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Subject: Closure Denied - Red Hill Station 1RP-5648
Date: Monday, January 13, 2020 10:24:00 AM
Attachments: [4. \(C-141-Denied\)1RP-5648 Plains Pipeline Red Hills Station.pdf](#)

Amber,

The OCD has received the closure report and C-141 for Red Hill Station 1RP-5648. This closure is denied for the following reason:

- Depth to ground water has not been adequately identified. The information authored by a third party, titled "Lea Co. Depth to Ground Water", takes into account ground water on a large scale, but it does not account for smaller ground water sources that may be present.

As the analytical data meets Closure Criteria for Soils Impacted by a Release for ground water at 51-100 feet bgs, Plains will need to drill a borehole on site to 55' bgs and leave it open for at least 24 hours. If there is no evidence of ground water after 24 hours, the OCD will accept the evidence in the closure report with a copy of the driller's log.

If Plains chooses not to drill a borehole to confirm depth to groundwater, the impacted area will need to be remediated to meet closure criteria for water at a depth of 50 feet or less.

For further clarifications regarding the implementation of the spill rule, visit the OCD website: <http://www.emnrd.state.nm.us/OCD/documents/OCDInternalPolicy-SpillRuleClarifications.pdf>

Feel free to call or email if you wish to discuss.

Thanks,

Cristina Eads

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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.