

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Stahnke, Graham"; Naranjo, Mark](#)  
**Cc:** [Everhart, Harley](#)  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1  
**Date:** Wednesday, March 14, 2018 7:51:00 AM  
**Attachments:** approved\_FINAL C-141\_Rhombus State Com 1\_1RP-4671.pdf

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Dear Mr. Stahnke:

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4671** closed. This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Stahnke, Graham [mailto:[gstahnke@sugf.com](mailto:gstahnke@sugf.com)]  
**Sent:** Wednesday, March 14, 2018 7:39 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Ms. Yu,  
Please find attached the final C-141.

Thanks,  
Graham

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**From:** Yu, Olivia, EMNRD [mailto:[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)]  
**Sent:** Wednesday, March 14, 2018 7:14 AM  
**To:** Stahnke, Graham <[gstahnke@sugf.com](mailto:gstahnke@sugf.com)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>

**Cc:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Good morning Mr. Stahnke:

Final C-141 is still required for complete closure.

Thanks,  
Olivia

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**From:** Stahnke, Graham [<mailto:gstahnke@sugf.com>]  
**Sent:** Tuesday, March 13, 2018 7:54 AM  
**To:** Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>; Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Thank you Mark, we appreciate the prompt review.

Regards,  
Graham



**Graham Stahnke, PE, ASP**  
*Sr. Environmental Compliance Specialist*  
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---

**From:** Naranjo, Mark [<mailto:MNaranjo@slo.state.nm.us>]  
**Sent:** Friday, March 09, 2018 2:18 PM  
**To:** 'Yu, Olivia, EMNRD' <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Stahnke, Graham <[gstahnke@sugf.com](mailto:gstahnke@sugf.com)>  
**Cc:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Mr. Stahnke,

The NMSLO also grants closure to 1RP-4671.

Mark Naranjo  
Assistant Division Director  
Field Operations Division

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New Mexico State Land Office  
1001 S. Atkinson  
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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Friday, March 9, 2018 1:44 PM  
**To:** Stahnke, Graham <[gstahnke@sugf.com](mailto:gstahnke@sugf.com)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Mr. Stahnke:

Thank you for your patience and compliance. NMOCD grants closure to 1RP-4671. Please submit a final C-141 for complete resolution.

Like approval from NMSLO required. Mark Naranjo is the interim correspondent.

Thanks,  
Olivia

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**From:** Stahnke, Graham [<mailto:gstahnke@sugf.com>]  
**Sent:** Wednesday, March 7, 2018 8:23 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Ms. Yu,  
Have you had a chance to review the closure documentation for the Rhombus spill? We are looking forward to closing this spill, please let me know if you have any questions.

Thanks,  
Graham



**Graham Stahnke, PE, ASP**  
*Sr. Environmental Compliance Specialist*  
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**From:** Stahnke, Graham  
**Sent:** Tuesday, January 16, 2018 12:44 PM  
**To:** 'Yu, Olivia, EMNRD' <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us); Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671 - Closure Request - Rhombus State Com #1

Dear Ms. Yu,  
Please find attached the final closure documentation you requested for the Rhombus Union State Com #1 release. Please let me know if you have any questions or if there are any additional steps to achieve final closure.

Best Regards,  
Graham



**Graham Stahnke, PE, ASP**  
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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Friday, December 01, 2017 12:20 PM  
**To:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Cc:** Stahnke, Graham <[gstahnke@sugf.com](mailto:gstahnke@sugf.com)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Subject:** RE: 1RP-4671\_REMEDIATION SUMMARY\_Rhombus\_11.15.17\_Part 1

Mr. Everhart:

Thank you for your prompt response. NMOCD approves of the delineation and proposed

remediation for 1RP-4671. See attachment for your records.

In the closure document, please include 1) an appropriately scaled map with lined and excavated area demarcated and depths of excavation annotated. If there are differing depths of excavation within the release area, please separately outline each area and indicate on the scaled map. 2) Dated photo documentation of the remedial activities.

Like approval from NMSLO is required before emplacement of liner and backfilling.

Thanks,  
Olivia

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**From:** Everhart, Harley [<mailto:heverhart@akaenergy.com>]  
**Sent:** Friday, December 1, 2017 11:53 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Stahnke, Graham <[gstahnke@sugf.com](mailto:gstahnke@sugf.com)>  
**Subject:** RE: 1RP-4671\_REMEDIATION SUMMARY\_Rhombus\_11.15.17\_Part 1

Several questions regarding the remediation plan for 1RP-4671:

- Where was the East of Leak sample located? **See attachment**
- Is a 20 mil liner still proposed as written on page 7? **Yes**
- Does the data tables indicate the depths of excavation or depth of soil samples taken? **Depth samples were taken**

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Friday, December 01, 2017 11:35 AM  
**To:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>  
**Subject:** RE: 1RP-4671\_REMEDIATION SUMMARY\_Rhombus\_11.15.17\_Part 1

Mr. Everhart:

Pardon, I see that Part 2 included the lab results.

Olivia

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**From:** Yu, Olivia, EMNRD  
**Sent:** Friday, December 1, 2017 11:31 AM  
**To:** Everhart, Harley <[heverhart@akaenergy.com](mailto:heverhart@akaenergy.com)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Subject:** RE: 1RP-4671\_REMEDIATION SUMMARY\_Rhombus\_11.15.17\_Part 1

Mr. Everhart:

Several questions regarding the remediation plan for 1RP-4671:

- Please submit laboratory reports with the chain of command for the soil samples from October 10, 2017.
- Where was the East of Leak sample located?
- Is a 20 mil liner still proposed as written on page 7?
- Does the data tables indicate the depths of excavation or depth of soil samples taken?

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Everhart, Harley [<mailto:heverhart@akaenergy.com>]  
**Sent:** Thursday, November 16, 2017 1:03 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Subject:** 1RP-4671\_REMEDIATION SUMMARY\_Rhombus\_11.15.17\_Part 1

Dear Ms. Yu and Ms. Groves

Part 1

Frontier Field Services (FFS) is pleased to submit the attached Remediation Summary for the Rhombus Union State Com #1, which provides recent analytical reports and excavation volumes. The remediation was completed in accordance with the enclosed New Mexico Oil Conservation Division (NMOCD) Approved Remediation Plan.

On behalf of Frontier Field Services, LLC (Frontier), a wholly-owned subsidiary of the Southern Ute Indian Tribe, the following Approved Revegetation and Noxious Weed Management Plan is provided to address revegetation at the Rhombus Union State Com 1 release location.

Respectfully,

*Harley Everhart*

EH&S Compliance

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