

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Monday, May 11, 2020 11:23 AM
To: 'Gonzales, Clair'; Rob Kirk; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Eads, Cristina, EMNRD
Cc: CFO_Spill, BLM_NM
Subject: RE: NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E
Attachments: (C-141 Remediation Plan) NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E_3.pdf

RE: NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E

Ms. Gonzalez,

I have reviewed your clarification email regarding the revised Remediation Plan for NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E, thank you. This remediation Plan is approved with the following conditions of approval:

- In lieu of drilling to determine the depth to groundwater, all material exceeding 600 mg/kg for chlorides, 10 mg/kg for benzene, 50 mg/kg for total BTEX, and 100 mg/kg for TPH will be removed to the necessary depth and five-point bottom hole and sidewall confirmation samples every 500 square feet, as previously discussed and approved.

The signed C-141 can be found in the online image data base under the incident #

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: Gonzales, Clair <Clair.Gonzales@tetrattech.com>
Sent: Friday, May 8, 2020 1:07 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Rob Kirk <rob.kirk@solarismidstream.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>
Subject: [EXT] RE: NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E_2

Ms. Venegas,

Please see my notes below in blue.

- The revised Remediation Plan does not address the required corrections requested in the first submittal. The only additional information is Appendix D/Revegetation Plan.
[The horizontal delineation and top 4.0' remediation, since the release is not on an active pad or production facility, was requested.](#)
- 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.
[Please see the attached email; we were informed we could perform the horizontal sampling during the remediation activities and that confirmation sidewall/bottom holes samples would be required. This was addressed the resubmitted work plan in the Reclamation Plan section on Page 2.](#)
- 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](#).
[This was also addressed in the first paragraph of the Reclamation Plan section on the Page 2.](#)
- The Depth to groundwater has been inadequately assessed. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If Solaris believes that groundwater is > 100', a borehole will need to be drilled onsite and a copy of the driller's log must be provided.
[Understood. In lieu of drilling to determine the depth to groundwater, all material exceeding 600 mg/kg for chlorides, 10 mg/kg for benzene, 50 mg/kg for total BTEX, and 100 mg/kg for TPH will be removed to the necessary depth and five-point bottom hole and sidewall confirmation samples every 500 square feet, as previously discussed and approved.](#)

Once approved, we will proceed with scheduling the remediation activities. Please let me know if you have any questions or concerns.

Thank you,

Clair Gonzales,

Clair Gonzales, P.G. | Project Manager

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax:432.682.3946

clair.gonzales@tetrattech.com

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From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Friday, May 8, 2020 11:51 AM

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

Cc: CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>

Subject: NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E_2

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NAB1928444103 OXY SAND DUNES LINE @ P-24-24S-29E_2

Mr. Kirk,

The OCD has denied the submitted Site Characterization/Remediation Plan C-141 for incident # for the following reasons:

- The revised Remediation Plan does not address the required corrections requested in the first submittal. The only additional information is Appendix D/Revegetation Plan.
- 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](#).
- The Depth to groundwater has been inadequately assessed. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If Solaris believes that groundwater is > 100', a borehole will need to be drilled onsite and a copy of the driller's log must be provided.

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
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