

From: [Yu, Olivia, EMNRD](#)
To: ["Karrigan, Callie N. \(MRO\)"; "Tucker, Shelly"](#)
Cc: [Hernandez, Christina, EMNRD](#)
Subject: RE: 1RP-4765 Closure
Date: Monday, September 17, 2018 11:29:00 AM
Attachments: approved_1RP4765_final c141 Ballard #2.pdf

Dear Ms. Karrigan:

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4765** closed. However, this determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

BLM approval required. BLM may have additional concerns and stipulations.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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.

From: Yu, Olivia, EMNRD
Sent: Monday, September 17, 2018 10:33 AM
To: 'Karrigan, Callie N. (MRO)' <cnkarrigan@marathonoil.com>; Tucker, Shelly <stucker@blm.gov>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Subject: RE: 1RP-4765 Closure

Good morning Ms. Karrigan:

Thank you for the photo. Please submit a final C-141 for 1RP-4765 at your earliest convenience.

Thanks,
Olivia

From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>
Sent: Monday, September 17, 2018 8:53 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Subject: RE: 1RP-4765 Closure

Good morning,

Please see the attached picture per your request for closure. Please disregard the email previously sent. This is the picture assigned to this RP#.

Callie

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Thursday, September 13, 2018 12:12 PM
To: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>; Tucker, Shelly <stucker@blm.gov>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Subject: [External] RE: 1RP-4765 Closure

Beware of links/attachments.

Dear Ms. Karrigan:

Please be advised that assessment to depth to groundwater must include USGS data. In general, NMOSE database is for depth to water table or aquifer, which is not necessarily equivalent to groundwater. Please also note that if the excavation area was laterally extended, please provide GPS coordinates of the impacted area as requested in the email dated May 1, 2018.

NMOCD will agree to closure of 1RP-4765, contingent upon photo documentation of the remediated area and submission of a final C-141 form. As this closure report was submitted before the revised 19.15.29 NMAC came into effect on August 14, 2018, the C-141 form (version 2017) may be used.

Thanks,

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From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>

Sent: Monday, June 18, 2018 11:08 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Subject: 1RP-4765 Closure

All,

Attached is the final closure for 1RP-4765 prepared by Souder Miller. Please let me know if you have any questions.

Thank you,

Callie

From: Tucker, Shelly
To: [Karrigan, Callie N. \(MRO\)](#)
Cc: [Yu, Olivia, EMNRD](#); [Hernandez, Christina, EMNRD](#)
Subject: Re: [EXTERNAL] RE: 1RP-4765 Closure
Date: Monday, September 17, 2018 10:01:23 AM

Correction, just found the C-141 but nothing after that...(I was looking under Mewbourne by accident).

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

NOTE: LPC Timing Stipulations - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

On Mon, Sep 17, 2018 at 9:59 AM Tucker, Shelly <stucker@blm.gov> wrote:

Please be aware, this is a federal site and Marathon never reported this release to the BLM as required by NTL-3A. In doing so, they never received authorization to preform any excavation/remedial activities. The C-141 states the release did not leave location but after reviewing satellite imagery and provided photos, it appears the release did leave location. This location does not have any archaeology surveys on record. In addition, this site is located in LPC timing stipulation area and according to the closure report, the remedial activities occurred during this time. It was not noted within the closure report if these stipulations were followed. Additionally, it was not stated in this closure report whether seeding of the impacted area will occur. Therefore, Marathon is required to reseed this area with BLM seed mix #2 LPC. Verification of reseeding will be required.

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Sincerely,

Shelly J Tucker

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On Mon, Sep 17, 2018 at 9:13 AM Tucker, Shelly <stucker@blm.gov> wrote:

BLM accepts closure request.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

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