

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Wednesday, March 25, 2020 4:40 PM  
**To:** Ike Tavarez; Jennifer Knowlton; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** CFO\_Spill, BLM\_NM; 'Brittany Esparza'  
**Subject:** NAB1914934715 WHITE FEDERAL COM #001H 2RP-5449/NAB1915531667 WHITE FEDERAL COM #001H 2RP-5469  
**Attachments:** (C-141 Remediation Plan) NAB1914934715 WHITE FEDERAL COM #001H 2RP-5449\_NAB1915531667 WHITE FEDERAL COM #001H 2RP-5469.pdf

### **NAB1914934715 WHITE FEDERAL COM #001H 2RP-5449/NAB1915531667 WHITE FEDERAL COM #001H 2RP-5469**

Mr. Tavarez,

The OCD has denied the submitted Proposed Monitoring Work Plan/C-141 for incidents: # NAB1914934715 WHITE FEDERAL COM #001H 2RP-5449/NAB1915531667 WHITE FEDERAL COM #001H 2RP-5469, for the following reasons:

- The closure criteria for this site is DWG < 50'. Impacted soils will need to meet Table 1 Closure Criteria for groundwater at a depth of 50' or less. A watercourse is located within 300' of the site, according to the USGS topographic map.
- The OCD does not accept the DWG of a well that is over 2.8 miles from the release site. The OCD doesn't accept the Chevron Texaco Map to estimate the depth to water to establish the closure criteria for a release.
- Vertical delineation has not been completed. Sample points AH-1 through AH-13 showed high chloride concentrations, above the 600 mg/kg limit for this site.
- Horizontal delineation has not been completed. More delineations efforts are needed for this site.
- **OCD denies COG's proposal to wait one more year -the date of release of this event is 05/13/2019- to address the remediation/restoration of this site. The OCD requests that the remediation/restoration process commences immediately. The spill rule requires it.**

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through the fee portal.

Thank you,

Victoria Venegas  
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.