

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, December 6, 2019 1:09 PM
To: 'Llull, Christian'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Billings, Bradford, EMNRD; blm_nm_cfo_spill@blm.gov
Subject: Closure Denied - ConocoPhillips - MCA 1C - (1RP-5141) 11-11-2016
Attachments: Closure Denied - ConocoPhillips - MCA 1C - (1RP-5141) 12.6.19.pdf

Christian,

We have received your closure report and final C-141 for **1RP-5141 MCA 1C** thank you. This closure is denied.

The State of New Mexico no longer uses the Ranking Scoring System. All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 "Closure Criteria for Soils Impacted by a Release" included in the spill rule <http://164.64.110.134/parts/title19/19.015.0029.html>

Your report says, "Based upon the depth to groundwater, the approved RRAL for TPH is 5,000 mg/kg". The correct limit for TPH 51'-100' and >100' are 2,500 mg/kg (GRO+DRO+MRO) or 1,000 mg/kg for (GRO+DRO).

Table I Closure Criteria for Soils Impacted by a Release			
Minimum depth below any point within the horizontal boundary of the release to ground water less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤ 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
51 feet-100 feet	Chloride***	EPA 300.0 or SM4500 Cl B	10,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg
>100 feet	Chloride***	EPA 300.0 or SM4500 Cl B	20,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg

	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

Sample ID "B-1" and "B-2" are both over the limit for TPH. Please excavate soil sample "B-1" to 4 feet bgs and "B-2" to 6 feet bgs.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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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.