

From: [Eads, Cristina, EMNRD](#)
To: "Littrell, Kyle"
Cc: [CFO Spill, BLM NM; Bratcher, Mike, EMNRD; Victoria EMNRD Venegas \(Victoria.Venegas@state.nm.us\); Robert EMNRD Hamlet \(Robert.Hamlet@state.nm.us\)](#)
Subject: NRM2005839143 POKER LAKE UNIT 25 BD 901H @ 30-015-45863
Date: Thursday, October 15, 2020 9:27:00 AM
Attachments: [image002.png](#)
[\(C-141 Closure\) NRM2005839143.pdf](#)
[image003.png](#)

NRM2005839143 POKER LAKE UNIT 25 BD 901H @ 30-015-45863

Kyle,

The OCD has denied the submitted Closure Request C-141 for incident # NRM2005839143 for the following reason:

- The depth to groundwater has not been adequately determined. 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. The responsible party may choose to remediate to the most stringent levels listed in Table 1 in lieu of drilling to determine the depth to groundwater.
- 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. Delineation samples SS01,02,03, and final confirmation samples SW03, 04, and 05 exceed 600 mg/kg Chloride, thus requiring additional samples beyond these points.

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



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.