

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, September 12, 2019 8:34 AM
To: 'steve.rice@arcadis.com'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Billings, Bradford, EMNRD
Subject: Closure Report Denied - Chevron - South Culebra Bluff Unit 3 - (2RP-3984) 1-11-2006
Attachments: Closure Report Denied - Chevron - South Culebra Bluff Unit 3 - (2RP-3984) 9.11.19.pdf

Steve,

We have received your closure report for **2RP-3984 South Culebra Bluff Unit 3**, thank you. This closure is denied.

After looking at various resources, the location appears to be <50' DTW. After checking the NM OCD Environmental Map, there are multiple wells within a 1/2 mile radius of the South Culebra Bluff Unit 3 location with DTW measurements of 12', 31', 38.2', 16.34', 47', 31', 36'. There is no justification in the report that the well is 52' DTW. White Buffalo Environmental Services went back multiple times, all samples were substantially over the limits required for <50' DTW closure. It seems like the spill never had a comprehensive remediation plan.

The closure limits for a spill that is <50' DTW is:

≤ 50 feet	Chloride***	EPA 300.0 or SM4500 Cl B	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

Please review and resubmit all documentation as required for a remediation plan.

Please submit:

1. Scaled site map diagram
2. Site Photos
3. Site Assessment/Delineation summary (horizontal and vertical)
4. Delineation sample analytical results (lab tested)
5. Table containing analytical data
6. Description of proposed excavation depths corresponding to analytical table
7. Depth to groundwater evaluation, including fluid level data from New Mexico Office of the State Engineer or other documented evidence
8. Karst evaluation, here is the link to the [CFO GIS data](#)
9. FEMA National Flood map review.
10. Signed and dated C-141 (Pages 3-5)

If you need assistance, the current spill rule may be viewed here: <http://164.64.110.134/parts/title19/19.015.0029.html>

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
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