

**From:** [Hamlet, Robert, EMNRD](#)  
**To:** [Natalie Gladden](#); [Chad Hensley](#)  
**Cc:** [Brady Moulder](#); [Dakoatah Montanez](#); [Bratcher, Mike, EMNRD](#); [Nobui, Jennifer, EMNRD](#); [Amos, James A](#)  
**Subject:** RE: [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request  
**Date:** Thursday, April 28, 2022 7:36:00 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Natalie,

The variance request for closure samples not to exceed 500 ft<sup>2</sup> is approved. The variance request will be placed in the incident file for future reference. Also, please make sure to include in closure report.

Regards,

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 S. First Street | Artesia, NM 88210  
575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



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**From:** Natalie Gladden <natalie@energystaffingllc.com>  
**Sent:** Wednesday, April 27, 2022 3:19 PM  
**To:** Chad Hensley <chensley@spurenergy.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Cc:** Brady Moulder <bmoulder@spurenergy.com>; Dakoatah Montanez <dakoatah@energystaffingllc.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>; Amos, James A <jamos@blm.gov>  
**Subject:** RE: [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request

Robert,

This site is in low karst, on BLM minerals, ground water is 76-80' bgs with no data within ½ a mile radius. This site was delineated following the most stringent sampling protocol and will be excavated the same. The composite map is included in this email. This is a narrow and long release impact area. There are no flood issues as well.

Let me know if you have any questions or would like more information.

*Natalie Gladden*

**Director of Environmental and Regulatory Services**

**Energy Staffing Services, LLC.**

**2724 NW County Road**

**Hobbs, NM 88240**

**Cell: 575-390-6397**

**Office: 575-393-9048**

**Email: [natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com)**



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**From:** Chad Hensley <[chensley@spurenergy.com](mailto:chensley@spurenergy.com)>

**Sent:** Wednesday, April 27, 2022 10:48 AM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Cc:** Braily Moulder <[bmoulder@spurenergy.com](mailto:bmoulder@spurenergy.com)>; Natalie Gladden <[natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com)>; Dakoatah Montanez <[dakoatah@energystaffingllc.com](mailto:dakoatah@energystaffingllc.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>

**Subject:** RE: [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request

Done Rob. We will get that over to you promptly.

Thanks!

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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Sent:** Wednesday, April 27, 2022 10:45 AM

**To:** Chad Hensley <[chensley@spurenergy.com](mailto:chensley@spurenergy.com)>

**Cc:** Braily Moulder <[bmoulder@spurenergy.com](mailto:bmoulder@spurenergy.com)>; [natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com); [dakoatah@energystaffingllc.com](mailto:dakoatah@energystaffingllc.com); Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>

**Subject:** RE: [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request

[EXTERNAL]

Chad,

We would need a proposed sampling grid map and sampling statistics showing equal or better protection of fresh water, public health and the environment. The demonstration should show that depth to groundwater and karst are not an issue. Also, that it's not within a 100-year floodplain.

Regards,

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 S. First Street | Artesia, NM 88210  
575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



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**From:** Chad Hensley <[chensley@spurenergy.com](mailto:chensley@spurenergy.com)>  
**Sent:** Wednesday, April 27, 2022 10:17 AM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Braidy Moulder <[bmoulder@spurenergy.com](mailto:bmoulder@spurenergy.com)>; [natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com);  
[dakoatah@energystaffingllc.com](mailto:dakoatah@energystaffingllc.com); Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Nobui,  
Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>  
**Subject:** RE: [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request

Rob,

We, Spur, will include all communications in the workplan/closure report so that requirement should always be satisfied. As for the e-mail request for a variance on sample size, hydrology and a scaled map will be sent for variances request. Will that satisfy an e-mail request, or would you want other information?

Chad Hensley  
EHS Coordinator  
Spur Energy Partners, LLC.  
346-339-1494



Begin forwarded message:

**From:** "Hamlet, Robert, EMNRD" <[Robert.hamlet@state.nm.us](mailto:Robert.hamlet@state.nm.us)>  
**Date:** April 27, 2022 at 9:18:05 AM MDT  
**To:** Natalie Gladden <[natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com)>

**Cc:** Brady Moulder <[bmoulder@spurenergy.com](mailto:bmoulder@spurenergy.com)>, Dakoatah Montanez <[dakoatah@energystaffingllc.com](mailto:dakoatah@energystaffingllc.com)>, "Bratcher, Mike, EMNRD" <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>, "Nobui, Jennifer, EMNRD" <[jennifer.nobui@state.nm.us](mailto:jennifer.nobui@state.nm.us)>

**Subject: RE: [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request**

[EXTERNAL]  
Natalie,

For future reference, a variance from the Spill Rule for closure sampling should be included in the remediation plan. We can approve a variance through email, but we need a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health and the environment.

Regards,

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 S. First Street | Artesia, NM 88210  
575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



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**From:** Natalie Gladden <[natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com)>  
**Sent:** Wednesday, April 27, 2022 8:47 AM  
**To:** ocdonline, emnrd, EMNRD <[EMNRD.OCDOnline@state.nm.us](mailto:EMNRD.OCDOnline@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; CFO\_Spill, BLM\_NM <[blm\\_nm\\_cfo\\_spill@blm.gov](mailto:blm_nm_cfo_spill@blm.gov)>; Amos, James A <[jamos@blm.gov](mailto:jamos@blm.gov)>  
**Cc:** Brady Moulder <[bmoulder@spurenergy.com](mailto:bmoulder@spurenergy.com)>; [chensley@spurenergy.com](mailto:chensley@spurenergy.com); Dakoatah Montanez <[dakoatah@energystaffingllc.com](mailto:dakoatah@energystaffingllc.com)>  
**Subject:** [EXTERNAL] Spur Energy - Burch Keely #629 - Composite Variance Request  
**Importance:** High

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

All,

On behalf of Spur Energy, ESS would like to request a variance for the composite samples. The impact area is 12,053 sq. ft. of pasture area. Instead of the 200 sq. ft. composites, we would like to request the 500 sq. ft. composites. With the 200 sq. ft. the bottom composites would consist of 60.26 composite samples verses 24.10 composites. The release information is below:

Location: Burch Keely Unit #629  
API No. 30-015-40705  
DOR: 3/13/22  
Incident No. NAPP2207346885

Thank you in advance, if you have any questions, please let me know.

Sincerely,

*Natalie Gladden*

**Director of Environmental and Regulatory Services**

**Energy Staffing Services, LLC.**

**2724 NW County Road**

**Hobbs, NM 88240**

**Cell: 575-390-6397**

**Office: 575-393-9048**

**Email: [natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com)**



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