

**From:** [Amber L Groves](#)  
**To:** [Hamlet, Robert, EMNRD](#)  
**Subject:** [EXT] RE: Variance Approval on the COG Screech Owl Fed CTB  
**Date:** Wednesday, March 31, 2021 12:53:46 PM  
**Attachments:** [Variance Request Regulatory Correspondence.pdf](#)

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Good Afternoon, Robert,

The portion of the variance on the closure criteria is at the very bottom of my variance request. Plains acknowledged that the area was high karst and presented monitor well information from the site of depth to groundwater being 93' bgs and total TDS of collected water sample being 485,000 which exceeds the NMOCD and NMWQCC standard of 10,000 mg/L TDS of abatable groundwater. Approval was given in Bradford's e-mail on June 8<sup>th</sup> to carry on as outlined below, which included the variance on closure criteria. Please feel free to give me a call at (575)200-5517 if you would like to discuss or have any questions.

Thank you,

*Amber L. Groves*  
*Remediation Coordinator*  
*Plains All American*  
*3112 W. US Hwy 82*  
*Lovington, NM 88260*  
*575-200-5517*

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**From:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Sent:** Wednesday, March 31, 2021 9:30 AM  
**To:** Amber L Groves <ALGroves@paalp.com>  
**Subject:** Variance Approval on the COG Screech Owl Fed CTB [External]

Amber,

In your Site Closure/Deferral Request report for the COG Screech Owl Fed CTB you say,

On April 21, 2020, based on the depth and non-abatable quality of the groundwater, Plains requested a variance in the Total Petroleum Hydrocarbon (TPH) confirmation sample standard from 100 mg/kg to 2,500 mg/kg as outlined in Table 1 of the *NMOCD Closure Criteria for Soils Impacted by a Release*. On June 8, 2020, the variance was approved by the NMOCD.

Please reference NMOCD correspondence provided as Appendix C.

Based on the NMOCD approved variance, the Closure Criteria for the COG Screech Owl Federal

CTB Release Site are as follows:

- Benzene - 10 mg/kg
- Benzene, Toluene, ethylbenzene, and total xylenes (BTEX) - 50 mg/kg
- Total Petroleum Hydrocarbons (TPH): GRO+DRO = 1,000 mg/kg, GRO+DRO+ORO = 2,500 mg/kg
- Chloride – 600 mg/kg

I can't seem to find any approval of this request in the incident file or in my archive files in outlook. Could you please send me a copy of the email deferral request approval?

Thanks

**Robert Hamlet** • Environmental Specialist - Advanced

Environmental Bureau

EMNRD - Oil Conservation Division

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575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



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