

Venegas, Victoria, EMNRD

From: Chris Jones <chris@pimaoil.com>
Sent: Friday, September 4, 2020 9:34 AM
To: Venegas, Victoria, EMNRD
Subject: [EXT] Re: NAB1911934844 JASPER 32 STATE COM #007H @ 30-015-40584 2RP-5370

Victoria, I completely understand getting everything delineated as stated in the plan, that's is why I referenced on page 3 under the proposed remediation plan that horizontal and vertical excavation will be sampled to ensure it is delineated. While sampling this site we met refusal with the hand augers but identified where the greatest part of the contaminated area is. Horizontal delineation has all been met with the exception of the east side based on other samples. Vertical delineation will be obtained with equipment once excavation has started and we can obtain deeper samples. It is more efficient to delineate as we are excavating the contamination wouldn't you agree? It makes no sense to go dig holes to sample and backfill with the same material that's dirty when we can begin the remediation and find the extents during this process. This practice has been accepted as long as we have the samples to back it all up which we will obtain.

On Fri, Sep 4, 2020 at 9:22 AM Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us> wrote:

NAB1911934844 JASPER 32 STATE COM #007H @ 30-015-40584 2RP-5370

Ms. Davis,

The OCD has denied the submitted Site Characterization/Remediation Plan C-141 for incident # NAB1911934844 JASPER 32 STATE COM #007H @ 30-015-40584 2RP-5370 for the following reasons:

- Vertical delineation has not been achieved.
- Horizontal delineation has not been achieved.
- Delineation samples will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.
- Page 5 of Form C-141 was not included in the report.

This email 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

811 S. First St., Artesia NM 88210

(575) 748-1283

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.

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Thank You,

Chris Jones
Environmental Professional
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Hobbs, NM 88240
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575-631-6977 cell

"Good timber does not grow with ease,
The stronger wind, the stronger trees,...
In trees and men good timbers grow"
Douglas Malloch