

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, December 13, 2019 8:45 AM
To: 'addisong@forl.com'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Remediation Denied - Fasken - Denton Trunkline Spill - (1RP-5271) 11-4-2019
Attachments: Remediation Denied - Fasken - Denton Trunkline Spill - (1RP-5271) 12.12.19.pdf

Addison,

We have received your Workplan/Remediation Proposal for **1RP-5271 Denton Trunkline Spill**, thank you. This Workplan/Remediation proposal is denied.

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>

With a depth to water of 51'-100', The limit for chlorides 4 feet below the ground surface would be 10,000 mg/kg. Please make sure that all samples 4 feet bgs are under the 10,000 mg/kg limit for chlorides. 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. Perform a grab sample plan of the remediation area, where each composite sample is not representative of more than 200 ft², **Unless a variance request is approved for a larger composite sample size area.**

Also, please have Aaron sign the C-141 Page 5 (Remediation Plan) before the Remediation/Closure Plan is resubmitted to the payment portal

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
State of New Mexico
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.

