

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Thursday, September 10, 2020 11:00 AM  
**To:** 'Laumbach, Lynda'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** 'CFO\_Spill, BLM\_NM'  
**Subject:** NRM2016456845 LONGVIEW FEDERAL 12-15H @ 30-015-41092  
**Attachments:** (C-141 Closure) NRM2016456845 LONGVIEW FEDERAL 12-15H @ 30-015-41092.pdf

### NRM2016456845 LONGVIEW FEDERAL 12-15H @ 30-015-41092

Ms. Laumbach,

The OCD has denied the submitted Closure Report C-141 for incident # for the following reasons:

- Horizontal delineation/remediation has not been completed. The edges -horizontal definition- of a liquid release must be determined. The values for determination of horizontal impact are derived by either “background” value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. To determine the horizontal extent, a “clean” sample is required. For the sake of consistency, the Division will consider a sample “clean” if it meets the more stringent requirements listed in Table 1. For chloride values, natural background levels will be considered. This is especially important for “on-pad” releases to ensure the release did not extend to the “off-pad”/pasture area.

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.