

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** [John Turner](#); [Bratcher, Mike, EMNRD](#)  
**Cc:** [Mike Martin](#); [Jamie Robinson](#)  
**Subject:** RE: SCB Injection Facility, Remediation Case #2RP-4412  
**Date:** Thursday, January 25, 2018 10:35:00 AM

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Rockcliff \* SCB Injection Facility (reported under API 30-015-22404) \* 2RP-4412

John,

This remediation work plan is approved with the following notes/conditions:

- Both the API number and the 2RP number utilized in the title box on the first page of the written work plan are for the Onsurez #2 location. Because of the turn around on OCD's end on getting this project reviewed I will not deny this work plan but I will state that if another is sent in like this it will be denied. I will cross out that part and correct it and rescan in the document so that we can use this copy.
- Depth and extent of delineation sampling efforts both vertically and horizontally will be led by laboratory confirmation data until required site specific remediation concentrations for Benzene, total BTEX, TPH (GRO+DRO+MRO; C6 thru C36) and chlorides are met. Based on site analysis and consultation of proximal ground water data, depth to ground water for this location could be as shallow as 12bgs (according OSE well C-1102 DTW data) subject to differences due to many factors such as elevation etc. If at any point during the delineation process or the remediation process ground water is reached this project would need to cease all action and OCD would need to be notified of the matter so that an action plan moving forward can be discussed.
- Based on site specific details a site ranking score of 20 or more is appropriate for this release location therefore RRALs (target clean up levels) are correct as stated in the work plan.
- Since this location involves a private surface owner OCD will state that the private party should be kept informed and if they would like to contact us for any reason related to this project OCD is available to communicate with them.
- Although it is stated in the work plan that quick response was achieved regarding retrieving standing fluids for this release the spill did happen back on 9/8/17 therefore there is a potential for fluid migration as well as running into historical impacts at this location. The resolution for this site will be data driven and a full delineation will need to be completed regardless if historical impact is found to be present or not at this location.

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.

If you have any questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

## Crystal Weaver

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**From:** John Turner [mailto:John.Turner@Rockcliffenergy.com]  
**Sent:** Wednesday, November 22, 2017 11:13 AM  
**To:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Mike Martin <mike.martin@rockcliffenergy.com>; Jamie Robinson <Jamie.Robinson@Rockcliffenergy.com>  
**Subject:** SCB Injection Facility, Remediation Case #2RP-4412

Please find attached the SCB Injection Facility Release Characterization Work Plan for the release that occurred at the SCB Injection Facility on September 8, 2107. C&S Consulting and myself will be New Mexico November 27 through November 29 completing field work at multiple locations including the SCB Injection Facility.

Thank you and hope you have a Happy Thanksgiving!

## John Turner

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