

From: [Eads, Cristina, EMNRD](#)
To: ["ABarnhill@chevron.com"](mailto:ABarnhill@chevron.com)
Cc: [Bradford EMNRD Billings \(Bradford.Billings@state.nm.us\)](mailto:Bradford.Billings@state.nm.us)
Subject: 1RP-1295 Brunson Argo Tank Battery #1 Closure Request
Date: Thursday, January 9, 2020 8:18:00 AM
Attachments: [\(C-141 Denied\) Closure Request Brunson Argo Tank Battery 1 1RP-1295.pdf](#)

Amy,

The OCD has reviewed the closure report for the Brunson Argo Tank Battery #1, 1RP-1295. This closure request is denied for the following reason:

- The release has not been fully delineated to the given closure criteria of 100 mg/kg TPH. The bottom samples, NEBH-1 (15') and BH-M(20'), taken from the deep excavations, exceed 100 mg/kg TPH. Samples BH1-ES, BH2-ES, and BH1-NS exceed 100 mg/kg TPH and the location from where these samples were taken is unknown.

Sample

The OCD requests Chevron perform additional site characterization by installing a two additional soil bores, one within the 20' excavation and the other within the 15' excavation, to vertically delineate to TPH – 100 mg/kg. Please include a scaled site map with locations of additional soil bores relative to the previously excavated area. If analytical results show there is no risk to groundwater contamination, Chevron can request a variance to keep the remainder of the affected soil in place.

I appreciate you taking the time to find additional sample data for this work which was completed over a decade ago. Thank you for your continued efforts. Please let me know if you have any questions.

Regards,

Cristina Eads

Environmental Bureau

EMNRD – Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505.476.3084

email: Cristina.Eads@state.nm.us

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.