

**From:** [Yu, Olivia, EMNRD](#)  
**To:** "Camille J Bryant"  
**Cc:** "Pair, Randal"; "Stanley, Curtis D."  
**Subject:** RE: 1RP-4276 Remediation Summary and Site Closure Request  
**Date:** Thursday, August 10, 2017 10:30:00 AM  
**Attachments:** approved\_1RP4276\_site closure request.pdf  
approved\_finalC141\_Cotton Draw Station.pdf

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Dear Ms. Bryant:

Please see attachments for your records.

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4276** closed. This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Camille J Bryant [mailto:CJBryant@paalp.com]  
**Sent:** Thursday, August 10, 2017 9:51 AM  
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Subject:** RE: 1RP-4276 Remediation Summary and Site Closure Request

Yes ma'am.

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**From:** Yu, Olivia, EMNRD [mailto:[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)]  
**Sent:** Tuesday, August 08, 2017 4:22 PM  
**To:** Camille J Bryant; 'Pair, Randal'  
**Cc:** 'Stanley, Curtis D.'  
**Subject:** RE: 1RP-4276 Remediation Summary and Site Closure Request [External]

Ms. Bryant:

I just noticed the email correspondence in the closure report for 1RP-4276. Due to the additional sampling for 3B, SK200C, and P400C in December 2016, this release is aiming for a complete closure with no portion remaining for remediation at time of abandonment. Correct?

Thanks,  
Olivia

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**From:** Yu, Olivia, EMNRD  
**Sent:** Friday, July 14, 2017 11:00 AM  
**To:** 'Camille J Bryant' <[CJBryant@paalp.com](mailto:CJBryant@paalp.com)>; 'Pair, Randal' <[rpair@blm.gov](mailto:rpair@blm.gov)>  
**Cc:** 'Stanley, Curtis D.' <[CDStanley@trcsolutions.com](mailto:CDStanley@trcsolutions.com)>  
**Subject:** RE: 1RP-4276 Remediation Summary and Site Closure Request

Ms. Bryant:

To follow-up on our phone conversation this morning regarding 1RP-4276, NMOCD will agree that the questions posed in the email dated July 12, 2017 have been addressed.

- May 6, 2017 is the soil sample date, not the treatment date and not related to the information in the Status column.
- Status refers to the condition of the location where the sample was taken.
- Microblaze was applied to only the sample areas indicated with a Treated status in Table 1.

Please inform if there is additional information to address.

Thanks,  
Olivia

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**From:** Yu, Olivia, EMNRD  
**Sent:** Wednesday, July 12, 2017 12:38 PM  
**To:** 'Camille J Bryant' <[CJBryant@paalp.com](mailto:CJBryant@paalp.com)>; 'Pair, Randal' <[rpair@blm.gov](mailto:rpair@blm.gov)>  
**Cc:** 'Stanley, Curtis D.' <[CDStanley@trcsolutions.com](mailto:CDStanley@trcsolutions.com)>  
**Subject:** RE: 1RP-4276 Remediation Summary and Site Closure Request

Dear Ms. Bryant:

Please address these questions regarding the closure report for 1RP-4276. There are several discrepancies between the text and the data presented in the table.

- The first treatment date indicated in text (May 18, 2016) differs from the date written in the table (May 6, 2016). Why? Is this a typo?
- What does Status column represent? Samples were taken after treatment, excavation, or in situ? Or does Status identify the areas that were treated, excavated, or in situ? Text indicated that the entire release area was applied with Microblaze.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Camille J Bryant [<mailto:CJBryant@paalp.com>]  
**Sent:** Monday, June 26, 2017 8:00 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; 'Pair, Randal' <[rpair@blm.gov](mailto:rpair@blm.gov)>  
**Cc:** 'Stanley, Curtis D.' <[CDStanley@trcsolutions.com](mailto:CDStanley@trcsolutions.com)>  
**Subject:** FW: 1RP-4276 Remediation Summary and Site Closure Request

Good Morning Olivia and Randy,

Please find attached the Final C-141 for the Plains Pipeline crude oil Release Site known as Cotton Draw Station (1RP-4276). I apologize for not including the C-141 in the original submittal. 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

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**From:** Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]  
**Sent:** Tuesday, June 20, 2017 10:21 AM  
**To:** 'Pair, Randal'; [Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)  
**Cc:** Camille J Bryant  
**Subject:** 1RP-4276 Remediation Summary and Site Closure Request [External]

Randy / Olivia,

On behalf of Plains Pipeline, L.P. (Plains), please find the attached “Remediation Summary and Site Closure Request” (Site Closure Request) for the crude oil Release Site known as Cotton Draw Station (1RP-4276). The Release Site is located in Unit Letter “E” (SW1/4,NW1/4), Section 3, Township 26 South, Range 32 East, NMPM in Lea County, New Mexico. The Release Site GPS coordinates are N 32.07570 degrees W103.67049 degrees. The property is administered by The United States Department of the Interior-Bureau of Land Management (BLM) -Carlsbad Field Office.

As general background information:

On April 19, 2016, a blind flange, located in the vicinity of Pump Skid P-400 apparently had been removed prior the completion of all repairs to the system. The Pump was activated to test the system, which resulted in the release of crude oil. The volume of the release was estimated at approximately one-hundred ninety (190) barrels (bbls) of crude oil, of which approximately one hundred (100) bbls was recovered for a net loss of approximately ninety (90) barrels of crude oil.

The released crude oil impacted a surface area measuring approximately fifty-three thousand (53,000) square feet inside the confines of the Cotton Draw Station Facility, then flowed south and impacted an area measuring approximately two-thousand eight-hundred (2,800) square feet along the south fence line outside of the facility. The released fluid continued to the south, impacting the adjacent pastureland measuring approximately four hundred fifty (450) square feet.

All remediation, sampling and backfilling activities have been completed and BLM and NMOCD representative email correspondence is provided in the Site Closure Request for your reference. If you have any questions or concerns, please contact Camille Bryant (Plains Pipeline, LP) at 575.441.1099.

Respectfully submitted on behalf of Plains and Camille Bryant,

Curt D. Stanley  
Senior Project Manager



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