

From: [ORR Jim * DEQ](#)
To: [Bartee, Mark](#)
Cc: [hanna.laura@epa.gov](#); [Hendrix, JT](#); [Mark Havighorst](#); [Lucas Thompson \(lthompson@geoengineers.com\)](#); [LACEY David J * DEQ](#); [Hanna, Laura](#); [ORR Jim * DEQ](#); [ORR Jim * DEQ](#)
Subject: RE: Zenith Energy: 2Q2025 Naphtha Well Gauging Report
Date: Monday, July 14, 2025 8:51:00 AM
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)

Mark,

The Naphtha well gauging and SCE work are part of the same agreement with DEQ.

DEQ does not agree that Naphtha well gauging should be discontinued in individual wells after one year of quarterly measurements of less than 0.01 feet of product.

DEQ requests that quarterly monitoring of naphtha well gauging include SCE updates.

Thank You kindly
Jim Orr R.G.
DEQ Northwest Region
700 NE Multnomah St., Suite 600
Portland, Oregon 97232
503-961-2647 Cell Phone
jim.orr@deq.oregon.gov

Someday, I hope to be the person that my dogs believe I am



[Helpful Links](#)

	<p>We are modernizing and upgrading the way we process information at DEQ with Your DEQ Online; a new centralized hub for communities, businesses and individuals. Click here to learn more.</p>
---	---

[Department of Environmental Quality : Vapor Intrusion Guidance : Environmental Cleanup : State of Oregon](#)

From: Bartee, Mark <Mark.Bartee@zenithterminals.com>
Sent: Wednesday, July 9, 2025 8:55 AM

To: ORR Jim * DEQ <jim.orr@deq.oregon.gov>

Cc: hanna.laura@epa.gov; Hendrix, JT <JT.Hendrix@zenithterminals.com>; Mark Havighorst <mhavighorst@geoengineers.com>; Lucas Thompson (lthompson@geoengineers.com) <lthompson@geoengineers.com>

Subject: RE: Zenith Energy: 2Q2025 Naphtha Well Gauging Report

Jim,

Zenith's voluntary agreement for source control does not indicate that routine (i.e., quarterly) status reports are required. Accordingly, Zenith has not been submitting reports to DEQ.

Zenith has submitted the required quarterly naphtha release progress reports to DEQ. The 2nd quarter 2025 progress report was attached to my email to you dated July 7, 2025. This report proposes to discontinue naphtha-well gauging at several locations where SPH thicknesses have been less than 0.01-foot for at least 1 year. Please confirm DEQ concurrence that naphtha-well gauging at these locations can be discontinued. No deviations are anticipated to the required quarterly naphtha-well gauging and reporting events.

The first and second groundwater monitoring events described in the Focused Source Control Evaluation Work Plan are planned for September 2025 (3Q25) and March 2026 (1Q26), respectively. Based on historical groundwater monitoring performed at the Zenith terminal, groundwater measurements collected at these times best represent low and high groundwater conditions, respectively.

Consistent with the Focused Source Control Evaluation Work Plan, groundwater monitoring results will be summarized in technical memorandums and submitted to DEQ no more than 30-days post the completion of each field event.

Mark Bartee

HSE Specialist



5501 NW Front Ave.
Portland, Oregon 97210
503.273.4720 (o)
971.254.6480 (m)

mark.bartee@zenithterminals.com

From: ORR Jim * DEQ <jim.orr@deq.oregon.gov>
Sent: Monday, July 7, 2025 9:55 AM
To: Bartee, Mark <Mark.Bartee@zenithterminals.com>
Cc: Mark Havighorst <mhavighorst@geoengineers.com>; Lucas Thompson (lthompson@geoengineers.com) <lthompson@geoengineers.com>; ORR Jim * DEQ <Jim.ORR@deq.oregon.gov>
Subject: RE: Zenith Energy: 2Q2025 Naphtha Well Gauging Report

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mark,
What is the progress on the Source Control Evaluation?

*Thank You kindly
Jim Orr R.G.
DEQ Northwest Region
700 NE Multnomah St., Suite 600
Portland, Oregon 97232
503-961-2647 Cell Phone
jim.orr@deq.oregon.gov*

Someday, I hope to be the person that my dogs believe I am



[Helpful Links](#)

	<p>We are modernizing and upgrading the way we process information at DEQ with Your DEQ Online: a new centralized hub for communities, businesses and individuals. Click here to learn more.</p>
---	---

[Department of Environmental Quality : Vapor Intrusion Guidance : Environmental Cleanup : State of Oregon](#)

From: Bartee, Mark <Mark.Bartee@zenithterminals.com>
Sent: Monday, July 7, 2025 7:29 AM
To: ORR Jim * DEQ <jim.orr@deq.oregon.gov>
Cc: Mark Havighorst <mhavighorst@geoengineers.com>; Lucas Thompson
(lthompson@geoengineers.com) <lthompson@geoengineers.com>
Subject: Zenith Energy: 2Q2025 Naphtha Well Gauging Report

Jim,

Zenith Energy's 2nd quarter 2025 Naphtha Well Gauging status report is attached for your review. Please reach out with any questions or concerns.

Thank you,

Mark Bartee

HSE Specialist



5501 NW Front Ave.
Portland, Oregon 97210
503.273.4720 (o)
971.254.6480 (m)
mark.bartee@zenithterminals.com