From: <u>Eads, Cristina, EMNRD</u>

To: <a href="mailto:""cjones@talonlpe.com"; Brittany Esparza

Cc: Mike EMNRD Bratcher (mike.bratcher@state.nm.us); Robert EMNRD Hamlet (Robert.Hamlet@state.nm.us);

Victoria EMNRD Venegas (Victoria. Venegas@state.nm.us)

Subject: NAB1912955644 CORAZON STATE UNIT #005H @ 30-025-40947

 Date:
 Wednesday, April 8, 2020 12:22:00 PM

 Attachments:
 (C-141 Closure) NAB1912955644.pdf

image003.png

NAB1912955644 CORAZON STATE UNIT #005H @ 30-025-40947

Chris,

The OCD has denied the submitted Closure C-141 for incident # nAB1912955644 for the following reasons:

- Samples S10 SW and S11 SW exceed the GRO+DRO limits of 1000 mg/kg given on Table I in 19.15.29.12.
- Horizontal delineation has not been completed. The edges -horizontal definition- of a liquid release must be determined. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release. Lab data must be provided as evidence of delineation efforts. The values for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. This is especially important for "on-pad" releases to ensure the release did not extend to the "off-pad"/pasture area.

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The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting though the fee portal. If you have any questions or believe this denial is in error, please contact me prior to submitting an additional C-141.

Thanks,

Cristina Eads

Environmental Bureau

EMNRD – Oil Conservation Division
5200 Oakland Avenue NE, Suite 100

Albuquerque, New Mexico 87113
505.670-5601

email: <u>Cristina.Eads@state.nm.us</u>



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.