From:	Eads, Cristina, EMNRD
To:	"james.raley@wpxenergy.com"
Cc:	Mike EMNRD Bratcher (mike.bratcher@state.nm.us); Victoria EMNRD Venegas (Victoria.Venegas@state.nm.us); Robert EMNRD Hamlet (Robert.Hamlet@state.nm.us)
Subject:	NRM2003533617 C 17 STATE #001H @ 30-015-44534
Date:	Wednesday, April 8, 2020 11:36:00 AM
Attachments:	(C-141 Closure) nRM2003533617.pdf image006.png

NRM2003533617 C 17 STATE #001H @ 30-015-44534

Jim,

The OCD has denied the submitted Closure C-141 for incident # NRM2003533617 for the following reasons:

- The closure criteria stated in the closure report is incorrect, and the site characterization is incorrect. According to the OCD Environmental Map and the GPS coordinates given in the Release Notification C-141, the release is overlying an area considered to have high potential for karst occurrence. Per rule 19.15.29.12 C. (4) NMAC, "The responsible party must treat the release as if it occurred less than 50 feet to ground water in Table I of 19.15.29.12 NMAC."

  Below is an image showing the location of release is in a high karst occurrence potential area.

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting though 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.