley@wpxenergy.com
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Deferral Denied - WPX - RDX Federal 17 #35H (Incident #NAB1928154373)
Attachments: Deferral Denied - WPX - RDX Federal 17 #35H.pdf

James,

We have received your Deferral Request for **Incident #NAB1928154373** RDX Federal 17 #35H, thank you. This Deferral Request is denied.

- The OCD can only grant a deferral on an “Active Well Pad”
- Soil sample points FS06 through FS09, SW01, SW02, and SW04 will need to be further delineated and safely excavated using a hydrovac and/or shovel. This will probably require coordinating with Solaris to remove the contaminated soil.
- All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 “Closure Criteria for Soils Impacted by a Release” included in the spill rule <http://164.64.110.134/parts/title19/19.015.0029.html>
- Looking at the OCD Environmental Map and a few other resources, **below 4 feet in the pasture** at this location, you would need to delineate and excavate to 20,000 mg/kg for chlorides.
- **Surface to 4 feet below ground surface** the release will need to be delineated and excavated to 600 mg/kg for chlorides.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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Energy, Minerals, and Natural Resources
Oil Conservation Division
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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 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.