

From: [Hamlet, Robert, EMNRD](#)
To: ["Daniel Dominguez"](#)
Cc: [Bratcher, Mike, EMNRD](#); [Venegas, Victoria, EMNRD](#); [Eads, Cristina, EMNRD](#); [BLM SPILL \(blm_nm_cfo_spill@blm.gov\)](#)
Subject: Remediation Conditional Approval - DCP - N Line Leak (Area 1 and Area 2) - (Incident #NRM2006235833)
Date: Tuesday, September 29, 2020 1:47:00 PM
Attachments: [Remediation Conditional Approval - DCP - N Line Leak \(Area 1 and Area 2\).pdf](#)

Daniel,

We have received your Workplan/Remediation Proposal for **Incident #NRM2006235833 N Line Leak (Area 1 and Area 2)**, thank you. This Workplan/Remediation proposal is approved with the following conditions:

- Please have all closure soil samples analyzed for **all components** in Table 1 of the spill rule.
- All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 "Closure Criteria for Soils Impacted by a Release" included in the spill rule <http://164.64.110.134/parts/title19/19.015.0029.html>
- Based on the depth to groundwater being >100', deeper than 4' below surface, the correct limit for TPH is 2,500 mg/kg (GRO+DRO+MRO) or 1,000 mg/kg for (GRO+DRO) . Benzene would need to be below the limit of 10 mg/kg, BTEX 50 mg/kg, and chlorides 20,000 mg/kg.
- Please continue to horizontally delineate sample points to 600 mg/kg for chlorides and TPH to 100 mg/kg on the outer edges/periphery and include sample points in your next report after closure criteria limits have been met. Surface sample points and sidewalls on the edge of the release need to be delineated to 600 mg/kg for chlorides and 100 mg/kg for TPH for the spill to be horizontally delineated. All sidewall samples must include **all components** in Table 1 of the spill rule and not just chloride analysis.
- Please collect closure samples, representing no more than 200 square feet. *Alternately, without division approval, the responsible party may elect to perform a composite and grab sample plan of the remediated area where each composite sample is not representative of more than 200 square feet 19.15.29.12D(1)(c).*
- Please delineate/excavate the contaminated soil until it is under required Closure Criteria limits.
- Please upload new Closure Report to the Payment Portal after Closure Criteria has been accomplished.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Robert.Hamlet@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.