3R - 450

2014 GEN COR

From To: Cc: VonGonten, Glenn, EMNRD "Radin, Jordan" Griswold, Jim, EMNRD

Subject: Date: Attachm RE: Koch Exploration Dryden 2-E Delineation Work Plan 3R-450 Tuesday, November 25, 2014 1:22:00 PM Image001.png Image002.png

Jordan.

Your request to modify the work plan is approved. Please remember to use the OCD Case No. 3R-450 in all future correspondence. Thanks.

Senior Hydrologist

Environmental Bureau

Oil Conservation Division

Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3488 Fax-476-3462

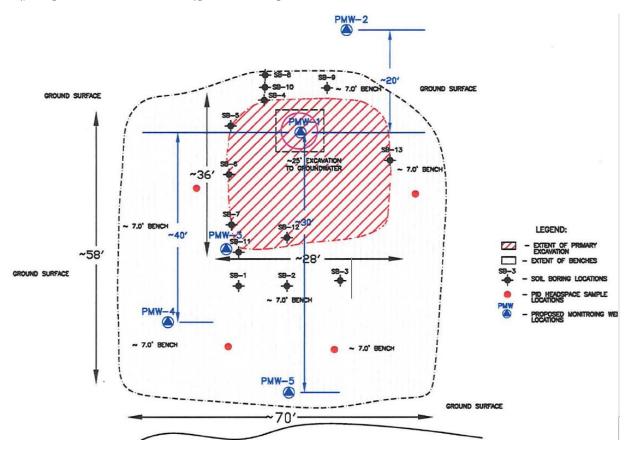
glenn.vongonten@state.nm.us

http://www.emnrd.state.nm.us/ocd/

From: Radin, Jordan [mailto:RADINJ@kochind.com] Sent: Thursday, November 20, 2014 10:48 AM To: VonGonten, Glenn, EMNRD Ce: Griswold, Jim, EMNRD

Subject: RE: Koch Exploration Dryden 2-E Delineation Work Plan

Sorry, the image I included in the email didn't show the upgradient well. Resending...



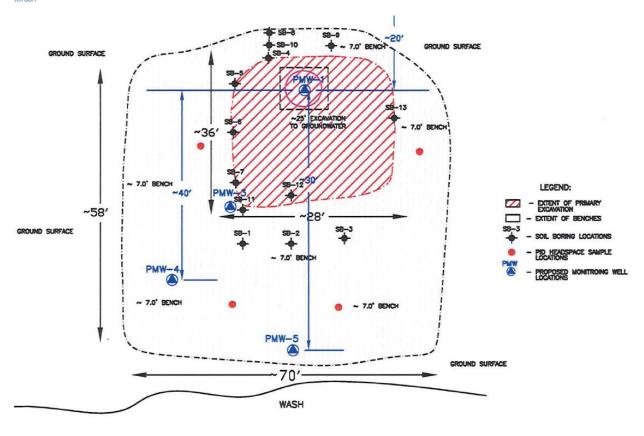
From: Radin, Jordan

Sent: Thursday, November 20, 2014 10:43 AM
To: 'VonConten, Glenn, EMNRD'
Cc: Griswold, Jim, EMNRD
Subject: RE: Koch Exploration Dryden 2-E Delineation Work Plan

We have hired a consulting company to execute the workplan you approved in the email below. One thing they brought to my attention was that the workplan narrative proposes four monitoring wells, but the site map depicts five. They thought that wells PMW-3 and PMW-4 were redundant and should be deleted and replaced with a single well about half way

We have confirmation samples taken during the original excavation showing a clean excavation sidewall next to PMW-3.

Let me know if you approve of this revised approach.



From: VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]
Sent: Friday, September 26, 2014 4:00 PM
To: Radin, Jordan
Co: Griswold, Jim, EMNRD
Subject: RE: Koch Exploration Dryden 2-E Delineation Work Plan

As we discussed, OCD hereby conditionally approves Koch's Work Plan (see attached pdfs). Please contact me if you have any questions. The OCD case number is 3R-450 and I should have the workplan, C-141, and approval posted this afternoon.

Glenn von Gonten

Senior Hydrologist

Environmental Bureau

Oil Conservation Division

Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, New Mexico 87505 505-476-3488

Fax-476-3462

glenn.vongonten@state.nm.us

http://www.emnrd.state.nm.us/ocd/

From: Radin, Jordan [mailto:RADINJ@kochind.com]
Sent: Wednesday, January 30, 2013 6:30 AM
To: VonGonten, Glenn, EMNRD
Cc: Adams, Andy (Koch Legal)
Subject: FW: Koch Exploration Dryden 2-E Delineation Work Plan

It's been a few months since I followed up with you regarding the groundwater delineation workplan originally submitted to NMED in May 2009. At your recommendation, we're awaiting NMED review and approval of the workplan before installing monitoring wells at the Dryden 2E natural gas production site. I've attached the workplan as originally submitted and hope to hear back from you soon.

Best regards, Jordan

Jordan Radin, PE Compliance Manager & Regulatory Specialist Koch Exploration Company, LLC (303) 325-2564

From: Radin, Jordan

Sent: Monday, March 07, 2011 12:38 PM
To: 'Glenn von Gotten (Glenn VonGonten@state.nm.us)'
Cc: Adams, Andy (Koch Legal)
Subject: Koch Exploration Dryden 2-E Delineation Work Plan

Hi Glenn-Koch submitted a groundwater delineation plan to NMOCD in May, 2009 (see attachment). During previous phone conversations you advised that we wait for NMED approval prior to implementing the plan. I'm wondering if you know when NMOCD will review the plan and approve or provide comments.

Thanks, Jordan

Jordan Radin, PE Compliance Manager Koch Exploration Company, LP (720) 201-4941

State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary



SEPTEMBER 26, 2014

Mr. Jordan Radin, PE Compliance Manager & Regulatory Specialist Koch Exploration Company, LP 950 17th Street, Suite 1900 Denver, CO 80202

RE: GROUNDWATER INVESTIGATION

KOCH EXPLORATION COMPANY, LLC. - DRYDEN 2E

NE 1/4 of the SE 1/4 of SECTION 22, TOWNSHIP 28 NORTH, RANGE 8 WEST,

NMPM, SAN JUAN COUNTY

OCD CASE NO.: 3R-450

Dear Mr. Radin:

The Oil Conservation Division (OCD) has reviewed Koch's May 2009 investigation work plan for a crude oil and produced water release that was reported via form C-141 on May 17, 2009. This workplan specifies how Koch will investigate ground water that may have been impacted by releases at Koch's Dryden 2E well site.

Koch's work plan is approved with the following conditions (please see OCD's comments on attached pdf copy of workplan):

- 1. Koch shall allow the monitor wells to recover for at least 24 hours after being completed before purging and sampling ground water.
- 2. Koch shall analyze the soil samples for TPH using 418.1. Koch is **not** required to analyze the ground water samples for 418.1.
- 3. Koch's report is due to OCD within 30 days of Koch receiving the lab results. Please provide a copy of the report to both OCD's Santa Fe and Aztec Offices.
- 4. Koch's report must also include a dip cross-section with the results of the headspace analyses, soil data, ground water data, and the lithology.

Please be advised that OCD's approval does not relieve Koch of liability if contamination exists which is beyond the scope of the work plan, if the activities fail to adequately determine the extent of contamination; or if the activities fail to adequately remediate contamination related to

September 26, 2014 Page 2

Koch's activities. In addition, OCD's approval does not relieve Koch of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

Please reference OCD Case No. **3R-450** on all future correspondence. Please submit a final, revised workplan with the report.

Please contact me at (505) 476-3488 (<u>Glenn.VonGonten@state.nm.us</u>) if you have any questions.

Sincerely,

Glenn von Gonten Senior Hydrologist

Cc: Jim Griswold, Brandon Powell