

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Monday, February 17, 2020 9:10 AM
To: 'cperacchi@oifieldwaterlogistics.com'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Closure Denied - Oilfield Water Logistics - Bert Madera SWD - (1RP-5498)
Attachments: Closure Denied - Oilfield Water Logistics - Bert Madera SWD - (1RP-5498) 2.17.20.pdf

Christopher,

We have received your closure report for **1RP-5498 Bert Madera SWD**, thank you. This closure is denied. This spill is clearly off the pad in the pasture area.

- 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>
- The OCD can't approve a deferral for a spill off pad in the pasture. 19.15.29.12 Remediation and Closure (2): States, "The responsible party shall restore the impacted surface area of a release occurring on a developed well pad, central tank battery, drilling site, compressor site or other exploration, development, production or storage sites to meet the standards of Table I of 19.15.29.12 NMAC or other applicable remediation standards and restore and reclaim the area pursuant to 19.15.29.13 NMAC. Please sample the proposed deferral area and safely excavate using a hydrovac and/or shovel to remove contaminated soil. Include the sample results and excavation depths in your updated closure report.
- Please include signed/dated C-141 (Pages 3-6) for Remediation Closure report.
- Please upload new Remediation Closure report to the Payment Portal after accomplished.

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
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