

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, July 12, 2017 9:26 AM
To: mike.martin@rockcliffenergy.com; Nick Koch
Cc: 'Kevin Elrod'; Weaver, Crystal, EMNRD
Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

RE: Rockcliff Operating NM * Onsurez 2 * 2RP-4255 * DOR: 6/13/2017

Greetings,

Your proposal for remediation of the above referenced release is approved with the following:

The Form C-141 submitted for this release lists volumes as 1 bbl produced fluid lost and 1 bbl produced fluid recovered. Based on a physical site inspection by OCD and analytical data provided, this site has either had another unreported release, or the volumes reported on the initial C-141 were grossly inaccurate. This is to be corrected by close of business Friday, July 14, 2017 or the matter will be referred to OCD legal for further investigation into possible non-reporting, and/or falsifying documentation.

Based on background sample and other site ranking criteria, remediation levels for chloride impacted soil will be 250 mg/kg, as stated in the proposal. Remedial levels for Benzene, BTEX and TPH are also as stated in the proposal. In the area identified as OS 1, a deeper excavation than proposed, will be required in order to meet the remedial goal. In the area identified as OS 2, it is very likely a deeper excavation will be required as well. Based on the submitted data, this area cleans up to below 250 mg/kg somewhere between the 5' interval and the 8' interval. It is unclear where that clean up level occurs due to a 3' gap in sample intervals. The same circumstance exists in the areas identified as OS 3 and OS 4 due to a 2' gap in sample intervals. The area identified as OS 5 will also require deeper excavation to achieve the remedial goal for chloride impact. All excavations will require bottom and sidewall samples for confirmation that target goals for chloride and hydrocarbon impact have been achieved. A review of the confirmation sample lab data by OCD will be required, prior to approval to backfill any excavation. All impacted material is to be hauled to an OCD approved disposal facility.

For TPH testing, EPA Method 8015 Extended Range is requested. For chloride testing, EPA Method 300 is requested.

Referencing the site map, OCD observed an area of impact just north of the area identified as OS 2, in the alfalfa field to the east (outside of the impact boundary line on the map). This area is to be remediated as well as any other area of impact associated with this well.

Remedial work is to commence not later than July 24, 2017. Please advise OCD once remedial activities have been scheduled.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher
NMOCD District 2
811 S. First St.
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

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: Kevin Elrod [mailto:kevinjelrod@comcast.net]
Sent: Monday, July 10, 2017 2:28 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; mike.martin@rockcliffenergy.com
Subject: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Crystal,

Attached you will find the Onsurez # 2 Site investigation report and Corrective Action Plan. If you have any questions please let me know.

Additionally if you would like hard copies mailed to your office please let me know as well.

Thank you,

Kevin Elrod
Kane Environmental Engineering, Inc.
Registration Number F-2355
(979) 450-8307
kevinjelrod@comcast.net