

From: [Yu, Olivia, EMNRD](#)
To: ["Stahnke, Graham"](#)
Cc: [Everhart, Harley](#); [Groves, Amber](#); [Young, Andy](#)
Subject: RE: 1RP-4671 Rhombus Remediation Project
Date: Friday, September 22, 2017 8:00:00 AM
Attachments: approved_1RP4671_Frontier Field Services - Rhombus Union State Com 1 Release - Response t...pdf

Good morning Mr. Stahnke:

NMOCD approves of the proposed additional delineation and remedial activities for 1RP-4671. Please see the attachment for your records. Like approval from NMSLO is required.

Thank you for your continued compliance.

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Stahnke, Graham [mailto:gstahnke@sugf.com]
Sent: Thursday, September 7, 2017 8:45 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Everhart, Harley <heverhart@akaenergy.com>; Groves, Amber <agroves@slo.state.nm.us>; Young, Andy <anyoung@sugf.com>
Subject: RE: 1RP-4671 Rhombus Remediation Project

Dear Ms. Yu,

Please find attached Frontier's response to your questions posed below. Please let me know if you have additional questions regarding the site or the proposed actions.

Regards,
Graham

Graham Stahnke, PE
Senior Environmental Compliance Specialist
Southern Ute Growth Fund
Safety & Environmental Compliance Management Group
175 Mercado Street, Suite 225
Durango, CO 81301

Phone: 970-764-6484
Cell: 970-759-5712
Email: gstahnke@sugf.com

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, August 07, 2017 9:07 AM
To: Everhart, Harley <heverhart@akaenergy.com>; NMSLO (Hobbs/Amber Groves) <agroves@slo.state.nm.us>
Cc: Stahnke, Graham <gstahnke@sugf.com>
Subject: RE: 1RP-4671 Rhombus Remediation Project

Good morning Mr. Everhart:

Note: an appropriately-scaled, clear resolution map must accompany all delineation and remediation workplans.

Please address these concerns regarding 1RP-4671:

1. The release volume has been revised. Provide calculations for this adjustment from 10-15 bbls reported on the initial C141 to the 5 bbls volume indicated in the report dated July 7, 2017.
2. Explain the rationale for the June 27-30 series of sampling dates for Sample location 6, 10, Repeat #1 and #5. Was sampling on these days at the same spot? Repeat sampling at specific locations does not represent delineation. As explained in the email dated June 9, 2017, vertical delineation must show a minimal of 5 ft. of permissible chloride levels. In other words, NMOCD expects to see confirmatory laboratory results of the first depth with ≤ 600 mg/kg and the depth 5 ft. further with ≤ 600 mg/kg.
3. What does A, B, and C denote in the Sample ID? Do these refer to the sampling depth?
4. Samples 4, 7, 8, 9, X have total TPH levels above permissible 1000 mg/kg. Vertical delineation is not complete. Total TPH levels must be obtained and maintained for a minimum of 2 ft. further in depth.
5. As per the appended to the reviewed initial C141, to confirm that permissible levels of BTEX, TPH, and chlorides are obtained horizontally, a minimum of 4 cardinal sample locations should be established laterally around the release area.
6. What is the proposed remedial plan? Please be advised that sidewall and bottom confirmation samples are required for closure.
7. NMSLO may have differing requirements for the revegetation plan.

Please request a meeting to address questions regarding delineation and remediation for this location.

Thanks,
Olivia

From: Everhart, Harley [<mailto:heverhart@akaenergy.com>]
Sent: Tuesday, August 1, 2017 9:43 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Stahnke, Graham <gstahnke@sugf.com>
Subject: 1RP-4671 Rhombus Remediation Project

Hello Olivia,

With all due respect, would it be possible to get your final approval for the completion of the 1RP-4671 Rhombus Remediation Project? Because Frontier does not have its own remediation team they have to pay for the contractors equipment even while it's on standby.

Thank you for your leadership on this matter,

Respectfully,

Harley Everhart

EH&S Compliance

(575) 676-3505 - Direct

(575) 513-4922 - Cell

(575) 676-2401 - Fax

heverhart@akaenergy.com



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