**Charles Beauvais**
**Environmental Engineer**
**15 W London Rd**
Loving, NM 88256
Telephone: 575/988-2043
Charles.R.Beauvais@ConocoPhillips.com

**October 8th, 2021**

Mr. Bradford Billings
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division
5200 Oakland Ave NE
Albuquerque, NM 87113

**Re: Screech Owl Federal #003H**
**nAB1707439864**
**Heritage Concho Agreed Compliance Order-Releases**

Dear Mr. Billings:

Please find attached documentation for an open remediation site, Screech Owl Federal #003H (Incident ID nAB1707439864 and Remediation Permit 2RP-4145). This reported incident is included in the Agreed Compliance Order-Releases (ACO-R) between the New Mexico Oil Conservation Division (NMOCD) and Concho Resources (COG) dated November 20, 2018. ConocoPhillips Company (COP) acquired COG in January 2021.

Although this release occurred at a facility operated by COG, it was caused by a third party, Plains Marketing, LP (Plains). According to the NMOCD initial C-141 form and related email correspondence, both COG and Plains independently submitted duplicate initial C-141 forms for the incident, as shown in Attachment A. Furthermore, Plains conducted assessment and remediation activities at the release site under the Incident ID assigned to their C-141 (Incident ID nAB1707636998 and Remediation Permit 2RP-4147), although closure of the release has not been approved. Therefore, COP respectfully requests that NMOCD close the duplicate incident ID nAB1707439864 (2RP-4145) associated with COG (and now COP) and remove it from the November 20, 2018 ACO-R.

Please contact me if you require any additional information or if you have any questions or comments.

Sincerely,

*Charles R. Beauvais II*

Charles Beauvais

Enclosures – Attachment A

# ATTACHMENT A

NM OIL CONSERVATION
ARTESIA DISTRICT
MAR 13 2017
RECEIVED

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

# Release Notification and Corrective Action

nAB1707439864 229137

## OPERATOR

☒ Initial Report ☐ Final Report

| | | | |
|---|---|---|---|
| Name of Company: | COG Operating LLC | Contact: | Robert McNeill |
| Address: | 600 West Illinois Avenue, Midland TX 79701 | Telephone No. | 432-683-7443 |
| Facility Name: | SCREECH OWL FEDERAL #003H | Facility Type: | Tank Battery |

| | | | |
|---|---|---|---|
| Surface Owner: | Federal | Mineral Owner: | API No. 30-015-42827 |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| O | 18 | 26S | 26S | 250' | South | 2450' | East | Eddy |

**Latitude** 32.0360380287938 **Longitude** 104.226795847027

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release: Oil | Volume of Release: 24bbls | Volume Recovered: 21bbls |
| Source of Release: LACT Unit | Date and Hour of Occurrence: 03/11/17 09:00 | Date and Hour of Discovery: 03/11/17 09:00 |
| Was Immediate Notice Given? ☐ Yes ☒ No ☒ Not Required | If YES, To Whom? | |
| By Whom? | Date and Hour: | |
| Was a Watercourse Reached? ☐ Yes ☒ No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Rubber suction line between LACT unit and pipeline pump blew out. Replaced the rubber section with hard pipe.

Describe Area Affected and Cleanup Action Taken.*

This release was caused by a third party (Plains) and was contained on the pad. Concho will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

| | |
|---|---|
| Signature: Robert Grubbs | OIL CONSERVATION DIVISION |
| Printed Name: Robert Grubbs Jr. | Approved by Environmental Specialist: Crystal Weaver |
| Title: Senior HSE Coordinator | Approval Date: 3/15/17 Expiration Date: N/A |
| E-mail Address: rgrubbs@concho.com | Conditions of Approval: COAs attached Attached ☒ |
| Date: March 13, 2017 Phone: 432-683-7443 | |

* Attach Additional Sheets If Necessary

2RP-4145

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **3/13/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4145 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

> *The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC.* [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 4/21/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; $C_6$ thru $C_{36}$), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; $C_6$ thru $C_{36}$), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

- Nominal detection limits for field and laboratory analyses must be provided.

- Composite sampling is not generally allowed.

- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

●Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

● If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

● Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

## Weaver, Crystal, EMNRD

**From:** Robert Grubbs <RGrubbs@concho.com>
**Sent:** Monday, March 13, 2017 1:31 PM
**To:** Weaver, Crystal, EMNRD; 'stucker@blm.gov'
**Cc:** Bratcher, Mike, EMNRD; Amos, James <jamos@blm.gov> (jamos@blm.gov)
**Subject:** (C-141 Initial) SCREECH OWL FEDERAL #003H 03/11/17 (30-015-42827)
**Attachments:** Screech Owl Federal #003H (TB) Initial.pdf

MS. WEAVER / MS. TUCKER,

ATTACHED IS A C-141 FOR YOUR CONSIDERATION. IF YOU HAVE ANY ADDITIONAL QUESTIONS PLEASE FEEL FREE TO CONTACT ME.

THANK YOU,

ROBERT GRUBBS JR.
SR. HSE COORDINATOR
432.683.7443 (MAIN)
432.818.2369 (DIRECT)
432.661.6601 (CELL)
432.221.0892 (FAX)
RGRUBBS@CONCHO.COM
MAILING ADDRESS:
ONE CONCHO CENTER
600 W. ILLINOIS AVENUE
MIDLAND, TEXAS 79701



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

NM OIL CONSERVATION
ARTESIA DISTRICT
MAR 16 2017
RECEIVED

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

fAB1707636774
fAB1707636998

# Release Notification and Corrective Action

## OPERATOR

☒ Initial Report ☐ Final Report

| | | | |
|---|---|---|---|
| Name of Company | Plains Pipeline, LP 34053 | Contact | Camille Bryant |
| Address | 577 US Hwy 385 N, Seminole, Texas 79360 | Telephone No. | (575) 441-1099 |
| Facility Name | Alpha Gathering Seg. 3 LAT. 6E | Facility Type | LACT Unit |

| | | |
|---|---|---|
| Surface Owner BLM | Mineral Owner BLM | Lease No. |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| K | 18 | 26S | 27E | | | | | Eddy |

Latitude N 32.039556° Longitude W 104.232184°

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release Crude Oil | Volume of Release 20 bbls | Volume Recovered 5 bbls |
| Source of Release LACT Unit 4-Inch Braided Hose | Date and Hour of Occurrence 3/11/2017 @ 09:45 | Date and Hour of Discovery 03/11/2017 @ 12:20 |
| Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required | If YES, To Whom? NMOCD Artesia Office Voicemail | |
| By Whom? Camille Bryant | Date and Hour | |
| Was a Watercourse Reached? ☐ Yes ☒ No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* A 4-inch braided rubber hose between the LACT and the suction side of the pump failed. The braided rubber hose has been replaced with steel piping.

Describe Area Affected and Cleanup Action Taken. The release impacted approximately 1,600 square feet. The impact was confined to the caliche pad of the facility. The impacted area will be remediated as per applicable NMOCD guidelines.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Camille Bryant

Printed Name: Camille Bryant

Title: Remediation Coordinator

E-mail Address: cjbryant@paalp.com

Date: 3/16/17 Phone: (575) 441-1099

## OIL CONSERVATION DIVISION

Signed By Mike Bratcher

Approved by District Supervisor:

Approval Date: 3/17/17 Expiration Date: N/A

Conditions of Approval: See Attached

Attached ☐

* Attach Additional Sheets If Necessary

2RP-4147

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 3/16/2017 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4147 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

> *The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC.* [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 4/16/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; $C_6$ thru $C_{36}$), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; $C_6$ thru $C_{36}$), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

- Nominal detection limits for field and laboratory analyses must be provided.

- Composite sampling is not generally allowed.

- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

## Bratcher, Mike, EMNRD

**From:** Camille J Bryant <CJBryant@paalp.com>
**Sent:** Thursday, March 16, 2017 9:14 AM
**To:** Bratcher, Mike, EMNRD; 'Tucker, Shelly'
**Cc:** 'rgrubbs@concho.com'
**Subject:** Plains Pipeline Initial C-141 Alpha Gathering Release
**Attachments:** 2.jpg; 6.jpg; 11.jpg; Initial C-141 Plains Pipeline Alpha Crude Gathering.pdf

Mike and Shelly,

Please find attached the Initial C-141 and photos of the Plains Pipeline crude oil release which occurred at the COG Screech Owl CTB on March 11, 2017. The site is located in Unit Letter K, Section 18, Township 26 South, Range 27 East of Eddy County New Mexico. The release was attributed to failure of a 4-inch braided hose on the LACT Unit, approximately 20 barrels of crude oil was released with approximately 5 barrels recovered. With NMOCD and BLM approval Plains will excavate the impacted material and stockpile it on plastic pending final disposal. Soil samples will be collected. Upon laboratory confirmation of BTEX and TPH concentrations less than the NMOCD regulatory guidelines Plains will request NMOCD and BLM approval to backfill the excavated area with import material and transport the stockpiled material off-site to an NMOCD permitted disposal facility.

Please contact me with any questions or concerns.

Respectfully,

**Camille J. Bryant**
Remediation Coordinator
Plains All American
577 US Highway 385 North
Seminole, Texas 79360
Office: 432.758.8139
Cell: 575.441.1099

**From:** Stanley, Curtis D.
**To:** Bratcher, Mike, EMNRD; Shelly Tucker
**Cc:** "Camille J Bryant"; algroves@paalp.com; Weaver, Crystal, EMNRD; Rebecca Haskell
**Subject:** [External] RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)
**Date:** Monday, May 14, 2018 4:34:25 PM
**Attachments:** image001.jpg
doc20180514101937.pdf
doc20180514101913.pdf

**** External email. Use caution. ****

Mike / Shelly,

On May 2, 2018, TRC on behalf of Plains, utilized a hydrovac to hydro excavate the two (2) areas of concern (Floor-9 @ 8' and NSW-4 @ 7') in the Stage 4B Excavation Area at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (2RP-4147). Soil represented by soil sample Floor-9 @ 8' area was excavated an additional six (6) inches vertically to approximately 8.5 feet bgs and soil represented by soil sample NSW-4 @ 7' was excavated an additional six to twelve (6 – 12) inches horizontally to the north of soil sample NSW-4 @ 7'.

Soil samples (Floor-9A @ 8.5' and NSW-4A @ 7') were collected and submitted to the laboratory for analysis. The analytical results indicated benzene concentrations were less than the laboratory reporting limit (RL). BTEX concentrations for soil samples Floor-9A @ 8.5' and NSW-4A @ 7' were 0.0326 mg/Kg and 0.0312 mg/Kg, respectively. TPH concentrations for soil samples Floor-9A @ 8.5' and NSW-4A @ 7' were 215.6 mg/Kg and 98.5 mg/Kg, respectively. Please reference the attached Table 1 – Concentrations of BTEX, TPH, and Chloride in Soil and Figure 2 – Site Details and Confirmation Soil Sample Location Map for additional details.

Based on the analytical results and with NMOCD and BLM approval, Plains requests permission to backfill the Stage 4B Excavation Area with locally purchased, non-impacted soil.

Talon LPE, on behalf of Plains, has applied for a drilling permit to install the monitor well (MW-1) requested by the NMOCD and the BLM. NMOCD and BLM will be notified when the installation of the monitor well has been scheduled.

Respectfully,

Curt D. Stanley
Senior Project Manager

***Please note our address and phone numbers have changed.***

trc-logo-blue

**10 Desta Drive, Suite 150E, Midland, TX 79705**
T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

LinkedIn | Twitter | Blog | www.trcsolutions.com

**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
**Sent:** Friday, April 27, 2018 11:31 AM
**To:** Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>
**Subject:** RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

Thanks for the extra attempt in 4B. You are approved by OCD for backfill in the 3B, 4A and area north of the containment.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108



**From:** Stanley, Curtis D. <CDStanley@trcsolutions.com>
**Sent:** Thursday, April 26, 2018 2:04 PM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>
**Subject:** RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-

impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley
TRC

---

**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
**Sent:** Friday, March 16, 2018 9:26 AM
**To:** Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Subject:** RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108



---

**From:** Stanley, Curtis D. [mailto:CDStanley@trcsolutions.com]
**Sent:** Thursday, February 1, 2018 7:42 AM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com
**Subject:** Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as "Stage 3A Excavation Area" with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the "Stage 3B Excavation Area". A copy of the initial NMOCD C-141 is attached for your reference.

The "Stage 4A Excavation Area" was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL , the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 4A Excavation Area" with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil

sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 3B Excavation Area" with locally obtained non-impacted material.

The "Stage 4B Excavation Area" was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7', SSW-6 @ 7', ESW-6 @ 7' and WSW-6 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7', SSW-6 @ 7', and WSW-6 @ 7' to 0.0138 mg/Kg for soil sample ESW-6 @ 7'. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7' and WSW-6 @ 7' to 0.07129 mg/Kg for soil sample NSW-4 @ 7'. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7' to 10,980.0 mg/Kg for soil sample NSW-4 @ 7'. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7' to 364 mg/Kg for soil sample ESW-6 @ 7'.

The "Stage 4B Excavation Area" consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum

layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOCD and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

***Please note our address and phone numbers have changed.***

trc-logo-blue

**10 Desta Drive, Suite 150E, Midland, TX 79705**
T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

LinkedIn | Twitter | Blog | www.trcsolutions.com

---

**From:** Shelly Tucker [mailto:stucker@blm.gov]
**Sent:** Wednesday, October 11, 2017 7:38 PM
**To:** Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** Camille J Bryant <CJBryant@paalp.com>
**Subject:** Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as “Stage 3A Excavation Area”.

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker
BLM-Carlsbad
EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>
Date: 10/11/17 11:26 AM (GMT-07:00)
To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,
We will wait for BLM approval before backfilling.

Curt

---

**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
**Sent:** Wednesday, October 11, 2017 12:21 PM
**To:** Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>
**Subject:** RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as “Stage 3A Excavation Area”. BLM approval required as well.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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.

---

**From:** Stanley, Curtis D. [mailto:CDStanley@trcsolutions.com]
**Sent:** Thursday, October 5, 2017 7:42 AM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>

**Subject:** Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager

2057 Commerce, Midland, TX 79703
T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296


LinkedIn | Twitter | Blog | www.trcsolutions.com

---

**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
**Sent:** Thursday, September 14, 2017 10:18 AM
**To:** Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>
**Subject:** RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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.

---

**From:** Stanley, Curtis D. [mailto:CDStanley@trcsolutions.com]
**Sent:** Tuesday, September 5, 2017 8:40 AM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>
**Subject:** Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E
2RP-4147
32.039556° 104.232184°
ULT K, Section 18, Township 26 South, Range 27 East NMPM
Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental

Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager

2057 Commerce, Midland, TX 79703

trc-logo-blue

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

LinkedIn | Twitter | Blog | www.trcsolutions.com

**From:** Bratcher, Mike, EMNRD
**To:** Stanley, Curtis D.; Tucker, Shelly; Rebecca Haskell
**Cc:** Camille J. Bryant (cjbryant@paalp.com); Amber L Groves; Pruett, Maria, EMNRD
**Subject:** [External] FW: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl
**Date:** Thursday, September 20, 2018 10:57:58 AM
**Attachments:** image001.jpg

**** External email. Use caution. ****
Curt,

Thanks for the notification. Please include Maria Pruett on all environmental correspondence to District 2 as she will be the main point of contact going forward.

Maria's email address: maria.pruett@state.nm.us

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

**From:** Stanley, Curtis D. <CDStanley@trcsolutions.com>
**Sent:** Wednesday, September 19, 2018 12:54 PM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Rebecca Haskell <RHaskell@concho.com>
**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>; Amber L Groves <ALGroves@paalp.com>
**Subject:** FW: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

On Thursday, September 20, 2018 at approximately 10 AM Mountain Time we will commence drilling at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl. If you have any questions, concerns, or need driving directions please contact me by phone or email.

Respectfully,

Curt Stanley
TRC

**From:** Stanley, Curtis D.
**Sent:** Wednesday, September 12, 2018 9:27 AM
**To:** 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Rebecca Haskell <RHaskell@concho.com>

**Cc:** 'Camille J Bryant' <CJBryant@paalp.com>; Amber L Groves <ALGroves@paalp.com>
**Subject:** Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

Weather permitting, TRC Environmental Corporation (TRC) on behalf of Plains Marketing, LP (Plains) anticipates commencing the drilling of the NMOCD and BLM requested soil boring at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl on Wednesday, September 19, 2018 or Thursday, September 20, 2018. I will email all of you early next week to give you an exact day and time for drilling.

As per the NMOCD and in concurrence with the BLM, the soil boring will be advanced to a maximum depth of approximately one-hundred ten (110) feet below ground surface (bgs). Soil samples will be collected a five (5) foot drilling intervals and selected soil samples will be submitted to the laboratory for total petroleum hydrocarbon (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) analysis.

- If groundwater is not encountered prior to reaching the NMOCD and BLM approved drilling maximum depth of one-hundred ten (110) feet bgs, a “temporary” well will be set and gauged with a water meter seventy-two (72) hours after the setting of the temporary well.
- If groundwater is detected in the “temporary” well after 72 hours, a permanent monitor well will be installed at the location.
- If groundwater is encountered prior to reaching the NMOCD and BLM approved one-hundred ten (110) foot bgs maximum drilling depth, the soil boring will be advanced approximately fifteen (15) feet below the groundwater interface and a permanent groundwater monitor well will be installed.
- If groundwater is NOT detected in the soil boring or “temporary” well within seventy-two (72) hours , the soil boring will be plugged and abandoned by a licensed New Mexico Water Well Driller using New Mexico Office of the State Engineer (NMOSE) approved plugging procedures.

If the drilling schedule changes due to adverse weather you will be contacted as soon as possible.

If you have any questions, please contact Camille Bryant at 575.441.1099 or contact the undersigned.

Respectfully,

Curt

Curt D. Stanley
Senior Project Manager

**10 Desta Drive, Suite 150E, Midland, TX 79705**

trc-logo-blue

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

LinkedIn | Twitter | Blog | www.trcsolutions.com

**District I**
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
**District II**
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
**District III**
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
**District IV**
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

# State of New Mexico
# Energy, Minerals and Natural Resources
# Oil Conservation Division
# 1220 S. St Francis Dr.
# Santa Fe, NM 87505

CONDITIONS

Action 55996

## CONDITIONS

| | |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137 |
| | Action Number:<br>55996 |
| | Action Type:<br>[C-141] Release Corrective Action (C-141) |

**CONDITIONS**

| Created By | Condition | Condition Date |
|---|---|---|
| bhall | 2RP-4145 has been closed. Please refer to incident #NAB1707439864 in all future communications. | 10/5/2022 |
| bhall | Based on the information provided, incident #NAB1707439864 is a duplicate of incident #NAB1707636998. If remediation under incident #NAB1707636998 is not completed, any future remediation will be the responsibility of the responsible party which is defined in 19.15.29.7 C. ""Responsible party" means the operator, as defined in 19.15.2 NMAC. Notwithstanding the foregoing, the division, in its sole discretion, may also consider a person causing the release, or controlling the location of the release as the responsible party." | 10/5/2022 |