

AP - 91

# APPROVALS

Year(s)

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Thursday, June 20, 2013 4:50 PM  
**To:** Jason Henry (JHenry@paalp.com)  
**Cc:** Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com); skillingsworth@talonlpe.com  
**Subject:** Recommendations Approval (2012) (AP-91) - Plains 8-Inch Moore To Jal #1 Release Site

**RE: Annual Monitoring Report (2012) for the Plains Marketing's  
8-Inch Moore To Jal #1 Release Site (AP-91)  
Unit Letter F, Section 16, T17S, R37E, NMPM, Lea County, New Mexico  
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Recommendations") the above-referenced site (dated March 2013). 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 Recommendations for the 8-Inch Moore To Jal #1 Release Site:

Regarding Polynuclear Aromatic Hydrocarbons (PAHs), Plains must:

- Sample for PAHs on an annual basis at each well (i.e., each well without NAPL and groundwater concentrations above any respective WQCC standard for BTEX) and at each well where NAPL has been removed and NAPL is no longer present in the well;
- Continue to sample each well for at least two consecutive years until each of the PAHs are at a concentration of 0.001 mg/L or less (and concentrations are the same or decreasing) for PAHs that do not have WQCC standards [and at or below WQCC standard if applicable (and concentrations are the same or decreasing)].

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

P.S.: Please keep in mind that in addition to the "1.4 Regulatory Framework" outlined in the Report, the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater:

- (a) anthracene
- (b) 3,4-benzofluoranthene {a.k.a.: benzo[b]fluoranthene}
- (c) benzo (k) fluoranthene
- (d) fluoranthene
- (e) fluorene
- (f) phenanthrene
- (g) pyrene

P.P.S.: Also, please keep in mind that the WQCC standard for benzo(a)pyrene is 0.0007 mg/L (*not 0.007 mg/L as noted in Section 1.4 of the Report*). In addition, the individual constituent of “PAHs” includes not only naphthalene (*as indicated in Section 1.4 of the Report*), but is a total of naphthalene, 1-methylnaphthalene and 2-methylnaphthalene.

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, April 15, 2013 10:31 AM  
**To:** Jason Henry (JHenry@paalp.com)  
**Cc:** Jeffrey P Dann; 'Brad Ivy'  
**Subject:** Groundwater Monitoring System Plan Amendment Approval (AP-91) - Plains 8-Inch Moore To Jal #1 Release Site

**RE: Groundwater Monitoring System Plan Amendment Approval  
for the Plains Marketing's  
8-Inch Moore To Jal #1 Release Site (AP-91)  
Unit Letter F, Section 16, T17S, R37E, NMPM, Lea County, New Mexico**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received the Groundwater Monitoring System Plan Amendment for the above-referenced site, dated April 12, 2013, and has conducted a review of the plan amendment. The plan amendment substantially meets the requirements of 19.15.30 NMAC. Therefore, the OCD hereby approves the plan amendment subject to the following condition:

Plains must submit to the OCD an installation report for the two proposed groundwater monitoring wells within 90 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**

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**From:** Jason Henry <MJHenry@paalp.com>  
**Sent:** Friday, April 12, 2013 3:03 PM  
**To:** Hansen, Edward J., EMNRD  
**Cc:** Jeffrey P Dann; 'Brad Ivy'  
**Subject:** Plains Pipeline - Moore to Jal #1 site (AP-91)  
**Attachments:** MJ#1 PMW map April 2013.pdf

Ed,

Plains Pipeline respectfully requests NMOCD approval to install 2 additional monitor wells at the above referenced site. Attached is a site map that depicts the approximate locations (PMW) where the 2 additional monitor wells will be installed.

Upon approval from the NMOCD and prior to installing the monitor wells, Plains will obtain the necessary permits from the landowner (New Mexico State Land Office) and from the New Mexico Office of the State Engineer.

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

Thank you,

Jason Henry  
575-441-1099



**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, January 14, 2013 6:23 PM  
**To:** Jason Henry (JHenry@paalp.com)  
**Cc:** Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com); skillingsworth@talonlpe.com  
**Subject:** Recommendations Approval (2011) (AP-91) - Plains 8-Inch Moore To Jal #1 Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's  
8-Inch Moore To Jal #1 Release Site (AP-91)  
Unit Letter F, Section 16, T17S, R37E, NMPM, Lea County, New Mexico  
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Recommendations") 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 Recommendations for the 8-Inch Moore To Jal #1 Release Site:

- Plains must submit a plan within 30 days to the OCD for the delineation of the dissolved phase.

Regarding Polynuclear Aromatic Hydrocarbons (PAHs), Plains must:

- Sample for PAHs on an annual basis at each well (i.e., each well without NAPL and groundwater concentrations above any respective WQCC standard for BTEX) and at each well where NAPL has been removed and NAPL is no longer present in the well;
- Continue to sample each well for at least two consecutive years until each of the PAHs are at a concentration of 0.001 mg/L or less (and concentrations are the same or decreasing) for PAHs that do not have WQCC standards [and at or below WQCC standard if applicable (and concentrations are the same or decreasing)].

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

P.S.: Please keep in mind that in addition to the “1.4 Regulatory Framework” outlined in the Report, the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater:

- (a) anthracene
- (b) 3,4-benzofluoranthene *{a.k.a.: benzo[b]fluoranthene}*
- (c) benzo (k) fluoranthene
- (d) fluoranthene
- (e) fluorene
- (f) phenanthrene
- (g) pyrene

P.P.S.: Also, please keep in mind that the WQCC standard for benzo(a)pyrene is 0.0007 mg/L (*not 0.007 mg/L as noted in Section 1.4 and Table 3*).