

From: [Weaver, Crystal, EMNRD](#)
To: ["Kevin Elrod"; Bratcher, Mike, EMNRD; Mike Martin](#)
Cc: [Alan Kane; Jamie Robinson; Michal Weesner](#)
Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan
Date: Friday, October 13, 2017 3:54:00 PM
Attachments: [IMG_6774.jpg](#)
[IMG_6762.JPG](#)
[IMG_6764.JPG](#)

RE: Rockcliff Op NM * Onsurez 2 * 2RP-4255 * DOR: 6/3/17 * 30-015-26472

Mike Martin/Kevin Elrod,

OCD has been very patient and tolerant in working thru the process of this spill with Rockcliff and its contracted environmental company. However, a pattern of misunderstanding, misinterpretation, and incomprehension has repeated itself during this project and others that the same partnership mentioned above have worked on recently. Please be clear that OCD is not here to train, provide special treatment or read word for word OCD regulatory reporting and remediation requirements to operators and their contractors.

Everything that is needing to be done for this site has already been lined out and specified by OCD members more than once within the responses provided to Rockcliff. Until the required efforts that OCD has asked for are meet for this location no further response from OCD District II Office will be provided.

As a final courtesy OCD will lastly offer a few suggestions:

- Read and apply knowledge of rules regulations and COA document attached to signed initial C-141 that was sent to the operator.
- Choice of sampling labels throughout this project are so confusing it is an enormous time consumptive effort on OCD's part to even try to follow the progression of the different reports that have been turned into OCD.
- Delineation makes no sense is the last report provided... Is it supposed to be from a certain depth excavated to in previous sampling efforts, at which the current sampling began from for points 13A and 4A???
- It was plainly stated in the work plan approval, OCD sent, that no backfilling of any of the excavated areas was approved until sampling efforts were approved first. Photographic proof that has a date stamp on it may be required to verify this request has remained adhered to.
- A liner is mentioned but no depth at where it will be placed or area of which it will encompass is mentioned.
- Heavy contamination was documented around the wellhead in photos OCD had taken (see for example IMG 6774 attached above) yet no sampling was ever conducted or offered to be conducted around this area. OCD will not provide approval until this area is adequately sampled and delineated. Ground water is shallow here. Highly likely to be more shallow then what was cited in the work plan for this spill. A USGS ground water monitoring well #32197104033701 is less than 800ft. away from this location and cites ground water at 14ft.bgs. Along with many others in the very near vicinity which are even farther away from the river than the Rockcliff facility cite ground water levels at 15ft and 15.7ft. bgs.
- There is a potential for groundwater contamination at this site therefore it is essential that a

FULL delineation be conducted at every sample point such as has been indicated by OCD in all responses that have been sent.

- OCD clearly stated in the work plan approval that and I quote " Referencing the site map, OCD observed an area of impact just north of the area identified as OS 2, in the alfalfa field to the east (outside of the impact boundary line on the map). This area is to be remediated as well as any other area of impact associated with this well." However, according to the newer site maps after this request was sent it appears this request was never met (photos attached above named IMG 6762 and IMG 6764 are of the area requested).

Based on an accumulation of all of the guidance provided by OCD an exceptional report should be able to be drafted and we look forward to seeing such a document.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Kevin Elrod [mailto:kevinjelrod@comcast.net]

Sent: Thursday, October 5, 2017 2:15 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Mike Martin <mike.martin@rockcliffenergy.com>

Cc: Alan Kane <alanjkane@comcast.net>; Jamie Robinson <jamie.robinson@rockcliffenergy.com>; Michal Weesner <michal.weesner@rockcliffenergy.com>

Subject: Re: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Mr. Bratcher,

Please find the updated Site Investigation and Corrective Action Plan for the Onsurez #2 facility. If you have any questions or concerns during the review, please let me know.

Thank you,

Kevin Elrod

Kane Environmental Engineering, Inc.

Registration Number F-2355

(979) 450-8307

kevinjelrod@comcast.net

From: [Bratcher, Mike, EMNRD](#)

Sent: Thursday, August 31, 2017 2:46 PM

To: [Kevin Elrod](#) ; [Weaver, Crystal, EMNRD](#) ; [Mike Martin](#) ; [Nick Koch](#)

Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

RE: Rockcliff Op NM * Onsurez 2 * 2RP-4255 * DOR: 6/3/17

Kevin,

Your Site Investigation Summary & Corrective Action Plan, submitted for the above referenced release, is not approved at this time. Additional delineation and very likely, additional excavation/remediation, will be required at this site. OCD requests a delineation be performed prior to making a determination on final remedial requirements. In the area identified as ES 13 on the site map, OCD requests delineation for chloride impact. Target goal will be 600 mg/kg. Once that goal has been achieved, a sample is to be obtained at 5' below that interval and one at 10' below that interval to validate chloride levels do not increase. Hydrocarbon impact has been adequately defined, vertically, in this area, so testing will be for total chloride only. In the area identified as ES 4 on the site map, OCD requests additional vertical delineation for hydrocarbon (TPH-GRO,DRO & ORO - goal is 100 mg/kg) and chloride impact (600 mg/kg plus 5' and 10' below). Data obtained indicates light end hydrocarbon (BTEX) is not an issue, so testing for those constituents will not be required. In the event ground water is encountered prior to achieving delineation goals, OCD is to be notified. The installation of any spill prevention equipment is encouraged.

If you have any questions or concerns, please contact me or Crystal Weaver.

Mike Bratcher

NMOCD District 2

811 South First Street

Artesia, NM 88210

575-748-1283 Ext 108

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 ground water, 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, local laws and/or regulations.

From: Kevin Elrod [mailto:kevinjelrod@comcast.net]

Sent: Tuesday, August 29, 2017 2:42 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Mike Martin

<mike.martin@rockcliffenergy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nick Koch <nkoch@rockcliffenergy.com>

Subject: Re: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Good Afternoon all,

Attached you will find the updated Site Investigation and Corrective Action Plan from the post cleanup visit at the Onsurez.

Please let me know if you have any questions.

Kevin Elrod

Kane Environmental Engineering, Inc.

Registration Number F-2355

(979) 450-8307

kevinjelrod@comcast.net

From: [Weaver, Crystal, EMNRD](#)

Sent: Monday, August 28, 2017 2:35 PM

To: [Mike Martin](#) ; [Bratcher, Mike, EMNRD](#) ; [Nick Koch](#)

Cc: [Kevin Elrod](#)

Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Rockcliff * Onsurez #2 * 30-015-26472 * 2RP-4255

Hello all,

OCD requests a status update on this site.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Mike Martin [<mailto:mike.martin@rockcliffenergy.com>]

Sent: Wednesday, July 12, 2017 10:00 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nick Koch <nkoch@rockcliffenergy.com>

Cc: Kevin Elrod <kevinjelrod@comcast.net>; Weaver, Crystal, EMNRD

<Crystal.Weaver@state.nm.us>

Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Mr. Bratcher,

If you would could you give me a call. I would like to discuss the remediation to make sure that I have our environmental group that is going to do the work 100% clear on what all needs to be done.

Thanks for your time,



Michael Martin
Field Operations Manager
Rockcliff Energy
Cell: 318-525-5676

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Wednesday, July 12, 2017 10:26 AM

To: Mike Martin <mike.martin@rockcliffenergy.com>; Nick Koch <nkoch@rockcliffenergy.com>

Cc: Kevin Elrod <kevinjelrod@comcast.net>; Weaver, Crystal, EMNRD

<Crystal.Weaver@state.nm.us>

Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

RE: Rockcliff Operating NM * Onsurez 2 * 2RP-4255 * DOR: 6/13/2017

Greetings,

Your proposal for remediation of the above referenced release is approved with the following:

The Form C-141 submitted for this release lists volumes as 1 bbl produced fluid lost and 1 bbl produced fluid recovered. Based on a physical site inspection by OCD and analytical data provided, this site has either had another unreported release, or the volumes reported on the initial C-141 were grossly inaccurate. This is to be corrected by close of business Friday, July 14, 2017 or the matter will be referred to OCD legal for further investigation into possible non-reporting, and/or falsifying documentation.

Based on background sample and other site ranking criteria, remediation levels for chloride impacted soil will be 250 mg/kg, as stated in the proposal. Remedial levels for Benzene, BTEX and TPH are also as stated in the proposal. In the area identified as OS 1, a deeper excavation than proposed, will be required in order to meet the remedial goal. In the area identified as OS 2, it is very likely a deeper excavation will be required as well. Based on the submitted data, this area cleans up to below 250 mg/kg somewhere between the 5' interval and the 8' interval. It is unclear where that

clean up level occurs due to a 3' gap in sample intervals. The same circumstance exists in the areas identified as OS 3 and OS 4 due to a 2' gap in sample intervals. The area identified as OS 5 will also require deeper excavation to achieve the remedial goal for chloride impact. All excavations will require bottom and sidewall samples for confirmation that target goals for chloride and hydrocarbon impact have been achieved. A review of the confirmation sample lab data by OCD will be required, prior to approval to backfill any excavation. All impacted material is to be hauled to an OCD approved disposal facility.

For TPH testing, EPA Method 8015 Extended Range is requested. For chloride testing, EPA Method 300 is requested.

Referencing the site map, OCD observed an area of impact just north of the area identified as OS 2, in the alfalfa field to the east (outside of the impact boundary line on the map). This area is to be remediated as well as any other area of impact associated with this well.

Remedial work is to commence not later than July 24, 2017. Please advise OCD once remedial activities have been scheduled.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher
NMOCD District 2
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575-748-1283 Ext 108
mike.bratcher@state.nm.us

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 ground water, 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, local laws and/or regulations.

From: Kevin Elrod [<mailto:kevinjelrod@comcast.net>]
Sent: Monday, July 10, 2017 2:28 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; mike.martin@rockcliffenergy.com
Subject: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Crystal,

Attached you will find the Onsurez # 2 Site investigation report and Corrective Action Plan. If you have any questions please let me know.

Additionally if you would like hard copies mailed to your office please let me know as well.

Thank you,

Kevin Elrod

Kane Environmental Engineering, Inc.

Registration Number F-2355

(979) 450-8307

kevinjelrod@comcast.net