

From: [Eads, Cristina, EMNRD](#)
To: ["Sanjari, Melodie \(MRO\)"](#)
Cc: [Kelsey; Mike EMNRD Bratcher \(mike.bratcher@state.nm.us\); Robert EMNRD Hamlet \(Robert.Hamlet@state.nm.us\); Victoria EMNRD Venegas \(Victoria.Venegas@state.nm.us\)](#)
Subject: NRM2010752258 GREEN FROG FEDERAL #001H @ 30-025-40828
Date: Wednesday, August 26, 2020 4:32:00 PM
Attachments: [image003.png](#)
[image001.png](#)
[\(C-141 Deferral Request\) NRM2010752258.pdf](#)

NRM2010752258 GREEN FROG FEDERAL #001H @ 30-025-40828

Melodie,

The OCD has denied the Remediation Plan Deferral Request C-141 for incident # for the following reasons:

- It appears samples SL1 , SL3, and SL4 are not within the containment, and the samples collected within the top 2' grossly exceed the closure criteria for this site. Horizontal delineation has not been completed near these sample points. Additional horizontal delineation samples will be required.
- The OCD agrees with the BLM that the areas where the deferral is being requested should be remediated as reasonably and safely as possible, especially the samples located outside of the secondary containment.

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.