

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Wednesday, December 11, 2019 8:57 AM
To: bhall@btaoil.com
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Remediation Denied - BTA Oil - Mesa 8105 JV-P 13-18 Compressor - (1RP-5289, 11-24-2018) (1RP-5383, 2-8-2019)
Attachments: Remediation Denied - BTA Oil - Mesa 8105 JV-P 13-18 Compressor - (1RP-5289) 12.10.19.pdf; Remediation Denied - BTA Oil - Mesa 8105 JV-P 13-18 Compressor - (1RP-5383) 12.10.19.pdf

Bob,

We have received your Workplan/Remediation Proposal for **1RP-5289 and 1RP-5383 Mesa 8105 JV-P 13-18 Compressor**, thank you. This Workplan/Remediation proposal is denied.

The two releases occurring within a 24 hour period causing the slop tank to overflow have the same RP-Number in the OCD Database. These two releases will be closed simultaneously under the same RP-Number of 1RP-5383, when the closure report is approved.

The OCD can't approve this remediation plan because there aren't enough soil sample points in the spill area. Looking at the analytical table, SP1 and SP2 have the first clean sample points for TPH at 4' bgs and have only been excavated to 1' bgs. The areas that prevent further excavation because of the compressors, installed production equipment, lines, and rock refusal will need to be delineated with lab tested soil samples to quantify the amount of contaminated soil left in place. These samples will need to be included in a formal deferral request, once the rest of the excavation is delineated and excavated. The entire spill will not be deferred, please use a hydrovac to remove contaminated soil in places that can be excavated.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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Energy, Minerals, and Natural Resources
Oil Conservation Division
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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.