

**Collins, Karen, EMNRD**

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**From:** Billings, Bradford, EMNRD  
**Sent:** Wednesday, December 30, 2020 9:37 AM  
**To:** 'Mark Larson'  
**Cc:** 'gstahnke@sugf.com'  
**Subject:** RE: Empire Abo Plant (AP-112) Soil Remediation Report/Deferral Request

12/30/2020

Mr. G. Stahnke – SUGF/AKA Energy Group  
Mr. M. Larson – LE Environmental

RE: Empire Abo Gas Plant Soil Remediation Report of November 6, 2020 – AP-112

To All,

Following detailed review of the above mentioned report, the following:

- 1) The Oil Conservation Division (OCD) concurs with report evaluation that soil remediation as outlined in approved work plan for On-site areas identified as EA-02, EA-03, EA-05 and EA-07 is completed and no additional soils work is needed in these specific areas.
- 2) The areas identified as EA-12 (with specific locations therein) and EA-13 (again with specific internal locations) as requested in the associated report in title are approved for remedial deferral of soils. These areas will be remediated at time of plant closure or until such time as these specific locations can be accessed for clean-up efforts.

OCD wants to thank you for your efforts and a well detailed report on a convoluted circumstance. As well as for your patience on timing for OCD review.

Please keep this electronic communication for your records, as NO paper copy will follow. The OCD appreciates your efforts on behalf of this issue. If there are any questions please contact this office. Otherwise please initiate work plan as soon as practicable.

Sincerely,

Bradford Billings  
EMNRD/OCD  
Santa Fe

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