

Venegas, Victoria, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, January 24, 2019 8:53 AM
To: Boyer, Katharine
Cc: Sanchez, Daniel J., EMNRD; Hamlet, Robert, EMNRD; Venegas, Victoria, EMNRD
Subject: RE: 275 BBL Spill at COG Carmen 3 Federal Lease 1H Well, Loco Hills, NM - 2019 JAN 07 OCD C141
Attachments: Transport Rule.docx

Katharine,

Thank you for the submittal. There are a couple of issues with it, the primary one being the OGRID number that was used. This OGRID (229137) belongs to COG. I again, have to defer back to who is the authorized transporter for this oil. OCD records reflect Holly Transportation, LLC (OGRID 278421) as the authorized transporter. In the instance of this release, it is the OCD District's contention that Holly Transportation, LLC is the Responsible Party (RP) for this release, and the C-141 will be entered under OGRID number 278421. If you disagree with the District's finding, you may petition the Santa Fe office to set the matter for hearing. Holly Transportation may have contractual or civil remedies that would require Transwood to be financially obligated for remedial costs, but that would be a matter between Holly Transportation and Transwood, since Transwood was acting on Holly Transportation's behalf.

On a more simple note, the current Form C-141 is relatively new, having gone from a one page document to now, a six page document. When submitting an Initial Form C-141, typically, only pages one and two are required. The other four pages are submitted as the remedial process progresses per 19.15.29 NMAC. (Effective date August 14, 2018).

Unless I hear back from you, we will process the submitted document using OGRID 278421, and will image only pages one and two into the OCD Online system. Also, the API number for the COG well will not be utilized for data entry.

If you have any questions or concerns, please contact me.

Thank you,

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

From: Boyer, Katharine <Katharine.Boyer@HollyFrontier.com>
Sent: Tuesday, January 22, 2019 3:25 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Boyer, Katharine <Katharine.Boyer@HollyFrontier.com>
Subject: [EXT] 275 BBL Spill at COG Carmen 3 Federal Lease 1H Well, Loco Hills, NM - 2019 JAN 07 OCD C141

Mike,

I have filled out the attached OCD 141 form on Transwood Logistic Inc. behalf. Brian Cooper with TRC is the project manager. He said he would be calling you.

We will send you additional information regarding the remediation project when it becomes available to us.

If you have any questions, please give me a call.

Thanks for working with us!

Kathy Boyer

EHS Manager

Logistics / Asphalt / Heavy Oils

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