

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Tuesday, February 25, 2020 9:21 AM
To: Littrell, Kyle; Ashley Ager; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: blm_nm_cfo_spill@blm.gov; Baker, Adrian
Subject: NAB1926638462 POKER LAKE UNIT 330H FLOW LINE @ FAB1926638136 2RP-5620
Attachments: (C-141 Final) Denied NAB1926638462 POKER LAKE UNIT 330H FLOW LINE @ FAB1926638136 2RP-5620.pdf

NAB1926638462 POKER LAKE UNIT 330H FLOW LINE @ FAB1926638136 2RP-5620

Mr. Littrell,

The OCD has denied the submitted Closure Plan C-141 for incident # **NAB1926638462** POKER LAKE UNIT 330H FLOW LINE @ FAB1926638136 2RP-5620 for the following reasons:

- Since the release was not on an active pad or production facility, the top 4 feet of the release must meet the NMOCD Reclamation Standards by Rule 19.15.29.13.
- Horizontal delineation has not been completed. The edges -horizontal definition- of a liquid release must be determined. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release. Chloride concentration @sample points FS02 @0.5' and FS04 @0.5' exceeded the NMOCD Reclamation Standards.
- Vertical delineation has not been completed. Sample points FS02 @0.5' and FS04 @0.5' exceeded the NMOCD Reclamation Standards of 600 mg/kg for chlorides.
- More delineation/remediation efforts are needed for this site.

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.

Thank you,

Victoria Venegas
State of New Mexico
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.