

## Rose-Coss, Dylan H, EMNRD

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**From:** Rose-Coss, Dylan H, EMNRD  
**Sent:** Friday, October 18, 2019 8:35 AM  
**To:** 'Aaron Pachlhofer'  
**Cc:** Billings, Bradford, EMNRD; Bob Allen; David Boyer  
**Subject:** RE: 1RP-5271

Aaron,

The OCD cannot accept a remediation variances until the impacts from the release have been fully delineated. As I am no longer an Environmental Specialist, any report revisions and additional measures will need to be reviewed by the current Environmental Staff. Submissions through the fees portal is how the Division can ensure that reports are responded to in the order that they were received.

Regards,

**Dylan Rose-Coss**

*Petroleum Specialist*  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

(505) 476-3477



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**From:** Aaron Pachlhofer <aaronp@forl.com>  
**Sent:** Thursday, October 17, 2019 3:57 PM  
**To:** Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>  
**Cc:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bob Allen <ballen@sesi-nm.com>; David Boyer <dgboyer@sesi-nm.com>  
**Subject:** [EXT] RE: 1RP-5271

Dylan and Brad,

It would appear that there is the site plan that has the locations of the borings that were advanced is missing. However the data is present. Bob or David, can you please combine these data onto one site plan for ease of interpretation? I have attached the site plan of borings here.

I will contact Plains for their gauging data, however Plains may decline to submit these data to us and want to submit the OCD directly.

Finally, I am at a loss: If these are the only two items that were lacking for you to approve the excavation project for this release, I could have submitted the to you them to you before you rejected the work plan. Please note that over the years I have advanced sites multiple states and with a variety oversight agencies in the various states and at the federal level. All of these various agencies will contact the submitter for supplemental or missing information. I do not understand why you could not ask me for the additional information so that this work plan can be approved and we can move on to the next step in an efficient manner.



Aaron Pachlhofer, P.G.  
Environmental Coordinator  
Fasken Oil and Ranch, Ltd.  
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Midland, TX 79707  
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**From:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Sent:** Thursday, October 17, 2019 2:32 PM  
**To:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>  
**Cc:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** RE: 1RP-5271

Aaron,

The OCD has reviewed the remediation workplan for the Denton Trunkline spill (1RP-5271). The remediation plan is not accepted at this time. Please correct the following in the report and resubmit through the fees portal:

- Vertically delineate sample locations TT-1, through TT-6, and provide locations for the referenced boring samples.
- Provide actual reports or data to validate the DTW claims.

Thanks, and please refer all future questions regarding this release to Robert Hamlet, Victoria Venegas or Bradford Billings.

Regards,

**Dylan Rose-Coss**

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**From:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>  
**Sent:** Wednesday, October 9, 2019 8:27 AM  
**To:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Subject:** [EXT] RE: 1RP-5271

Actually it is a work plan, not a report. Since the release is different...larger volume, spilled into a pasture, etc...it is a different approach than 5270. But since it is a work plan and I do desire review and comments from OCD. I have attached it again for you.

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**From:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Sent:** Wednesday, October 09, 2019 9:19 AM  
**To:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>  
**Subject:** RE: 1RP-5271

I have not.

Will you go ahead and review the report for me bearing in mind all the items I asked for in the 1RP-5270 case and then send it back? I don't want to be able to accept the report straight away.

Best,

**Dylan Rose-Coss**

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**From:** Aaron Pachlhofer <[aaronp@forl.com](mailto:aaronp@forl.com)>  
**Sent:** Wednesday, October 9, 2019 7:40 AM  
**To:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Subject:** [EXT] 1RP-5271

Dylan, did you have any opportunity to review my other Denton spill, 1RP-5271?

Thanks,



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