From: Hamlet, Robert, EMNRD

To: Guesnier, Joseph R

Cc: Chad Hensley; Braidy Moulder; Bratcher, Mike, EMNRD; Nobui, Jennifer, EMNRD; Harimon, Jocelyn, EMNRD

Subject: RE: [EXTERNAL] incident ID nRM2003858408

Date: Tuesday, July 5, 2022 2:17:08 PM

Attachments: <u>image002.png</u>

Joseph,

The release was in high karst, which means all the sample points will need to meet the strictest closure criteria standards. Sidewall and floor samples should represent no more than 200 ft2. The release area will need to be resampled and an updated closure report will need to be resubmitted.

Please let me know if you have any questions.

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
http://www.emnrd.state.nm.us/OCD/



From: Guesnier, Joseph R < Joseph. Guesnier@terracon.com>

Sent: Friday, July 1, 2022 11:12 AM

To: Hamlet, Robert, EMNRD < Robert. Hamlet@state.nm.us>

Cc: Chad Hensley <chensley@spurenergy.com>; Braidy Moulder <bmoulder@spurenergy.com>

Subject: [EXTERNAL] incident ID nRM2003858408

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

Rob,

At the time of this report Terracon treated this as an on-pad release.

The Karst map previously on the NMOCD website lacked a clear and concise key to understand what was and wasn't considered high Karst, we can see where this report missed the mark.

Subsequently, this well has been plugged and abandoned and the pad itself has been ripped and flipped to a depth of 2 feet below grade surface (bgs).

Additionally, it was reseeded following the reclamation rules.

Terracon proposes to return to the site and collect composite confirmation samples from five locations within the inferred release area at surface, 1 ft. bgs, 2 ft. bgs, and 4 ft. bgs, totaling 20 total samples.

Would this suffice and how would you like the resampling data submitted for closure?

Thank you,

Joseph Guesnier, NORM RSO
Senior Staff Scientist | Environmental



5847 50th Street I Lubbock, Texas 79424 D (806) 300-0140 I M (806) 544-9276 I O (806) 589-6525 <u>irguesnier@terracon.com</u> I <u>terracon.com</u>

Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

Private and confidential as detailed here (<u>www.terracon.com/disclaimer</u>). If you cannot access the hyperlink, please e-mail sender.