

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Tuesday, July 14, 2020 11:22 AM
To: 'Debbie Moughon'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Mann, Ryan
Subject: Closure Denied - Advance Energy - Dagger Lake to Merchant Pond Line Test - (Incident #NCE2003540506)
Attachments: Closure Denied - Advance Energy - Dagger Lake to Merchant Pond Line Test.pdf

Debbie,

We have received your closure report and final C-141 for **Incident #NCE2003540506** **Dagger Lake to Merchant Pond Line Test**, thank you. This closure is denied.

- The OCD appreciates the potentiometric maps outlining the major Artesian Strata in the general area of the release. Although, depth to groundwater has not been sufficiently answered. Potentiometric maps don't outline potential water trapped in shallow clay layers or other protectable shallow waters in the immediate area of the release.
- The Wall samples are all below the strictest closure criteria standards of 600 mg/kg. The only problem we have is with the Base samples. With depth to water not established, some of the Base samples are over the limit of 600 mg/kg for chlorides. Impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.
- Two possible options would suffice for closure. Drill a hole to 15-20 feet and fully delineate the spill vertically. The Base samples are all over the place at 4 feet below ground surface (320 - 2,280 mg/kg for chlorides). Clear vertical delineation has not been established. If the drill hole shows the release was below 600 mg/kg at a deeper depth (15-20') and vertically delineated, we would accept this with a liner installation at 4 feet. The other option involved drilling a shallow borehole to 51' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log. Since all of the Base samples are under 10,000 mg/kg for chlorides, verification of the 51' water depth would allow us to close the release.
- It looks like the release area has already been backfilled, so the borehole to 51' might be an easier route.
- Please let us know your decision.

Please let me know if you have any further questions.

Regards,

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

Robert.Hamlet@state.nm.us