

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, July 17, 2020 10:39 AM
To: Trish Thomas
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; BLM Releases (blm_nm_cfo_spill@blm.gov); Billings, Bradford, EMNRD
Subject: Closure Denied - Lime Rock - Logan Transfer Line - (Incident #NAB1816355653) (2RP-4801)
Attachments: Closure Denied - Lime Rock - Logan Transfer Line.pdf

Trish,

We have received your closure report and final C-141 for **Incident #NAB1816355653 Logan Transfer Line**, thank you. This closure is denied.

- 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 evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.
- If you feel the depth to groundwater is >50', a shallow borehole can be drilled 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.
- This release has occurred in a High Karst area and will need to be remediated to the strictest closure criteria of <50' depth to groundwater from Table 1 of the spill rule. The current spill rule may be viewed here: <http://164.64.110.134/parts/title19/19.015.0029.html>
- Please collect more confirmation samples, representing no more than 200 square feet. Alternately, without division approval, the responsible party may elect to perform a composite and grab sample plan of the remediated area where each composite sample is not representative of more than 200 square feet 19.15.29.12D(1)(c).
- Please have soil samples analyzed for all components in Table 1 of the spill rule.
- Please attach a signed/dated C-141 page 6 Closure page in your resubmittal.

Please let me know if you have any further questions.

Regards,

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.