

Rose-Coss, Dylan H, EMNRD

From: Rose-Coss, Dylan H, EMNRD
Sent: Monday, July 29, 2019 3:39 PM
To: 'BEN THOMPSON'
Cc: 'melancon.jacob@yahoo.com'
Subject: RE: [EXT] Re: YO ST #1 (30-025-38162) 1RP-5060, DOR: 05/08/2018
Attachments: 19.015.0029.pdf

Ben and Jacob,

It looks like you were able to submit the closure request through the OCD's online system, so thanks for doing that! I have a long line of reports to review, but was able to move the submission up a few hundred places to take a look at it. Based on the lap results I was happy to see that all of the samples came back below standard.

However, I am unable to grant closure at this time. The report is lacking in a few pieces that I need to fully process the request. For instance:

- The first two pages of the submission are on an outdated form that I am not allowed to process.
- The Site Assessment/Characterization page suggests a depth to ground water for the site, but the report does not include any supporting documents to validate the number.
- The Site Assessment/Characterization checklist indicates that a scaled site map, data table of soil contamination, boring or excavation logs, photographs including date and GIS information and Topographic/Aerial maps are included, but I did not see any as attachments
 - NOTE: not all of the checklist needs to be checked, but I do need a site map with GIS locations for sample points.
- None of the items on the remediation plan checklist are included, but all of the boxes are checked.
- From the closure report checklist, I again do not have a site map, or a description of remediation activities.
- I assume the submitted photos are the same that I received in the emails, but the ones in the report are indecipherable.
- The lab data is typically put into a table format so that it is easier for me to interpret, but without GPS locations for the samples I am unable to use or accept the data.

Apologies if I seem critical, but I could get in trouble if I were to accept the report without some of these items. Additionally, the regulations (19.15.29 NMAC) state that closure samples are not supposed to represent more than 200 square feet, which would technically be substantially more than the amount submitted based on the size of the release. Because this is the first release that you have worked with me on, I am willing to overlook that, but the minimum that I will need to accept closure is:

- A site map.
 - One can be created using Google Earth
- GPS locations for samples, with sample locations indicated on the site map
- A brief description of remediation activities and an estimate of the volume of soil removed.
 - Approximately how deep was excavation, and over what area (this is where the site map helps).
- Depth to ground water data from the nearest well you can find on the Office of the State Engineers Website
 - <http://nmwrrs.ose.state.nm.us/nmwrrs/index.html>
- A brief description as to how the excavated area will be backfilled and the restored.

Again, thanks for your effort on the remediation and feel free to reach out if you have any questions or require clarification.

Regards,

Dylan Rose-Coss

Environmental Scientist
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

(505) 476-3488



From: BEN THOMPSON <razoilandgas@gmail.com>
Sent: Thursday, June 6, 2019 11:33 AM
To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>
Subject: Re: [EXT] Re: YO ST #1 (30-025-38162) 1RP-5060, DOR: 05/08/2018

Thanks
Ben

On Thu, Jun 6, 2019 at 10:54 AM Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us> wrote:

Mr. Thompson,

I was unable to open any of the Internet Explorer Links that were sent. Is it possible to convey the information in any other format? Also, here is a list of things we will be looking for in order to grant closure:

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Laboratory analyses of final sampling
- Description of remediation activities
- Probable depth to most shallow groundwater

It also might be helpful to reference the C-141 form on the website. The form contains bullet points of remediation and closure activities that we will look for in the closure report. I've also attached a copy of the form for your convenience.

Thanks

Dylan Rose-Coss

Environmental Scientist

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From: BEN THOMPSON <razoilandgas@gmail.com>

Sent: Thursday, June 6, 2019 10:22 AM

To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: [EXT] Re: YO ST #1 (30-025-38162) 1RP-5060, DOR: 05/08/2018