

Venegas, Victoria, EMNRD

From: Wade, Kelsey L <kwade@blm.gov> on behalf of CFO_Spill, BLM_NM <BLM_NM_CFO_Spill@blm.gov>
Sent: Thursday, March 5, 2020 12:50 PM
To: Castro, Isaac (MRO); Sanjari, Melodie (MRO)
Cc: Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: [EXT] Re: NRM1935242300 TAYLOR DEEP 12 FEDERAL #009 @ 30-015-39764

Hi,

BLM agrees with OCD that the TPH concentration must be less than 100 mg/kg at the sample point. This is for all off pad release that the top 4ft needs to have TPH less than 100 mg/kg and chlorides less than 600 mg/kg.

Kelsey

From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Tuesday, March 3, 2020 6:43 PM
To: Castro, Isaac (MRO) <icastro@marathonoil.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Sanjari, Melodie (MRO) <msanjari@marathonoil.com>; CFO_Spill, BLM_NM <BLM_NM_CFO_Spill@blm.gov>
Subject: [EXTERNAL] NRM1935242300 TAYLOR DEEP 12 FEDERAL #009 @ 30-015-39764

NRM1935242300 TAYLOR DEEP 12 FEDERAL #009 @ 30-015-39764

Mr. Castro,

The OCD has denied the submitted Closure Report C-141 for incident # **NRM1935242300** TAYLOR DEEP 12 FEDERAL #009 @ 30-015-39764 for the following reasons:

- All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with TPH concentration less than 100 mg/kg. Sample points SS19-06, SS19-11 and SS19-17 are above the limit.
- The OCD can't approve a deferral for a spill off pad in the pasture. Rule NMAC 19.15.29.12.C.2: *If contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility deconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first.*
- More remediation efforts are required for this site.

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through the fee portal.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283

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.