

**From:** [Hamlet, Robert, EMNRD](#)  
**To:** [Baker, Adrian](#)  
**Cc:** [Bratcher, Mike, EMNRD](#); [Eads, Cristina, EMNRD](#); [CFO Spill, BLM NM](#)  
**Subject:** Deferral Denied - XTO - Pierce Canyon 17 TB - (Incident #NRM2015454866)  
**Date:** Monday, December 7, 2020 9:39:00 AM  
**Attachments:** [Deferral Denied - XTO - Pierce Canyon 17 TB - \(Incident #NRM2015454866\).pdf](#)

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**Adrian,**

We have received your Remediation/Deferral Request for **Incident #NRM2015454866 Pierce Canyon 17 TB**, thank you. The Remediation/Deferral request is denied.

- Before we can approve a deferral the spill must be fully delineated. The bottom samples BH01, BH02, and BH3 in the battery are over for TPH (GRO + DRO + MRO), which is 2500 mg/kg or (GRO + DRO), which is 1000 mg/kg. If the deepest sample is still over the limit, the spill hasn't been vertically delineated. The OCD requests that samples be taken to a depth that contamination amounts are under the limit and the release is vertically delineated before a deferral request is resubmitted.

Regards,

**Robert Hamlet** • Environmental Eng. Tech. III  
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