

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, April 22, 2020 2:21 PM
To: Littrell, Kyle; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Eads, Cristina, EMNRD
Cc: Ashley Ager; Baker, Adrian; Mann, Ryan
Subject: NCE2002450037 ROSS DRAW CDP @ A-32-26S-30E
Attachments: (C-141 Remediation Plan) NCE2002450037 ROSS DRAW CDP @ A-32-26S-30E.pdf

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Mr. Littrell,

The OCD has denied the Deferral request for incident # NCE2002450037 ROSS DRAW CDP @ A-32-26S-30E for the following reasons:

- The chloride impacts in the Kinder Morgan Ford Lateral CO₂ pipeline ROW has not been fully delineated. Background samples from a road is not acceptable. Background needs to come from completely undisturbed area. A grab, not composite, sample(s) should be gathered in areas undisturbed by oil and gas activities, nominally uphill from the release area, and no closer than 50 feet but no farther than 100 feet from the lateral and horizontal extents of a release's impact.

The signed C-141 can be found in the online image data base under the incident #

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.