

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, June 25, 2020 1:18 PM
To: Baker, Adrian
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Mann, Ryan
Subject: Remediation Denied - XTO - Remuda Basin #1 - (Incident #NAB1836137253) (2RP-5135)
Attachments: Remediation Denied - XTO - Remuda Basin #1.pdf

Adrian,

We have received your Workplan/Remediation Proposal for **Incident #NAB1836137253 Remuda Basin #1**, thank you. This Workplan/Remediation proposal is denied.

Summary

- ROE from SLO May 31st 2020
- Completed an Arch Survey as well as a Karst Survey in Oct. 2019 (Surficial Karst features noted, Excavation deemed appropriate)
- Site is located in a high-potential karst area
- >200 BBLs unrecovered (51'-100' depth to groundwater)
- 12 Soil Samples (2,110 – 7,900 mg/kg chlorides)
- 7 initial Boreholes (811 mg/kg in BH03B at 18 feet bgs up to 8,860 mg/kg in PH08 at 4 feet bgs)
- Excavated 4' in most areas
- Advanced 2 additional potholes (vertically delineate)
- The release covers a good part of the reserve pit.

Resolution Steps

- A variance is approved for the spill area, not including the legacy pit area to excavate to 4' and install a liner
- A variance is approved for 800 ft² confirmation sample size including the spill area and the legacy reserve pit.
- The OCD has discussed legacy reserve pits in our weekly meeting the last couple of months. Brad Billings has recommended that if a release goes into an old legacy reserve pit, the spill and the legacy reserve pit will need to be cleaned up. With regards to the reserve pit, there won't be a variance for a liner 4' w/ a liner. Pit closure and reclamation requires that liners are removed, and follow same Table 1 closure standards as spills. If these are pits and they were closed way back when, they will need to be cleaned up to today's standards.
- Please remove liner, continue to delineate the legacy reserve pit and remediate to Table 1 standards.
- Please make sure the spill area minus the reserve pit is excavated to 4' below ground surface and a liner is installed (variance request), and then backfilled with clean material.
- Upload remediation/closure report to the payment portal, when completed.

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
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