

From: [Yu, Olivia, EMNRD](#)
To: [Alan Barksdale](#); [Tara Hodges](#); [Ross Pearson](#); mnaranjo@slo.state.nm.us; [Mann, Ryan](#)
Cc: [Bob Allen](#); [Veronica Luna](#)
Subject: RE: Sunray State Tank Battery Closure Report 1RP-3619
Date: Friday, October 19, 2018 9:29:00 AM
Attachments: approved_1RP3619_Closure Report-September 2018-FINAL Revision.pdf

Good morning Mr. Barksdale:

In the interest of facilitating resolution, given the additional information provided, NMOCD grants closure to 1RP-3619. As a point of advice for future releases, initial release/site characterization reports with data must have all the closure constituents (Benzene, BTEX, TPH extended, and chlorides) analyzed. Only 2 of the 5 laboratory analytical reports have hydrocarbon data. Of particular interest is the lack of BTEX and TPH extended analyses at the release point and where the historic hydrocarbon layer was detected in 2016 sampling event.

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-3619** closed. However, this determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

NMSLO approval required. NMSLO may have additional concerns or stipulations for closure.

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: Monday, October 15, 2018 10:30 AM
To: Alan Barksdale <alan@redmountainresources.com>; Tara Hodges <office2@sesi-nm.com>; Ross Pearson <ross@redmountainresources.com>; mnaranjo@slo.state.nm.us; Mann, Ryan <rmann@slo.state.nm.us>

Cc: Bob Allen <ballen@sesi-nm.com>; Veronica Luna <books@sesi-nm.com>

Subject: RE: Sunray State Tank Battery Closure Report 1RP-3619

Mr. Barksdale:

Thanks for the reminder. The closure for 1RP-3619 is on my to-do list for this week.

Olivia

From: Alan Barksdale <alan@redmountainresources.com>

Sent: Monday, October 15, 2018 8:36 AM

To: Tara Hodges <office2@sesi-nm.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Ross Pearson <ross@redmountainresources.com>; mnanranjo@slo.state.nm.us; Mann, Ryan <rmann@slo.state.nm.us>

Cc: Bob Allen <ballen@sesi-nm.com>; Veronica Luna <books@sesi-nm.com>

Subject: [EXT] RE: Sunray State Tank Battery Closure Report 1RP-3619

Olivia:

Any feedback on the Sunray State Closure Report? This location is last item that we have to resolve to commence a development program, so please let us know what we can do to get this resolved.

Thanks,

Alan W. Barksdale

Red Mountain Resources, Inc.

14282 Gillis Rd

Farmers Branch, TX 75244

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Fax: +1 214.871.0406

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alan@redmountainresources.com

From: Tara Hodges [<mailto:office2@sesi-nm.com>]

Sent: Tuesday, September 18, 2018 9:20 AM

To: Yu, Olivia, EMNRD; Alan Barksdale; Ross Pearson; mnanranjo@slo.state.nm.us; Mann, Ryan

Cc: Bob Allen; Veronica Luna

Subject: RE: Sunray State Tank Battery Closure Report 1RP-3619

Hello all!

I have attached, per Bob Allen SESI, the revised closure report for the Sunray State Tank Battery 1RP-3619. I have also attached an additional document addressing all of the previous concerns regarding the Sunray State Tank Battery. Please let us know if you have any questions.

Thank You

Tara Hodges

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: Wednesday, September 05, 2018 4:03 PM
To: Alan Barksdale <alan@redmountainresources.com>; Tara Hodges <office2@sesi-nm.com>; Ross Pearson <ross@redmountainresources.com>; mnanranjo@slo.state.nm.us; Mann, Ryan <rmann@slo.state.nm.us>
Cc: ballen@sesi-nm.com; books@sesi-nm.com
Subject: RE: Sunray State Tank Battery Closure Report 1RP-3619

Mr. Barksdale:

Please be advised that review of submitted reports would be greatly facilitated by clear documentation and presentation of data. In review of the closure report for 1RP-3619, please address the following concerns:

1. Where were the confirmation samples taken? Figure 2 does not have the locations of bottom and sidewall samples from November 2017 (SP-1 to SP-6) marked.
2. On Figure 2, when was the samples represented by Sample Point 1, 2, & 3 taken? Are these bottom or sidewall samples? Is there laboratory data?
3. Were BH-1 and BH-2 samples, collected on June 25, 2018, from the same original locations in June 2016? Was the impacted 3-4 ft. of soil removed and backfilled? In which case, the data presented in June 2018 are confirming that backfill material is clean?
4. What does BH-3A denote on Figure 2? There are no associated laboratory data for BH-3A.
5. Based on the scale of the release and the estimated depth to groundwater < 100 ft. bgs, if a 1 or 4 ft. excavation was conducted over the release area, confirmation sidewall and bottom samples, at no greater than 50 ft. apart, are required. Neither Figure 2 nor the text state to what depth the release area was excavated? Which area had 1 ft. or 4 ft. of impacted soil removed?

Moreover, the original concerns from the email dated March 30, 2018 have not been addressed. Is the area that is lined, denoted by a purple polygon? Is this the lined 12 x 12 ft. area? What depth is this excavation area?

Please address these issues point by point and submit a modified figure and tabulated data.

Thanks,
Olivia

From: Alan Barksdale <alan@redmountainresources.com>
Sent: Tuesday, August 7, 2018 12:01 PM
To: Tara Hodges <office2@sesi-nm.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Ross Pearson <ross@redmountainresources.com>; mnanranjo@slo.state.nm.us
Cc: ballen@sesi-nm.com; books@sesi-nm.com
Subject: RE: Sunray State Tank Battery Closure Report 1RP-3619

Ms. Yu:

Is there an update on the Sunray Closure Report?

Thanks,

Alan W. Barksdale
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From: Tara Hodges [<mailto:office2@sesi-nm.com>]
Sent: Thursday, July 19, 2018 10:05 AM
To: olivia.yu@state.nm.us; Alan Barksdale; Ross Pearson; mnanranjo@slo.state.nm.us
Cc: ballen@sesi-nm.com; books@sesi-nm.com
Subject: Sunray State Tank Battery Closure Report 1RP-3619

Hello all!

I have attached, per Bob Allen SESI, the revised closure report for the Sunray State Tank Battery 1RP-3619. Please let us know if you have any questions.

Thank You

Tara Hodges

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