

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Friday, September 11, 2020 10:42 AM  
**To:** 'Gloria Garza'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** 'CFO\_Spill, BLM\_NM'  
**Subject:** NRM2014958679 SANDY FEDERAL BATTERY @ P-23-23S-30E ON OE  
**Attachments:** (C-141 Closure) NRM2014958679 SANDY FEDERAL BATTERY @ P-23-23S-30E ON OE.pdf

### **NRM2014958679 SANDY FEDERAL BATTERY @ P-23-23S-30E ON OE**

Ms. Garza,

The OCD has denied the submitted Closure Report C-141 for incident # NRM2014958679 SANDY FEDERAL BATTERY @ P-23-23S-30E ON OE for the following reasons:

- The Depth to groundwater has been incorrectly assessed. The remediation levels outlined in Table 1 of 19.15.29.12 NMAC have not been established for this site.
- Confirmation samples must be analyzed for the constituents listed in Table 1; see Closure Requirements: 19.15.29.12.D.1,(a), (b), (c).
- According to the Site Characterization/Remediation Plan, the spill encompasses approximately the entire well pad. The entire affected area needs to be delineated and remediated per rule 19.15.29.11 & 19.15.29.12.
- Liner installation requires a variance. The variance request must include a detailed statement explaining the need for a variance and a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health, and the environment.

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.