

Bratcher, Mike, EMNRD

From: Tucker, Shelly <stucker@blm.gov>
Sent: Friday, March 30, 2018 11:12 AM
To: Ben J. Arguijo
Cc: Weaver, Crystal, EMNRD; Wade_Dittrich@oxy.com; Bratcher, Mike, EMNRD; Jennifer_Smith@oxy.com
Subject: Re: Initial C141-Sterling Silver 3 0005

I am reviewing your proposal and I have a few questions/issues.

1. According to your summary - on 10/25 & 10/26 of 2017 - SP6 was excavated to 1.5'bgs...your analyticals only show a 6" sample. Why did you remove 1.5' and what were the analyticals at 1.5'bgs?
2. According to your summary you removed 6" from SP4 but your next sample was taken at 2'. Did you take a confirmation sample to verify you removed all impact?
3. According to your proposed activities - you want to remove an additional 6" at Sp1 & SP2...why? Your analytical results do not show any impact.
4. Your proposed activities state "a delineation trench will be advanced to the extent practicable..." at SP2. You also state "any additional delineation will be deferred until...well is decommissioned." This will not be acceptable. This sample point will need to be fully delineated per the current NMOCD guidelines.
5. This release went off location and request for authorization to perform remedial activities in the pasture was not requested. ALL remedial activities off location must be preapproved. The area off location has not been surveyed for archaeological evidence but is located within the PA. So it can be handled that way.
6. This location is located in Lessor Prairie Chicken habitat - High Impact Area and shinnery oak. Therefore, you are bound under the timing stipulations for the remaining remedial actions. You are also required to restore the disturbed surface with BLM approved six mixture.

On Thu, Feb 15, 2018 at 1:35 PM, Ben J. Arguijo <ben@trinityoilfieldservices.com> wrote:
Crystal,

I had in my notes that I had submitted the work plan back in late December. However, I could not find the email in my Sent folder. It must have gotten lost in the ether. Here is the "Environmental Site Summary & Spill Remediation Plan", dated 12/22/2017.

Thanks.

Ben

Ben J. Arguijo
Environmental Project Manager
Trinity Oilfield Services
P.O. Box 2587
Hobbs, NM 88241
(575)390-7208

ben@trinityoilfieldservices.com

On Thu, Feb 15, 2018 at 12:23 PM, Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us> wrote:

Wade/Ben,

Ben your recent email just reminded me of a another one you had asked the same request to OCD regarding asking for an RP number, it was for Sterling Silver 3 #5. Any update on this one? OCD gave a deadline of 1/5/18 for you all to produce a site characterization plan or plan of action by and that time has lapsed. Please advise as to why this has occurred and provide the requested report/update as soon as possible, but no later than 2/23/18.

Thanks,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: [575-748-1283](tel:575-748-1283) ext. 101

Cell: [575-840-5963](tel:575-840-5963)

Fax: [575-748-9720](tel:575-748-9720)

From: Weaver, Crystal, EMNRD

Sent: Wednesday, November 22, 2017 12:03 PM

To: 'Wade Dittrich@oxy.com' <Wade_Dittrich@oxy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Cc: ben@trinityoilfieldservices.com; Jennifer_Smith@oxy.com; stucker@blm.gov

Subject: RE: Initial C141-Sterling Silver 3 0005

RE: OXY * Sterling Silver 3 #5 * 30-015-27637

Wade,

I understand about you all having behind the scenes issues with getting this Initial C-141 out, however, I will still have to mark it as a past due form and document it as such in our system. Getting an RP number for this one may take some time cause it will go in to be processed at the order in which it was received. Due to the delay of this form and the fact that you all seem to have the desire to want to get working on the project now, you are ok to start doing preliminary sampling and submit a proposal for delineation according to authorization I am providing you on behalf of the OCD, **BUT** please note that you all will need to get approval from the BLM as well before you do anything that they would need to approve.

Thank you,

Crystal Weaver

Environmental Specialist

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From: [Wade Dittrich@oxy.com](mailto:Wade_Dittrich@oxy.com) [mailto:Wade_Dittrich@oxy.com]

Sent: Tuesday, November 21, 2017 3:48 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: ben@trinityoilfieldservices.com; Jennifer_Smith@oxy.com; stucker@blm.gov

Subject: Initial C141-Sterling Silver 3 0005

All,

Attached is the **Initial** C141. Please review and let me know if there are any questions. Thank you.

Wade Dittrich

Environmental Specialist

Oxy Permian-New Mexico

[575-390-2828](tel:575-390-2828) cell

[575-397-8214](tel:575-397-8214) office

Wade_Dittrich@Oxy.com

----- Forwarded message -----

From: "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>

To: "Wade_Dittrich@oxy.com" <Wade_Dittrich@oxy.com>, "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>

Cc: "ben@trinityoilfieldservices.com" <ben@trinityoilfieldservices.com>, "Jennifer_Smith@oxy.com" <Jennifer_Smith@oxy.com>, "stucker@blm.gov" <stucker@blm.gov>

Bcc:

Date: Wed, 27 Dec 2017 19:01:32 +0000

Subject: RE: Initial C141-Sterling Silver 3 0005

RE: OXY * Sterling Silver 3 #5 * 30-015-27637 * 2RP-4497

Wade,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval (COA). The OCD tracking number for this event is 2RP-4497, please refer to this tracking number on any and all submissions sent in to the OCD. Please remit a site characterization plan (see COA document included in attachment) or advise OCD of plan of action by no later than 1/5/18.

Thank you,

Crystal Weaver

Environmental Specialist

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Artesia, NM 88210

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Fax: [575-748-9720](tel:575-748-9720)

From: Wade_Dittrich@oxy.com [mailto:Wade_Dittrich@oxy.com]

Sent: Tuesday, November 21, 2017 3:48 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: ben@trinityoilfieldservices.com; Jennifer_Smith@oxy.com; stucker@blm.gov

Subject: Initial C141-Sterling Silver 3 0005

All,

Attached is the **Initial** C141. Please review and let me know if there are any questions. Thank you.

Wade Dittrich

Environmental Specialist

Oxy Permian-New Mexico

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[575-397-8214](tel:575-397-8214) office

Wade_Dittrich@Oxy.com

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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

575.234.5905 - Direct

Management

575.361.0084 - Cellular

575.234.6235 - Emergency Spill Number

Bureau of Land

620 E. Greene St

Carlsbad, NM 88220

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 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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