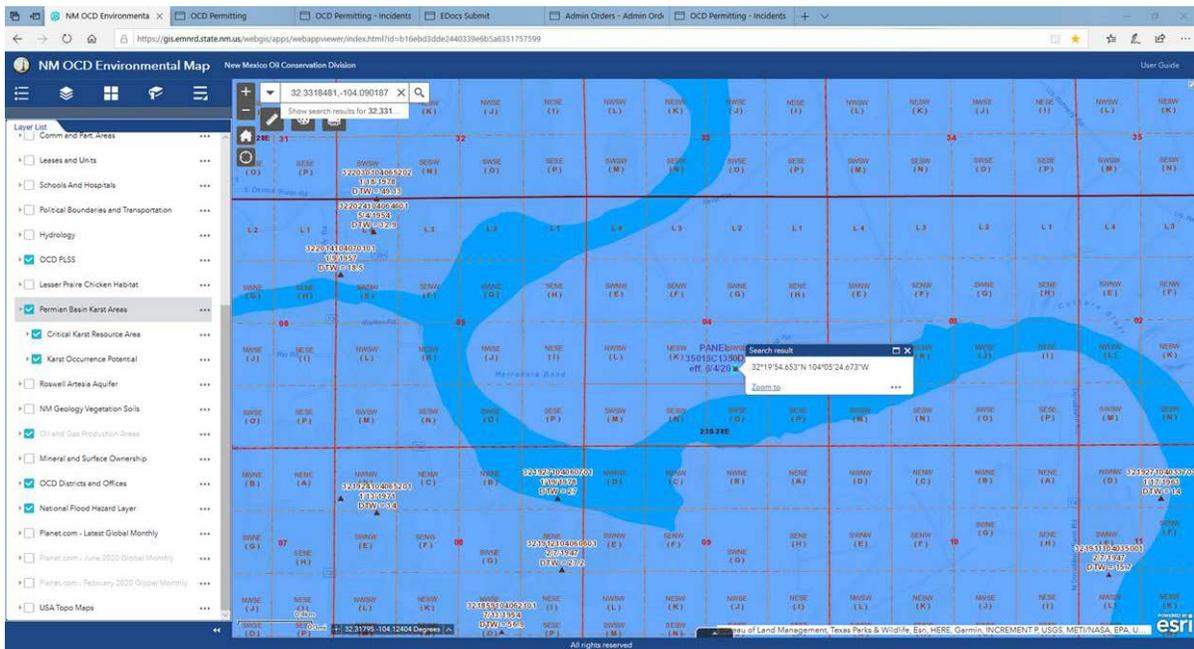


From: Hamlet, Robert, EMNRD
 To: "Baley, Jim"; Ashley, Aar
 Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Billings, Bradford, EMNRD
 Subject: Remediation Denied - WPX - Swearingen #1 - (Incident #NAB1927155176) (ZRP-5628)
 Date: Monday, September 28, 2020 3:28:00 PM
 Attachments: Remediation Denied - WPX - Swearingen #1.pdf

James and Ashley,

We have received your Workplan/Remediation Proposal for **Incident #NAB1927155176 Swearingen #1**, thank you. This Workplan/Remediation proposal is denied. Sometime in the near future we will all need to get on a call and discuss this release. With high chloride levels on potholes PH01 and PH02 at 8' and 8.5' and the groundwater table measured at 19.8', it's likely groundwater has been impacted. I will try to get Brad Billings to join the call and assist in answering any questions.

- A variance for each composite sample not exceeding 500 ft2 is denied.
- The only background sample that follows current protocol is BG01. The other boreholes are on an active well pad or sandwiched between roads and the well pad. The clarification states, "A grab, not composite, sample(s) should be gathered in areas undisturbed by oil and gas activities, nominally uphill from the release area, and no closer than 50 feet but no farther than 100 feet from the lateral and horizontal extents of a release's impact. The Chloride value of 1,300 mg/kg will be the background value that the release should be horizontally/vertically delineated too.
- 3 groundwater (monitoring) wells will be required. One in the center of the release, one down gradient, and one up gradient to be used for collecting groundwater samples. The monitoring well up gradient will be placed off pad north of pothole PH07. Convert pothole PH02 to a monitoring well or drill one in very close proximity to this location for the one in the center of the release. Finally, drill a monitoring well about 50 feet southwest of PH09 off pad for the down gradient monitoring well. The groundwater is most likely moving from north to south down toward the river.



- Please apply for the permits on the 3 monitoring wells with the OSE Office as quickly as possible. A 90 extension will be granted to apply for the permits and to move forward on drilling the monitoring wells. Samples will need to be taken as quickly as possible after the monitoring wells are installed. This will give us insight into the groundwater impact and whether additional steps need to be taken.

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.