

**Karrigan, Callie N. (MRO)**

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**From:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Sent:** Wednesday, July 25, 2018 10:34 AM  
**To:** Karrigan, Callie N. (MRO); Hernandez, Christina, EMNRD; rmann@slo.state.nm.us  
**Cc:** Heather Patterson  
**Subject:** [External] RE: Marathon Oil Company - 1RP-4869 and 1RP-5003 Closure  
**Attachments:** reviewed\_1RP4869\_1RP5003\_Tonto 15 State #1 Closure Report.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Beware of links/attachments.**

Good morning Ms. Karrigan:

**Notes**

- Please be advised that any deferral of a portion of the release area, even if the majority of the impacted area has been remediated, will not require a final C-141.
- Please note that under the new NMAC 19.15.29, to be in effect in August 2018, there will be no adjustment to the permissible levels left in place. For example, if  $\leq 600$  mg/kg chloride level is not obtained (+ 5% standard deviation or standard error not accepted), the excavated area must be laterally or vertically extended.
- In assessing depth to groundwater, please check USGS database.

NMOCD will agree that delineation has been completed for 1RP-4869 & 1RP-5003. However, several concerns regarding the remediation process:

1. Please demarcated clearly the areas represented by each of the delineation sample locations. Where are the borders among the differing depths of excavation? For example, the area represented by L1 is proposed for deferral, while the L2/L3 area has 1.75 ft removed. The transition edge/sidewall should confirmatory soil samples taken.
2. Was the elevated BTEX, TPH extended, and chlorides at 0.5 ft in the area represented by L1, at least surficially addressed through non-mechanical methods? Any areas to be deferred must be explicitly outlined on a scaled map for documentation.

NMSLO may have additional concerns.

Thanks,  
Olivia

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**From:** Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>  
**Sent:** Thursday, July 19, 2018 2:36 PM  
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; rmann@slo.state.nm.us  
**Cc:** Heather Patterson <heather.patterson@soudermiller.com>  
**Subject:** Marathon Oil Company - 1RP-4869 and 1RP-5003 Closure

Good afternoon,

Please see the attached closure documents for 1RP-4869 and 1RP-5003 prepared by SMA. Clean-up pictures are also attached.

Callie

**District I**  
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**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 191101

CONDITIONS

Operator: MARATHON OIL PERMIAN LLC 990 Town & Country Blvd. Houston, TX 77024	OGRID: 372098
	Action Number: 191101
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	3/13/2023