

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, June 21, 2018 11:01 AM  
**To:** 'Ben J. Arguijo'  
**Cc:** Wade Dittrich; Todd Roberson; Duskie Bennett  
**Subject:** RE: Backfill Request - Osage 18 Fee B Com 0001H (2RP-4334)

RE: OXY USA \* Osage 18 Fee B 1H \* **2RP-4334** \* DOR: 7/31/17

Ben,

Your request to backfill portions of the excavation that have met the RRAL is approved. It is OCD's understanding that additional excavation will be performed in areas returning values above the RRAL, as referenced in your email.

Thank you,

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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:** Ben J. Arguijo <ben@trinityoilfieldservices.com>  
**Sent:** Wednesday, June 20, 2018 9:35 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Wade Dittrich <wade\_dittrich@oxy.com>; Todd Roberson <todd@trinityoilfieldservices.com>; Duskie Bennett <duskie@trinityoilfieldservices.com>  
**Subject:** Backfill Request - Osage 18 Fee B Com 0001H (2RP-4334)

Mike,

Trinity Oilfield Services, on behalf of OXY USA, Inc., hereby requests permission to begin backfilling the excavation at the Osage 18 Fee B Com 0001H release site (2RP-4334).

The excavation was advanced horizontally to the extent indicated by concurrent field-screening and vertically to the depths listed in the NMOCD-approved "Environmental Site Summary & Spill Remediation Plan" (Work Plan), dated 11/22/2017. Confirmation soil samples were collected from the sidewalls of the excavation at intervals ranging from 20 to 50 feet (as needs dictated). Laboratory analytical results indicated concentrations of TPH and BTEX were below the NMOCD's recommended remediation action levels (RRALs) in all submitted soil samples. Chloride concentrations were also below the RRAL in all but 4 soil samples: Wall 3a, Wall 4b, Wall 5a, and Wall 40a (see attached soil chemistry data table and "Sample Location Map").

Prior to backfilling, the excavation will be advanced to the areas represented by soil samples Wall 3b, Wall 4d, Wall 5b, and Wall 40c, as depicted in the "Sample Location Map". Delineation samples from these locations have been submitted to the laboratory for analysis of TPH, BTEX, and chloride concentrations, and analytical results are pending. The area immediately adjacent to the on-site well and pump jack will also be hand-excavated to a maximum depth of 1 foot bgs, per the Work Plan.

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

Respectfully,  
Ben J. Arguijo

Ben J. Arguijo  
Environmental Project Manager  
Trinity Oilfield Services  
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