

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, February 11, 2016 8:09 AM
To: 'Ben J. Arguijo'; Patterson, Heather, EMNRD; rpair@blm.gov
Cc: Camille J. Bryant; Jody Walters
Subject: RE: Former Maljamar Station (2RP-2504) - Partial Backfill Request

Ben,

Please proceed on your schedule, pending like approval from BLM.

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.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

From: Ben J. Arguijo [mailto:bjarguijo@basinenv.com]
Sent: Monday, February 08, 2016 3:17 PM
To: Patterson, Heather, EMNRD; Bratcher, Mike, EMNRD; rpair@blm.gov
Cc: Camille J. Bryant; Jody Walters
Subject: Re: Former Maljamar Station (2RP-2504) - Partial Backfill Request

All,

Attached please find the laboratory analytical report for composite soil sample Caliche Stockpile #20. The results indicate TPH, BTEX, and chloride concentrations are well below the NMOCD RRALs established for the site, and the soil is acceptable for use as backfill material.

Thank you for your time and consideration. I look forward to hearing back from you soon.

Respectfully,
Ben J. Arguijo



Ben J. Arguijo
Sr. Project Manager
Basin Environmental
Lovington & Hobbs, NM

On Mon, Feb 8, 2016 at 9:46 AM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:

Heather,

Per our discussion on Friday, 2/5/16, attached please find an updated data table for sub-excavation C-16, along with a lab report for the soil samples collected from that sub-excavation on 1/19/16.

As we discussed, TPH analyses on the four (4) wall samples (i.e., C-16 @ 12' - N, S, E & W. Walls) was conducted on 1/20, but BTEX was analyzed on 2/3, approximately twenty-two (22) hours out of regulatory hold time. I have been assured by the Laboratory/Technical Director of the Permian Basin Environmental Lab (PBEL) that the results are statistically valid, and page 2 of the attached lab report states, "*the samples had been kept frozen at less than 5 degrees C since receipt, therefore there should be no appreciable affect to the data.*"

The BTEX results were not available until 2/4/16, the day after I submitted the "Partial Backfill Request" below. As you can see from the lab report and data table, benzene concentrations were less than the laboratory method detection limit (MDL) in all four (4) samples, and total BTEX ranged from less than the MDL in the N. & W. Walls to 0.8170 mg/kg in the S. Wall. Based on the statement from PBEL, the results would have been essentially the same had the samples been analyzed the day before. Since the concentrations are so low, they have little to no bearing on the "Partial Backfill Request" as written.

I am still awaiting lab results on the composite soil sample from Caliche Stockpile #20 and will forward those upon availability.

Respectfully,
Ben J. Arguijo



Ben J. Arguijo
Sr. Project Manager
Basin Environmental
Lovington & Hobbs, NM
Mobile: (806) 549-9597
bjarguijo@basinenv.com

On Wed, Feb 3, 2016 at 5:26 PM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:

All,

Based on laboratory analytical results and field-screens, Plains and Basin Environmental respectfully request permission to perform the following activities at the remediation site known as Former Maljamar Station (2RP-2504):

1. Backfill sub-excavations C-16 through C-20 using the stockpiled material on-site. Laboratory analytical results from confirmation soil samples collected from the floors and sidewalls of the sub-excavations indicate TPH, BTEX, and chloride concentrations are below the recommended remediation action levels (RRALs) established for the site by the NMOCD. See attached Site & Sample Location Map #4I for additional

information. Laboratory analytical results are summarized in attached data tables #17 through #21.

2. Use soil represented by soil samples Caliche Stockpile #15, #16, #17b, #18, #19 and Sand Stockpile #3 and #4 as backfill material. As previously agreed, 10-point composite samples have been collected for every 500 cubic yards of stockpiled soil, and laboratory analytical results indicate TPH, BTEX, and chloride concentrations are below the NMOCD RRALs established for the site. See attached data table #23 for a summary of laboratory analytical results.

3. Use soil represented by soil sample Caliche Stockpile #20 as backfill material, provided that laboratory analytical results confirm TPH, BTEX, and chloride concentrations are below the NMOCD RRALs established for the site. A 10-point composite soil sample was collected on 2/2/2016 and submitted to the laboratory for analysis. Results are pending. The laboratory analytical report will be forwarded to the NMOCD and BLM upon receipt.

In addition to the aforementioned data tables, an up-to-date, cumulative soil chemistry data table (MaljamarStation_SoilChemistryTable.pdf) is attached for your convenience.

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

Respectfully,
Ben J. Arguijo



Ben J. Arguijo
Sr. Project Manager
Basin Environmental
Lovington & Hobbs, NM
Mobile: [\(806\)549-9597](tel:8065499597)
bjarguijo@basinenv.com