

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Monday, December 9, 2019 2:33 PM
To: 'Castro, Isaac (MRO)'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Closure Denied - Marathon - Sterling 20 State 1H - (2RP-5091) 11-11-2018

Isaac,

We have received your closure report for **2RP-5091 Sterling 20 State 1H**, thank you. This closure is denied.

I did see a workplan was approved on 2/15/2019 with a request to defer the area immediately beneath the battery. Generally, the spill must be fully delineated and excavated to receive a deferral. The liner integrity was inspected and found to be compromised where plastic welding failed along the liner seam. The battery will need to be sampled underneath the liner and specific sample points will need to be requested for deferral. If contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility deconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first. Due to the spill being located with a 100 year floodplain, as much of the contaminants as possible will need to be removed before a deferral can be approved.

- L2, L3, L4, and L5 will need to be further excavated to 100 mg/kg for TPH. Please use a hydrovac to remove soil in and around buried lines and equipment. If tanks or equipment hinder further excavation please include pictures and a formal request to defer specific soil sample locations.
- Sample the battery underneath the liner and delineate the spill (depth), so we know the amount of contaminants being left in place around the tanks and equipment. Please, excavate with shovel/hydrovac as much contaminated soil in the battery as possible.
- C4 and SW4 will also need to be excavated to 100 mg/kg for TPH. If tanks, buried lines, or equipment hinder further excavation please include pictures and a formal request to defer specific soil sample locations.
- Please include a Signed and dated C-141 (Page 6) Closure page.

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
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Energy, Minerals, and Natural Resources
Oil Conservation Division
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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.