

1R - 463

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 29, 2013 10:32 AM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Recommendations Approval (2012 Report) (1R-463) - Plains D. S. Hugh Release Site

**RE: Annual Monitoring Report (2012) for the Plains Marketing's
D. S. Hugh Release Site (1R-463)
Unit K, Section 26, T21S, R37E, NMPM, Lea County, New Mexico
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including "Findings" with proposed recommendations) the above-referenced site (dated March 2013). 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 proposed recommendations for the D. S. Hugh 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)];
- Also, please be sure to include **1-Methylnaphthalene** and **2-Methylnaphthalene** in the PAHs analyses.

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 “1.3 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

Also, please include toluene with a limit of 0.75 mg/L.