

From: [Yu, Olivia, EMNRD](#)
To: [Ben J. Arguijo](#)
Cc: [Tucker, Shelly](#); [Wade Dittrich](#); [Todd Roberson](#); [Duskie Bennett](#)
Subject: RE: Madera 35 Federal #1H CTB (1RP-4785 & 4906) - Spill Remediation Proposal
Date: Monday, May 7, 2018 11:54:00 AM
Attachments: approved_1RP4785_4906_Madera35_SpillRemediationProposal.pdf

Mr. Arguijo:

Thank you for your prompt response. Although a section of the release area is under the current tank battery, NMOCD will approve of the proposed additional delineation for 1RP-4785 and 1RP-4906 in the areas represented by SP-7 and SP-8.

For the proposed remediation plan, confirmation bottom and sidewall samples are required for each of the different depths of excavation. Bottom samples are not required for lined areas. Provide dated, optimally geo-referenced, photo documentation of remedial activities. Please be advised that NMOCD and BLM must be informed if proposed depths of excavation could not occur due to feasibility, safety, or practicability issues. Rather than closure, a deferral may be considered.

Like approval from BLM required.

Thanks,
Olivia

From: Ben J. Arguijo <ben@trinityoilfieldservices.com>
Sent: Monday, May 7, 2018 11:19 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Tucker, Shelly <stucker@blm.gov>; Wade Dittrich <wade_dittrich@oxy.com>; Todd Roberson <todd@trinityoilfieldservices.com>; Duskie Bennett <duskie@trinityoilfieldservices.com>
Subject: Re: Madera 35 Federal #1H CTB (1RP-4785 & 4906) - Spill Remediation Proposal

Olivia,

The facility was not relocated. The work plan states that "a new containment area was constructed around the facility...", meaning the existing facility, minus the 2 storage tanks that were destroyed by the lightning strike. Figure 2 is scaled and depicts where the new containment area is located (i.e., green polygon). It also shows that a portion of the August 2017 release is underneath the western end of the new containment.

Thanks.

Ben

Ben J. Arguijo
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Trinity Oilfield Services

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On Fri, May 4, 2018 at 3:46 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Arguijo:

Please address the following concerns regarding the proposed delineation for 1RP-4785 and 1RP-4906:

1. As written, is the rebuilt lined facility relocated East and North of the original location? Is there any part of the release area under the new facility?
2. Please provide a scaled map with the original and rebuilt facility location demarcated with GPS coordinates and photo documentation and/or BLM sundry for verification.

Thanks,
Olivia

From: Ben J. Arguijo <ben@trinityoilfieldservices.com>

Sent: Monday, April 23, 2018 4:05 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Tucker, Shelly <stucker@blm.gov>; Wade Dittrich <wade_dittrich@oxy.com>; Todd Roberson <todd@trinityoilfieldservices.com>; Duskie Bennett <duskie@trinityoilfieldservices.com>

Subject: Re: Madera 35 Federal #1H CTB (1RP-4785 & 4906) - Spill Remediation Proposal

Olivia,

A revised work plan is attached. The only revisions necessary were the removal of the 2 copy/paste typos I mentioned previously.

Thanks.

Ben J. Arguijo

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On Tue, Apr 10, 2018 at 11:16 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Arguijo:

It would be easier for me to review if you submit a revised workplan for 1RP-4785 and 1RP-4906 with the below corrections and any modifications necessary for the figures.

Thanks,
Olivia

From: Ben J. Arguijo <ben@trinityoilfieldservices.com>

Sent: Monday, April 2, 2018 2:48 PM

To: Tucker, Shelly <stucker@blm.gov>

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Wade Dittrich <wade_dittrich@oxy.com>;

Todd Roberson <todd@trinityoilfieldservices.com>; Duskie Bennett

<duskie@trinityoilfieldservices.com>

Subject: Re: Madera 35 Federal #1H CTB (1RP-4785 & 4906) - Spill Remediation Proposal

Shelly,

Several of those points were the result of copy-paste errors that I missed upon review. I initially typed out a full list of all of the auger holes that were advanced at the site and simply forgot to go back and delete SP-4 and SP-5 from the list once I had pasted them in the appropriate bullet under the proposed excavation depths. I then apparently copied/pasted the full list into the sentence about the liner and didn't catch either error. Evidently, I was overly focused on the big picture and/or got ahead of myself and missed those typos. I apologize for the confusion.

That having been said, to clarify:

SP-1, SP-2, and SP-3 exhibited limited impact in August 2017. However, the December 2017 release commingled with the in-situ contamination in those areas from the August 2017 release, as depicted in Figure 2. Auger holes SP-6, SP-7, and SP-8 were advanced following the December 2017 release, however, SP-1, SP-2, and SP-3 were not re-sampled. SP-6 was located less than 10 feet from SP-1 and about 40 feet from SP-2. SP-6 exhibited impact at 2' bgs, which cleaned up at 3' bgs. It is an educated guess that, upon excavation, the areas represented by SP-1 and SP-2 will exhibit similar depths of contamination as SP-6, since they are in such close proximity. Therefore, those areas will all be excavated to 3' bgs and will not be lined, unless confirmation samples indicate deeper excavation and/or a liner is/are required. Similarly, the area represented by SP-3 is about 24 feet from SP-7 and about 34 feet from SP-8 and is in the zone of commingled impacted soil. It would stand to reason that the area needs to be excavated to 4' bgs and lined, along with the areas represented by SP-7 and SP-8.

The area represented by SP-4 will be excavated to 6 inches bgs and will not be lined.

SP-5 is on the periphery of the December 2017 release margin. Since it was outside of the impacted area, it was not re-sampled at the time. The proposed excavation depth of 1' - 2' in that area is simply an educated guess based on 1.) field screens of soil samples associated with the December 2017 release, and 2.) the fact that it is inside the footprint of the containment

area, and the chances of encountering historical contamination are higher.

Again, I apologize for the confusion. If you have any other questions and/or I need to send a revised work plan, please let me know.

Thanks.

Ben J. Arguijo

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On Fri, Mar 30, 2018 at 5:08 PM, Tucker, Shelly <stucker@blm.gov> wrote:

Also, why are you installing a liner at Sp3, SP4, SP5, Sp7 and SP8? Your diagram does not match that statement and SP7 and SP8 are your only two hot spots. I am not saying you can't, but I would like understand the rationale for the extra plastic.

NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

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

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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 a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they 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.

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On Fri, Mar 30, 2018 at 4:59 PM, Tucker, Shelly <stucker@blm.gov> wrote:

BLM is requesting the following clarifications:

You wrote:

*... "The excavation will be advanced vertically as follows: **Maximum depth of 6 inches bgs** in the area south of the former containment (represented by auger hole **SP-4**), as well as along the pipe array that bisects the release site north-to-south (see Figure 2). *** AND*** **Maximum depth of 4 feet bgs** in the areas represented by auger holes **SP-3, SP-4, SP-5, SP-7, and SP-8.**" I am confused...which is it? Analytical data for SP 4 shows no impact...why 4'bgs?*

*"**Maximum depth of 1 to 2 feet bgs** in the footprint of the former containment area and in the area represented by auger hole/delineation trench **SP-5.** ***AND*** **Maximum depth of 4 feet bgs** in the areas represented by auger holes **SP-3, SP-4, SP-5, SP-7, and SP-8** "*

I am confused.. .which is it? Analytical data for SP 5 shows no impact...why 1-2' or 4'bgs?

*"Maximum depth of 3 feet bgs in the areas represented by auger holes **SP-1, SP-2, and SP-6**" Your diagram corresponds to this statement but, according to lab data SP1 is clean, SP2 only needs 6" and SP6 needs the 3' removed. So why remove 3' at SP1 and SP2? Simply horizontally delineate SP6...*

*"Maximum depth of 4 feet bgs in the areas represented by auger holes **SP-3, SP-4, SP-5, SP-7, and SP-8** " ... According to your diagram you stated SP3, SP7, SP8 would have 4' removed. SP 5 would have 1-2' removed. SP 4 would only have 6" removed.*

Please clarify what is going to be removed and what is not.

NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

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

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On Wed, Mar 14, 2018 at 9:24 AM, Ben J. Arguijo <ben@trinityoilfieldservices.com> wrote:

Olivia/Shelly,

Attached please find the "Environmental Site Summary & Spill Remediation Proposal" for the Madera 35 Federal #1H CTB release site (1RP-4785 & 4906).

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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Environmental Project Manager
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