

From: [Yu, Olivia, EMNRD](#)
To: ["Ben J. Arguijo"; Billings, Bradford, EMNRD](#)
Cc: ["Groves, Amber"; "Trinity"; "Zack Thomas"](#)
Subject: RE: Backfill Request - Merit 32 DM St. Com #1H (1RP-4724)
Date: Thursday, August 31, 2017 8:25:00 AM

Dear Mr. Arguijo:

After discussion with NMSLO, a few points of clarification regarding delineation and remediation completed for 1RP-4724:

1. Approval is given for backfilling and placement of a 20 mil liner at 2 ft. bgs for the area indicated on the scaled map.
2. The areas represented by Floor 2, Floor 3, and Wall 15 will be deferred for additional delineation and remediation until location is not in operation.

Does this clarify some confusion? Please confirm or inform if additional clarification is required.

Thanks,
Olivia

From: Yu, Olivia, EMNRD
Sent: Wednesday, August 30, 2017 3:19 PM
To: Ben J. Arguijo <ben@trinityoilfieldservices.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Trinity <todd@trinityoilfieldservices.com>; Zack Thomas <zthomas@mewbourne.com>
Subject: RE: Backfill Request - Merit 32 DM St. Com #1H (1RP-4724)

Mr. Arguijo:

Thank you for the clarification for documentation purposes of the proposed remediation for 1RP-4724. Please be advised that NMOCD does not agree that a hard rock layer is an acceptable rationale for cessation of vertical delineation. Sample locations Floor 2, Floor 3, and Wall 15 greatly exceeds permissible chloride levels and thus, would require additional delineation or a deferral of 1RP-4724. Please inform of decision.

Thanks,
Olivia

From: Ben J. Arguijo [<mailto:ben@trinityoilfieldservices.com>]
Sent: Tuesday, August 29, 2017 9:42 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Trinity <todd@trinityoilfieldservices.com>; Zack Thomas <zthomas@mewbourne.com>
Subject: Re: Backfill Request - Merit 32 DM St. Com #1H (1RP-4724)

Olivia,

1. As discussed during our meeting on 8/23, the liner will be installed in the entirety of the dark green area symbolized on the Sample Location Map (Figure 2) and denoted as "Excavation - 2' bgs" in the legend.

This "Remediation Summary & Backfill Request" references the "Remediation Summary & Spill Remediation Proposal" dated 7/10/2017 (i.e., "Work Plan"). Per the Work Plan, the "liner will be installed on the floor of the excavation prior to backfilling. A cushion of sand will be installed approximately 6 inches both above and below the liner to protect it during installation and backfilling activities."

2. As discussed during our meeting, Mewbourne believes that the 8 auger holes advanced throughout the site sufficiently demonstrate that the hard rock layer served to inhibit vertical migration of the release and are representative of the site as a whole, since they were advanced in the most heavily impacted areas (i.e., the footprint of the former battery and the flow path and pooling area of the release).

Thank you.

Ben

Ben J. Arguijo
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On Mon, Aug 28, 2017 at 4:09 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Dear Mr. Arguijo:

Thank you for the additional information. Please address these concerns regarding the delineation workplan for 1RP-4724.

1. What is proposed depth and coverage of the liner? Please clearly state in the text and/or demarcate on the scaled map.
2. As vertical delineation is not completed for the sample locations denoted by Floor 2, Floor 3, and Wall 5; is the Responsible Operator requesting a deferral (partial)?

Please confirm or inform if additional clarification is required.

Thanks,
Olivia

From: Ben J. Arguijo [mailto:ben@trinityoilfieldservices.com]
Sent: Friday, August 25, 2017 1:21 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Groves, Amber <agroves@slo.state.nm.us>
Cc: Trinity <todd@trinityoilfieldservices.com>; Zack Thomas <zthomas@mewbourne.com>
Subject: Backfill Request - Merit 32 DM St. Com #1H (1RP-4724)

Olivia/Amber,

Attached please find the *Environmental Site Summary & Backfill Request* for the Merit 32 DM St. Com #1H release site (1RP-4724). As discussed in our meeting on Wednesday, I added text to clarify the sampling conducted during the delineation trenching event and added the trenches themselves to the Sample Location Map. I also updated the field screen data table to make it a little more clear which samples were submitted to the laboratory.

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

Thank you for your time and consideration.

Respectfully,
Ben J. Arguijo

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