

**From:** [Eads, Cristina, EMNRD](#)  
**To:** ["Larry.Baker@apachecorp.com"](mailto:Larry.Baker@apachecorp.com)  
**Cc:** [Mike EMNRD Bratcher \(mike.bratcher@state.nm.us\)](mailto:Mike.EMNRD.Bratcher@mike.bratcher@state.nm.us); [Robert EMNRD Hamlet \(Robert.Hamlet@state.nm.us\)](mailto:Robert.EMNRD.Hamlet@robert.hamlet@state.nm.us); [Victoria EMNRD Venegas \(Victoria.Venegas@state.nm.us\)](mailto:Victoria.EMNRD.Venegas@victoria.venegas@state.nm.us)  
**Subject:** RE: 3. (C-141 Denied) 1RP-5635 Remediation Plan Ghost Rider 22-15 Fed Com 202H  
**Date:** Thursday, December 5, 2019 1:37:00 PM

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Mr. Baker,

Please see **19.15.29.12 C. NMAC**. In order for a remediation plan to be approved, a complete site assessment/characterization must be submitted. The current site assessment is incomplete.

I encourage you to continue with delineation efforts and soil bore installation for ground water determination.

Thank you for your continued efforts at this site. Please let me know if you have any other questions or concerns.

Respectfully,

**Cristina Eads**

*Environmental Bureau*  
*EMNRD – Oil Conservation Division*  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505.476.3084  
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.**

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**From:** Baker, Larry <[Larry.Baker@apachecorp.com](mailto:Larry.Baker@apachecorp.com)>  
**Sent:** Thursday, December 5, 2019 11:05 AM  
**To:** Eads, Cristina, EMNRD <[Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)>  
**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Subject:** [EXT] RE: 3. (C-141 Denied) 1RP-5635 Remediation Plan Ghost Rider 22-15 Fed Com 202H

Ms. Eads,

Thank you for your response and explanation for denial of the plan. However I would like to point out that the report does address those areas of concern. There is only one well in that township and range and it identifies groundwater 380 feet. Due to the lack of data points and distance of the well

from the release location Apache Corporation decided to confirm the depth of groundwater in that area. The assumption is that water will be over 100 feet below ground surface. If the assumption is confirmed then the site has been delineated vertically below table one standards for releases over 100 feet to groundwater. The plan also addresses how Apache Corporation would proceed if groundwater is shallower than 100 feet. Since those areas of denial were identified in the remediation plan with a course of action Apache Corporation respectfully ask NMOCD to reconsider the denial of the remediation plan. Please let me know if you have any questions or wish to discuss thanks and have a good day.

### **BRUCE BAKER**

ENVIRONMENTAL TECHNICIAN SR

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**From:** Eads, Cristina, EMNRD [<mailto:Cristina.Eads@state.nm.us>]  
**Sent:** Thursday, December 05, 2019 10:24 AM  
**To:** Baker, Larry <[Larry.Baker@apachecorp.com](mailto:Larry.Baker@apachecorp.com)>  
**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Subject:** [EXTERNAL] 3. (C-141 Denied) 1RP-5635 Remediation Plan Ghost Rider 22-15 Fed Com 202H

Mr. Baker,

The OCD has received the Remediation Plan for **1RP-5635 Ghost Rider 22-15 Fed Com 202H**, thank you. This remediation plan is denied for the following:

- The extent of the release's impact has not been fully delineated.
- Depth to ground water at the site has not been identified.

Please let me know if you have any questions.

Regards,

### **Cristina Eads**

*Environmental Bureau*

*EMNRD – Oil Conservation Division*

1220 South St. Francis Drive  
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