

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, March 7, 2017 8:49 AM
To: 'emily@mogc-kec.com'
Cc: Weaver, Crystal, EMNRD; Tucker, Shelly; Billings, Bradford, EMNRD
Subject: Poker Laker 36 C-141
Attachments: C-141 directive REVISED of 11-4-16.pdf

RE: Maverick Operating LLC * Poker Lake Ut 36 * **2RP-4136** * DOR: Discovered 2/26/17

Ms. Sirgo,

OCD has received the USPS mailed copy of a Form C-141 for the above referenced release, marked Final Report. At this time, the C-141 will be accepted and processed as an **Initial Report** only. OCD encourages “immediate response actions” in regard to produced fluid releases, where and when possible, however, a release will not be closed until, at a minimum, analytical data has been obtained from the affected area to confirm contaminants have been removed to acceptable levels. More recently, OCD has instituted “Conditions of Approval” that are sent out with each Initial C-141 as they are processed. This document is intended to provide the operator with some idea of what OCD requires for spill remediation. I will attach a copy to this correspondence, and if you have any questions, contact me and I will attempt to explain it.

It is my understanding that Maverick has removed the contaminated material identified at this site. Please submit a site diagram showing the release area in relation to the facility, along with the location of sample points. Samples are to be obtained in a manner that will encompass the release area, with samples also obtained just outside the boundaries of the release area to confirm lateral definition. Samples need to be obtained and sent to an accredited lab under proper conditions, and chain of custody protocol, and tested for BTEX, TPH (GRO/DRO) and chloride content. Once the data has been obtained by Maverick, OCD would prefer the data be put in a “table format” and sent to the appropriate District office, along with the site diagram and the lab data. OCD may consider the release incident closed, or request additional work and/or data.

The link provided below is to an OCD publication titled “Guidelines for Remediation of Leaks, Spills and Releases”. It will provide some insight into OCD requirements for release events.

http://www.emnrd.state.nm.us/OCD/documents/7C_spill1.pdf

There are current efforts under way to make some changes to the spill guidance with possibly a rule being formulated, but at this time, OCD is administering spill events utilizing existing Rules and Guidelines. On Federal sites, OCD works with BLM on remediation requirements. In some instances, there may be minor modifications and/or additions from either agency, but the operator must report to, and comply with, both agencies.

If you have any questions or I can assist in any way, please contact me.

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