

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Thursday, July 16, 2020 2:53 PM  
**To:** Tom Bynum; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** CFO\_Spill, BLM\_NM; 'Dhugal Hanton'; DeHoyos, Kendra; 'Carrasco, Lupe'  
**Subject:** NRM2007031081 COTTON DRAW UNIT #205H @ 30-015-42071  
**Attachments:** (C-141 Closure) NRM2007031081 COTTON DRAW UNIT #205H @ 30-015-42071.pdf

### **NRM2007031081 COTTON DRAW UNIT #205H @ 30-015-42071**

Ms. DeHoyos,

The OCD has denied the submitted Closure Report C-141 for incident # NRM2007031081 COTTON DRAW UNIT #205H @ 30-015-42071 for the following reasons:

- 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 Devon believes that groundwater is > 100', a borehole will need to be drilled onsite and a copy of the driller's log must be provided.
- If Devon chooses not to drill a borehole to confirm the depth to groundwater, the site must be remediated to meet the Closure Criteria in Table 1 for groundwater at a depth of 50 feet or less. This will require additional excavation @ sample points: BS20-10, BS20-13, BS20-14, BS20-15, BS20-16, WS20-08 WS20-18.
- As for the trend map -Chevron/Texaco 2004-, it is not an acceptable means for determining depth to groundwater. It is a tool that may have some value as a quick reference guide, however, the Division does not consider it factual evidence of depth to ground water.

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.