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**Subject:** Former Maljamar Station (2RP-2504)  
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All,

As discussed in our conference call yesterday, caliche stockpiles #2 through #4 at Former Maljamar Station (2RP-2504) will be rolled to facilitate off-gassing and natural attenuation of contaminants. A 10-point composite sample will then be collected from each of the 500-cubic yard stockpiles and submitted for laboratory analysis. When analytical results confirm that TPH, BTEX, and chloride concentrations are below the NMOCD recommended remediation action levels (RRALs) established for the site, caliche stockpiles #1 through #4 will be used as backfill material in portions of subsections #11 and #12 of Section C to facilitate advancement of the southern wall of the excavation. No additional remediation of the stockpiles will occur prior to backfilling.

Excavation of Section C and the as yet unexcavated portions of the former crude oil pumping station will continue as described in the NMOCD- and BLM-approved *Remediation Summary & Risk-Based Site Closure Proposal* (i.e., until laboratory analytical results indicate contaminants of concern are below the RRALs established for the site by the NMOCD, or to a maximum depth of 10 feet). In areas exhibiting contaminant concentrations above NMOCD RRALs 10 feet below ground surface, the floor of the excavation(s) will be fitted with an impermeable liner, which serve to inhibit vertical migration of contaminants both upward to the vegetative zone and downward to the underlying groundwater. No liner will be installed in areas where floor samples exhibit contaminant concentrations below NMOCD RRALs.

Excavated material will be segregated and stockpiled on-site based on the inferred extent of hydrocarbon impact (as determined by visual/olfactory senses, laboratory analytical results, and/or PID readings), pending final disposition. Heavily impacted soil will be transported to an NMOCD-approved facility for disposal. Lesser impacted soil will first be rolled to facilitate off-gassing and natural attenuation of contaminants. A composite sample of a minimum of 5 points will then be collected for every 500 cubic yards of stockpiled material. If laboratory analytical results indicate TPH, BTEX, and chloride concentrations are below NMOCD RRALs, the stockpiled material will be used as backfill at the earliest opportunity. Otherwise, the material will be designated for bioremediation utilizing the methodology described in the *Remediation Summary & Risk-Based Site Closure Proposal*. Again, a composite sample of a minimum of 5 points will be collected for every 500 cubic yards of treated material.

An up-to-date soil chemistry data table and a copy of all pertinent laboratory analytical reports will be forwarded to the NMOCD and BLM prior to any backfilling activities.

Upon completion of the proposed corrective actions, a *Remediation Summary & Risk-Based Site Closure Request* will be submitted to the NMOCD and BLM, documenting remediation activities and results of confirmation soil samples.

The disturbed area will be seeded with a BLM-approved seed mix at a time conducive to germination.

If you have any questions, comments, or concerns, please do not hesitate to contact me by telephone or email.

Respectfully,  
Ben J. Arguijo

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