

**From:** [Dade, Randy, EMNRD](mailto:Dade.Randy.EMNRD)  
**To:** [Patterson, Heather, EMNRD](mailto:Patterson.Heather.EMNRD)  
**Subject:** FW: Re:  
**Date:** Tuesday, May 19, 2015 9:52:45 AM

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**From:** Pair, Randal [<mailto:rpair@blm.gov>]  
**Sent:** Monday, May 18, 2015 1:47 PM  
**To:** Ben J. Arguijo  
**Cc:** Dade, Randy, EMNRD; Camille J. Bryant; Bobby Blackwood; [sjwalters@basinenv.com](mailto:sjwalters@basinenv.com)  
**Subject:** Re:

Whoops! Forgot to mention Lesser Prairie Chicken - this leak is in an area where the timing restriction applies - no work between 3:00 a.m. to 9:00 a.m. [From March 1 to June 15]. In this particular area, this timing requirement might be waived, depending upon this year's survey data. If that is a big imposition and you want to pursue a waiver, let me know.

Randal "Randy" Pair  
Envir. Protection Specialist - Realty Compliance  
office: 575.234.6240  
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email: [rpair@blm.gov](mailto:rpair@blm.gov)

On Mon, May 18, 2015 at 12:28 PM, Ben J. Arguijo <[bjarguijo@basinenv.com](mailto:bjarguijo@basinenv.com)> wrote:  
Thank you, sir.

Ben

Ben J. Arguijo  
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On Mon, May 18, 2015 at 11:59 AM, Pair, Randal <[rpair@blm.gov](mailto:rpair@blm.gov)> wrote:

Ben,

With your addendum, I approve this general approach. As your addendum noted, BLM will want to see lab results of final confirmation samples before BLM approves liner installation and backfilling.

Liner - if needed - should extend 4-ft laterally beyond remaining contamination (and, if feasible, turned vertically downward 2-feet at that extra 4-ft extent). And you will GPS the area of the liner for BLM records.

Randal "Randy" Pair  
Envir. Protection Specialist - Realty Compliance

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On Mon, May 18, 2015 at 8:27 AM, Ben J. Arguijo <[bjarguijo@basinenv.com](mailto:bjarguijo@basinenv.com)> wrote:  
Gentlemen,

I failed to note that laboratory analytical results and field-screens from the delineation activities will be provided to, and discussed with, the NMOCD and BLM prior to commencement of any of the proposed remediation activities. Apologies.

Respectfully,  
Ben J. Arguijo

Ben J. Arguijo  
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On Mon, May 18, 2015 at 8:13 AM, Ben J. Arguijo <[bjarguijo@basinenv.com](mailto:bjarguijo@basinenv.com)> wrote:  
Mr. Dade and Mr. Pair,

Attached please find an *Environmental Site Summary & Spill Remediation Plan* (Work Plan) for the Plains All American Pipeline, LP (Plains), release site known as Palladium 7-1 4-Inch Poly.

As has been discussed on-site and via telephone, the crude oil release occurred in March 2013 and was initially estimated to be approximately one-half of a barrel (0.5 bbl) in size. The site fell through the cracks as a result of personnel transitions but was revisited last month. Laboratory analytical results and field-screens from samples collected during delineation activities conducted on April 16 and April 29, 2015, indicated the release was actually greater than or equal to five barrels (=5 bbls). The release was subsequently reported to both the NMOCD Artesia District Office and the BLM Carlsbad Field Office. An amended C-141 is included in the attached Work Plan.

Plains and Basin Environmental request permission to commence the following delineation activities described in the Work Plan posthaste:

"The area around delineation trench TT-1 will be excavated to approximately five feet (5') bgs to allow access for heavy equipment to further advance the trench. The trench will be advanced to the extent practicable. Soil samples will be collected at one (1) to two-foot (2') vertical intervals and field-screened with a PID. A representative selection of samples will be submitted to the laboratory for confirmatory analyses of BTEX, TPH, and/or chloride concentrations using the EPA laboratory analytical methods described above. If vertical

delineation cannot be achieved via trenching, a drilling rig will be employed to advance one (1) soil boring (SB-1) in the area of trench TT-1."

Please review the Work Plan at your earliest convenience. I look forward to hearing back from you.

Thank you for your time and consideration.

Respectfully,  
Ben J. Arguijo

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