1R - 420APPROVALS YEAR(S): 2011

Hansen, Edward J., EMNRD

From:Hansen, Edward J., EMNRDSent:Tuesday, November 08, 2011 2:12 PMTo:'Jason Henry'Cc:Leking, Geoffrey R, EMNRD; 'Jeffrey P Dann'Subject:Anticipated Actions Approval (1R-420) - Plains Texaco Skelly F Release Site

RE: Annual Monitoring Report (2010) for the Plains Marketing's Texaco Skelly F Release Site (1R-420) Unit F, 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 19.15.29 NMAC (Rule 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby conditionally approves the Anticipated Actions for the Texaco Skelly F Release Site:

Plains must continue to sample on an annual basis for PAHs in groundwater monitoring well, MW-8.

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 03, 2011 3:07 PM
To:	'Jason Henry'
Cc:	Leking, Geoffrey R, EMNRD; 'Jeffrey P Dann'
Subject:	Soil Closure Proposal Amendment Approval - (1R-420) Plains Texaco Skelly 'F' Release Site

RE: Soil Closure Proposal Amendment Approval for the Plains Marketing, L.P. Texaco Skelly 'F' Release Site (1R-420)

Unit Letter E, Section 21, T20S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' Amendment to the Soil Closure Proposal for the above-referenced site (dated September 26, 2011). The Amendment, submitted in partial fulfillment of 19.15.29 NMAC (Rule 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby approves the Amendment to the Soil Closure Proposal for the Texaco Skelly "F" Release Site.

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.

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

From: Jason Henry [mailto:]Henry@paalp.com]
Sent: Monday, September 26, 2011 10:52 AM
To: Hansen, Edward J., EMNRD
Cc: Jeffrey P Dann; 'Ron Rounsaville'
Subject: RE: Remediation Summary Submittal Extension Approval - (1R-420) Plains Texaco Skelly 'F' Release Site

Ed,

Plains' respectfully requests NMOCD approval to modify the previously approved April 2008 *Soil Closure Proposal* for the subject site. The requested modification consists of performing the following activities during the soil remediation phase of the project:

- Expose groundwater in the bottomhole of the excavation, most likely in the vicinity of recovery wells RW-1 and RW-2
- Utilize a vacuum truck to recover impacted groundwater

- Dispose of the recovered groundwater off-site at an approved disposal facility
- Backfill and compact the areas of exposed groundwater to a level of 20' below ground surface (bgs) with clean soil (<100 mg/kg TPH concentrations) after the completion of recovery efforts
- Proceed with the installation of the synthetic liner in the bottomhole of the excavation as per the April 2008 *Soil Closure Proposal*
- Include a description of the groundwater recovery activities performed at the site in the forthcoming soil remediation summary report

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

Thank you, Jason Henry 575-441-1099

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Thursday, June 09, 2011 9:15 AM
To: Jason Henry
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann
Subject: FW: Remediation Summary Submittal Extension Approval - (1R-420) Plains Texaco Skelly 'F' Release Site

RE: Remediation Summary Submittal Extension Approval for the Plains Marketing, L.P. Texaco Skelly 'F' Release Site (1R-420) Unit Letter E, Section 21, T20S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has reviewed your request for extension of the submittal of the soils remediation summary regarding the above-referenced site [Remediation Plan (1R-420)]. Due to the expanded scope of the project, the OCD hereby approves the request for extension of the submittal until **Thursday, December 1, 2011**.

Please be advised that OCD approval of this extension 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:	Hansen, Edward J., EMNRD
Sent:	Thuisday, June 09, 2011 8:15 AM
То:	'Jason Henry'
Cc:	Leking, Geoffrey R, EMNRD; Jeffrey P Dann
Subject:	FW: Remediation Summary Submittal Extension Approval - (1R-420) Plains Texaco Skelly 'F' Release Site

RE: Remediation Summary Submittal Extension Approval for the Plains Marketing, L.P. Texaco Skelly 'F' Release Site (1R-420) Unit Letter E, Section 21, T20S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

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Please be advised that OCD approval of this extension 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