

From: [Hamlet, Robert, EMNRD](#)
To: ["Wade Dittrich"](#)
Cc: [Bratcher, Mike, EMNRD](#); [Eads, Cristina, EMNRD](#)
Subject: Remediation Conditional Approval - OXY - Cedar Canyon 22 CTB Lact 2 (Incident #NRM2015534932) and Cedar Canyon 22 CTB (Incident #NRM2018236487)
Date: Wednesday, November 4, 2020 3:00:00 PM
Attachments: [Remediation Conditional Approval - OXY - Cedar Canyon 22 CTB Lact 2 \(Incident #NRM2015534932\).pdf](#)
[Remediation Conditional Approval - OXY - Cedar Canyon 22 CTB \(Incident #NRM2018236487\).pdf](#)

Wade,

We have received your Workplan/Remediation Proposal for **Incident #NRM2015534932 Cedar Canyon 22 CTB Lact 2 and Incident #NRM2018236487 Cedar Canyon 22 CTB**, thank you. This Workplan/Remediation proposal is approved with the following conditions:

- Please continue to horizontally delineate sample points to 600 mg/kg for chlorides and TPH to 100 mg/kg on the outer edges/periphery and include sample points in your next report after closure criteria limits have been met. 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).
- The report says, "The leak area near SP1 – SP4, SP6, and SP7 (BLUE shade on diagram) will be excavated to a depth of 2 feet". Please excavate SP1, SP2, and SP4 to 3 feet in order to horizontally/vertically the release. Include sidewall results in closure plan to verify the edge of the spill have been defined.

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.