

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Friday, May 29, 2020 2:29 PM
To: 'Michael Gant'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: CFO_Spill, BLM_NM; Ashley Ager; 'Joseph Hernandez'
Subject: NRM1935234977 SAGUARO 12" LINE @ C-23-20S-24E
Attachments: (C-141 Remediation Plan) NRM1935234977 SAGUARO 12 LINE @ C-23-20S-24E.pdf

NRM1935234977 SAGUARO 12" LINE @ C-23-20S-24E

Mr. Gant,

The OCD has denied the submitted Site Characterization/Remediation Plan C-141 for incident # NRM1935234977 SAGUARO 12" LINE @ C-23-20S-24E for the following reasons:

- The release is overlying an area considered to have high potential for karst occurrence. OCD can't approve a deferral for a spill off pad in high karst area. More remediation efforts are needed for this site. Please use alternative remediation methods -in situ bioremediation or others methods- to lower the TPH concentration @ sample point B-8-C.
- To evaluate the variance request of qualifying BH09A as a fully vertically delineated sample, please provide the measurement uncertainty associated with the analysis results.

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.