



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

Carlsbad Field Office
620 E. Greene St.
P. O. Box 1778
Carlsbad, New Mexico 88221-1778

IN REPLY REFER TO:

May 3, 2000

Ms. Linda Frank-Supka
Westinghouse Electric Company
Waste Isolation Division
P.O. Box 1155
Carlsbad, New Mexico 88221



Dear Ms. Frank-Supka:

As we discussed on April 7, 2000, the U.S. Department of the Interior, United States Geological Survey (USGS) Conservation Division was the approval authority for potash exploration boreholes drilled during the period 1953 through 1978 in Eddy County, New Mexico. During this period, USGS administered the drilling programs under the authority granted by the U.S. Congress. In February 1982, Secretary Watt removed the Conservation Division from USGS, establishing the Minerals Management Service. On December 3, 1982, onshore minerals functions were transferred from MMS to the Bureau of Land Management (BLM) under Secretarial Order No. 3087.

During this period, the USGS permitted private exploration boreholes, which were drilled by mineral leaseholders. The USGS engineer received and approved Sundry Notices and Reports on Wells. Prior to drilling a borehole, the company submitted a Notice of Intention to Drill for approval by the USGS. Following completion of the drilling and closure of the drilling location, the company submitted a Subsequent Report of Abandonment. Upon approval of the Subsequent Report of Abandonment, USGS considered the drilling location closed. No additional closure documentation was required. Examples of the drilling programs conducted during this time period included private exploration pursued by International Minerals Corporation (IMC), Duval Sulphur and Potash Company (DSP), and the ERDA Potash (P) boreholes developed by Sandia National Laboratory (SNL).

The USGS also permitted government agency exploration boreholes. The U.S. Energy Research and Development Administration (ERDA) completed a Special Land Use Application and Permit Application for the USGS. ERDA also provided other information requested by the USGS for boreholes completed on what is now called the Waste Isolation Pilot Plant (WIPP) Land Withdrawal Area. USGS then issued a permit for the purpose of potash resource evaluation testing which includes boreholes, drilling pads and access roads. Table 1 lists the designations of boreholes completed either by private companies or by ERDA.



The USGS approved the closure and abandonment of the drilling sites according to then current requirements. The permitting and closure activities for potash exploration were established by the USGS in the early 1950's. These activities have not changed substantially since that time, as evidenced by recent permits being granted by Bureau of Land Management (BLM). To date, mud pits associated with potash exploration may be lined or unlined and must be covered with native soil to be abandoned.

If you have further questions, please call me at (505) 234-5936.

Sincerely,



Craig Cranston

5-3-2000

Craig Cranston
Bureau of Land Management

Table 1: Summary of Boreholes and Associated Solid Waste Management Units and Areas of Concern

Drilling Organization

Private Company

SWMU & AOC and (Borehole Name)

AOC 001u (IMC-376)
AOC 001v (IMC-456)
AOC 001w (IMC-457)
AOC 001ac (DSP-207)
AOC 001ae (IMC-377)
SWMU 001g (H-14)
SWMU 001h (H-15)
SWMU 001t (IMC-374)
AOC 001r (D-123)

Energy Research and Development
Administration

SWMU 001g (P-1)
SWMU 001h (P-2)
SWMU 001j (P-3)
SWMU 001k (P-4)
SWMU 001L (P-5)
SWMU 001m (P-6)
SWMU 001n (P-15)
SWMU 001L (WIPP-12)
SWMU 001s (ERDA-9)
SWMU 001x (WIPP-13)

AOC Area of Concern

SWMU Solid Waste Management Unit