## Hamlet, Robert, EMNRD

**From:** Hamlet, Robert, EMNRD
**Sent:** Friday, August 7, 2020 8:41 AM
**To:** DeHoyos, Kendra
**Cc:** Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; CFO_Spill, BLM_NM; Billings, Bradford, EMNRD
**Subject:** Closure Denied - Devon - Cotton Draw Unit 171H - (Incident #NAB1508251701) (2RP-2907)
**Attachments:** Closure Denied - Devon - Cotton Draw Unit 171H.pdf

**Kendra**,

We have received your closure report and final C-141 for **Incident #NAB1508251701 Cotton Draw Unit 17H**, thank you. This closure is denied.

- Please continue to **horizontally delineate** spill to 600 mg/kg for chlorides on the outer edges/periphery and include sample points in report. While vertical definition of contamination that may be acceptable is almost exclusively driven by depth to water, as determined, and as driven by Table I in rule, horizontal definition is different. The edges (horizontal definition) of a liquid release must be determined as well. The only value for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. This 600 mg/Kg value is discussed in detail in 19.15.29.13 D. (1). **Therefore, horizontal soils delineation for chloride should be 600 mg/KG (again, or background) for all liquid releases, either on or off production pad.** It is conceivable that in determining the horizontal extent of chloride that the edge of the production pad may be encountered, if last sample taken on pad limit, samples(s) must be obtained off pad to determine extent of release. If horizontal delineation samples on pad eventually reach a mechanical barrier, (such as pipeline or battery) sample(s) should be obtained as near as possible on the linear opposite side of said barrier and as close as possible to barrier. It is conceivable that a liquid release may occur with, for example, a surface soil chloride of 19,000 mg/Kg, and if it is reliably determined that groundwater is over 101 feet below ground surface, then that value may stand as a vertical definition, but nonetheless, the horizontal value(s) for lateral extent of liquid release would still, of Rule 29 necessity, be 600 mg/Kg chloride or less. **This would be inclusive of both "on-pad" of "off-pad" release area.** The above if laboratory data driven, not just reported visual extent of a liquid release or calculated and reported release volumes. As indicated in above portions, a scaled map with horizontal and vertical definition of actual laboratory values is required. Generally, the top one foot sample suffices for immediate horizontal evaluation and deeper contamination would likely be identified during actual remediation.
- Soil Sample points SP1 and SP5 will need to be further horizontally delineated.
- The OCD cannot accept field screening results from Petro FLAG Analyzer Systems, PID Meters, and Ground Conductivity Meters for closure criteria sampling determination. These locations will need to have lab analytical samples completed for the closure process also.

Please let me know if you have any further questions.

Regards,

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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.