

Bratcher, Mike, EMNRD

From: Tucker, Shelly <stucker@blm.gov>
Sent: Wednesday, March 21, 2018 4:28 PM
To: Ben J. Arguijo
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Todd Roberson; Wade Dittrich; Duskie Bennett
Subject: Re: Lost Tank 33 Federal #2 SWD (2RP-4542) - Spill Remediation Proposal

BLM **DENIES** the proposal for the **Lost Tank 33 Federal 2 SWD ** 2RP-4542**. The site has not been fully delineated.

1. SP-3, SP-9, SP-10 and SP-12 will need to be delineated until 2 consecutive **laboratory readings** of 600 mg/kg of chlorides or less is obtained.
2. It is agree FP-1, FP-2 and FP-3 are over the top of the old drill pit, but FP-4, FP-5 and FP-6 are not. Therefore FP-4, FP-5 and FP-6 will need to be delineated until 2 consecutive **laboratory readings** of 600 mg/kg of chlorides or less is obtained.

I have reviewed the old closures and satellite imagery from October, 1996 through November, 2017. The pit obviously has restoration issues due to the heavy migration of chlorides to surface from repeated releases and being an old drill pit. Therefore, BLM will require 4' of material to be removed from the old drill pit and a 20 mil liner installed. The surface area will need to backfilled with clean soil, viable soil to support revegetation. All disturbed surface area, off location, will need to be reseeded with approved BLM seed mix.

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

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient

or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Fri, Mar 16, 2018 at 2:19 PM, Ben J. Arguijo <ben@trinityoilfieldservices.com> wrote:

All,

Attached please find the "Environmental Site Summary & Spill Remediation Proposal" for the Lost Tank 33 Federal #2 SWD release site (2RP-4542).

If you have any questions, please do not hesitate to contact me.

Thank you for your time and consideration.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
Environmental Project Manager
Trinity Oilfield Services
P.O. Box 2587
Hobbs, NM 88241
(575)390-7208
ben@trinityoilfieldservices.com