

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, December 5, 2019 4:03 PM
To: 'Castro, Isaac (MRO)'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; 'Mann, Ryan'
Subject: Closure Denied - Marathon - State AA #1 - (2RP-5257) 10-18-2018
Attachments: Closure Denied - Marathon - State AA #1 - (2RP-5257) 12.5.19.pdf

Isaac,

We have received your closure report and final C-141 for **2RP-5257 State AA #1**, thank you. This closure is denied.

After reviewing the previous e-mail between Heather Patterson, Brad Billings, and Dylan Rose-Coss, It appears that the work plan for 1RP-5257 was approved with the following stipulations:

- A 10 foot excavation within the battery (SB1) is approved with 2 bottom hole confirmation and 6 sidewall wall confirmation samples. All of which are to be analyzed for both chloride and TPH. While OCD would prefer a plastic liner in this area, if the landowner has other preferences, the clay liner is acceptable.
- The well pad excavation to 4 feet is approved. The OCD prefers a plastic liner, or the thinnest available version of a clay liner.
- The pad area excavation should have 5 to 6 bottom hole confirmation (5-point composite) samples for tph and chlorides, and at least as many sidewall composites for chloride only.
- Both SB2 and SB3 are to be further delineated to 600mg/Kg chloride.

The tank battery has been excavated to ten feet and a bentonite liner has been installed at the base of the excavation. All of the tank battery sidewall confirmation samples, except 1 are over the 600 mg/kg limit for chlorides. Please excavate and extend outward the tank battery sidewalls until they are under the limit of 600 mg/kg for chlorides and then line the bottom of the excavation with bentonite to create an impermeable barrier.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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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.

