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Subject: NAB1904257393 MALDIVES 15 CTB 1 BATTERY @ FAB1904256659
Date: Friday, September 11, 2020 12:29:00 PM
Attachments: [image002.png](#)
[\(C-141 Closure\) NAB1904257393.pdf](#)
[image002.png](#)

NAB1904257393 MALDIVES 15 CTB 1 BATTERY @ FAB1904256659

Amanda,

The OCD has denied the submitted Closure Request C-141 for incident # NAB1904257393 for the following reason:

- Horizontal delineation has not been completed. The values for determination of horizontal impact are derived by either “background” value as determined appropriate to Rule 29, or Table I Closure Criteria for releases where groundwater is at a depth of 50 feet or less. This is especially important for “on-pad” releases to ensure the release did not extend to the “off-pad”/pasture area. A visual footprint on the surface is not sufficient to assess the horizontal extent of the release. Lab data must be provided as evidence of delineation efforts. Samples BS-05 and BS-06 exceed 100 mg/kg TPH, thus requiring additional samples beyond these two points.

I would like to note that I had trouble verifying the NMOSE groundwater data with my sources and with the information provided in Attachment 3 of this report. I apologize if this is an oversight on my part, but can you supply the evidence for the referenced groundwater well “located approximately 0.5 miles west of the site”? In the event you are unable to do provide this data, or any other data accepted by the division supporting the argument that groundwater is greater than 50 feet below ground surface, the responsible party will need to remediate to our most stringent Table I Closure Criteria.

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

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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.