

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Thursday, October 1, 2020 4:23 PM
To: 'albert.ochoa@goodnightmidstream.com'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: spills@slo.state.nm.us
Subject: NRM2022638776 DODGER INJECTION WELL
Attachments: (C-141 Closure) NRM2022638776 DODGER INJECTION WELL.pdf

NRM2022638776 DODGER INJECTION WELL

Mr. Ochoa,

The OCD has denied the submitted Closure Report C-141 for incident # NRM2022638776 DODGER INJECTION WELL for the following reasons:

- The Depth to groundwater has not been established. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, data should be no more than 25 years old, and well construction information should be provided:
<http://www.emnrd.state.nm.us/OCD/documents/OCDInternalPolicy-SpillRuleClarifications.pdf>.
- More confirmation samples need to be collected from the remediation site. Please see 19.15.29.12 D Closure Requirements. Unless a sampling plan was submitted to and approved by the division, confirmation samples should represent an area of no more than 200 square feet.
- It's unclear how the confirmation samples were collected. Per 19.15.29.12 D.(1) "The responsible party must test the remediated areas for contamination with representative five-point composite samples from the walls and base, and individual grab samples from any wet or discolored areas". Please clarify in your next submittal.
- Per Rule 19.15.29.12.(1)(a) the appropriate OCD District office must be notified 2 days prior to conducting final sampling. Please note that confirmation closure samples not collected in accordance to 19.15.29.12.D may not be accepted during closure and Operators may be required to collect additional samples.

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.