

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Friday, December 20, 2019 10:31 AM
To: Thomas Haigood; Bob Allen; Bratcher, Mike, EMNRD
Cc: Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Subject: Jalmat Sands Unit Water Injection
Attachments: (C-141 Remediation Plan) Denied Breitburn Jalmat Sands Unit Water Injection Unit.pdf

Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857

Mr. Haigood,

OCD has received your Remediation Plan for Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857, thank you. This Remediation Plan is denied for the following:

- This release has not been fully delineated. By Rule 19.15.29.11.A(5)(b): "If the release occurred outside of a lined containment area, the responsible party must delineate the release horizontally and vertically using Table I of 19.15.29.12 NMAC constituents or as required by Subparagraph (e) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC based on the type of release." On page 3, Table Soil Sample Results, the TPH concentration is above the limit for almost all samples. The closure criteria for this site is DWG < 100' i.e. TPH 2500 mg/kg, GRO+DRO 1000 mg/kg. OCD requests this site be fully delineated. Laboratory data should be provided as evidence of delineations efforts.

Regards,

Victoria Venegas
EMNRD
OCD-District II
Artesia NM
Victoria.Venegas@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.