

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Friday, May 8, 2020 10:51 AM  
**To:** 'Rob Kirk'; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Eads, Cristina, EMNRD  
**Cc:** CFO\_Spill, BLM\_NM; 'Gonzales, Clair'  
**Subject:** NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E\_2  
**Attachments:** (C-141 Remediation Plan) NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E\_2.pdf

### NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E\_2

Mr. Kirk,

The OCD has denied the submitted Site Characterization/Remediation Plan C-141 for incident # for the following reasons:

- The revised Remediation Plan does not address the required corrections requested in the first submittal. The only additional information is Appendix D/Revegetation Plan.
- Horizontal delineation has not been completed. The edges -horizontal definition- of a liquid release must be determined. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release.
- 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.
- The Depth to groundwater has been inadequately assessed. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If Solaris believes that groundwater is > 100', a borehole will need to be drilled onsite and a copy of the driller's log must be provided.

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.