

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

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Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



July 24, 2008

MEMORANDUM

Clarification of analytical test method, EPA Method 300.1, for chloride in regards to 19.15.36 NMAC and 19.15.17 NMAC.

On June 16, 2008 a new regulation regarding the permitting, design and construction, operations and closure of pits, closed-loop systems, below-grade tanks, and sumps, 19.15.17 NMAC, went into effect. On February 14, 2007 the new surface waste management regulation, 19.15.36 NMAC, also went into effect. Each of these rules, 19.15.17 NMAC and 19.15.36 NMAC, established EPA test methods for chlorides.

The Oil Conservation Division (OCD) has received several inquiries regarding implementation of EPA Method 300.1 for chloride, as specified in the above referenced rules. In order to address these inquiries and to provide clarification to operators and laboratories, OCD wishes to identify the following test methods as "other approved methods" that OCD will consider acceptable in lieu of EPA Method 300.1, as specified in 19.15.17 NMAC and 19.15.36 NMAC:

EPA Method 300.0 (extraction utilizing deionized water)
Standard Method 4500B

If you have any questions regarding this matter, please contact Brad A. Jones of my staff at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark E. Fesmire".

Mark E. Fesmire
Director, Oil Conservation Division

MF/baj

cc: Daniel Sanchez, Enforcement & Compliance Manager, OCD, Santa Fe, NM
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