

**From:** [Eads, Cristina, EMNRD](#)  
**To:** [Ike Tavarez](#)  
**Cc:** "[agrant@concho.com](#)"; [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:** NRM1933644528 SRO 5 STATE COM #506H & 507H @ L-33-25S-28E ON OE  
**Date:** Thursday, June 4, 2020 2:32:00 PM  
**Attachments:** [\(C-141 Remediation Plan\) nRM1933644528.pdf](#)  
[image003.png](#)

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**NRM1933644528 SRO 5 STATE COM #506H & 507H @ L-33-25S-28E ON OE**

Mr. Tavarez,

The OCD has denied the submitted Remediation Plan C-141 for incident # nRM1933644528 for the following reasons:

- The background data is not approved. Most of the background samples indicate chloride concentrations are less than 600 mg/kg in the top 4'. Background samples 3 and 4 indicate soils surrounding the area contain concentrations of chloride of just over 600 mg/kg or less at depths between 0 and 12' below ground surface (bgs). Confirmation samples within the northern part of the nAB192543066 release area (most near the nRM1933644528 release) indicate clean soils contained chloride concentrations of less than 600 mg/kg. Several samples collected for this particular incident indicate soils contain chloride concentrations of less than 600 mg/kg. The distance between release boundaries for both incidents, nRM193364452 and nAB192543066, appears to be less than 175 feet, and soils containing less than chloride concentrations of 600 mg/kg were identified in the latter incident. Closure criteria will need to adhere to Table I Closure Criteria for ground water at a depth of 50 feet or less.
- Vertical delineation has not been achieved.
- Horizontal delineation has not been achieved.
- Analytical Data is missing from the report.

The variance will not be considered until vertical delineation has been achieved and depth to water is established. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If COG is unable to provide evidence that depth to groundwater is greater than 50' below ground surface, a borehole may need to be installed.

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through 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: [Cristina.Eads@state.nm.us](mailto: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.**