

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Wednesday, June 10, 2020 2:36 PM  
**To:** 'kfisher@3ROperating.com'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** 'Austin Weyant'  
**Subject:** NCE2002851831 STATE 36 #001 @ L-36-21S-27E  
**Attachments:** (C-141 Final) NCE2002851831 STATE 36 #001 @ L-36-21S-27E ON OE\_2.pdf

### NCE2002851831 STATE 36 #001 @ L-36-21S-27E

Mr. Fisher,

The OCD has denied the submitted Closure Request C-141 for incident NCE2002851831 STATE 36 #001 @ L-36-21S-27E for the following reasons:

- The page header for all logs provided from page 25 – 27 belongs to DIG-1 (see images below). The lat/long coordinates are identical, however the logs are different.
- Figure 1 -page 23- doesn't show where DIG-1 is located.
- Please, provide the lat/long coordinates for each borehole.
- Sample point SW3 is not depicted on the Sampling Map in Page 13.
- The groundwater lab results provided in the report -Table 2. Groundwater Sample Analytical Results- corresponds to DIG-5, however the sample analyzed by Hall Laboratories was taken from DIG-4 (see page 28, Client Sample ID: DIG #4)
- The chain of custody of sample DIG-4 was not included in the report.
- Laboratory analytical results corresponding to the Delineation samples were not provided.
- Appendix C: VSP Sampling Protocol, was not included in the report.
- Figures' names and numbers in the attachment list don't match the Figures in the report.
- Tables' names and numbers in the attachment list don't match the Tables in the report.

Received by OCD: 4/1/2020 7:22:07 AM

Page 25 of 60

<b>Log</b>  <b>DIG-1</b>  Page 1 of 1	Client: Ridge Runner	Completion Date	03/28/2019	Latitude	32.442822
	Location: East Carlsbad, NM	Drilling Contractor	Atkins Engineering Associates	Longitude	104.146243
	Purpose: Delineation for Chlorides	Drilling Method	Hollow Stem Auger	Surface Elevation (ft)	3.119
		Boring Diameter	6.5"	Total Depth (ft)	30
	Project: rrrgene_rnv_18	Sample Type	Auger		

<b>Log</b> <b>DIG-1</b> Page 1 of 1	Client: Ridge Runner	Completion Date	03/28/2019	Latitude	32.442822
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	Purpose: Delineation for Chlorides	Drilling Method	Hollow Stem Auger	Surface Elevation (ft)	3.119
	Project: rrrgene_rnv_18	Boring Diameter	6.5"	Total Depth (ft)	30
		Sample Type	Auger		
Depth in Feet	Lithology	USCS	Description		

<b>Log</b> <b>DIG-1</b> Page 1 of 1	Client: Ridge Runner	Completion Date	03/28/2019	Latitude	32.442822
	Location: East Carlsbad NM	Drilling Contractor	Atkins Engineering Associates	Longitude	104.146243
	Purpose: Delineation for Chlorides	Drilling Method	Hollow Stem Auger	Surface Elevation (ft)	3.119
	Project: rrrgene_rnv_18	Boring Diameter	6.5"	Total Depth (ft)	30
		Sample Type	Auger		
Depth					

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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(575) 748-1283  
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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.