

From: [Yu, Olivia, EMNRD](#)
To: ["Buddy Richardson"; Billings, Bradford, EMNRD](#)
Cc: [Darrell Pennington](#); [Matthew Mugavero](#)
Subject: RE: RAM Yates State #2
Date: Thursday, January 4, 2018 2:20:00 PM

Dear Mr. Richardson:

Please address these concerns regarding 1RP-4587.

1. Proposed remediation from October 2, 2017 is approved with clarifications. a) Please inform whether the entire tank battery will be removed before 4 ft. excavation and liner emplacement or whether the tanks would remain in situ. b) The areas represented by WSB-1 and ESB-2 demonstrate chloride levels above 600 mg/kg at the surface. Impacted soil must be removed until laboratory analyses of bottom and sidewall samples demonstrate chlorides are within permissible levels of 600 mg/kg at the lateral extent of these two areas.
2. Please inform whether the temporary wells, TMW-1 and TMW-2, are still intact. If these two wells are still integral, NMOCD requests that the temporary wells be made permanent. Since TMW-2 is downgradient of the tank battery, it is probable that the chloride concentration in the groundwater above permissible level of 250 mg/kg was influenced by current and historic releases from the tank battery. If the wells are already closed, then NMOCD requires that the replacement permanent wells be situated as close to the original positions as feasible.
3. In addition, based on the groundwater data presented in TMW-2, NMOCD requires that a 3rd permanent monitoring well be established to model the chloride plume.
4. Questions regarding the placement of the 3rd monitoring well can be directed to Bradford Billings.

Please confirm or inform for clarification.

Thanks,

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: Buddy Richardson [mailto:Buddy.Richardson@eccgrp.com]
Sent: Thursday, December 14, 2017 12:15 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Darrell Pennington <dpennington@ramenergy.net>; Matthew Mugavero <matthew.mugavero@eccgrp.com>

Subject: RAM Yates State #2

NMOCD Case No. 1R-4587

Ms. Yu,

Please find attached a document titled ***Release Characterization Report and Proposed Remediation Work Plan – Addendum 2*** that Enviro Clean Cardinal, LLC has prepared on behalf of our client RAM Energy Resources regarding their Yates State #2 Tank Battery located in Lea County, New Mexico. This report provides the NMOCD with the results of the two temporary monitoring wells that NMOCD requested be installed upgradient and downgradient of the subject tank battery. Our client would like to proceed with implementation of the soil remediation that has been proposed and approved if you concur. If you have any questions, please do not hesitate to contact Mr. Darrell Pennington with RAM at 918-947-6304, or myself at 918-794-7828. Thank you for your assistance in this matter.

Buddy Richardson



George H. (Buddy) Richardson, P.G.

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