

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Monday, July 20, 2020 11:27 AM  
**To:** 'Sanjari, Melodie (MRO)'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** 'Appelt, Robert'; CFO\_Spill, BLM\_NM  
**Subject:** NRM2002458606 H F 7 FEDERAL COM #001 @ 30-015-28509  
**Attachments:** (C-141 Remediation) NRM2002458606 H F 7 FEDERAL COM #001 @ 30-015-28509.pdf

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Ms. Sanjari,

The OCD has denied the submitted Deferral/ Closure Report C-141 for incident # (Insert Incident#) for the following reasons:

- A deferral cannot be granted on a release if the depth to water is <50' depth to groundwater. The release will need to be remediated to the strictest closure criteria limits (600 mg/kg, Chlorides, 100 mg/kg TPH, etc.), which matches the closure criteria that Marathon has elected to go with. If Marathon believes 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.

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  
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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.