Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD

Sent: Friday, September 13, 2019 1:37 PM

To: 'steve.rice@arcadis.com'

Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD

Subject: Closure Denied - Chevron - Reid Well No. 1 - (2RP-3981) 9.13.19 **Attachments:** Closure Denied - Chevron - Reid Well No. 1 - (2RP-3981) 9.13.19.pdf

Steve,

We have received your closure report and final C-141 for <u>2RP-3981</u> Reid Well No. 1, thank you. This closure is denied.

The report has a depth to groundwater of 44'. The closure requirement for <50' DTW is:

≤ 50 feet	Chloride***	EPA 300.0 or SM4500 Cl B	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

I looked through the lab results in the closure report and saw some samples over the limit for either Chlorides and/or TPH. If I've missed something please let me know.

Quad A: Chlorides 959 TPH 426 Quad B: Chlorides 628 TPH 234 Quad C: Chlorides 971 TPH <50 Quad D: Chlorides 719 TPH <50 North Wall: Chlorides 423 TPH? East Wall: Chlorides 145 TPH? West Wall: Chlorides 572 TPH? South Wall: Chlorides 197 TPH? Floor Comp: Chlorides 226 TPH?

In the future, please put the results in a table so they can be viewed properly. Please review the table after the data has been entered and verify that <u>none</u> of the closure samples are over the limit. Also, include a scaled site map diagram in the report with the sample locations clearly labeled.

We would also like to have a summary of what was excavated and at what depths the closure samples were taken. This can be in a summary or included in the table.

If you need assistance, the current spill rule may be viewed here: http://164.64.110.134/parts/title19/19.015.0029.html

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Robert.Hamlet@state.nm.us

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.