

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Monday, October 5, 2020 3:28 PM  
**To:** Kenny Kidd; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** CFO\_Spill, BLM\_NM; natalie@energystaffingllc.com  
**Subject:** NRM2021853352 SKELLY UNIT #940 @ 30-015-32599  
**Attachments:** (C-141 Remediation Plan) NRM2021853352 SKELLY UNIT #940 @ 30-015-32599.pdf

### NRM2021853352 SKELLY UNIT #940 @ 30-015-32599

Mr. Kidd,

The OCD has approved the Site Characterization and Remediation Plan for incident # NRM2021853352 SKELLY UNIT #940 @ 30-015-32599 with the following conditions of approval:

- The OCD wants to clarify that the entire release area will not be deferred, only the sample points that are around production equipment such as production tanks, wellheads and pipelines. The deferral may be granted so long as the contamination is fully delineated and does not cause an imminent risk to human health, the environment, or ground water. Please continue delineating Sample Points SP-1 and SP-7 to remediation levels for DWG > 100’.
- OCD does not approve the requested variance to install a liner. 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.
- Confirmation floor samples and sidewall samples, should be collected at a frequency of no more than one sample per 200 square feet.
- Five point composite confirmation samples must be analyzed for the components listed in Table 1.
- The affected pasture area must meet the “4 feet reclamation standard”.

The signed C-141 can be found in the online image data base under the incident #.

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.**