

KNC

Everett Spellman

From: Everett Spellman
Sent: Thursday, December 17, 2009 10:49 AM
To: 'LeRock, Gary'
Cc: stone.andrear@epa.gov; Rohman.Wray@epamail.epa.gov; Stucky-Gregg, Elise; Zellers, Cory; Siegrist, Thomas; Mostafa Kamal
Subject: Water Supply for Oil Well Drilling Activities

Gary,

The Kansas Department of Health and Environment (KDHE) shares Koch Nitrogen Company's (KNC) concern that extracting water from the supply well may influence the migration of the contaminant plume. KDHE also agrees that the Ogallala Aquifer is probably not capable of sustaining a well that consistently produces water at 50 gallon per minute. This estimate is based on a hydraulic conductivity of approximately 4.5 feet per day from slug test data and an estimated aquifer thickness of 20 feet. However, if a supply well is installed in the Ogallala Aquifer, the temporary nature of the supply well will likely not generate a long term effect on the contaminant plume. KDHE recommends that if a supply well is installed in the Ogallala Aquifer, it be located as far as possible northeast of monitoring well TW-11 to reduce its potential impact on the contaminant plume. As you noted, the Dakota Formation may be a more suitable formation to install this well. Please contact me if you'd like to discuss this issue in more detail.

Everett Spellman
 Professional Geologist
 Bureau of Waste Management
 Kansas Department of Health & Environment
 Phone: (785) 296-1616
 Fax: (785) 296-1592

From: LeRock, Gary [mailto:lerockg@kochind.com]
Sent: Tuesday, December 15, 2009 6:45 PM
To: stone.andrear@epa.gov
Cc: Rohman.Wray@epamail.epa.gov; Everett Spellman; Stucky-Gregg, Elise; Zellers, Cory; Siegrist, Thomas
Subject: RE: New Environmental Leader at KNC -Dodge City

Hi Andrea:

I received a call yesterday from the representative with Vincent Oil. He indicated that in addition to the previously discussed oil well, they will also be drilling a water well to support the oil well drilling operation. They are planning to drill the well as early as Friday and it will be drilled approximately 300 feet east of the proposed oil well. The representative indicated that they required a yield of 50 gpm and intended to drill in the Ogallala. I explained to him we had concerns about them installing an Ogallala well near the boundary of the contamination.

At 50 gpm this well would be pumping at a rate approximately 10 times the rate of the nearest recovery well, TW-86. We are concerned that this well would alter the existing groundwater flow pattern and cause contamination to spread eastward. I suggested, due to the geology in the area, that he may not be able to drill a well in the Ogallala that will produce 50gpm and that he should consider the Dakota formation. Installing the well in the Dakota formation would also avoid the potential for altering the groundwater flow in the Ogallala. During the phone call he accessed the water well completion records on the Kansas Geological Survey website and confirmed that drilling in the Dakota formation was a possibility. Dodge City Services has a Dakota well just south of this area that is rated at 55gpm.

At the conclusion of the phone conversation he indicated that he would contact his water well contractor to evaluate the option of installing the well in the Dakota formation. We have sent Vincent Oil Corp a letter expressing our concerns and will keep you informed of further communications we receive.

I would be happy to have a conference call with you and Randy if you think it would be beneficial. I am available most of the day Thursday or Friday of this week. Or, if you wish to discuss earlier, please feel free to call Elise or Cory at the plant.

Thanks!

Gary J. LeRock
 Plant Manager
 Koch Nitrogen Company, LLC
 Dodge City, KS 67801-1337

Office: (620) 227-8631 ext 300
 Cell: (620) 339-9051

RCRA



531854

From: LeRock, Gary
Sent: Monday, December 07, 2009 3:01 PM
To: Stone.AndreaR@epamail.epa.gov
Cc: Rohman.Wray@epamail.epa.gov; espellma@kdhe.state.ks.us; Stucky-Gregg, Elise; Zellers, Cory; Siegrist, Thomas
Subject: RE: New Environmental Leader at KNC -Dodge City

Hi Andrea:

Shortly after I left the voice mail message for you, I had a fairly detailed visit with Randy about the proposed oil well that is to be drilled by Vincent Oil Corp on the Crane property to the east of us. I followed that conversation with a similar phone discussion with Everett Spellman. I then had another follow-up call with the representative from Vincent. Here's what I know at this point:

- Vincent proposes to begin drilling an oil well within the next week or two at the following location: from the NW corner of Section 23-T26S-R24W, go 1830' east, then 950' south. From my measurements, that places their well approximately half way between our TW-11 (monitor well) and TW-86 (recovery well).
- Vincent plans to drill to approximately 4500' to 5500' deep.
- Randy and Everett both felt it could be possible for Vincent to accomplish their objective, provided they take appropriate precautions to protect the Ogallala and Dakota water zones from any new contamination. We understand this is one of the main

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purposes of the permitting regulations of the KCC for oil and gas well drilling.

- Everett mentioned that he would be interested in seeing the well design that Vincent plans to use.
- Vincent Oil planned to have further discussion(s) with KCC representatives to see if they had additional requirements for well drilling in locations with irregular environmental sensitivity.

I would be happy to have a conference call with you and Randy if you think it would be beneficial. I am available Wednesday morning, as well as most of Thursday and Friday.

Thanks!

Gary J. LeRock
Plant Manager
Koch Nitrogen Company, LLC
Dodge City, KS 67801-1337

Office: (620) 227-8631 ext 300
Cell: (620) 339-9051

-----Original Message-----

From: Stone.AndreaR@epamail.epa.gov [mailto:Stone.AndreaR@epamail.epa.gov]
Sent: Monday, December 07, 2009 1:05 PM
To: LeRock, Gary
Cc: Rohrman.Wray@epamail.epa.gov
Subject: Re: New Environmental Leader at KNC -Dodge City

Hi Gary:

I have been out of the office for about three (3) weeks due to health issues. I have been checking e-mails and phone messages today.

I am working at my home today and tomorrow. I should be back in the office on Wednesday. In your voice message you mentioned that you wanted to chat.

What is your availability for a conference call either Wednesday afternoon, Thursday or Friday. I would like Randy to be on the call since you mentioned an oil well. I will need to check his availability also.

Thanks!

Andrea R. Stone
U.S. EPA Region 7
AWMD/RCAP
901 North 5th Street
Kansas City, Kansas 66101

Phone: (913) 551-7662
Toll-Free 1-800-223-0425; extension 7662 (Only valid within MO, KS, NE & IA)
Fax: (913) 551-7947

stone.andrear@epa.gov

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| From: |
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| "LeRock, Gary"
| <lerockg@kochind.com>
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| To: |
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| AndreaR Stone/R7/USEPA/US@EPA, Wray Rohrman/R7/USEPA/US@EPA, <spellma@kdhe.state.ks.us>,
| <rallen@kdheks.gov>,
| <khoeffner@kdheks.gov>, <dbiester@kdheks.gov>,
| <dbutler@kdheks.gov>
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| Cc: |
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| "Siegrist, Thomas" <SIEGRIST@kochind.com>, "Sahatjian, Laurie (Koch Legal)" <Laurie.Sahatjian@kochps.com>, "Stephen M.
| Richmond"
| <SRichmond@bdlaw.com>, "Valmont, Hannah" <ValmontH@kochind.com>, "Stucky-Gregg, Elise" <StuckyGE@kochind.com>, "Zellers,
| Cory"
| <ZELLERSC@kochind.com>
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12/18/2009

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| Date: |>
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| 12/03/2009 03:37
PM |>
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| New Environmental Leader at KNC -Dodge
City |>
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Per our recent phone calls and/or voice mails, please be informed that the Koch Nitrogen Company - Dodge City plant has recently experienced a change in personnel.

Elise Stucky-Gregg has replaced AnnieLaurie Burke as the Environmental Leader for the facility. Her contact information is as follows:

Elise Stucky-Gregg
Environmental Leader
Koch Nitrogen Company, LLC
P.O. Box 1337
11559 U.S. Hwy 50
Dodge City, KS 67801-1337

Office: (620) 227-8631 ext 350
Fax: (620) 227-6016
Cell: (620) 339-9024

E-mail: StuckyGE@kochind.com

Please feel free to contact Elise for anything you previously would have contacted AnnieLaurie for.
Thank you,

Gary J. LeRock
Plant Manager

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