

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, July 9, 2020 11:47 AM
To: Littrell, Kyle
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Mann, Ryan
Subject: Closure Denied - XTO - Remuda Basin St #2 - (Incident #NAB1802927873) (2RP-4585)
Attachments: Closure Denied - XTO - Remuda Basin St #2.pdf

Kyle,

We have received your closure report and final C-141 for **Incident #NAB1802927873 Remuda Basin St #2**, thank you. This closure is denied.

- There is a specific process to have BLM change a karst designation. The OCD follows the BLM, when it comes to karst. The BLM puts together and updates the karst maps. If a site shows as high karst under the current map, that is what we go off of. Kyle Rybacki – (575-234-5970) was the individual at the BLM that was in charge of the karst study in the Carlsbad office, but recently has left. To my knowledge he hasn't been replaced yet. You would probably need to call and find out who is in charge of it, since he left. Ideally, you would need to send your karst study to the BLM and try to get high karst potential downgraded to medium in this particular area. If they do make changes to the map, let us know and we will honor their decision.
- The entire spill area is in high karst, so the closure criteria that would apply is 600 mg/kg on Chlorides and 100 mg/kg on TPH. Please make sure all floor samples and sidewall samples are below these limits.
- Please let us know the BLM's decision if you petition to have the karst designation changed.

Please let me know if you have any further questions.

Thank you,

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.