

From: Mann, Ryan
To: [Yu, Olivia, EMNRD](#); [Tara Hodges](#); [Alan Barksdale](#); [Ross Pearson](#)
Cc: ballen@sesi-nm.com; books@sesi-nm.com; [Billings, Bradford, EMNRD](#)
Subject: RE: Sunray State Tank Battery Closure Report
Date: Monday, April 2, 2018 11:17:17 AM

Mr. Allen,

Please be aware NMSLO will not the issue closed until revegetation of the off-site area is completed. Additionally the work plan will need to include a "Revegetation and Noxious Weed Management" section. Ideally something more thorough than "BLM #2 seed mixture was and spread"....i.e. seeding rate/acre, weed management monitoring plan, seedbed preparation, etc. Let me know if you have any questions about this.

Thanks

Ryan Mann
District Resource Specialist
Field Operation Division
(575) 392-3697
(575) 699-1989
New Mexico State Land Office
2827 N. Dal Paso Suite 117
Hobbs, NM 88240

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, March 30, 2018 3:55 PM
To: Tara Hodges <office2@sesi-nm.com>; Alan Barksdale <alan@redmountainresources.com>; Ross Pearson <ross@redmountainresources.com>; Naranjo, Mark <MNaranjo@slo.state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Cc: ballen@sesi-nm.com; books@sesi-nm.com; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: Sunray State Tank Battery Closure Report

Mr. Allen:

Notes

- There are 2 USGS wells, 2 miles Southwest of the release location, with average depth to groundwater at 76 ft. bgs.
- Type of fluid released and size of impacted area written on the final C-141 conflict with data and information provided in delineation and remediation/closure report.

The closure report for 1RP-3619 is DENIED. Please address these concerns:

- On an appropriately scaled map, please demarcate the sample locations from March 20,

2017 and June 30, 2017. Please be advised that soil temperatures were not within standard collection conditions.

- Where was the 12 ft x 12 ft excavation? What was the excavation depth?
- Where was the lined area?
- Why were sidewall samples not submitted to a laboratory for confirmation on November 7 and 8, 2017? Please provide data from field tests.
- Areas represented by BH-1 and BH-2 (data from June 29, 2016) suggest that the surface 3 ft. of soil exceeds permissible chloride levels of 600 mg/kg. These areas need to be addressed.

NMSLO may have additional concerns or stipulations.

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: Tara Hodges <office2@sesi-nm.com>
Sent: Wednesday, February 21, 2018 9:03 AM
To: Alan Barksdale <alan@redmountainresources.com>; Ross Pearson <ross@redmountainresources.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; mnaranjo@slo.state.nm.us
Cc: ballen@sesi-nm.com; books@sesi-nm.com
Subject: Sunray State Tank Battery Closure Report

Hello!

I have attached, per Bob Allen SESI, a Closure Report for the Cross Border Resources Sunray State Tank Battery. Please let us know if you have any questions.

Thank You

Tara Hodges

Safety & Environmental Solutions, Inc.
703 East Clinton Street
Hobbs, NM 88240
Office: (575) 397-0510

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Safety & Environmental Solutions, Inc.

Ryan Mann
NMSLO

May 4, 2018

Dear Ryan:

Thank you for the opportunity to submit information regarding the reseed/reveg plan for the Cross Border Resources Sunray State Tank Battery.

I have included the sequence of events below, from the Closure Report, regarding the plan:

- *On December 11, 2017, SESI personnel was onsite at the CBR Sunray Battery to till and reseed the affected area. SESI personnel walked the whole area of the site and hand spread the seed. Before and after photos of the area were taken.*
- **Request for Closure:** The results of the confirmation sampling indicate that all soils impacted above 250ppm Chlorides were removed and transported to an approved NMOCD facility for disposal. The area was backfilled with clean soil and returned to grade. *The area has also been reseeded with BLM #2-LPC seed mixture, and SESI commits to a second application being applied in spring 2018.* Cross Border Resources respectfully submits this closure report for your consideration, and requests that no further action be required

Currently, there is minimal growth at this site. SESI commits to continuing the reseed/reveg process until regrowth is successful. SESI requests that the process be put on hold until monsoon season, or August 2018. Additionally, SESI requests that this commitment meet the requirements to receive closure on this site.

Sincerely,

James R. Allen CSP, CHMM
President