

From: [Randall Hicks](#)
To: clayton@blm.gov; astockto@blm.gov; [Bratcher, Mike, EMNRD](#); [Patterson, Heather, EMNRD](#)
Cc: [Linsay Earle@oxy.com](mailto:Linsay_Earle@oxy.com); [David Allen2@oxy.com](mailto:David_Allen2@oxy.com); [David Stewart@oxy.com](mailto:David_Stewart@oxy.com); [Robert Holcomb@oxy.com](mailto:Robert_Holcomb@oxy.com); jamos@blm.gov; mike@rthicksconsult.com
Subject: Oxy - Peaches 4H Burial Trench - Preliminary Evaluation
Date: Tuesday, July 14, 2015 2:43:43 PM
Attachments: image001.png
OxyPeaches4HFigures.pdf

Cody, Aaron, Mike, Heather

After visiting the Peaches 4H site, it is not suitable for a drilling pit that would store fluids for a number of reasons. The location is suitable for a burial trench that would accept drilling solids in lieu of transport to R360. The attached figures show some of the site characteristics as well as the survey.

Although the location lies in an area mapped as high karst potential, my brief site visit and evaluation of available data (attached) suggests that burial of the dry solids in a trench that is consistent with OCD Rules provides a much higher environmental benefit than transporting the waste to R360.

We would use this trench at the 4H for the solids generated by the Peaches 3H well and the 4H.

I will be conducting a more thorough site evaluation on Thursday morning (7/16). I will be looking carefully at the exposed bedrock for any evidence of surface instability that may preclude construction of a lined burial trench that complies with OCD Rules.

It is my understanding that OCD policy is to deny the use of drilling pits in high karst areas unless a licensed PE provides recommendations relating to the construction of the pit and the liner foundation. As this is not a drilling pit, I am unsure how OCD would rule.

Additionally, BLM often denies the use of pits in high karst areas. I copied this note to [Aaron Stockton](#) as I would appreciate some [feedback relating to the use of a burial trench at this location](#).

I thank you in advance for any input in advance of my site visit. With some input, I can look more carefully at the issues that may be problematic for OCD or BLM.

Please expect a sundry notice and C-144 for a burial trench at the Peaches 4H location (pending the results of my second site visit).

The burial trench would lie within the box of the survey, which is what I believe has been cleared for disturbance.

The trench would lie in the cut on the southeast or southwest corner of the location.

Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004