

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Wednesday, February 19, 2020 11:25 AM  
**To:** 'Rob Kirk'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** blm\_nm\_cfo\_spill@blm.gov; 'Gonzales, Clair'  
**Subject:** NAB1928444103 OXY SAND DUNES LINE  
**Attachments:** (C-141Remediation Plan) NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E 0N 0E.pdf

### NAB1928444103 OXY SAND DUNES LINE

Mr. Kirk,

The NMOCD has received your Remediation Plan for **NAB1928444103** OXY SAND DUNES LINE, thank you. This remediation plan is denied for the following reason:

- Horizontal delineation has not been completed. The edges -horizontal definition- of a liquid release must be determined. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release.
- Since the release was not on an active pad or production facility, the top 4 feet must meet the NMOCD Reclamation Standards by Rule 19.15.29.13.

Please let me know if you have any questions.

Victoria Venegas  
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Oil Conservation Division  
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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.