

From: [Eads, Cristina, EMNRD](#)
To: ["bhall@btaoil.com"](mailto:bhall@btaoil.com)
Cc: [Robert EMNRD Hamlet \(Robert.Hamlet@state.nm.us\)](mailto:Robert.Hamlet@state.nm.us); [Victoria EMNRD Venegas \(Victoria.Venegas@state.nm.us\)](mailto:Victoria.Venegas@state.nm.us); [Mike EMNRD Bratcher \(mike.bratcher@state.nm.us\)](mailto:mike.bratcher@state.nm.us)
Subject: RE: NAB1907834716 YOUNG, 8709 JV-P #001 HEATER TREATER @ 30-025-30051--NCH1836251271 ROJO AE 7811 JV-P FED 001H @ 30-025-43476
Date: Monday, March 16, 2020 4:43:00 PM
Attachments: [image003.png](#)

Bob,

I included the wrong incident number and site name in the subject line. I apologize. The correct incident number and site name is NCH1836251271 ROJO AE 7811 JV-P FED 001H @ 30-025-43476.

My apologies.

Cristina Eads | 505-670-5601

From: Eads, Cristina, EMNRD
Sent: Monday, March 16, 2020 4:33 PM
To: 'bhall@btaoil.com' <bhall@btaoil.com>
Cc: Robert EMNRD Hamlet (Robert.Hamlet@state.nm.us) <Robert.Hamlet@state.nm.us>; Victoria EMNRD Venegas (Victoria.Venegas@state.nm.us) <Victoria.Venegas@state.nm.us>; Mike EMNRD Bratcher (mike.bratcher@state.nm.us) <mike.bratcher@state.nm.us>
Subject: NAB1907834716 YOUNG, 8709 JV-P #001 HEATER TREATER @ 30-025-30051

Bob,

The OCD has denied the submitted Closure Report C-141 for incident # NCH1836251271 for the following reasons:

- Soil samples were collected from only 10 points within the excavation spanning an area of more than 75,000 square feet. Please see 19.15.29.12 D. Closure Requirements. Each samples should not represent more than 200 square feet unless a sampling plan has already been submitted to and approved by the division.
- Sidewall samples were not collected to confirm the horizontal extents of the release were addressed.
- Depth to groundwater is not adequately identified. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.

Please review and make the required correction prior to resubmitting though the fee portal. It appears this report was a resubmittal, and I have already sent an email to you detailing the reasons for denial. If you have any questions or believe this denial is in error, please contact me prior to submitting an additional C-141.

Thanks,

Cristina Eads

Environmental Bureau

EMNRD – Oil Conservation Division

5200 Oakland Avenue NE, Suite 100

Albuquerque, New Mexico 87113

505.670-5601

email: Cristina.Eads@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.