

## Vaughn, Lorena

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**From:** Vaughn, Lorena  
**Sent:** Monday, September 27, 2021 10:27 AM  
**To:** Rucki, Thomas  
**Subject:** FW: EPA Administrative Penalty Order Issued to RFL Clayton Farms

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**From:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Sent:** Monday, September 27, 2021 10:21 AM  
**To:** Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Cc:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>; Vaughn, Lorena <[Vaughn.Lorena@epa.gov](mailto:Vaughn.Lorena@epa.gov)>  
**Subject:** RE: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Thank you. RLF Clayton requests a thirty-day extension to respond to the APO.

Best regards,

Aaron M. Patsch, CFA | Partner | Resource Land Holdings, LLC  
1400 16<sup>th</sup> Street, Suite 320 Denver, CO 80202  
Main: 720.723.2850 | Direct: 720.723.2853 | Mobile: 719.332.0205 Email: [aaron.patsch@rlholdings.com](mailto:aaron.patsch@rlholdings.com)

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**From:** Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Sent:** Monday, September 27, 2021 9:05 AM  
**To:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Cc:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>; Vaughn, Lorena <[Vaughn.Lorena@epa.gov](mailto:Vaughn.Lorena@epa.gov)>  
**Subject:** RE: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Aaron,  
I recommend asking for a 30 day extension.

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**From:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Sent:** Monday, September 27, 2021 8:09 AM  
**To:** Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Cc:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>; Vaughn, Lorena <[Vaughn.Lorena@epa.gov](mailto:Vaughn.Lorena@epa.gov)>  
**Subject:** Re: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Thank you. If it helps, we are merely making some suggested (and hopefully modest) changes to the settlement agreement but are not planning to contest the fines. Thank you again, Aaron

Aaron M. Patsch, CFA | Partner | Resource Land Holdings, LLC  
[1400 16th Street, Suite 320 Denver, CO 80202](mailto:aaron.patsch@rlholdings.com)  
Direct: [720.723.2853](tel:720.723.2853) | Mobile: [719.332.0205](tel:719.332.0205) Email: [aaron.patsch@rlholdings.com](mailto:aaron.patsch@rlholdings.com)

On Sep 27, 2021, at 6:43 AM, Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)> wrote:

FILED  
21 SEP 27 PM 2:26  
REGIONAL HEARING CLERK  
EPA REGION VI

Mr. Patsch,

I am not opposed to an extension, but it will have to be granted by the Regional Judicial Officer. I have copied the Regional Hearing Clerk and you can email a request to Ms. Lorena Vaughn who will then direct it to the Regional Judicial Officer. Thank you.

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**From:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>  
**Sent:** Thursday, September 23, 2021 3:51 PM  
**To:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Cc:** Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Subject:** RE: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Mr. Patsch,

Your request for an extension for October 1<sup>st</sup> has been approved.

Lucas Bomar  
Life Scientist  
Water Enforcement Branch  
U.S. EPA Region 6  
1201 Elm St. Dallas, TX 75270  
(214) 665-2182  
[Bomar.lucas@epa.gov](mailto:Bomar.lucas@epa.gov)

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**From:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Sent:** Thursday, September 23, 2021 2:51 PM  
**To:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>  
**Cc:** Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Subject:** RE: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Lucas: I would like to request a limited extension. Would the EPA be amenable to an extension until Friday, October 1, 2021?

Thank you for your consideration. Best regards,

Aaron M. Patsch, CFA | Partner | Resource Land Holdings, LLC  
1400 16<sup>th</sup> Street, Suite 320 Denver, CO 80202  
Main: 720.723.2850 | Direct: 720.723.2853 | Mobile: 719.332.0205 Email: [aaron.patsch@rlholdings.com](mailto:aaron.patsch@rlholdings.com)

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**From:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>  
**Sent:** Wednesday, September 22, 2021 2:52 PM  
**To:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Cc:** Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Subject:** RE: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Hello Mr. Patsch,

This is a reminder that the 30 day period to request a hearing to deny, explain any material allegation, or contest the penalty proposed in the APO concerning Clayton Farms is coming close to an end. Failure to file an Answer to this Complaint shall constitute an admission of all facts alleged in the Complaint and a waiver to the right to a hearing. If needed, please let me know if you wish to request an extension.

Respectfully,

Lucas Bomar  
Life Scientist  
Water Enforcement Branch  
U.S. EPA Region 6  
1201 Elm St. Dallas, TX 75270  
(214) 665-2182  
[Bomar.lucas@epa.gov](mailto:Bomar.lucas@epa.gov)

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**From:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Sent:** Thursday, August 26, 2021 3:27 PM  
**To:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>  
**Cc:** [susan.lucaskamat@state.nm.us](mailto:susan.lucaskamat@state.nm.us); Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Subject:** RE: EPA Administrative Penalty Order Issued to RFL Clayton Farms

Mr. Bomar:

I am confirming the receipt of the Administrative Penalty Order concerning RLF Clayton Farms. We will immediately review.

Thank you,

Aaron M. Patsch, CFA | Partner | Resource Land Holdings, LLC  
1400 16<sup>th</sup> Street, Suite 320 Denver, CO 80202  
Main: 720.723.2850 | Direct: 720.723.2853 | Mobile: 719.332.0205 Email: [aaron.patsch@rlholdings.com](mailto:aaron.patsch@rlholdings.com)

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**From:** Bomar, Lucas <[Bomar.Lucas@epa.gov](mailto:Bomar.Lucas@epa.gov)>  
**Sent:** Thursday, August 26, 2021 2:22 PM  
**To:** Aaron Patsch <[Aaron.Patsch@RLHoldings.com](mailto:Aaron.Patsch@RLHoldings.com)>  
**Cc:** [susan.lucaskamat@state.nm.us](mailto:susan.lucaskamat@state.nm.us); Chang-Vaughan, Ellen <[Chang-Vaughan.Ellen@epa.gov](mailto:Chang-Vaughan.Ellen@epa.gov)>  
**Subject:** EPA Administrative Penalty Order Issued to RFL Clayton Farms

Hello Mr. Patsch,

Enclosed is an Administrative Penalty Order issued by the United States Environmental Protection Agency, Region 6 (EPA) concerning RFL Clayton Farms. This Order requires (Respondent) to comply with the provisions set forth in the attached Order. The EPA requests that you immediately confirm receipt of this e-mail and the attached Order by a response e-mail.

Luke Bomar  
Life Scientist  
Water Enforcement Branch  
U.S. EPA Region 6  
1201 Elm St. Dallas, TX 75270  
(214) 665-2182  
[Bomar.lucas@epa.gov](mailto:Bomar.lucas@epa.gov)

