BLM stance.

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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.

Please note:

-The OCD is no longer granting "risk-based," or standard closure of events/RPs with remediation deferred to site abandonment/sale/closure. The RP will remain open until such time as historic contamination is addressed.

-Geotagged photographic documentation is stipulated for all events involving liquids.

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

From: Amos, James [mailto:jamos@blm.gov]
Sent: Wednesday, July 01, 2015 9:06 AM
To: Oberding, Tomas, EMNRD; Randall Hicks
Cc: Robertson, Jeffery
Subject: Re: FW: Lime Rock Staley - Background information for you

Thomas,

The BLM was not crazy about the burial of the spilled product on site as the product was not generated at the site. As for the Arco site, the old disposal pit at one time had been an authorized pit. However the remediation of the 5 bbls spill encountered the old pit during the remediation process. The burial (encapsulation) took place in a previously disturbed area, thus causing no new disturbance, and was basically buried in the area where generated (not much different than the hundreds, if not thousands of old reserve pits). The BLM would prefer to stabilize and treat onsite as to haul to what could become a future superfund site. We also do not want salt contaminant burial cells spread across BLM lands. If questions, please get back to me. thanks

On Tue, Jun 30, 2015 at 2:32 PM, Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us> wrote:

> The background.