

From: [Yu, Olivia, EMNRD](#)
To: ["Alan Kane"](#)
Cc: [Elrod, Kevin; Billings, Bradford, EMNRD](#)
Subject: RE: Annapurna-Release
Date: Wednesday, August 2, 2017 11:40:00 AM

Dear Mr. Kane:

Please address these concerns regarding 1RP-4737:

1. When were the photos taken?
2. Provide a rationale for the pools of water. Was there a recent precipitation event?
3. A scaled map is required with the release point and dimensions of the impacted area demarcated.
4. Due to the volume of release, additional soil sample locations are required for release characterization.
 - As the release point was at one of the separators, several (2-3) representative sample points are required in proximity.
 - Establish sample locations as practicable in the spots where there are still apparent oil staining around the separator infrastructure, as shown in the photos in Appendix A- Part 7.
5. Permissible chloride levels must be obtained and maintained for a minimum of 5 ft. in depth. Laboratory analyses are required for a minimum of 2 depths for each sample location: the first depth obtained and 5 ft. further in depth. The provided data indicate that vertical delineation is not complete at S1A. For S2A, permissible chloride levels of ≤ 600 mg/kg must be demonstrated at 7 ft. bgs and at 5 ft. bgs for S3A, 4A, and S6A. At any depth permissible chloride levels are exceeded, the 5 ft. additional recommences.
6. Use Method 8015, extended for TPH analyses (GRO, DRO, MRO).
7. PID for field evaluation is applicable only to BTEX and not functional for TPH. Provide all field chloride tests if available.

Please be advised that NMOCD does not permit soil washing currently. Please revise the proposed remedial activities.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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.

From: Alan Kane [mailto:alanjkane@comcast.net]
Sent: Tuesday, August 1, 2017 2:20 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Elrod, Kevin <kevinjelrod@comcast.net>
Subject: Re: Annapurna-Release

Thanks for your help on this.

From: "Olivia Yu, EMNRD" <Olivia.Yu@state.nm.us>
To: "Alan Kane" <alanjkane@comcast.net>
Cc: "Kevin Elrod" <kevinjelrod@comcast.net>
Sent: Tuesday, August 1, 2017 2:14:35 PM
Subject: RE: Annapurna-Release

Mr. Kane:

Thank you for the reminder. As I informed Ms. Stratton, the earliest review time is this week. Please be patient as I am the sole Environmental Specialist for NMOCD- District I.

Olivia

From: Alan Kane [<mailto:alanjkane@comcast.net>]
Sent: Tuesday, August 1, 2017 12:58 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Elrod, Kevin <kevinjelrod@comcast.net>
Subject: Annapurna-Release

Olivia, have you been able to evaluate the sampling information and proposed corrective action plan for the following facility?

Annapurna 20 #001H

The 1RP for this incident is

4737	6/26/2017	A	Rockcliff Operating	Annapurna 20 #001H	30-041-20969	8S-34E-17P	6/15/2017
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Thanks,

Alan Kane