



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Friday, September 19, 2014 8:12 AM
To: Allen, Pam, NMENV
Subject: FW: Amendment to Reporting Requirements Pertaining to 2/27/14 and 5/12/14 NMED Administrative Orders

From: Anthony Stone [<mailto:anthony.stone@cbfo.doe.gov>]
Sent: Monday, September 15, 2014 2:38 PM
To: Maestas, Ricardo, NMENV
Cc: George Basabilvazo - WIPPNet; Chavez, Rick - RES (Rick.Chavez@wipp.ws); Susan McCauslin
Subject: Amendment to Reporting Requirements Pertaining to 2/27/14 and 5/12/14 NMED Administrative Orders

Mr. Maestas:

The last bi-weekly report, prepared by the Permittees to satisfy the reporting requirements of the subject Administrative Orders, was submitted to the NMED on September 5, 2014, for the reporting period August 11, 2014, through August 24, 2014. On August 29, 2014, the Permittees received a written notification from the NMED that the reporting frequency was being amended from bi-weekly to monthly. The letter states that “[t]he monthly submittal shall be submitted to the NMED no later than the 15th of each month for activities conducted during the previous month. The amended schedule shall be effective on September 16, 2014, with the first monthly report due on October 15, 2014. The biweekly reporting shall cease after the submittal of the last report due on September 8, 2014.”

The second administrative order, dated May 12, 2014, specifically states in Paragraph (18) that the bi-weekly reports will be due on every other Friday. September 8, 2014, is a Monday; therefore, the Permittees assume that the NMED intended the last bi-weekly report to occur on Friday, September 5, 2014.

The Permittees also assume that since the end of the last bi-weekly reporting period occurred on August 24, 2015, the beginning of the next reporting period should be August 25, 2014, in order to provide continuity in the reporting of information required by the Administrative Orders. Therefore, the Permittees assume that the “effective” date of the amended schedule should be August 25, 2014, and that the first monthly reporting period should include August 25 – 31, 2014, in addition to the entire month of September 2014. The first monthly report would be due October 15, 2014.

The Permittees propose to submit subsequent monthly reports by the 15th day of each month for the previous calendar month’s reporting period.

If you have any questions please contact me.

V/R

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