

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, September 6, 2017 10:01 AM
To: Kevin Elrod
Subject: Re: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Kevin

Please see the email I sent. The delineation is to be guided by data not predetermined depths. I am out of the office this week so you are welcome to proceed but OCD expects a full delineation of the site no matter what depth that may take to achieve.

Sent from my Verizon Wireless 4G LTE DROID

Kevin Elrod <kevinjelrod@comcast.net> wrote:

Mike,

we are proposing the following delineation activities based on your comments:

For sample point ES-13. We propose collecting a sample 3ft below the current bottom, 8 ft below the current bottom and also 13 ft below the current bottom. The samples will be analyzed for chloride content using Method 4500.

For sample point ES-4. We propose collecting a sample 3ft below the current bottom, 8 ft below the current bottom and also 13 ft below the current bottom. The samples will be analyzed for chloride content using Method SM 4500 and Method 8015 for TPH (GRO,DRO & ORO).

We believe that the soil samples collected from 3 foot below the current bottom at each of the locations will meet the 600 mg/kg levels. We are planning to be onsite next Monday to collect these samples if you agree with our approach.

Thanks,

Kevin Elrod

Kane Environmental Engineering, Inc.

Registration Number F-2355

(979) 450-8307

kevinjelrod@comcast.net

From: [Bratcher, Mike, EMNRD](#)
Sent: Thursday, August 31, 2017 2:46 PM
To: [Kevin Elrod](#) ; [Weaver, Crystal, EMNRD](#) ; [Mike Martin](#) ; [Nick Koch](#)
Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Kevin,

Your Site Investigation Summary & Corrective Action Plan, submitted for the above referenced release, is not approved at this time. Additional delineation and very likely, additional excavation/remediation, will be required at this site. OCD requests a delineation be performed prior to making a determination on final remedial requirements. In the area identified as ES 13 on the site map, OCD requests delineation for chloride impact. Target goal will be 600 mg/kg. Once that goal has been achieved, a sample is to be obtained at 5' below that interval and one at 10' below that interval to validate chloride levels do not increase. Hydrocarbon impact has been adequately defined, vertically, in this area, so testing will be for total chloride only. In the area identified as ES 4 on the site map, OCD requests additional vertical delineation for hydrocarbon (TPH-GRO,DRO & ORO - goal is 100 mg/kg) and chloride impact (600 mg/kg plus 5' and 10' below). Data obtained indicates light end hydrocarbon (BTEX) is not an issue, so testing for those constituents will not be required. In the event ground water is encountered prior to achieving delineation goals, OCD is to be notified. The installation of any spill prevention equipment is encouraged.

If you have any questions or concerns, please contact me or Crystal Weaver.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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: Tuesday, August 29, 2017 2:42 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Mike Martin <mike.martin@rockcliffenergy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nick Koch <nkoch@rockcliffenergy.com>
Subject: Re: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Good Afternoon all,

Attached you will find the updated Site Investigation and Corrective Action Plan from the post cleanup visit at the Onsurez.

Please let me know if you have any questions.

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

From: [Weaver, Crystal, EMNRD](#)
Sent: Monday, August 28, 2017 2:35 PM
To: [Mike Martin](#) ; [Bratcher, Mike, EMNRD](#) ; [Nick Koch](#)
Cc: [Kevin Elrod](#)
Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Rockcliff * Onsurez #2 * 30-015-26472 * 2RP-4255

Hello all,

OCD requests a status update on this site.

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Mike Martin [<mailto:mike.martin@rockcliffenergy.com>]
Sent: Wednesday, July 12, 2017 10:00 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nick Koch <nkoch@rockcliffenergy.com>
Cc: Kevin Elrod <kevinjelrod@comcast.net>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Onsurez # 2 Site Investigation Summary and Corrective Action Plan

Mr. Bratcher,

If you would could you give me a call. I would like to discuss the remediation to make sure that I have our environmental group that is going to do the work 100% clear on what all needs to be done.

Thanks for your time,



Michael Martin
Field Operations Manager
Rockcliff Energy
Cell: 318-525-5676

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Wednesday, July 12, 2017 10:26 AM
To: Mike Martin <mike.martin@rockcliffenergy.com>; Nick Koch <nkoch@rockcliffenergy.com>
Cc: Kevin Elrod <kevinjelrod@comcast.net>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
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