

From: [Pair, Randal](#)
To: [Baker, Larry](#); [Patterson, Heather, EMNRD](#); [John Zimmerman](#); [Fernando Banos](#)
Subject: Re: FW: Loco Hills SWD Booster Station 2RP-3460 Corrective Action Plan
Date: Friday, September 23, 2016 7:02:57 PM

I am extremely disappointed to have had to wade through so much self-serving blather as the "safety" justification contained in this proposal.

If you break it, you buy it: if you spread contamination over or under someone else's utilities, then you bring in expensive hydraulic excavation equipment, or pay those other operators to temporarily or permanently relocate their utilities while you conduct your remediation.

The only exceptions might be high-voltage transmission lines or large-diameter and high-pressure gas lines. Electric distribution lines and flow lines can and should be dealt with.

That said, the levels of contamination shown here are not that bad.

BLM defers to OCD on the matter of ground- and surface-water protection. However, we have responsibility for surface vegetation and livestock/wildlife.

For this reason, BLM wants SP-8 to be excavated to at least 6-feet bgs for protection of roots.

BLM also requests that microblaze be applied to the entire spill path, to help eliminate remaining TPH at the surface level.

BLM also requests to be consulted on obtaining confirmation samples from the two excavation sites prior to backfilling.

Randal "Randy" Pair

Envir. Protection Specialist - Realty Compliance

office: 575.234.6240

cell: 575.361.0062

email: rpair@blm.gov

On Thu, Sep 1, 2016 at 11:12 AM, Baker, Larry <Larry.Baker@apachecorp.com> wrote:

Mr. Pair,

Have you had a chance to review this proposal?

Bruce Baker

Apache Corporation

Environmental Technician

Northwest District

Email: larry.baker@apachecorp.com

Mobile: 432-631-6982

From: Patterson, Heather, EMNRD [mailto:Heather.Patterson@state.nm.us]
Sent: Monday, August 15, 2016 8:08 AM
To: Baker, Larry
Cc: John Zimmerman (jzimmerman@americansafety.net); Bratcher, Mike, EMNRD; Pair, Randal; Bayliss, Randolph, EMNRD
Subject: RE: Loco Hills SWD Booster Station 2RP-3460 Corrective Action Plan

**RE: Apache Corporation * Loco Hills SWD Booster Station * fAB1535241846
* 2RP-3460**

Bruce,

Your proposed excavation depths for the above listed release are approved. Your request for variance is approved. This said, the OCD would like you to attempt to achieve further chloride delineation during excavation activities in the area of SP8, if it can be done safely. Like approval by BLM is required for this location.

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson

Environmental Specialist

NMOCD District II

Office (575)748-1283 ext.101

Cell (575)703-0228

From: Baker, Larry [<mailto:Larry.Baker@apachecorp.com>]
Sent: Monday, August 01, 2016 3:33 PM
To: Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD; rpair@BLM.com
Cc: John Zimmerman (jzimmerman@americansafety.net)
Subject: Loco Hills SWD Booster Station 2RP-3460 Corrective Action Plan

All,

Please find the attached corrective action plan for the above referenced site for your approval. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

Bruce Baker

Apache Corporation

Environmental Technician

Northwest District

Email: larry.baker@apachecorp.com

Mobile: 432-631-6982