

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Andy Rickard](#); "[Tavarez, Ike](#)"  
**Cc:** [Naranjo, Mark](#); [Griswold, Jim, EMNRD](#)  
**Subject:** March 1, 2018 meeting notes: 1RP-4970 and 1RP-4974  
**Date:** Friday, March 2, 2018 9:12:00 AM

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Good morning Gentlemen:

Summary of our 1 pm MST meeting regarding Cambrian Management/Grand Banks releases. Mark Naranjo is cc'd as a representative from NMSLO was not present for the meeting. Please inform if information was miscommunicated, missing, or clarification is required.

- In general, the optimal timeline of resolution for a release is 90 days from the day of issuing the 1RP. A delineation/release characterization plan must be approved before submission of a remediation/closure report.
- Unless hydrocarbon-impacted soil, conventional remedial activity is a maximum of 4 ft. excavation with a minimal 20 mil liner properly keyed in place.
- NMOCD assumes that soil purchased for backfill is 'clean' (i.e., chloride levels  $\leq 600$  mg/kg). NMSLO will issue revegetation requirements.
- NMOCD assumes that release information and data provided on reports from a consulting firm were professionally evaluated. GPS coordinates of the delineation and confirmation sample locations are for GIS documentation.
- It is the responsibility of the consultant to include the Responsible Operator/Party of the progress towards resolution of a 1RP, including the submittal of a C-141.

#### 1RP-4887/1RP-4974

- Both 1RPs can be addressed under one report.
- Although not identified as part of the releases under 1RP-4887 and 1RP-4974, NMOCD requests that the visibly impacted area- as shown on aerial imagery- on the eastern section of the same location be addressed. If a liner is present under the release, a statement of liner integrity and removal of impacted fill material are required. Photo documentation of remedial activities are requested. If not, the impacted area must be addressed with complete delineation and remediation.

#### 1RP-4970

- Amber Groves sent photos of the overspray and un-remediated area to Ms. Jones on July 12, 2017 and I forwarded the email to you on July 26, 2017.
- Pertinent documentation and correspondence have been uploaded.
- Confirmatory soil samples are required for the overspray area in addition to the delineation and remediation of the release(s) areas.

#### 1RP-4973

- Surface house-cleaning around the wellhead. NMOCD prefers a confirmatory sample to be taken outside a radius of 5 ft. from the wellhead. However, professional judgement of the consultant deems 10-15 ft. is the safe distance.
- Edge samples (4 cardinal directions) will be taken from the edge of the impacted area.

Samples must be collected below the current 'replacement dirt' layer and tested for BTEX, TPH extended, and chlorides.

Discussion of reserve pits:

- Currently, NMOCD will not 'chase' reserve/drilling pits for remediation or reclamation.
- In general, if a current release area impacts with a presumed reserve pit, even if documentation is provided of proper closure, delineation will be required. Nonetheless, each incident is evaluated on a site-by-site basis.
- NMOCD recommends that Responsible Operators institute preventive methods to ensure that releases are confined to locations away from probable reserve pit areas.
- BLM and private surface owners have their own reclamation requirements. NMOCD may or may not be informed of these activities.
- Jim Griswold, NMOCD Environmental Bureau Chief, can verify if the above information is miscommunicated or for clarification.

Thanks,

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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 ground water, 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, local laws and/or regulations.