

From: [Eads, Cristina, EMNRD](#)
To: ["Ben J. Arguijo"](#)
Cc: ["wade_dittrich@oxy.com"](#); [Robert EMNRD Hamlet \(Robert.Hamlet@state.nm.us\)](#); [Victoria EMNRD Venegas \(Victoria.Venegas@state.nm.us\)](#); [Mike EMNRD Bratcher \(mike.bratcher@state.nm.us\)](#)
Subject: NRM2009941553 SOUTH LOCO HILLS CTB @ O-19-18S-29E ON OE
Date: Thursday, April 23, 2020 5:26:00 PM
Attachments: [\(C-141 Remediation Plan - Deferral Request\) NRM2009941553.pdf](#)
[image003.png](#)

NRM2009941553 SOUTH LOCO HILLS CTB @ O-19-18S-29E ON OE

Ben,

The OCD has denied the submitted Remediation Plan/Deferral Request C-141 for incident # nRM20099415530 for the following reasons:

- The SP-1 test trench area needs to be vertically delineated with respect to GRO+DRO.
- To approve deferral, points and/or areas where a deferral is being requested need to be specified. Horizontal and vertical delineation at these specified places should be demonstrated.

With that being said, I do not want to discourage OXY from continuing with remediation as described in the plan. Had the points above been addressed in the remediation plan/ deferral request, it would have been approved with the condition that the SP 1 test trench area would be excavated, where possible, to a minimum depth of 8' given the TPH concentration.

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.

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.