

From: [Pair, Randal](#)
To: [Ben J. Arguijo](#)
Cc: [Bratcher, Mike, EMNRD](#); [Patterson, Heather, EMNRD](#); [Jody Walters](#); [Camille J. Bryant](#)
Subject: Re: Former Maljamar Station (2RP-2504) - Partial Backfill Request
Date: Wednesday, March 02, 2016 1:56:03 PM

Ben et al -

Just to clarify: in my Feb 12, 2016 email reply, I wrote:

"BLM approves the partial backfill request for sub-excavations C-16 through C-20, provided that material from Stockpile 17 that exceeds the TPH limit is not used."

I fully intended that as BLM approval to perform the requested backfilling, as long as no material that exceeded OCD remediation levels was used for the backfilling. Ben subsequently clarified to me that Caliche Stockpile 17b on 1/26/2016 was the same material as Stockpile 17 on 12/22/2015; but turning and aerating that material had resulted in the significant concentration of TPH.

Hence, my approval in my reply of 2/12/2016 should be construed as approval of the backfilling request.

Randal "Randy" Pair
Envir. Protection Specialist - Realty Compliance
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On Tue, Feb 23, 2016 at 4:10 PM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:
Just following up on this, Randy.

Thanks.

Ben



Ben J. Arguijo
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On Fri, Feb 19, 2016 at 12:28 PM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:
Randy,

I apologize for the delay in response. I have been in and out of the office this week. Caliche Stockpile #17b is the same material as Caliche Stockpile #17. The material was not sorted, treated, or "cut"/blended with anything to dilute the concentration of TPH. The drop in TPH concentration observed in Caliche Stockpile #17b is attributable to natural attenuation/off-gassing. Following receipt of the laboratory analytical results from the initial composite sample (i.e., Caliche Stockpile #17), the stockpile was flattened/spread out to increase the surface area exposed to the elements (i.e., sun, wind, moisture). Every few days, the material in the stockpile was moved around in-situ with a front-end loader

to circulate the soil and facilitate volatilization of entrapped hydrocarbons. The time between collection of Caliche Stockpile #17 and Caliche Stockpile #17b was approximately 35 days, which accounts for the fairly dramatic decrease in TPH concentrations between the two samples.

If the process described above had been unsuccessful, the impacted soil in Caliche Stockpile #17 would have been treated using the methodology described in the Work Plan or hauled to a disposal facility. However, that proved unnecessary.

If you have any additional questions, let me know.

Thanks.

Ben



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On Fri, Feb 12, 2016 at 5:13 PM, Pair, Randal <rpair@blm.gov> wrote:

Ben,

Question regarding Caliche Stockpile 17. Sample date 12/22/2015 shows TPH of 7,880.

On 1/26/2016, there is a sample of "Caliche Stockpile 17b" with TPH of 3,620.

Is Stockpile 17b the same material as Stockpile 17? Was it treated somehow? Or was the material in Stockpile 17 sorted, with the cleaner material placed in Stockpile 17B?

BLM approves the partial backfill request for sub-excavations C-16 through C-20, provided that material from Stockpile 17 that exceeds the TPH limit is not used.

Please respond separately to the Stockpile 17 vs Stockpile 17b issue.

Randal "Randy" Pair

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On Thu, Feb 11, 2016 at 4:28 PM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:

Thank you, sir.

Ben

On Feb 11, 2016 8:11 AM, "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us> wrote:

Ben,

Please proceed on your schedule, pending like approval from BLM.

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.

Mike Bratcher

NMOCD District 2

811 S. First Street

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From: Ben J. Arguijo [mailto:bjarguijo@basinenv.com]

Sent: Monday, February 08, 2016 3:17 PM

To: Patterson, Heather, EMNRD; Bratcher, Mike, EMNRD; rpair@blm.gov

Cc: Camille J. Bryant; Jody Walters

Subject: Re: Former Maljamar Station (2RP-2504) - Partial Backfill Request

All,

Attached please find the laboratory analytical report for composite soil sample Caliche Stockpile #20. The results indicate TPH, BTEX, and chloride concentrations are well below the NMOCD RRALs established for the site, and the soil is acceptable for use as backfill material.

Thank you for your time and consideration. I look forward to hearing back from you soon.

Respectfully,

Ben J. Arguijo

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On Mon, Feb 8, 2016 at 9:46 AM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:

Heather,

Per our discussion on Friday, 2/5/16, attached please find an updated data table for sub-excavation C-16, along with a lab report for the soil samples collected from that sub-excavation on 1/19/16.

As we discussed, TPH analyses on the four (4) wall samples (i.e., C-16 @ 12' - N, S, E & W. Walls) was conducted on 1/20, but BTEX was analyzed on 2/3, approximately twenty-two (22) hours out of regulatory hold time. I have been assured by the Laboratory/Technical Director of the Permian Basin Environmental Lab (PBEL) that the results are statistically valid, and page 2 of the attached lab report states, "*the samples had been kept frozen at less than 5 degrees C since receipt, therefore there should be no appreciable affect to the data.*"

The BTEX results were not available until 2/4/16, the day after I submitted the "Partial Backfill Request" below. As you can see from the lab report and data table, benzene concentrations were less than the laboratory method detection limit (MDL) in all four (4) samples, and total BTEX ranged from less than the MDL in the N. & W. Walls to 0.8170 mg/kg in the S. Wall. Based on the statement from PBEL, the results would have been essentially the same had the samples been analyzed the day before. Since the concentrations are so low, they have little to no bearing on the "Partial Backfill Request" as written.

I am still awaiting lab results on the composite soil sample from Caliche Stockpile #20 and will forward those upon availability.

Respectfully,
Ben J. Arguijo

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On Wed, Feb 3, 2016 at 5:26 PM, Ben J. Arguijo <bjarguijo@basinenv.com> wrote:

All,

Based on laboratory analytical results and field-screens, Plains and Basin Environmental respectfully request permission to perform the following activities at the remediation site known as Former Maljamar Station (2RP-2504):

1. Backfill sub-excavations C-16 through C-20 using the stockpiled material on-site. Laboratory analytical results from confirmation soil samples collected from the floors and sidewalls of the sub-excavations indicate TPH, BTEX, and chloride concentrations are below the recommended remediation action levels (RRALs) established for the site by the NMOCD. See attached Site & Sample Location Map #4I for additional information. Laboratory analytical results are summarized in attached data tables #17 through #21.
2. Use soil represented by soil samples Caliche Stockpile #15, #16, #17b, #18, #19 and Sand Stockpile #3 and #4 as backfill material. As previously agreed, 10-point composite samples have been collected for every 500 cubic yards of stockpiled soil, and laboratory analytical results indicate TPH, BTEX, and chloride concentrations are below the NMOCD RRALs established for the site. See attached data table #23 for a summary of laboratory analytical results.
3. Use soil represented by soil sample Caliche Stockpile #20 as backfill material, provided that laboratory analytical results confirm TPH, BTEX, and chloride concentrations are below the NMOCD RRALs established for the site. A 10-point composite soil sample was collected on 2/2/2016 and submitted to the laboratory for analysis. Results are pending. The laboratory analytical report will be forwarded to the NMOCD and BLM upon receipt.

In addition to the aforementioned data tables, an up-to-date, cumulative soil chemistry data table (MaljamarStation_SoilChemistryTable.pdf) is attached for your convenience.

If you have any questions, comments, or concerns, please do not hesitate to contact me by telephone or email.

Respectfully,
Ben J. Arguijo

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