

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, June 12, 2020 1:43 PM
To: 'Daniel Dominguez'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; CFO_Spill, BLM_NM
Subject: Remediation Denied - DCP Midstream - N Line Leak - (Incident #NRM2006235833)
Attachments: Remediation Denied - DCP Midstream - N Line Leak.pdf

Daniel,

We have received your Workplan/Remediation Proposal for **Incident #NRM2006235833 N Line Leak**, thank you. This Workplan/Remediation Proposal is denied.

- 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>
- Based on the depth to groundwater being >100' , deeper than 4' below surface, the correct limit for TPH is 2,500 mg/kg (GRO+DRO+MRO) or 1,000 mg/kg for (GRO+DRO) . Benzene would need to be below the limit of 10 mg/kg, BTEX 50 mg/kg, and chlorides 20,000 mg/kg.
- A liner is beneficial on produced water spills in keeping chlorides from moving down the soil column, but deeper oil spills they are not helpful. They can actually inhibit the lighter end BTEXs and GROs from permeating back to the surface and dissipating.
- Please delineate/excavate the contaminated soil until it is under the required Closure Criteria limit.
- Please upload new Remediation/Closure report to the Payment Portal after Closure Criteria has been accomplished.

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
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Energy, Minerals, and Natural Resources
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.

