

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Monday, April 13, 2020 1:10 PM
To: 'Rob Kirk'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: blm_nm_cfo_spill@blm.gov; Guesnier, Joseph R
Subject: RE: NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760
Attachments: (C-141 Remediation Plan) #2 NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760 1RP-5609.pdf

NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760

Mr. Kirk,

The OCD has denied the submitted Remediation Plan C-141 for incident # NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760 PO number 2E0OU-200221-C-1410 for the following reasons:

- Duplicate submission

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
Victoria.Venegas@state.nm.us

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.

From: Rob Kirk <rob.kirk@solarismidstream.com>
Sent: Monday, April 13, 2020 12:09 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: blm_nm_cfo_spill@blm.gov; Guesnier, Joseph R <Joseph.Guesnier@terracon.com>
Subject: [EXT] RE: NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760

Hello Ms. Venegas,

The submittal you reference is the same document. At that time (02/21/2020), we were only meeting NM OCD general document resubmittal guidance.

Below is the confirmation of the updated Remedial Action Plan submitted with the changes you had outlined and as corrected by our consultants on this project Terracon.

PO Number: 4KA64-200330-C-1410
Payment Date: 3/30/2020
Payment Amount: \$150.00
Payment Type: Credit Card

Application Type: Application for administrative approval of a release notification and corrective action.
Fee Amount: \$150.00
Application Status: Under OCD Review

OGRID: 371643
First Name: Rob
Last Name: Kirk
Email: rob.kirk@solarismidstream.com

Please let me know if you have any additional questions or comments.

Regards,

Rob Kirk
General Manager, HSE and Compliance
Solaris Water Midstream
3305 Boyd Drive
Carlsbad, NM 88220
O NM (575) 300-5155
C: (469) 978-5620

907 Tradewinds Blvd., Suite B
Midland, TX 79706
O TX: (432) 203-9020

From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Monday, April 13, 2020 11:44 AM
To: Rob Kirk <rob.kirk@solarismidstream.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: blm_nm_cfo_spill@blm.gov; Guesnier, Joseph R <Joseph.Guesnier@terracon.com>
Subject: RE: NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760

Mr. Kirk,
Can you please clarify if the Remediation Plan submitted on 02/21/2020 for NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760 PO number 2E0OU-200221-C-1410, is the same document that was submitted on 12/25/2019 PO number IW33D-191205-C-1410 and denied on Feb 21/2019? It appears to be exactly the same document dated September 20, 2019. Thank you,

2E0OU-200221-C-1410

Application Information

Operator: [371643] SOLARIS WATER MIDSTREAM, LLC
Status: Under OCD Review
Type: [C-141] Application for administrative approval of a release notification and corrective action.
Attachment: [C141 and RAP Solaris Water Midstream Caza Eagle Claw 1RP-5609.pdf \(5871 Kb\)](#)
Reference: [nDHR1918948878] CAZA EAGLE CLAW LINE [Reviewer: Victoria Venegas]

Pending Review

IW33D-191205-C-1410

Application Information

Operator: [371643] SOLARIS WATER MIDSTREAM, LLC
Status: Rejected by the OCD
Type: [C-141] Application for administrative approval of a release notification and corrective action.
Attachment: [C141 and RAP Solaris Water Midstream Caza Eagle Claw 1RP-5609.pdf \(5871 Kb\)](#)
Reference: [nDHR1918948878] CAZA EAGLE CLAW LINE [Reviewer: Victoria Venegas]

Rejected on 02/21/2020

Victoria Venegas
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From: Venegas, Victoria, EMNRD

Sent: Friday, February 21, 2020 11:27 AM

To: Rob Kirk <rob.kirk@solarismidstream.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: blm_nm_cfo_spill@blm.gov; 'Guesnier, Joseph R' <Joseph.Guesnier@terracon.com>

Subject: NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760

NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760

Mr. Kirk,

The OCD has denied the submitted Remediation Plan **NDHR1918948878 CAZA EAGLE CLAW LINE @ FDHR1918948760** for the following reasons:

- The Chloride concentration exceeded 600 mg/kg @ sample points HA-3 / HA-4 and per rule [19.15.29.11](#) A. (5) (c) NMAC, vertical delineation has not been completed.
- 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. Lab data must be provided as evidence of delineation efforts.
- Background Data Evaluation. Please identify the background samples in the report (see page 15 of 77). Note, that there is no natural background level for TPH, BTEX or Benzene.
<http://www.emnrd.state.nm.us/OCD/documents/OCDInternalPolicy-SpillRuleClarifications.pdf>
- Since the release was not on an active pad or production facility, the top 4 feet of the entire release must meet the NMOCD Reclamation Standards by Rule [19.15.29.13](#).

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,

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