

From: [Yu, Olivia, EMNRD](#)
To: ["Robbie Runnels"](#); John.Wierzowiecki@blackmtn.com; ["Mann, Ryan"](#)
Subject: RE: Black Mountain - State K #2 - 1RP-4675
Date: Friday, September 21, 2018 8:51:00 AM

Good morning Messrs. Runnels & Wierzowiecki:

Please note that there are several incorrect information stated in the closure report, dated April 2018, for 1RP-4675.

1. At the time of the release, permissible chloride level was 600 mg/kg not 1000 mg/kg for remediation and 250 mg/kg for delineation.
2. Although estimated depth of groundwater was stated in the email thread below, upon reassessment of USGS water data, NMOCD acknowledges the mistake and revises the depth to groundwater at < 50 ft. bgs.
3. Unsubstantiated assumption of TPH delineation levels on page 4.

While NMOCD will admit to an oversight of initial groundwater assessment, which was based on the data available at the time of the review of the corrective action plan, dated June 1, 2017, and information written with the submitted reports, NMOCD reserves the authority to revise decisions.

Based on the reassessment of tabulated data, which demonstrated in situ soil data above permissible TPH extended remediation level of 100 mg/kg, NMOCD will not grant closure to 1RP-4675. Furthermore, based on a revision of the TPH levels, the deferral for remediation is rescinded as horizontal and vertical delineation have not been completed.

NMSLO may have additional concerns and 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: Yu, Olivia, EMNRD
Sent: Thursday, August 2, 2018 4:19 PM
To: Robbie Runnels <rrunnels@basinenv.com>
Subject: RE: Black Mountain - State K #2 - 1RP-4675

Mr. Runnels:

Thanks for the confirmation. My ArcGIS show similarly. I believe these USGS wells are relevant as there were no NMOSE wells in the area. Unless the confirmation sidewall and bottom samples indicate otherwise, there will be no need for a phone call. I will be assessing the closure report according to RRALs of depth to groundwater of 50-99 ft. bgs.

Thanks,
Olivia

From: Robbie Runnels <rrunnels@basinenv.com>
Sent: Thursday, August 2, 2018 1:57 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Black Mountain - State K #2 - 1RP-4675

Ms. Yu,

I have attached an "updated" DGW map. Only one of the wells is in approximation of 1 mile from the remediation site and the last time it was measured was 22 years ago. I am available to speak to you any time at your convenience.

Thank you,

Robbie Runnels
Basin Environmental

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

Subject: RE: Black Mountain - State K #2 - 1RP-4675
From: "Yu, Olivia, EMNRD" <Olivia.Yu@state.nm.us>
Date: 7/30/18 2:49 pm
To: "Robbie Runnels" <rrunnels@basinenv.com>

Mr. Runnels:

Please call me to discuss this closure. But before you do, please double check that your GIS data for USGS wells has been updated.

Thanks,
Olivia

From: Robbie Runnels <rrunnels@basinenv.com>
Sent: Friday, May 18, 2018 1:02 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Naranjo, Mark <MNaranjo@slo.state.nm.us>; John.Wierzowiecki@blackmtn.com

Subject: Black Mountain - State K #2 - 1RP-4675

Ms. Yu,

Attached is the Closure Report for the aforementioned site. Please let me know if you have any questions or comments.

Thank you,

Robbie Runnels

Project Manager

Basin Environmental Service Technologies

3100 Plains Hwy.

P.O. Box 301

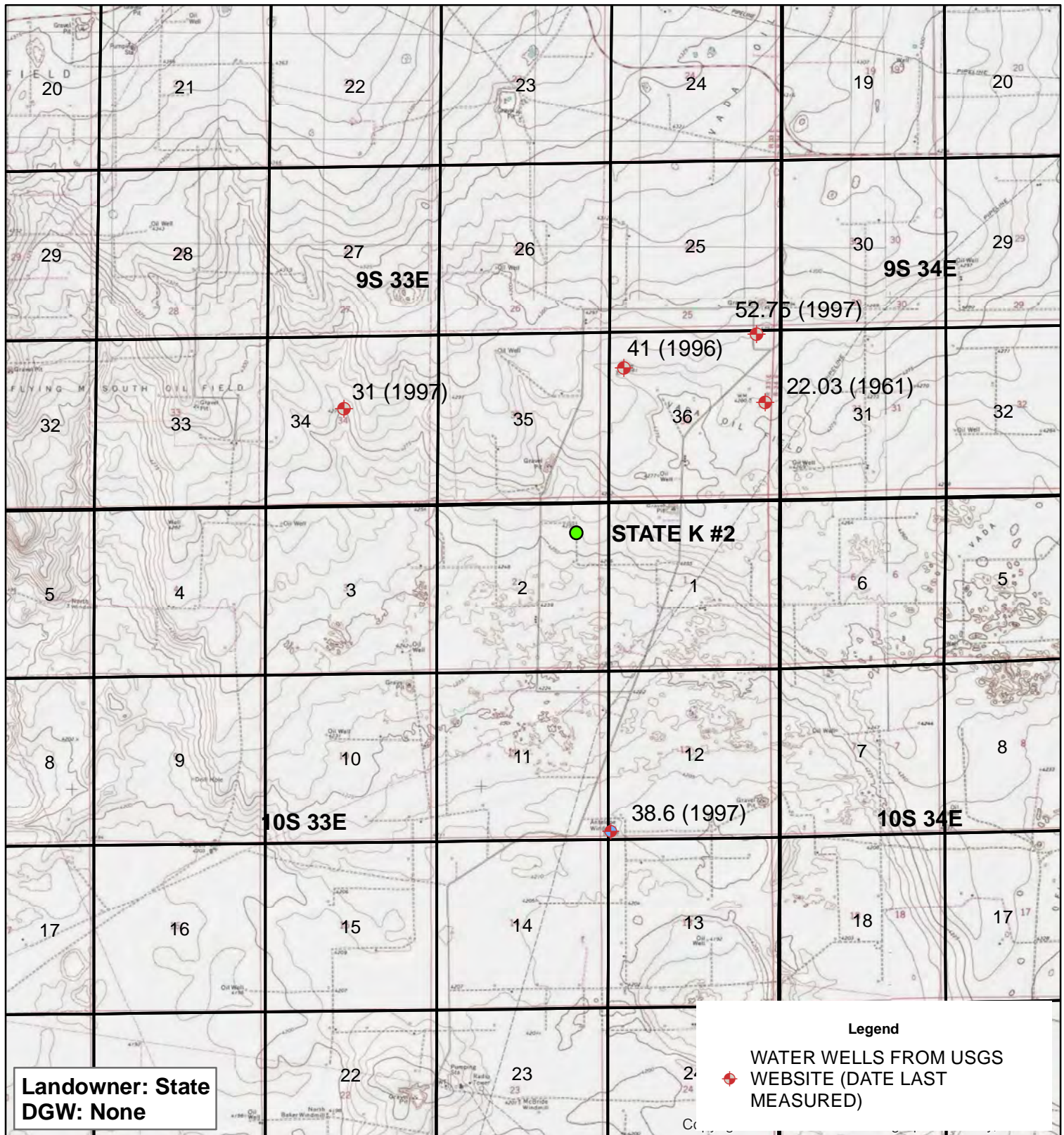
Lovington, NM 88260

p. 575-396-2378 m. 575-441-5598

f. 575-396-1429

rrunnels@basinenv.com

Depth to Groundwater



BLACK MOUNTAIN RESOURCES STATE K #2

**UL A & H SECTION 2
T-10-S R-33-E
LEA COUNTY, NM**

GPS: 33.481374 -103.532198

0 0.5 1
 Miles

GPS date: 4/24/17 TG
 Drawing date: 3/22/18
 Drafted by: T. Grieco

