

Venegas, Victoria, EMNRD

From: Sanjari, Melodie (MRO) <msanjari@marathonoil.com>
Sent: Friday, September 18, 2020 12:04 PM
To: Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: CFO_Spill, BLM_NM
Subject: [EXT] RE: NRM2002458606 H F 7 FEDERAL COM #001 @ 30-015-28509
Attachments: 2020-09-11_hf7_Report.pdf; HF7 FedCom Rpt_NRM2002458606.pdf

Ms. Venegas,

In order to provide more clarity on this incident and future projects in the area - Marathon Oil oversaw the drilling of a temporary monitoring well on the south-west corner of the HF Fed Com #1 location (C-4470 POD 1). Adkins Engineering executed the work and provided the drilling and plugging operations and OSE Permit in the form of a letter report (attached). As the report details, the well was left open to allow recharge and when probed, there was no groundwater detected at 55 feet bgs. When adjusting the remedial targets of the 51-100 feet bgs criteria to the confirmation and delineation samples that have been taken, this incident now meets closure criteria. Please let me know if you would like me to resubmit this new data with an amendment report and a signed final C141 or if you would like to review the report with this new data before resubmission.

Please don't hesitate to reach out to discuss if you have any questions or concerns and I appreciate your time in advance.

Melodie Sanjari

Environmental Professional
Permian Basin
Mobile: (575) 988-8753



From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Wednesday, July 22, 2020 11:14 AM
To: Sanjari, Melodie (MRO) <msanjari@marathonoil.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>; Johnson, Misti M. (MRO) <mjohnson4@marathonoil.com>
Subject: [External] RE: NRM2002458606 H F 7 FEDERAL COM #001 @ 30-015-28509

Beware of links/attachments.

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Ms. Sanjari,

You are correct. Less than 50 feet depth to groundwater is the depth that the OCD has decided will result in imminent risk to human health, the environment, or groundwater. That is why the Division is no longer approving deferrals for releases that occurred in an area with a groundwater depth of less than 50 feet bgs.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Victoria.Venegas@state.nm.us

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.

From: Sanjari, Melodie (MRO) <msanjari@marathonoil.com>
Sent: Tuesday, July 21, 2020 1:42 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>; Johnson, Misti M. (MRO) <mjohnson4@marathonoil.com>
Subject: [EXT] RE: NRM2002458606 H F 7 FEDERAL COM #001 @ 30-015-28509

Ms. Venegas,

Thank you so much for your attention to this incident. I am reaching out for some clarification on the subject of your denial below. The rule states that "The deferral may be granted so long as the contamination is fully delineated and does not cause an imminent risk to human health, the environment and groundwater" (19.15.29.12(C).2). This incident in particular has been completely delineated with no evidence of encountering groundwater during the excavation and delineation processes and is not believed to be a risk to groundwater between now and site abandonment. Am I understanding that the Division is stating that all locations with a depth to groundwater at or less than 50 feet bgs are an automatic imminent risk to groundwater no matter the delineation results or depth of separation? Any details or further explanation you can provide me would be extremely helpful.

Thank you in advance for your time

Melodie Sanjari

Environmental Professional
Permian Basin
Mobile: (575) 988-8753



From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Monday, July 20, 2020 11:27 AM
To: Sanjari, Melodie (MRO) <msanjari@marathonoil.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: Appelt, Robert <Robert.Appelt@WestonSolutions.com>; CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>
Subject: [External] NRM2002458606 H F 7 FEDERAL COM #001 @ 30-015-28509

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Ms. Sanjari,

The OCD has denied the submitted Deferral/ Closure Report C-141 for incident # (Insert Incident#) for the following reasons:

- A deferral cannot be granted on a release if the depth to water is <50' depth to groundwater. The release will need to be remediated to the strictest closure criteria limits (600 mg/kg, Chlorides, 100 mg/kg TPH, etc.), which matches the closure criteria that Marathon has elected to go with. If Marathon believes the depth to groundwater is >50', a shallow borehole can be drilled to 51' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log.

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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Victoria.Venegas@state.nm.us

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