

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, March 22, 2018 7:11 AM  
**To:** 'Tucker, Shelly'; Ben J. Arguijo  
**Cc:** Weaver, Crystal, EMNRD; Todd Roberson; Wade Dittrich; Duskie Bennett  
**Subject:** RE: Lost Tank 33 Federal #2 SWD (2RP-4542) - Spill Remediation Proposal

RE: OXY USA \* Lost Tank 33 Fed 2 SWD \* 2RP-4542 \* DOR: 10/30/17

OCD concurs with BLM Denial of this remediation proposal.

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:** Tucker, Shelly [mailto:stucker@blm.gov]  
**Sent:** Wednesday, March 21, 2018 4:28 PM  
**To:** Ben J. Arguijo <ben@trinityoilfieldservices.com>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Todd Roberson <todd@trinityoilfieldservices.com>; Wade Dittrich <wade\_dittrich@oxy.com>; Duskie Bennett <duskie@trinityoilfieldservices.com>  
**Subject:** Re: Lost Tank 33 Federal #2 SWD (2RP-4542) - Spill Remediation Proposal

BLM **DENIES** the proposal for the **Lost Tank 33 Federal 2 SWD \*\* 2RP-4542**. The site has not been fully delineated.

1. SP-3, SP-9, SP-10 and SP-12 will need to be delineated until 2 consecutive **laboratory readings** of 600 mg/kg of chlorides or less is obtained.
2. It is agree FP-1, FP-2 and FP-3 are over the top of the old drill pit, but FP-4, FP-5 and FP-6 are not. Therefore FP-4, FP-5 and FP-6 will need to be delineated until 2 consecutive **laboratory readings** of 600 mg/kg of chlorides or less is obtained.

I have reviewed the old closures and satellite imagery from October, 1996 through November, 2017. The pit obviously has restoration issues due to the heavy migration of chlorides to surface from repeated releases and being an old drill pit. Therefore, BLM will require 4' of material to be removed from the old drill pit and a 20 mil liner installed. The surface area will need to be backfilled with clean soil, viable soil to support revegetation. All disturbed surface area, off location, will need to be reseeded with approved BLM seed mix.

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

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[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 Fri, Mar 16, 2018 at 2:19 PM, Ben J. Arguijo <[ben@trinityoilfieldservices.com](mailto:ben@trinityoilfieldservices.com)> wrote:

All,

Attached please find the "Environmental Site Summary & Spill Remediation Proposal" for the Lost Tank 33 Federal #2 SWD release site (2RP-4542).

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

Thank you for your time and consideration.

Respectfully,  
Ben J. Arguijo

Ben J. Arguijo  
Environmental Project Manager  
Trinity Oilfield Services  
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