

## Venegas, Victoria, EMNRD

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**From:** Hamlet, Robert, EMNRD  
**Sent:** Thursday, September 19, 2019 1:44 PM  
**To:** Andresen, Rebecca; steve.rice@arcadis.com  
**Cc:** Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'; tgregsto@blm.gov  
**Subject:** Remediation Conditional Approval - Chevron - South Culebra Bluff 5B to Candelario 4 inch Polyline Release - (2RP-4737) 4-26-2018  
**Attachments:** Remediation Conditional Approval - Chevron - South Culebra Bluff 5B to Candelario 4 inch Polyline Release - (2RP-4737) 9.19.19.pdf

Steve and Rebecca,

SMA's Remediation Report for the 2RP-4737, proposes that the affected soil on and around the concrete forms be removed and disposed of after the completion of the road construction activities, represented by SW3, SW5, SW7, SW9, SW15, SW27, SW17, SW29, and SW30. Please continue with confirmation sampling to establish horizontal delineation at those locations if the road construction has been accomplished. The areas requested for deferral on the interior of the road are identified on the site map as soil samples SW2, SW4, SW6, SW8, SW10, SW12, and SW14. These sample locations reached conglomerate rock material on the bottom and after the county poured concrete the impacted areas were encapsulated by concrete on top and on either side and conglomerate rock on the bottom. Removal of the conglomerate bedrock could destabilize the low water crossing and endanger the low water crossing bridge in flood events. The areas have been delineated and documented in the report.

The OCD will conditionally approve the Remediation report under the following conditions:

1. All off pad areas to contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg.
2. Performing a grab sample plan of the remediation area, where each composite sample is not representative of more than 200 ft<sup>2</sup>
3. If rock refusal interferes with the remediation process, use a back-hoe/track-hoe to remove the rock. If the rock is immovable and target depth cannot be reached, use a hydrovac to clean the contaminated soil off of the rock surface and outline specific locations and steps taken on the Closure Report. If allowed by the BLM, layer the cleaned rock with Micro-Blaze or liquid with microbial strains, surfactants and nutrients designed to digest organics and hydrocarbons.
4. Please complete delineation on the south side of the road that was bounded by the underground pipeline. If this is unsafe or impractical, please let the OCD know in your closure report.
5. Laboratory analyses of final sampling and a description of all remedial activities taken
6. Provide a scaled site and sampling diagram, photographs of the remediation site prior to backfill
7. All other closure reporting need to follow requirements set forth in 19.15.29.12 NMAC
8. Restoration, reclamation and re-vegetation to 19.15.29.13 NMAC

This is a Federal site and will require like approval from BLM.

Thank you,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources

Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto: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.

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**From:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>  
**Sent:** Thursday, June 27, 2019 1:42 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; 'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; [tgregsto@blm.gov](mailto:tgregsto@blm.gov)  
**Subject:** [EXT] RE: South Culebra Bluff 5B to Candelario 4" Polyline Release, 2RP-4737

The report is attached.

Thanks,  
Rebecca

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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Thursday, June 27, 2019 12:36 PM  
**To:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; 'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; [tgregsto@blm.gov](mailto:tgregsto@blm.gov)  
**Subject:** RE: South Culebra Bluff 5B to Candelario 4" Polyline Release, 2RP-4737

Rebecca,

After looking at documents in the OCD RP-Folder, I was unable to find the SMA Work Plan (Dated July 4, 2018) that was submitted to the BLM. Could you please send us a copy of that report ASAP. Once the work plan is received, the OCD will review the plan and communicate its findings.

Due to the severity, sensitivity, and depth to ground water at this spill site, we will mostly likely not be able to approve a deferral request.

Please keep the OCD updated on major status changes.

Thank you,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

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**From:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>  
**Sent:** Thursday, June 13, 2019 2:09 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; 'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>  
**Subject:** [EXT] South Culebra Bluff 5B to Candelario 4" Polyline Release, 2RP-4737

Mr. Hamlet,

Please find attached a Site Status Letter regarding NMOCD Case No. 2RP-4737. A release at this location was reported to the NMOCD in April 2018. Reports documenting initial cleanup activities were submitted to the NMOCD in July and September 2018. Chevron acquired the lease for this well in October 2018, and is respectfully requesting a review and determination of the submitted reports.

Please let us know if you have questions.

Best Regards,

**Rebecca Andresen, P.G.** | Vice President | [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)  
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