

AP -

17

APPROVALS

YEAR(S):

2011-2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, November 15, 2012 11:26 AM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Anticipated Actions Approval (2011 Report) (AP-17) - Plains TNM 97-17 Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
TNM 97-17 Release Site (AP-017)
Unit K, Section 21, T20S, R37E, NMPM, Lea County, New Mexico
Anticipated Actions Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Anticipated Actions") the above-referenced site (dated March 2012). The above-referenced report, submitted in partial fulfillment of 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Anticipated Actions for the TNM 97-17 Release Site:

Plains must also analyze for PAHs in groundwater at those monitoring wells where NAPL is no longer detected (including MW-15) at the TNM 97-17 Release Site.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, October 01, 2012 3:44 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Abatement Plan (AP-17) Amendment Approval - Plains TNM 97-17 Release Site

**RE: Abatement Plan (AP-17) Project Update
for the Plains All American Pipeline's
TNM 97-17 Release Site
Unit Letter K, Section 21, T20S, R37E, NMPM, Lea County, New Mexico
Abatement Plan (AP-17) Amendment Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received the Abatement Plan (AP-17) project update for the Plains TNM 97-17 Release Site, dated September 27, 2012, and has conducted a review of the proposed amendment. The proposed amendment indicates that Plains All American Pipeline (Plains) has met the requirements of OCD Part 30 (formerly, Rule 19) for a Stage 1 & 2 Abatement Plan. Therefore, the OCD hereby conditionally approves the Abatement Plan (AP-17) Amendment as proposed for above-referenced site in accordance with 19.15.30.16 NMAC:

Plains must submit to the OCD an initial report of the proposed corrective actions within 180 days.

Please be advised that OCD approval of this Amendment does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Jason Henry <JHenry@paalp.com>
Sent: Thursday, September 27, 2012 4:39 PM
To: Hansen, Edward J., EMNRD
Cc: Jeffrey P Dann
Subject: Plains TNM 97-17 remediation site (AP-017)
Attachments: TNM 97-17 WP Text.pdf; TNM 97-17 NMOCD WP Approval.pdf; TNM 97-17 WP Figures.pdf

Ed,

As we discussed previously, Plains has excavated and stockpiled the impacted soil from the bottomhole portion of the excavated area at the above referenced site to approximately 19 feet below ground surface (bgs). The initial depth of the bottomhole was approximately 15 feet bgs.

Non-impacted soil that had been segregated and stockpiled during the course of the soil excavation activities was used to replace approximately 3-4 feet of the impacted soil that was removed from the bottomhole of the excavated area. Nova Safety and Environmental personnel are currently in the process of preparing the bottomhole of the excavation for the installation of a synthetic liner as per the process outlined in Section 5.0 of the approved work plan.

Please let me know if you have any questions or need additional information.

Thank you,
Jason Henry
575-441-1099

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, October 25, 2011 6:03 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; 'Jeffrey P Dann'
Subject: Anticipated Actions Approval (AP-017) - Plains TNM 97-17 Release Site

**RE: Annual Monitoring Report (2010) for the Plains Marketing's
TNM 97-17 Release Site (AP-017)
Unit K, Section 21, T20S, R37E, NMPM, Lea County, New Mexico
Anticipated Actions Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Anticipated Actions") the above-referenced site (dated March 2011). The above-referenced report, submitted in partial fulfillment of 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Anticipated Actions for the TNM 97-17 Release Site:

Plains must not limit the analyses for PAHs to RW-1 and RW-4 only at the TNM 97-17 Release Site.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau