

From: [Yu, Olivia, EMNRD](#)
To: ["Rebecca Pons"; "Ross Pearson"; "agroves@slo.state.nm.us"](#)
Cc: ["Bob Allen"; Oberding, Tomas, EMNRD](#)
Subject: RE: Sunray State Tank Battery Work Plan
Date: Friday, March 17, 2017 11:43:00 AM

Dear Ms. Martin:

In light of new evidence about recent activities at the release location, which were not mentioned in the delineation workplan, the below concerns regarding 1RP-3619 has been suspended. However, NMOCD requires that the Responsible Party is responsible for addressing work that has been completed and actions underway in any delineation plan submitted to NMOCD. Please provide a status update regarding Sunray State Tank Battery.

Thanks,
Olivia

From: Yu, Olivia, EMNRD
Sent: Wednesday, March 15, 2017 9:02 AM
To: 'Rebecca Pons' <office2@sesi-nm.com>; Ross Pearson <ross@redmountainresources.com>; agroves@slo.state.nm.us
Cc: Bob Allen <ballen@sesi-nm.com>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Sunray State Tank Battery Work Plan

Good morning Ms. Martin:

NMOCD requests additional delineation to address these concerns regarding 1RP-3619. Please confirm.

1. There are insufficient data to determine the vertical extent of chloride levels with depth at BH 1, 2, 4. Vertical definition requires 600 mg/kg plus 10 additional feet at 5' intervals for sampling.
2. In order to correlate field titration to laboratory values, please provide field titration of chlorides at every sampled depth, including those submitted for laboratory analyses. Please provide field titration results at the depths of samples submitted to the laboratory.
3. For BH 3, permissible chloride level was obtained at 27 ft. bgs. Vertically delineate 10 ft. more to 37 ft. bgs (with depth intervals no greater than 5 ft.) to ensure that target chloride levels are maintained.
4. Horizontal delineation of the release area is not complete. Suggested sample locations are noted in the google earth image on page 9 in the attachment. Horizontal delineation is defined at 600 mg/kg ~Cl.
5. For the proposed area to be lined near the water tank, horizontally delineate to determine the edges to set the liner. Confirmation sidewall samples must be at or below 600 mg/kg chloride levels.
6. Confirmation that the water tank have or have not been replaced. If the tank is extant, the OCD understands that complete delineation may not be achieved.

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: Rebecca Pons [<mailto:office2@sesi-nm.com>]
Sent: Tuesday, March 14, 2017 7:52 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Ross Pearson <ross@redmountainresources.com>; agroves@slo.state.nm.us
Cc: Bob Allen <ballen@sesi-nm.com>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Sunray State Tank Battery Work Plan

Ms. Yu:

I have attached the revised Work Plan for the Sunray State Tank Battery.

The revisions include:

1. An updated Figure 2 map with the appropriate areas shaded
2. The correct information in point 1, under Action Plan, stating Chlorides less than 250 ppm
3. A more detailed and referenced explanation, under Action Plan, addressing the location areas of concern

Thank You

Tara Martin

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

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Monday, March 13, 2017 3:47 PM
To: Rebecca Pons <office2@sesi-nm.com>; Ross Pearson <ross@redmountainresources.com>;
agroves@slo.state.nm.us
Cc: ballen@sesi-nm.com; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Sunray State Tank Battery Work Plan

Dear Ms. Martin:

Please clarify several details of the proposed action plan for 1RP-3619.

Demarcate on Figure 2 the area vaguely mentioned to be West of the battery for removal of contaminated soil.

Where does the 1000 mg/kg permissible chloride level come from in point 1? One page 1, characterization to 250 mg/kg chloride levels was stated.

Which "small area" of the water tank will be excavated to 4 ft. and 20 mil liner set? Is this in reference to the footprint of the water tank itself?

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: Rebecca Pons [mailto:office2@sesi-nm.com]
Sent: Wednesday, February 22, 2017 7:26 AM
To: Ross Pearson <ross@redmountainresources.com>; agroves@slo.state.nm.us; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: ballen@sesi-nm.com
Subject: Sunray State Tank Battery Work Plan

I have attached the Work Plan for the Cross Border Resources Sunray State Tank Battery. Please review and let us know if you have any questions.

Thank You

Tara Martin

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