

**From:** Tucker, Shelly  
**To:** [Yu, Olivia, EMNRD](#)  
**Cc:** [Ben J. Arguijo](#); [Wade Dittrich](#); [Trinity](#)  
**Subject:** Re: Spill Remediation Plan - Covington A Federal 0002 (1RP-4816)  
**Date:** Tuesday, December 26, 2017 4:15:35 PM

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## BLM concurs with NMOCD stipulations and approval for the Oxy Covington A Federal 0002 (1RP-4816)

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

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[stucker@blm.gov](mailto: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.

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On Mon, Dec 4, 2017 at 4:10 PM, Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)> wrote:

Mr. Arguijo:

Thank you for the clarification. A typical remedial activity is 4 ft. excavation with a minimally 20 mil liner properly keyed at 4 ft. bgs, not 3.5 ft.

NMOCD will approve of the delineation as completed for 1RP-4816, although NMOCD would prefer that there is another sample at a couple feet further in depth at SP-2. The proposed remedial activities are approved with these stipulations:

- NMOCD requires excavation of 4 ft. of soil for the area represented by SP4 and SP5 with the liner at 4 ft. bgs. A sand layer underneath the liner from 4-4.5 ft. bgs is acceptable.
- At least two confirmation surface samples must be taken from the oversprayed area. Analyze for BTEX, TPH extended, and chlorides.
- Confirmatory sidewall samples for each of the proposed areas of excavation as represented by SP1, SP2/3, and SP4/5.

In the remediation report, please include a scaled map with 1) each of the differing depths of excavation outlined and annotated; 2) lined area and radius around the wellhead clearly demarcated; and 3) confirmation bottom and sidewall sample locations marked by GPS coordinates.

Please confirm or inform.

Thanks,

Olivia

**From:** Ben J. Arguijo [mailto:[ben@trinityoilfieldservices.com](mailto:ben@trinityoilfieldservices.com)]

**Sent:** Monday, December 4, 2017 3:05 PM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** [stucker@blm.gov](mailto:stucker@blm.gov); Wade Dittrich <[wade\\_dittrich@oxy.com](mailto:wade_dittrich@oxy.com)>; Trinity <[todd@trinityoilfieldservices.com](mailto:todd@trinityoilfieldservices.com)>

**Subject:** Re: Spill Remediation Plan - Covington A Federal 0002 (1RP-4816)

Olivia,

The proposed depth of excavation in the areas represented by SP-4 and SP-5 is stated as a "maximum depth of 4 feet". The bullet concerning the liner reads, "...A cushion of sand will be installed approximately 6 inches...below the liner...". Therefore, the "liner will be installed at approximately 3.5 feet bgs", not directly on the floor of the excavation.

The "1 ft. excavation around the pumpjack/wellhead" will be a radius of approximately 1-2 feet around the structures themselves in order to not compromise their structural integrity.

The permissible chloride level is noted. The release has been vertically delineated to <600 mg/kg in all sample locations.

Thank you.

Ben

Ben J. Arguijo

Environmental Project Manager

Trinity Oilfield Services

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[ben@trinityoilfieldservices.com](mailto:ben@trinityoilfieldservices.com)

On Mon, Dec 4, 2017 at 12:38 PM, Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)> wrote:

Mr. Arguijo:

Please be advised that NMOCD permissible chloride levels for delineation and remediation is 600 mg/kg, not 1000 mg/kg.

Please address these concerns regarding the delineation report for 1RP-4816:

- Page 2 has a discrepancy. Is the proposed depth of excavation for the area represented by SP4 and SP5 3.5 ft. or 4 ft?
- Please indicate which area is denoted for 1 ft. excavation around the pumpjack/wellhead. What is the radius? Based on the scale indicated on Figure 2, SP5 is within 10 ft. of the point of release (stuffing box).

Thanks,

Olivia

**From:** Ben J. Arguijo [mailto:[ben@trinityoilfieldservices.com](mailto:ben@trinityoilfieldservices.com)]  
**Sent:** Monday, October 30, 2017 10:29 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** Wade Dittrich <[wade\\_dittrich@oxy.com](mailto:wade_dittrich@oxy.com)>; Trinity <[todd@trinityoilfieldservices.com](mailto:todd@trinityoilfieldservices.com)>  
**Subject:** Spill Remediation Plan - Covington A Federal 0002 (1RP-4816)

Ms. Yu & Ms. Tucker,

Trinity Oilfield Services, on behalf of OXY USA, Inc., is pleased to submit the attached "Environmental Site Summary & Spill Remediation Plan" for the Covington A Federal 0002 release site in Lea County (1RP-4816). Trinity is prepared to begin the proposed remediation activities upon your review and approval.

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

Thank you for your time and consideration.

Respectfully,

Ben J. Arguijo

Ben J. Arguijo

Environmental Project Manager

Trinity Oilfield Services

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