

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Thursday, May 7, 2020 2:42 PM
To: 'Natalie Gladden'; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: Bratcher, Mike, EMNRD; Jerry Mathews; Braidy Moulder; Kenny Kidd; Kathy Rivera
Subject: RE: Morris Boyd 26 Fee Com 1H

NAB1910937075 MORRIS BOYD 26 FEE COM #001H @ 30-015-38962

Hi Natalie,
Please include all your comments in the Closure Report and submit it via OCD's fee portal. Please remain patient and we will review your report as soon as possible.
Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Victoria.Venegas@state.nm.us

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.

From: Natalie Gladden <nagladden@hungry-horse.com>
Sent: Thursday, May 7, 2020 10:51 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Jerry Mathews <jmathews@spurepllc.com>; Braidy Moulder <boulder@spurepllc.com>; Kenny Kidd <kkidd@spurepllc.com>; Kathy Rivera <krivera@hungry-horse.com>
Subject: [EXT] Morris Boyd 26 Fee Com 1H
Importance: High

Victoria,

As per our conversation yesterday concerning the Morris Boyd 26 Fee Com 1H, Hungry Horse, LLC on behalf of Spur Energy we would like to request closure for the site mentioned herein. The closure plan for PO: QIL78-200317-C-1410 was denied for the following reasons:

- Average ground water depth: The data was typed wrong on the report and has been repaired. It show the closest well is 40'bgs. And the Closure Criteria will be reflect this change. The site was fully delineated using the 0-50' criteria. Sample point 4 which was sampled down to 26'bgs (1380 mg/kg) and sample point 9 was sampled to 34' (8400 mg/kg chloride). These concentrations were above the closure criteria. That is why a liner was installed at 4'bgs. The seven other sample points were delineated under <50 DGW criteria and the requirements were met.

- Soil samples were collected from 9 sample points within the excavation spanning an area of more than 13000 square feet (Figure 35). Page 32 shows the site drawing with measurements of 150' x 65' which is 9750 sq. ft. of impact area, which would average the 9 samples points to be 1083.34 sq. ft. apart. The job scope and timeline was very tight for this location. As discussed Percussion was selling the leases to Spur Energy and we had 14 sites to complete within a two week period. The sampling event even though is under the 200 sq. ft. sampling requirement still shows adequate sampling to indicate the contamination impact area of the site. We did not have the time frame to submit a sampling plan for approval to meet the acquisition deadline, therefore one was not sent in.
- At the time the company I was working for did not have a Juno/Geo Mapping devise to populate a scaled map. With that being said we can formulate your requirement with GPS points that were taken at the time of the delineation/closure sample process and put on the map we have for this site, to somewhat meet your requirements. These changes have been made to the maps for your review.

Please review the amended closure plan. If approved for submittal, I will then upload to the portal.

Thank you so much for taking my call yesterday. Stay safe and thank you for your time in this matter.

Sincerely,

Natalie Gladden

Director of Environmental & Regulatory Services

4024 Plains Highway

Lovington, NM 88260

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