

From: [Hernandez, Christina, EMNRD](#)
To: ["Zack Thomas"](#); [Yu, Olivia, EMNRD](#); [Shelly Tucker](#); [Amos, James](#)
Cc: [Griswold, Jim, EMNRD](#)
Subject: RE: 1RP-5086 Red Hills Water Management System Work Plan
Date: Thursday, October 25, 2018 10:45:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[1RP-5086 Work Plan - Mewbourne Red Hills Water Management - RXSoil 09202018 \(002\).pdf](#)

Dear Mr. Thomas:

Notes

- Please note that RRAL's for TPH (for GW over 100' bgs) is 2,500 mg/kg and not 5,000.
- It is unclear if the entire area will be excavated to 4' or if the delineated area is going to be excavated to the various depths in bold presented in the Delineation Summary Table, please clarify.

NMOCD approves the delineation completed and proposed alternative work plan (dig/haul) provided in the email dated September 25, 2018 for 1RP-5086: with these clarifications:

- Both bottom and sidewall confirmation samples are required for each of the proposed depths of excavation.
- Marked confirmation sample locations in relation to delineation sample locations on a scaled map.
- Dated photo documentation of the remediation process.

Thanks,
Christina Hernandez
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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: Zack Thomas <zthomas@mewbourne.com>
Sent: Tuesday, September 25, 2018 4:30 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Shelly Tucker <stucker@blm.gov>; Amos, James <jamos@blm.gov>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>

Subject: [EXT] 1RP-5086 Red Hills Water Management System Work Plan

Good Afternoon,

Attached is a work plan/characterization report made by Rx Soil for 1RP-5086. Even though Rx performed the delineation, they will most likely **Not** win the bid to bio-remediate over dig and haul. If that's the case, we will perform a standard dig and haul and use their delineation as our site characterization. Based on the analytical data and depth to groundwater, the excavation will not go deeper than 4 foot and will not need any liner. If sufficient, I ask that you all would approve the site characterization/delineation of this plan independently from Rx Soil's soil washing procedure. If delineation is sufficient and Rx Soil doesn't win the bid, I request that you allow me to just submit a dig and haul closure report. That way Mewbourne doesn't have to pay a consultant to write another work plan. We will follow Rx's excavation depths to the T and will gather all bottom and sidewall closure samples, which will all be a part of the closure report. Thank you all for your time and consideration.



Zack Thomas
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