

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Thursday, May 14, 2020 1:26 PM
To: Mathews, Wesley; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: 'Dhugal Hanton'; CFO_Spill, BLM_NM
Subject: NAB1903733353 TODD 26 K FEDERAL #010 @ 30-015-27102 2RP-5222
Attachments: (C-141 Final) NAB1903733353 TODD 26 K FEDERAL #010 @ 30-015-27102_1 2RP-5222.pdf

NAB1903733353 TODD 26 K FEDERAL #010 @ 30-015-27102 2RP-5222

Mr. Wesley,

The OCD has denied the submitted Closure Report C-141 for incident # NAB1903733353 TODD 26 K FEDERAL #010 @ 30-015-27102 2RP-5222 for the following reasons:

- Since the release was not on an active pad or production facility, the top 4 feet must meet the NMOCD Reclamation Standards by Rule 19.15.29.13. Lease roads are considered off-pad areas.
- Per rule 19.15.29.12.E.1.a. the final report must include a sampling diagram. Please include a sampling diagram with all sample points clearly marked in your next submittal.
- All samples in this report are named SS19 -see Table 3. Soil Analysis-. Please clarify which are floor samples and which are sidewall samples. It cannot be determined if the horizontal delineation/remediation has been completed because sidewall samples are not clearly identified. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release.

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.