

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, May 7, 2019 3:50 PM  
**To:** Wright, Justin K  
**Cc:** Fejervary Morena, Gustavo A; Hamlet, Robert, EMNRD; Venegas, Victoria, EMNRD  
**Subject:** RE: CAP for James A Waterflood 2RP-5017  
**Attachments:** 20190503124725.pdf

RE: ConocoPhillips \* James A 12 aka James A Waterflood \* 2RP-5017 \* DOR: 8/24/18

Justin,

Assuming this is the remediation proposal for this release, it is **DENIED** due for the most part, for not meeting requirements of current spill rule [19.15.29]NMAC.

Here is a link to the rule: <http://164.64.110.134/parts/title19/19.015.0029.html>

Please review and resubmit including all documentation as required. Along with multiple other deficiencies, the analytical data needs to be in a table format with sample points clearly marked on a scaled site diagram. The attachments you have sent are not legible, making this type submittal unacceptable. I would suggest a third party contractor be retained to formulate your proposal.

Also, for all OCD District 2 Environmental correspondence, please address to the following District Environmental Specialists:

Rob Hamlet: [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
Victoria Venegas: [victoria.venegas@state.nm.us](mailto:victoria.venegas@state.nm.us)

You may continue to copy me as well.

Thank you,

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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 ground water, 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, local laws and/or regulations.

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**From:** Wright, Justin K <Justin.Wright@conocophillips.com>  
**Sent:** Friday, May 3, 2019 2:08 PM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

**Cc:** Fejervary Morena, Gustavo A <G.Fejervary@conocophillips.com>

**Subject:** [EXT] FW: CAP for James A Waterflood 2RP-5017

**From:** Wright, Justin K <[Justin.Wright@conocophillips.com](mailto:Justin.Wright@conocophillips.com)>

**Sent:** Friday, May 3, 2019 12:50 PM

**To:** Wright, Justin K <[Justin.Wright@conocophillips.com](mailto:Justin.Wright@conocophillips.com)>

**Subject:**