

Venegas, Victoria, EMNRD

From: Boyle, Matthew <Matthew.Boyle@wsp.com>
Sent: Friday, February 1, 2019 11:05 AM
To: Venegas, Victoria, EMNRD
Cc: 'Lupe Carrillo'; Harlan, Charles
Subject: [EXT] RE: Closure request for 2RP-5159 Huber Central Tank Battery Facility

Victoria,

Thank you for your response. Can you please provide me a copy of the map you are using for Karst or a link to where it can be downloaded. I have requested this from BLM and OCD before with no luck, so I have been using the map the USGS utilizes. 19.15.29 makes no mention of Karst topography as being a factor for site characterization or closure so I am not sure why OCD continues to cite it as a reason for the more stringent closure criteria?

Thank you,

Matthew Boyle
Sr. Environmental Scientist



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Please note I have a new email address.

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Leggette, Brashears & Graham is now WSP.

From: Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]
Sent: Thursday, January 31, 2019 10:32 AM
To: Boyle, Matthew <Matthew.Boyle@wsp.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Lupe@percussionpetroleum.com; Harlan, Charles <Charles.Harlan@wsp.com>; stucker@blm.gov
Subject: Closure request for 2RP-5159 Huber Central Tank Battery Facility

Mr. Boyle,

OCD has received the closure request for 2RP-5159 Huber Central Tank Battery Facility, thank you. At this time this closure is not approved for the following reason:

Based on the BLM Carlsbad Field Office Karst map, the Huber Central Tank Battery facility is located in a BLM designated High Karst Area and according to this information, the applicable NMOCD closure criteria is:

Chlorides <600 mg/kg, TPH <100mg/kg, BTEX <50mg/kg, Benzene <10mg/kg.

Further delineation and remediation are required.

Please let me know if you have any questions or need further assistance.

Regards.

Victoria Venegas
EMNRD
OCD-District II
811 S First St. Artesia
NM 88210

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.

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