



September 12, 2024

Mr. Robert Hamlet
Environmental Specialist - Advanced
Environmental Bureau
New Mexico Oil Conservation Division
811 South First Street
Artesia, New Mexico, 88210

505 East Huntland Dr.
Suite 250
Austin, TX 78752

T 512.329.6080
TRCcompanies.com

**Re: Response to New Mexico Oil Conservation Division Denial Comments
November 2023 Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction
System Recommendation Report
Holly Energy Partners – Operating, L.P.
Former Tank 970 / Artesia Station West, Eddy County, New Mexico
NMOCD Incident No. nCE2003752717**

Dear Mr. Hamlet:

On November 14, 2023, Holly Energy Partners – Operating, L.P. (HEP) submitted the *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* (Recommendation Report) for the Former Tank 970 / Artesia Station West facility (the “Site”) Incident Number nCE2003752717, located southeast of Artesia in Eddy County, New Mexico. The New Mexico Oil Conservation Division (NMOCD) rejected the submitted *Application for Administrative Approval of a Release Notification and Corrective Action* (C-141), for Incident ID (n#) nCE2003752717 on June 11, 2024, with comments. HEP, NMOCD, and TRC Environmental Corporation (TRC) representatives met virtually on August 2, 2024, to discuss the NMOCD comments. An email summary of the key discussion points was submitted by TRC to NMOCD on August 7, 2024. The meeting summary email and other correspondence with NMOCD are included in **Attachment A**.

This letter provides HEP’s responses to the NMOCD denial comments based on the August 2, 2024, virtual meeting and in accordance with the August 7, 2024, email summary. This letter also includes a proposal for additional soil delineation activities and a request for NMOCD approval of the soil vapor extraction (SVE) system.

RESPONSE TO NMOCD COMMENTS

Below are NMOCD’s June 11, 2024, denial comments (shown in *italics*) to the November 2023 Recommendation Report and HEP’s responses to NMOCD’s denial comments.

Mr. Robert Hamlet
Response to NMOCD's June 2024 Denial Comments
September 12, 2024
Page 2

NMOCD Comment 1

The Remediation Plan/Deferral Request is Denied. The proposed deferral area will need to be vertically/horizontally delineated before a deferral request can be considered. Safety should be paramount sampling around equipment and pipelines, use your best judgement. If you believe a certain area will require a deferral, please make sure that it has been fully delineated. Much of the proposed deferral area in Figure 4 is not located in or around equipment/infrastructure. Samples will need to be collected every 500 ft2 in the proposed deferral area. Only sample locations that would cause a facility deconstruction will be eligible for a deferral. A remediation endpoint for TPH GRO, 1,000 mg/kg is denied. Please, make sure the entire release area is included on the site map, not just the release area inside the facility fence.

HEP Response to NMOCD Comment 1

As discussed during the August 2024 virtual meeting, the deferral area presented in the Recommendation Report is based on Site characterization results and sidewall confirmation soil sample results. Notably, deferral is required due to safety (above/below ground infrastructure) and security (fencing/berms) associated with facility operation. **Figure 1** depicts the locations of tank berms, aboveground conduit and pipelines, aboveground and belowground utilities, and facility equipment, all of which limited the areas that could be safely accessed to collect samples. With respect to NMOCD's request for a sampling frequency of one sample every 500 square feet within the deferral area, NMOCD acknowledged during the August 2024 virtual meeting that there is no regulatory basis for the requested sampling frequency and that it may not be appropriate or necessary. As discussed, HEP cannot safely implement such a sampling frequency within the deferral area.

As requested by NMOCD, additional photographs were taken of the proposed deferral area and are presented in **Attachment B**. As shown, no visually apparent crude oil-affected soil is present at the ground surface within the proposed deferral area that might pose a risk to Site workers or wildlife (e.g., birds). Based on the absence of visually apparent crude oil-affected soil at the ground surface and the limited areas that could be safely accessed to collect additional samples within the deferral area, no additional soil sample data is currently warranted within the proposed deferral area. Of note, HEP is not requesting Site closure at this time. Site closure will be pursued upon closure of the active facility and following additional Site characterization and remediation/reclamation within the deferral area, as necessary.

The entire release area (former Tank 970 footprint) and delineation area (extent of soil with hydrocarbon concentrations above Closure Criteria) are shown on Figures 2 and 4 of the Recommendation Report. The southern and eastern extents of the delineation area are generally consistent with the Site boundary. As discussed during the August 2024 virtual meeting, the delineation area extent has not been arbitrarily established at the southern and eastern Site boundary. Rather, a tank berm is present along the southern and eastern Site

Mr. Robert Hamlet
Response to NMOCD's June 2024 Denial Comments
September 12, 2024
Page 3

boundary at the southeast portion of the Site. The release was believed to be a leak from the bottom of former Tank 970 within the tank berm (i.e., not affecting the entire facility) as evidenced by the limited lateral extent of hydrocarbon affected soil. County Road CR 229 is located immediately east of the Site and a lease road is located immediately south of the Site. Delineation borings SB-South and SB-East, located in accessible locations beyond these roads, provide delineation of hydrocarbon concentrations to Reclamation Standards in the upper 4 feet and to Closure Criteria below 4 feet below ground surface (bgs) to the south and east, respectively. Thus, no additional soil delineation is warranted to the south and east of the release area.

Additional soil delineation is proposed to the west and north of the release area to delineate the extent of hydrocarbons in these directions as follows:

- West – In accordance with NMOCD's request during the August 2024 virtual meeting, a "deep" boring is proposed west of the former Tank 970 berm along the western Site boundary. The boring will be drilled to a depth of approximately 102 feet bgs to provide lateral delineation of hydrocarbon concentrations to Reclamation Standards in the upper 4 feet and to Closure Criteria below 4 feet bgs.
- North – A shallow hand auger boring is proposed at the northern Site boundary. The boring will be advanced to a depth of 4 feet bgs to provide lateral delineation of hydrocarbon concentrations to Reclamation Standards in the upper 4 feet at boring SB-North. Additional lateral delineation of hydrocarbons to Closure Criteria in soil below 4 feet bgs at the northern Site boundary is not needed, as the existing soil sample results below 4 feet bgs at boring SB-North do not exceed the Closure Criteria.

The proposed boring locations are depicted on **Figure 1**. Additional details regarding the proposed delineation borings are provided below.

HEP acknowledges NMOCD's denial of total petroleum hydrocarbons (TPH) gasoline range organics (GRO) of 1,000 milligrams per kilogram (mg/kg) as a remediation endpoint for soil beneath 4 feet bgs for the proposed SVE system. The applicable SVE remediation endpoint for TPH GRO will be consistent with the Closure Criteria, which is the sum of TPH GRO and diesel range organics (DRO) (TPH GRO+DRO) of 1,000 mg/kg.

NMOCD Comment 2

Confirmation samples must meet OCD Spill Rule Table 1 standards. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. A variance was approved on May 5th, 2023, for 500 ft2 floor confirmation samples. The release area will still need confirmation sidewall samples representing no more than 200 ft2. Additional SVE wells may need to be installed based on the O&M data (e.g.,

Mr. Robert Hamlet
Response to NMOCD's June 2024 Denial Comments
September 12, 2024
Page 4

effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.

HEP Response to NMOCD Comment 2

The use of Closure Criteria (for sites with groundwater deeper than 100 feet bgs) to delineate the release area and verify hydrocarbon concentrations in sidewall confirmation samples was proposed in the July 2022 *Revised Site Characterization and Remediation Workplan* (Workplan), which was approved by NMOCD in January 2023. During the August 2024 virtual meeting, NMOCD clarified the purpose for their request that sidewall confirmation samples meet Reclamation Standards is to establish that the release from former Tank 970 has not migrated beyond the Site boundary despite the presence of a berm around former Tank 970. As discussed above, additional borings are proposed to delineate the extent of hydrocarbons west and north of the release area, including to the Reclamation Standards in the upper 4 feet. Additional delineation to the Reclamation Standards is not required to the south and east of the release area.

In response to NMOCD's request for sidewall confirmation samples every 200 square feet, a sidewall confirmation sample frequency of one sample per 100 linear feet was proposed in the July 2022 Workplan, which was approved by NMOCD in January 2023 and implemented during 2023 remediation activities. During the August 2024 virtual meeting, and as documented in the August 7, 2024, email summary, NMOCD acknowledged that the request for one sidewall sample per 100 linear feet was previously approved by NMOCD and that this sidewall sampling frequency is adequate.

HEP concurs with NMOCD's statement that additional SVE wells may need to be installed based on the SVE operation and maintenance (O&M) data (e.g., effective radius of influence [ROI]) and/or confirmation soil sample results. SVE system O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.

PROPOSED ADDITIONAL SOIL DELINEATION

As discussed above, HEP proposes to advance two additional borings to better delineate hydrocarbons in soil west and north of the release area. A "deep" boring is proposed along the western Site boundary (i.e., west of the former Tank 970 berm). The boring will be drilled to a depth of approximately 102 feet bgs using an air rotary drill rig to provide delineation of hydrocarbon concentrations to Reclamation Standards in the upper 4 feet and to Closure Criteria below 4 feet bgs. The proposed boring location (SB-West) is presented in **Figure 1** and is proposed west of the Site fence line based on consideration of the access needed for the air

Mr. Robert Hamlet
Response to NMOCD's June 2024 Denial Comments
September 12, 2024
Page 5

rotary drill rig, infrastructure and utilities present in the vicinity of the active Tank 974, and HEP operational and safety procedures. Lithology, field observations of the potential presence of petroleum hydrocarbons, including hydrocarbon odor and staining, and photo-ionization detector (PID) readings will be logged. The final boring location may be shifted slightly in the field based on utility clearance and drill rig accessibility. Soil samples will be collected for laboratory analysis at 5- to 10-foot intervals (including at least one sample in the upper 4 feet), preferentially at intervals with elevated PID readings and/or evident hydrocarbon odor or staining (if present). Following drilling, the borehole will be backfilled with cement-bentonite grout or hydrated bentonite chips. Soil cuttings will be containerized in 55-gallon drums pending off-Site disposal.

A hand auger boring is proposed immediately north of the Site boundary. The boring will be drilled to a depth of 4 feet bgs to delineate hydrocarbon concentrations above the Reclamation Standard in the upper 4 feet at boring SB-North. The proposed boring location (HA-North-2) is presented in **Figure 1** and has been selected with consideration of infrastructure and utilities present in the vicinity. The final boring location may be shifted slightly in the field based on utility clearance. Lithology, field observations of the potential presence of petroleum hydrocarbons, including hydrocarbon odor and staining, and PID readings will be logged. At least one soil sample will be collected for laboratory analysis in the upper 4 feet, preferentially at the interval with the highest PID reading and/or evident hydrocarbon odor or staining (if present). The borehole will be backfilled with soil cuttings.

The soil samples will be submitted to Eurofins Midland for analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) by United States Environmental Protection Agency (EPA) Method SW8260, TPH by EPA Method 8015M, and chloride by EPA Method 300.

PATH FORWARD AND REQUEST FOR SVE SYSTEM APPROVAL

In the interest of moving forward with remediation at the Former Tank 970 release area, HEP requests that NMOCD approve this response letter with HEP's commitment to conduct the following:

- Complete additional delineation of the release area utilizing a shallow boring to the north and a deep boring to the west and provide the results in a letter report within 60 days of receiving laboratory results. The letter report will include a figure depicting the revised delineation area extent based on the additional soil delineation results.
- Implement full-scale SVE to reduce TPH GRO and BTEX concentrations in soil from 4.5 to 32 feet bgs to below the Closure Criteria utilizing the currently installed network of four (4) SVE wells.

Mr. Robert Hamlet
 Response to NMOCD's June 2024 Denial Comments
 September 12, 2024
 Page 6

- At the time of abandonment of the Facility or the removal of the surface equipment and features in the Deferral Area, conduct additional sampling to provide updated soil data and/or submit a revised remediation workplan to NMOCD proposing remedial activities to address the remaining soil with total BTEX and/or TPH concentrations above the NMOCD Closure Criteria.
- Perform final remediation and reclamation of the facility area in accordance with 19.15.29.12 and 19.15.29.13 New Mexico Administrative Code (NMAC), if necessary, once the facility is no longer operational.

HEP will initiate installation of the full-scale SVE system at the Site with NMOCD's approval of this letter. The system will be installed within 120 days of NMOCD approval of this letter, pending the availability and installation of an electrical power drop by a local power utility. While additional soil delineation is proposed, the additional delineation results are not anticipated to change the selection of SVE as an appropriate and effective remedy for TPH GRO and BTEX treatment at the Site. Thus, HEP requests approval to implement SVE.

Per NMOCD's request, additional SVE wells may be installed based on the SVE O&M data and confirmation soil sample results, while the applicable SVE remediation endpoint for TPH GRO will be consistent with the Closure Criteria for TPH GRO+DRO, which is 1,000 mg/kg. SVE system O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.

CLOSING

HEP will implement the actions outlined in this letter upon NMOCD approval. HEP is available to discuss this letter and the proposed path forward at NMOCD's convenience. If you should have any questions or comments regarding this project, please contact Melanie Nolan of HEP at (575) 748-8972, or Bryan Gilbert of TRC at (925) 699-6184.

Sincerely,



Marianne Link
 Project Manager



Bryan Gilbert, P.G.
 Austin Office ECR Practice Leader

Figure

Figure 1 – Proposed Boring Location Map

Mr. Robert Hamlet
Response to NMOCD's June 2024 Denial Comments
September 12, 2024
Page 7

Attachments

Attachment A – NMOCD Correspondence
Attachment B – Site Photographs

cc: Mike Bratcher, NMOCD, Artesia, New Mexico
Jason Leik, P.E., HF Sinclair, Dallas Texas
Arsin Sahba, P.G., HF Sinclair, Dallas, Texas
Paul Richardson, HF Sinclair, Tulsa, Oklahoma
Jared Stoffel, P.G., TRC, Austin, Texas



Attachment A
NMOCD Correspondence

HEP Artesia Station West Former Tank 970 - Incident ID nCE2003752717 - Meeting Summary

Gilbert, Bryan <BGilbert@trccompanies.com>

Wed 8/7/2024 5:35 PM

To: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Cc: Stoffel, Jared <JStoffel@trccompanies.com>; Richardson, Paul <Paul.Richardson@HFSindair.com>; Link, Marianne <MLink@trccompanies.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSindair.com>; Nolan, Melanie <Melanie.Nolan@HFSindair.com>

Thank you for taking the time to meet with us on August 2, 2024, regarding the Artesia Station West – Former Tank 970 site (Incident ID nCE2003752717). The virtual meeting was attended by the following:

- Holly Energy Partners (HEP) and HF Sinclair: Jason Leik, Arsin Sahba, and Melanie Nolan
- NMOCD: Robert Hamlet and Michael Bratcher
- TRC: Bryan Gilbert, Jared Stoffel, and Marianne Link

TRC provided a summary of the project background and site characterization results and then discussed NMOCD's June 2024 comments to the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* (Recommendation Report). A summary of the key discussion points is provided below.

Discussion of Release Area:

- In response to NMOCD's comment that the entire release area be shown on the site map, TRC provided clarification that the entire release and delineation areas were included on Figure 2 of the November 2023 Recommendation Report.
- NMOCD inquired on the overall basis of delineation, particularly along the southern and eastern property boundaries. TRC and HEP clarified that the delineation area is located within the site boundaries based on historical site characterization results and the presence of a berm along the site southern and eastern site boundaries. TRC also noted that a road is present immediately east of the site and a lease road is present immediately south of the site.

Discussion of Proposed Deferral Area:

- TRC and HEP clarified that the deferral area is based on site characterization results and sidewall confirmation soil sample results and that deferral is required due to safety (above/below ground infrastructure) and security (fencing/berms) associated with facility operation.
- Regarding NMOCD's request for a sampling frequency of one sample every 500 square feet within the deferral area, NMOCD acknowledged that there is no regulatory basis for this request and that it may not be appropriate or necessary. However, NMOCD indicated there may not be enough soil sample data within the deferral area, particularly near boring SB-3, and that the deferral area can be better "bounded" to the north.
- NMOCD requested additional photographs of the proposed deferral areas to demonstrate that visually apparent crude oil-affected soil is not present at the ground surface that might pose a risk to site workers or wildlife (e.g., birds).

Discussion of Confirmation Sampling:

- In response to NMOCD's request that sidewall confirmation samples meet Reclamation Standards to define the edge of release, TRC and HEP indicated that the use of Closure Criteria (for sites with groundwater deeper than 100 feet bgs) was proposed in the July 2022 Workplan, which was approved by NMOCD in January 2023.
- NMOCD indicated a preference for additional soil data to demonstrate that crude oil-affected soil does not extend beyond the site boundaries.
- With respect to delineation to the west, TRC acknowledged that TPH concentrations at HA-West exceed Reclamation Standards in the upper 4 feet, but that lateral delineation beneath 4 feet was provided by soil sample data from nearby boring SB-2, which was drilled to 102 feet bgs.
- NMOCD requested additional delineation west of borings HA-West and SB-2 (i.e., west of the former Tank 970 berm) in the vicinity of active Tank 974. HEP indicated safe access may be limited east of Tank 974. NMOCD clarified that the boring may be drilled west of Tank 974 along the western site boundary.

- In response to NMOCD's request for sidewall confirmation samples every 200 square feet, TRC provided clarification that a sidewall confirmation sample frequency of one sample per 100 linear feet was proposed in the July 2022 Workplan, which was approved by NMOCD in January 2023. NMOCD acknowledged that the request for one sample per 100 linear feet was approved by OCD and that the sidewall sampling frequency of one sample per 100 linear feet was adequate.

Discussion of SVE Implementation

- TRC concurred with NMOCD's request that additional SVE wells may be required pending SVE O&M data and confirmation soil sample results, and noted that this iterative approach is typical of SVE remediation systems.
- NMOCD inquired on the large SVE effective radius of influence (ROI) observed during extraction at well VW-04 (i.e., 185 feet). TRC indicated the overall large effective ROIs observed during the pilot test may be due, in part, to the liner installed in the excavation prior to backfilling (i.e., the liner promotes lateral soil vapor movement). TRC also indicated the range in effective ROIs observed during the pilot test may be due to lithologic heterogeneity between the wells and/or slight changes in how the SVE wells "communicate" with the formation.

Of note, HEP reiterated that they are not requesting site closure at this time. Site closure will be pursued upon closure of the active facility and following additional site characterization and remediation/reclamation within the deferral area, as necessary.

Please let us know if you have any revisions or additions to the above summary. In the next few weeks, we will provide a response to NMOCD including photographs of the deferral area, plan for proposed boring(s), and a request for NMOCD approval of SVE implementation.

Bryan Gilbert, P.G.
Austin Office ECR Practice Leader



505 E. Huntland Drive, Suite 250, Austin, TX 78752
C: 925.699.6184 | F: 512.329.8750

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

[EXTERNAL] Rejection of Application for Incident ID nCE2003752717 - Meeting Request

Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Fri 7/12/2024 11:31 AM

To: Robert.Hamlet@emnrd.nm.gov <Robert.Hamlet@emnrd.nm.gov>
Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Link, Marianne <MLink@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; mike.bratcher@emnrd.nm.gov <mike.bratcher@emnrd.nm.gov>

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Mr. Hamlet,

We have received NMOCD's June 11, 2024, notice of its rejection of the Application for Administrative Approval of a Release Notification and Corrective Action (C-141), for Incident ID (n#) nCE2003752717. HEP would like to propose a meeting between NMOCD, HEP, and TRC to discuss NMOCD's comments to the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report*. We are providing some specific questions and discussion points below to help guide this discussion.

- **NMOCD Comment: Please, make sure the entire release area is included on the site map, not just the release area inside the facility fence.** HEP Discussion Point: HEP would appreciate additional information on this request, as Figure 4 of the *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* presents the entire release area.
- **NMOCD Comments: Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.** HEP Discussion Point: HEP would appreciate confirmation on whether NMOCD is approving the proposed remedy of SVE for affected soils beneath 4.5 feet bgs.

HEP would like to discuss the above NMOCD comments and NMOCD's remaining comments during the meeting.

Please let us know who will attend the meeting and several dates that you and your team would be available to meet, and we will send out a meeting invite.

I can now be reached at: Melanie.Nolan@HFSinclair.com. Please update your records.

Thank you,

Melanie Nolan
Environmental Specialist | Environmental

O 575-748-8972
M 214-605-8303

Melanie.Nolan@hfsinclair.com
www.HFSinclair.com

1602 W. Main, Artesia, New Mexico 88210



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Tuesday, June 11, 2024 1:54 PM

To: Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Subject: [EXTERNAL Email]: The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

CAUTION: This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, for the following reasons:

- The Remediation Plan/Deferral Request is Denied. The proposed deferral area will need to be vertically/horizontally delineated before a deferral request can be considered. Safety should be paramount sampling around equipment and pipelines, use your best judgement. If you believe a certain area will require a deferral, please make sure that it has been fully delineated. Much of the proposed deferral area in Figure 4 is not located in or around equipment/infrastructure. Samples will need to be collected every 500 ft2 in the proposed deferral area. Only sample locations that would cause a facility deconstruction will be eligible for a deferral. A remediation endpoint for TPH GRO, 1,000 mg/kg is denied. Please, make sure the entire release area is included on the site map, not just the release area inside the facility fence.
- Confirmation samples must meet OCD Spill Rule Table 1 standards. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. A variance was approved on May 5th, 2023, for 500 ft2 floor confirmation samples. The release area will still need confirmation sidewall samples representing no more than 200 ft2. Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 285414.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Robert Hamlet

575-748-1283

Robert.Hamlet@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

[EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Tue 6/11/2024 6:01 PM

To: Leik, Jason <Jason.Leik@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Link, Marianne <MLink@trccompanies.com>

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Please see below concerning the Artesia Tank 970 OCD has basically thrown a whammy at us. Jared is reviewing and will send a follow-up email detailing what this means and possible measures to address.

I can now be reached at: Melanie.Nolan@HFSinclair.com. Please update your records.

Thank you,

Melanie Nolan
Environmental Specialist | Environmental

O 575-748-8972
M 214-605-8303

Melanie.Nolan@hfsinclair.com
www.HFSinclair.com

1602 W. Main, Artesia, New Mexico 88210



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Tuesday, June 11, 2024 1:54 PM
To: Nolan, Melanie <Melanie.Nolan@HFSinclair.com>
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

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- Confirmation samples must meet OCD Spill Rule Table 1 standards. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. A variance was approved on May 5th, 2023, for 500 ft2 floor confirmation samples. The release area will still need confirmation sidewall samples representing no more than 200 ft2. Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.

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Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Robert Hamlet

575-748-1283

Robert.Hamlet@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

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From: Hamlet, Robert, EMNRD
To: Stoffel, Jared
Cc: Bratcher, Michael, EMNRD; Sahba, Arsin; Melanie Nolan; Leik, Jason; Gilbert, Bryan; Clark, Darija
Subject: RE: [EXTERNAL] Tank 970 (NCE2003752717) Notification and Sampling Variance Request
Date: Friday, May 5, 2023 12:37:25 PM
Attachments: image002.jpg
image003.png

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Jared,

A variance is approved for collecting 5-point composite confirmation samples to represent each 500 square foot area. Please include this e-mail correspondence in the closure report.

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
506 W. Texas Ave. | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Stoffel, Jared <JStoffel@trccompanies.com>
Sent: Friday, May 5, 2023 10:08 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>
Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>
Subject: [EXTERNAL] Tank 970 (NCE2003752717) Notification and Sampling Variance Request

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Mr. Hamlet,

We intend to start remedial activities at the Tank 970/Artesia Station West Site (NCE2003752717) on May 8, 2023. The remedial activities include soil excavation with off-site disposal, liner installation, backfilling the excavation and a soil vapor extraction (SVE) pilot test. The confirmation soil sampling

associated with soil excavation is scheduled to start as soon as May 9, 2023. The soil remediation associated with the excavation, liner installation, and backfill is anticipated to take up to approximately 25 working days. This email is intended to serve as the 48-hour notice of confirmation sampling activities. The SVE well installation and pilot test will be performed within 90 days of completion of the backfilling activities.

Additionally, we would like to request a variance to the confirmation soil sampling plan presented in the July 2022 *Revised Site Characterization Report and Remediation Workplan* (Workplan), which was approved by the NMOCD on January 17, 2023. The NMOCD-approved Workplan included the collection of excavation bottom samples on a 200 square-foot basis consistent with NMAC 19.15.29. We are requesting a variance to the excavation bottom sampling frequency to 1 sample per 500 square feet due to the planned installation of a liner at the base of the excavation (i.e., at 4.5 feet below ground surface) prior to backfilling with clean, imported fill. The liner will prevent stormwater infiltration through underlying affected soil and promote lateral air flow through the affected zone during the soil vapor extraction (SVE) pilot test, which will be conducted following excavation/liner/backfill activities. The confirmation samples at the base of the excavation will not drive further excavation because soils deeper than 4.5 feet bgs will be remediated by the liner and SVE. Excavation sidewall samples will be collected at a sampling frequency of 1 sample per 100 linear feet of sidewall in accordance with the NMOCD-approved Workplan.

Please let us know if we can proceed with a reduced excavation bottom sampling frequency of 1 sample per 500 square feet.

Thank you very much.

Jared Stoffel, P.G.
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752
F: 512 329 8750 | C: 432 238 3003
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From: Nolan, Melanie
To: Stoffel, Jared; Sahba, Arsin; Leik, Jason; Gilbert, Bryan
Cc: Hoover, Shannon; Clark, Darla
Subject: [EXTERNAL] Artesia Tank 970 - The Oil Conservation Division (OCD) has approved the application, Application ID: 128062
Date: Tuesday, January 17, 2023 9:50:46 AM
Attachments: [image001.png](#)

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Please see the below approval (with conditions) for Artesia Tank 970 from NMOCD.

Melanie Nolan
Environmental Specialist/EHS Department

Holly Energy Partners

O 575-748-8972

M 214-605-8303

Melanie.Nolan@hollyenergy.com

www.hollyenergy.com

1602 W. Main, Artesia, New Mexico, 88210



From: OCDOOnline@state.nm.us <OCDOOnline@state.nm.us>
Sent: Tuesday, January 17, 2023 8:41 AM
To: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>
Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 128062

CAUTION: This email originated from outside of the HollyFrontier organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, with the following conditions:

- The Revised Remediation Plan is Conditionally Approved. The OCD, TRC, and HEP held a meeting on February 21st, 2022 to discuss the path forward on the Former Tank 970 release (NCE2003752717). A follow-up email was sent on 3/14/2022 and acknowledged by the OCD environmental group (Bradford Billings and Robert Hamlet). Please implement the agreed upon steps forward that were discussed in meeting and 3/14/2022 follow-up email. This would include a soil vapor extraction (SVE) pilot test, excavation of soil with BTEX and/or TPH above closure criteria in accessible portions of the site to a depth of approximately 4.5 feet (bgs), liner install at the base of the excavation and backfill to current grade. TPH (DRO) and (MRO) in soil at depths greater than approximately 25 feet below ground surface (bgs) do not require additional action based on the current site status and proposed action plan.

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Robert Hamlet
575-748-1283
Robert.Hamlet@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive
Santa Fe, NM 87505

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From: Stoffel, Jared
To: Hamlet, Robert, EMNRD
Cc: Sahba, Arsin; Gilbert, Bryan; Clark, Darija; Bratcher, Michael, EMNRD; Nobui, Jennifer, EMNRD; Leik, Jason; Melanie Nolan
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)
Date: Friday, January 13, 2023 12:11:00 PM
Attachments: [image001.png](#)

Robert – thank you very much for the update – have a great weekend!

Jared Stoffel, P.G.
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752
F: 512 329 8750 | C: 432 238 3003
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From: Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>
Sent: Friday, January 13, 2023 12:10 PM
To: Stoffel, Jared <JStoffel@trccompanies.com>
Cc: Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Nobui, Jennifer, EMNRD <lennifer.Nobui@emnrd.nm.gov>; Leik, Jason <Jason.Leik@HFSinclair.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

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Jared,

I'm hoping to get to the report next week. You should get an email once it's reviewed.

Regards,

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
506 W. Texas Ave. | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us

<http://www.emnrd.state.nm.us/OCD/>



From: Stoffel, Jared <JStoffel@trccompanies.com>
Sent: Friday, January 13, 2023 11:02 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>
Cc: Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Nobui, Jennifer, EMNRD <Nobui@emnrd.nm.gov>; Leik, Jason <Jason.Leik@HFSinclair.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>
Subject: FW: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

I wanted to follow up on this workplan – is there any way that we could know where in your current queue we sit? We are trying to put together a projected timeline for this project and we are looking for a quick update. Please let me know what you think. Thank you.

Jared Stoffel, P.G.
Project Manager



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From: Stoffel, Jared
Sent: Wednesday, September 28, 2022 11:35 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; melanie.nolan <melanie.nolan@hollyenergy.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; mike.bratcher@state.nm.us; Nobui, Jennifer, EMNRD <Nobui@state.nm.us>
Subject: FW: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

Robert,
I wanted to reach out and confirm that you didn't have any questions or concerns with regards to this workplan – please let me know if any arise. Thank you.

Jared Stoffel, P.G.

Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752
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From: Stoffel, Jared

Sent: Friday, July 29, 2022 11:53 AM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

Robert,

This report was submitted through the portal last Friday July 22nd. Please let me know if you have any questions, comments, or concerns during your review. Thank you and have a great weekend!

Jared Stoffel, P.G.
Project Manager



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From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Sent: Wednesday, July 13, 2022 10:16 AM

To: Stoffel, Jared <JStoffel@trccompanies.com>

Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

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Jared,

Please uploaded the report to the payment portal at your earliest convenience. The OCD doesn't pre-review reports. Decisions need to be tracked and logged on the OCD Permitting incident page throughout the incident's life cycle. Additionally, make sure all correspondence is included in the report. Please, attach the email thread with your understanding of expectations that need to be met and Bradford's concurrence.

Regards,

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Stoffel, Jared <JStoffel@trccompanies.com>

Sent: Tuesday, July 12, 2022 9:44 AM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>

Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

Robert – I wanted to circle back with you and Bradford about this report – have either of you gotten a chance to review? We just wanted to confirm the status and see if there are any questions or concerns that you'd like us to address prior to submittal through the portal. Thanks!

Jared Stoffel, P.G.

Project Manager



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From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Monday, June 6, 2022 2:38 PM
To: Stoffel, Jared <jstoffel@trccompanies.com>
Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

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Jared,

Would you send Brad B. and myself a copy of the revised report? We'll both take a look at it and get back to you in the next week or so. Thanks

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Stoffel, Jared <jstoffel@trccompanies.com>
Sent: Monday, June 6, 2022 12:14 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

Robert,

Thank you for the call last week regarding the draft Revised Site Characterization Report and Remediation Workplan (report) for the Former Tank 970/Artesia Station West site. I would like to clarify my understanding of our discussion – at this time, we are waiting for Bradford's informal review of the draft report to confirm that our proposed workplan is appropriate prior to submission through the portal to streamline the process. The report was developed in accordance with our discussion on February 21, 2022. Bradford indicated he agreed with our understanding of the discussion on March 14, 2022. I've attached the email thread with our understanding and Bradford's concurrence for your convenience. We would like to ensure we are correct in our understanding that we are still waiting on Bradford's informal of the draft report review prior to formal submission via the portal. If we are incorrect in this understanding, please let us know and we will submit the final report through the portal – we would just like to confirm our next steps and continue to progress the project forward. Thank you.

Jared Stoffel, P.G.
Project Manager



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From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Wednesday, April 20, 2022 10:01 AM
To: Stoffel, Jared <JStoffel@trccompanies.com>
Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>
Subject: RE: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

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Jared,

This will need to be uploaded to the payment portal. The OCD doesn't pre-review reports.

Decisions need to be tracked and logged on the OCD Permitting incident page throughout the life cycle of incident. Additionally, make sure all correspondence is included in the report.

Regards,

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau

EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Stoffel, Jared <JStoffel@trccompanies.com>

Sent: Friday, April 15, 2022 1:36 PM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird

<Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>;

mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>;

Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>

Subject: [EXTERNAL] Draft Revised Site Characterization Report and Remediation Workplan - Former Tank 970/Artesia Station West (NCE2003752717)

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Robert and Bradford,

Please see the attached Draft Revised Site Characterization Report and Remediation Workplan (Draft Revised SCR and RWP) for the Former Tank 970/Artesia Station West (NCE2003752717). As discussed during our virtual meeting on February 21, 2022 and confirmed in our correspondence on March 14, 2022, the Draft Revised SCR and RWP is submitted for your review prior to submittal of the final Revised SCR and RWP through the portal. We have modified the previously submitted and denied SCR and RWP (denied November 29, 2022) as discussed during the February 2022 virtual

meeting. A cover letter outlining revisions from the previously submitted SCR and RWP is provided at the beginning of the document. Note that the updated C-141 in Appendix A will be signed upon submittal of the final Revised SCR and RWP via the portal. Please let us know if you have any questions, concerns, or comments. If you approve the Draft Revised SCR and RWP, please let us know and we will finalize and submit through the NMOCD e-permitting portal.

Thank you for your time and consideration.

Jared Stoffel, P.G.
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752
F: 512 329 8750 | C: 432 238 3003
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From: Billings, Bradford, EMNRD
To: Stoffel, Jared; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Nobui, Jennifer, EMNRD; Hensley, Chad, EMNRD
Cc: Sahba, Arsin M.; Trevor.baird; Melanie Nolan; mark.shemaria; Gilbert, Bryan; Hoover, Shannon; Clark, Darija; Varnell, Richard; Pearson, Christopher
Subject: RE: [EXTERNAL] Email memorializing 2/21/2022 NMOCD-HEP Meeting Discussing the Tank 970 Remediation Plan (NCE2003752717)
Date: Monday, March 14, 2022 5:02:09 PM
Attachments: [image001.png](#)

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3/14/2022

Confirm receipt of this email. Represents an accurate detail of issues discussed and paths forward. Other recipients may have additional comment. Thank you.

Bradford Billings
ENRD/OCD

From: Stoffel, Jared <JStoffel@trccompanies.com>
Sent: Monday, March 14, 2022 3:06 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>; Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>
Cc: Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>; Pearson, Christopher <CPearson@trccompanies.com>
Subject: [EXTERNAL] Email memorializing 2/21/2022 NMOCD-HEP Meeting Discussing the Tank 970 Remediation Plan (NCE2003752717)

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We want to thank you for meeting with us on February 21, 2022, to discuss the Holly Energy Partners – Operating, L.P. (HEP) Tank 970 project (NMOCD Incident #NCE2003752717). The meeting was held at the request of HEP to discuss the path forward following New Mexico Oil Conservation Division's (NMOCD's) denial of the August 2021 Remediation Workplan. Meeting participants included NMOCD staff (Mike Bratcher, Bradford Billings, Chad Hensley, and Jennifer Nobui), and the representatives from HEP and TRC Environmental Corporation (TRC) copied on this email. Based on

the meeting, NMOCD has requested that HEP submit a Remediation Workplan Addendum to the NMOCD to include the following:

- Conduct a soil vapor extraction (SVE) pilot test to determine the effective radius of influence to address total petroleum hydrocarbons (TPH) gasoline range organics (GRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX) in soil in approximately the upper 25 feet.
- Conduct excavation of soil with BTEX and/or TPH above Closure Criteria in the accessible portions of the site to a depth of approximately 4.5 feet bgs.
- Install a liner at the base of the excavation and backfill to current grade to inhibit future stormwater infiltration through the affected soil at depth and to also promote lateral air flow through the affected zone targeted by the proposed SVE system.
- TPH diesel range organics (DRO) and motor oil range organics (MRO) in soil at depths greater than approximately 25 feet below ground surface (bgs) do not require additional action based on: (1) removal of the source (Former Tank 970); (2) limited leaching of DRO and MRO from soil to groundwater; (3) presence of the underlying clay layer inhibiting further vertical migration; (4) depth to groundwater (>112 feet bgs); and (5) proposed installation of a liner to prevent stormwater infiltration through the affected soil.

By April 15, 2022, we will submit a draft Remediation Workplan Addendum to Robert and Bradford via email for NMOCD's preliminary review and comment. Once the NMOCD has an opportunity to review the draft Remediation Workplan Addendum, a virtual meeting can be scheduled for further discussion, if needed. Pending NMOCD review and approval of the draft, the final Remediation Workplan Addendum will be submitted via the NMOCD E-permitting portal within 5 business days of draft approval.

Please confirm receipt and concurrence with this summary by return email, or let me or Trevor Baird of HEP know if you have additional comments or proposed revisions to the summary. We appreciate the opportunity to discuss the site and Remediation Workplan with you!

Jared Stoffel, P.G.
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752
F: 512 329 8750 | C: 432 238 3003
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From: Hamlet, Robert, EMNRD
To: Sahba, Arsin M.; Stoffel, Jared
Cc: melanie.nolan; mark.shemaria; Trevor.baird; Gilbert, Bryan; Hoover, Shannon; Varnell, Richard; Bratcher, Mike, EMNRD; Billings, Bradford, EMNRD; Hensley, Chad, EMNRD
Subject: RE: [EXTERNAL] Request for Meeting - Former Tank 970 (NCE2003752717) Following Denial Letter
Date: Friday, January 28, 2022 9:47:07 AM
Attachments: [image002.png](#)

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Thought I flipped my calendar over to February. Oops! Yeah, Monday morning at 10 or 11 a.m. works for me on February 21st. Guess it depends on everybody's schedule. Maybe shoot for 10 a.m. for now.

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Sahba, Arsin <Arsin.Sahba@HollyFrontier.com>
Sent: Friday, January 28, 2022 8:39 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Stoffel, Jared <JStoffel@trcccompanies.com>
Cc: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>; Shemaria, Mark <Mark.Shemaria@hollyenergy.com>; Baird, Trevor <Trevor.Baird@hollyenergy.com>; Gilbert, Bryan <BGilbert@trcccompanies.com>; Hoover, Shannon <SHoover@trcccompanies.com>; Varnell, Richard <RVarnell@trcccompanies.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>
Subject: RE: [EXTERNAL] Request for Meeting - Former Tank 970 (NCE2003752717) Following Denial Letter

Thanks Robert – we look forward to reviewing the project with NMOCD.

Just one clarification – you indicated Feb 21 but also mentioned Friday morning. Feb 21 is a Monday. So wanted to confirm – would you like Monday Feb 21 in the morning or the preceding Friday Feb 18?

thanks

Arsin
972-689-8540

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Friday, January 28, 2022 9:33 AM
To: Stoffel, Jared <JStoffel@trccompanies.com>
Cc: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>; Sahba, Arsin <Arsin.Sahba@HollyFrontier.com>; Shemaria, Mark <Mark.Shemaria@hollyenergy.com>; Baird, Trevor <Trevor.Baird@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>
Subject: [EXTERNAL] Request for Meeting - Former Tank 970 (NCE2003752717) Following Denial Letter

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Jared,

February 21st would probably work the best. Set up a Teams or Zoom call for Friday morning around 10 a.m. if that works? Send invites to myself, Brad Billings, Mike Bratcher, Chad Hensley.

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Stoffel, Jared <JStoffel@trccompanies.com>
Sent: Tuesday, January 25, 2022 10:21 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: melanie.nolan <melanie.nolan@hollyenergy.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; trevor.baird@hollyfrontier.com; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: [EXTERNAL] Request for Meeting - Former Tank 970 (NCE2003752717) Following Denial

Letter

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Mr. Hamlet:

We have received the NMOCD's rejection notice for the Remediation Workplan submitted for the Former Tank 970 Site (NCE2003752717) and want to follow up on Richard Varnell's email dated 12.20.2021 requesting further discussion about the rejection. We would appreciate the opportunity to discuss your comments regarding the Remediation Workplan. Would you be available for a Teams or Webex meeting regarding this Site the week of either February 14 or February 21? We are also available to meet in person if that is the NMOCD's preference. If so, please provide a few preferred dates and times and I will send you a meeting invite. Thank you.

Jared Stoffel, P.G.
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752
F: 512 329 8750 | C: 432 238 3003
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

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From: [Varnell, Richard](#)
To: [Stoffel, Jared](#)
Subject: FW: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119
Date: Tuesday, January 25, 2022 8:48:42 AM
Attachments: [image001.png](#)
[image002.png](#)

From: Varnell, Richard
Sent: Monday, December 20, 2021 1:25 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: mark.shemaria <mark.shemaria@hollyenergy.com>; melanie.nolan <melanie.nolan@hollyenergy.com>; Sahba, Arsin <Arsin.Sahba@HollyFrontier.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Coupland, Lori <Lori.Coupland@hollyenergy.com>
Subject: FW: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119

Mr. Hamlet:

We have received OCD's rejection notice for the Remediation Workplan submitted for the Former Tank 970 Site (NCE2003752717). We would appreciate the opportunity to discuss your comments regarding the Remediation Workplan. Would you be available for a Teams or Webex meeting regarding this Site in early to mid-February? We are also available to meet in person if that is OCD's preference. If so, please provide a few preferred dates and times and I will send you a meeting invite.

Thanks,

-RD Varnell

Richard (RD) Varnell, P.G., P.E.
Senior Project Manager



505 E. Huntland Drive, Suite 250, Austin, TX 78752
T 512.626.3990 | F 512.684.3136 | C 512.297.3019
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

Please note that my office number has changed.

From: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>
Sent: Monday, November 29, 2021 12:39 PM

To: Coupland, Lori <Lori.Coupland@hollyenergy.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>
Cc: Varnell, Richard <RVarnell@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>
Subject: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

All,

Please see below concerning the Artesia Tank 970 SCR and Remediation Plan that was submitted to NMOCD.

Unfortunately NMOCD has **rejected** the Remediation Plan based upon the reason stated below.

Melanie Nolan
Environmental Specialist/EHS Department

Holly Energy Partners

O 575-748-8972

M 214-605-8303

Melanie.Nolan@hollyenergy.com

www.hollyenergy.com

1602 W. Main, Artesia, New Mexico, 88210



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Monday, November 29, 2021 11:22 AM

To: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>

Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119

CAUTION: This email originated from outside of the HollyFrontier organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717,

for the following reasons:

- **The Remediation Plan is denied. Based on data already obtained, a four feet excavation and liner installation will not be an acceptable remedial proposal for this site. A deeper excavation will likely be required, along with a proposed method for mitigating the deeper impact that may not be practicable to excavate. Of particular concern, is the lighter end hydrocarbons that have been determined to exist at significant depths. I would expect this to be a somewhat longer project than normal, possibly involving Soil Vapor Extraction (SVE) in some locations. A deferral around critical infrastructure will need to be submitted after all possible contaminated soil is removed. Specifying exactly which sample points you are asking for a deferral on and the reason the contaminants cannot be removed. A meeting to discuss the site may be appropriate at some point in the near future. Please, make sure a C-141 page 5 “Remediation Plan” page is signed and filled out at submission of your report.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 42119.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Robert Hamlet

575-748-1283

Robert.Hamlet@state.nm.us

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

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From: [Varnell, Richard](#)
To: [Hamlet, Robert](#), [EMNRD](#)
Cc: [mark.shemaria](#); [melanie.nolan](#); [Sahba, Arsin](#); [Gilbert, Bryan](#); [Hoover, Shannon](#); [Clark, Darja](#); [Coupland, Lori](#)
Subject: FW: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119
Date: Monday, December 20, 2021 1:24:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Mr. Hamlet:

We have received OCD's rejection notice for the Remediation Workplan submitted for the Former Tank 970 Site (NCE2003752717). We would appreciate the opportunity to discuss your comments regarding the Remediation Workplan. Would you be available for a Teams or Webex meeting regarding this Site in early to mid-February? We are also available to meet in person if that is OCD's preference. If so, please provide a few preferred dates and times and I will send you a meeting invite.

Thanks,

-RD Varnell

Richard (RD) Varnell, P.G., P.E.
Senior Project Manager



505 E. Huntland Drive, Suite 250, Austin, TX 78752
T 512.626.3990 | F 512.684.3136 | C 512.297.3019
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

Please note that my office number has changed.

From: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>
Sent: Monday, November 29, 2021 12:39 PM
To: Coupland, Lori <Lori.Coupland@hollyenergy.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>
Cc: Varnell, Richard <RVarnell@trcccompanies.com>; Hoover, Shannon <SHoover@trcccompanies.com>; Gilbert, Bryan <BGilbert@trcccompanies.com>
Subject: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

All,

Please see below concerning the Artesia Tank 970 SCR and Remediation Plan that was submitted to NMOCD.

Unfortunately NMOCD has **rejected** the Remediation Plan based upon the reason stated below.

Melanie Nolan
Environmental Specialist/EHS Department

Holly Energy Partners

O 575-748-8972

M 214-605-8303

Melanie.Nolan@hollyenergy.com

www.hollyenergy.com

1602 W. Main, Artesia, New Mexico, 88210



From: OCDOOnline@state.nm.us <OCDOOnline@state.nm.us>

Sent: Monday, November 29, 2021 11:22 AM

To: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>

Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 42119

CAUTION: This email originated from outside of the HollyFrontier organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, for the following reasons:

- **The Remediation Plan is denied.** Based on data already obtained, a four feet excavation and liner installation will not be an acceptable remedial proposal for this site. A deeper excavation will likely be required, along with a proposed method for mitigating the deeper impact that may not be practicable to excavate. Of particular concern, is the lighter end hydrocarbons that have been determined to exist at significant depths. I would expect this to be a somewhat longer project than normal, possibly involving Soil Vapor Extraction (SVE) in some locations. A deferral around critical infrastructure will need to be submitted after all possible contaminated soil is removed. Specifying exactly which sample points you are asking for a deferral on and the reason the contaminants cannot be removed. A meeting to discuss the site may be appropriate at some point in the near future.

Please, make sure a C-141 page 5 “Remediation Plan” page is signed and filled out at submission of your report.

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 42119.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Robert Hamlet

575-748-1283

Robert.Hamlet@state.nm.us

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

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From: [Melanie Nolan](#)
To: Hoover, Shannon; [Sahba, Arsin M.](#); [mark.shemaria](#); [Varnell, Richard](#)
Subject: [EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 15561
Date: Tuesday, March 23, 2021 9:26:57 AM

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Please see below for approval of site characterization and work plan for Artesia Tank 970.

Melanie

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Friday, March 19, 2021 11:10 AM
To: Nolan, Melanie <Melanie.Nolan@hollyenergy.com>
Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 15561

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To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, with the following conditions:

- **The site characterization and proposed work plan are approved.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Cristina Eads
Environmental Scientist and Specialist
505-670-5601
Cristina.Eads@state.nm.us

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

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Varnell, Richard

From: Varnell, Richard
Sent: Friday, March 27, 2020 2:42 PM
To: Varnell, Richard
Subject: FW: [EXTERNAL] ARTESIA STATION TANK - FW: [EXTERNAL Email]: New Mexico OCD Application Submission was Approved by the OCD

From: OCDOnline@state.nm.us [<mailto:OCDOnline@state.nm.us>]
Sent: Thursday, February 06, 2020 2:46 PM
To: Nolan, Melanie A.
Subject: [EXTERNAL Email]: New Mexico OCD Application Submission was Approved by the OCD

CAUTION: This email originated from outside of the HollyFrontier organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

The Oil Conservation Division (OCD) has approved the application PO: TSF9G-200129-C-1410.
The original application was submitted by Melanie Nolan for HOLLY ENERGY PARTNERS.

The user added the additional comment:

"To whom it may concern: The NMOCD has accepted the submitted Initial and C-141 and has assigned incident # NCE2003752717. Please retain this incident # as it will be required for all future communication and submittals for this release. Note: As of December 13, 2019, NMOCD has discontinued the use of the "RP" number. Thank you, Cristina Eads Environmental Specialist Cristina.Eads@state.nm.us ".

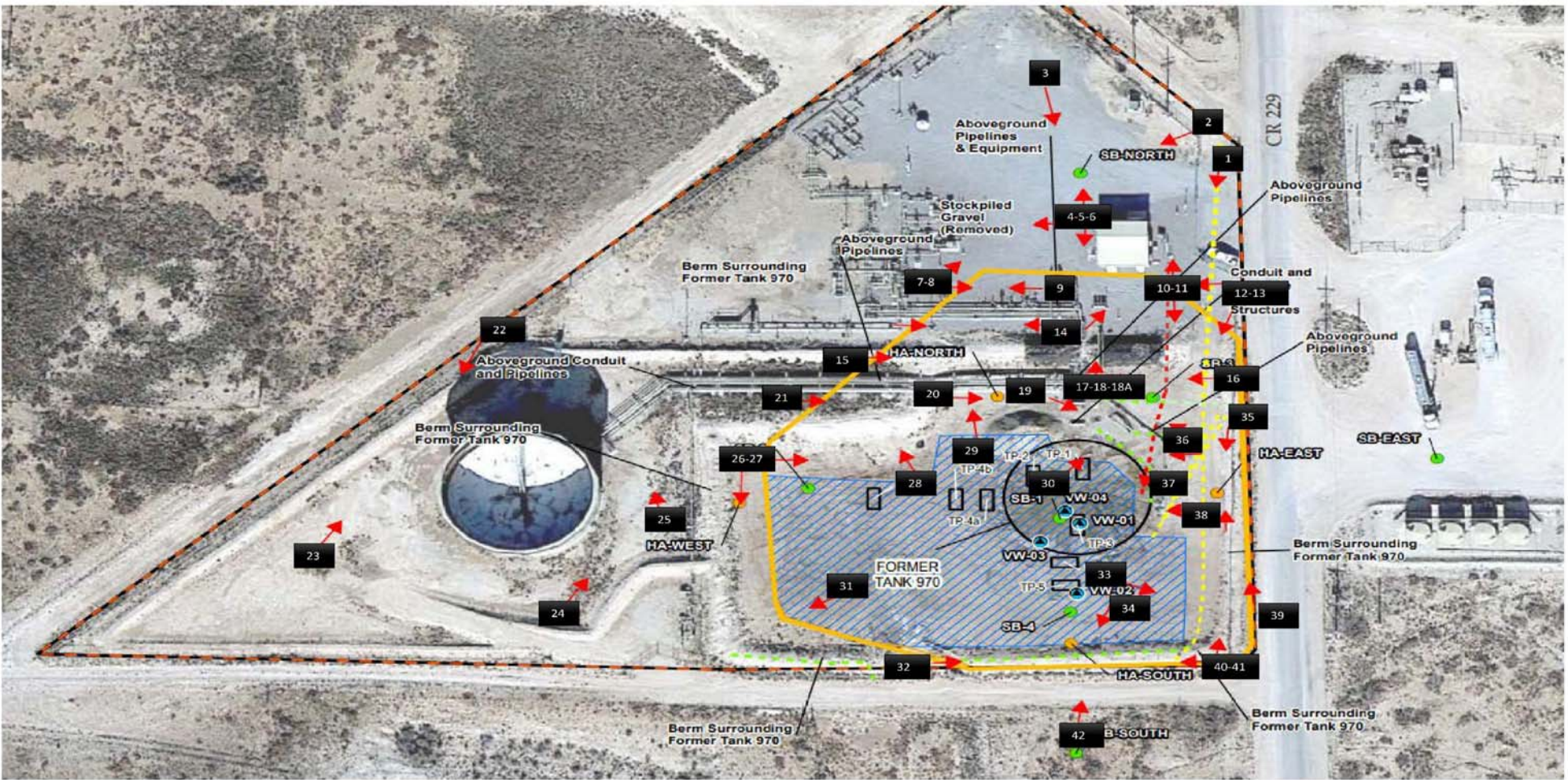
If you are concerned about receiving this email or have any other questions, please feel free to contact our Santa Fe OCD office.

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive
Santa Fe, NM 87505

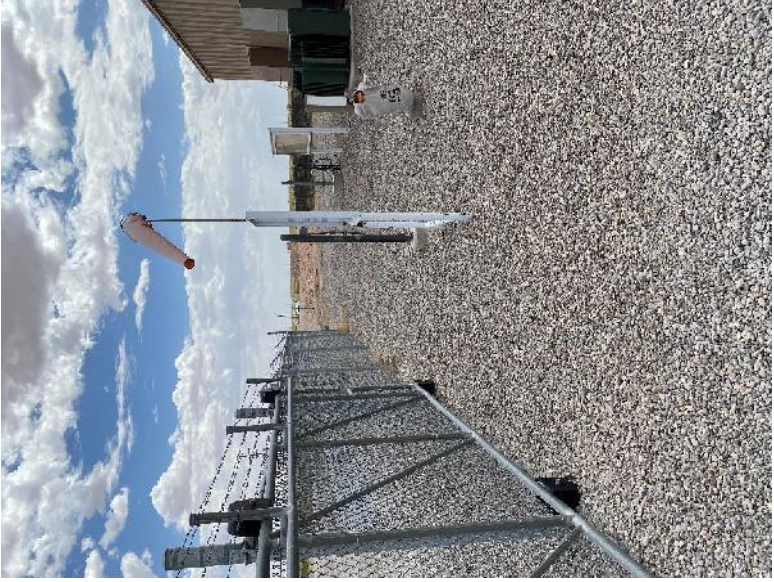
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Attachment B
Site Photographs



PROJECT: HOLLY ENERGY PARTNERS - OPERATING, L.P. ARTESIA STATION WEST, EDDY COUNTY, NM FORMER TANK 970	
TITLE: SITE PHOTOGRAPH LOCATION MAP	
DRAWN BY: A. CLINE	PROJ. NO.: 580999
CHECKED BY: M. LINK	FIGURE B - 1
APPROVED BY: B. GILBERT	
DATE: AUGUST 2024	
 505 EAST HUNTLAND DRIVE SUITE #250 AUSTIN, TX 78752 PHONE: 512.329.6080	
FILE:	TANK970 WORK PLAN 2023.APRX

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph Location 1. August 22, 2024. At facility entrance, facing south. View of fence along CR 229, fence controls, safety equipment, and building infrastructure.



Photograph Location 2. August 22, 2024. Northeast corner of facility facing southwest overlooking SB-North location. View of aboveground pipelines, structures and equipment between SB-North and release area.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	1 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 3. August 22, 2024. North portion of facility, facing south overlooking SB-North location. View of aboveground pipelines, structures and equipment between SB-North and release area.



Photograph location 4. August 22, 2024. Northwest corner of building facing north. View of northernmost portion of the facility including fencing, aboveground pipelines and powerlines, and utility structures.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
666085	HEP	2 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 5. August 22, 2024. Northwest corner of building facing west. View of aboveground pipelines and stockpile gravel.

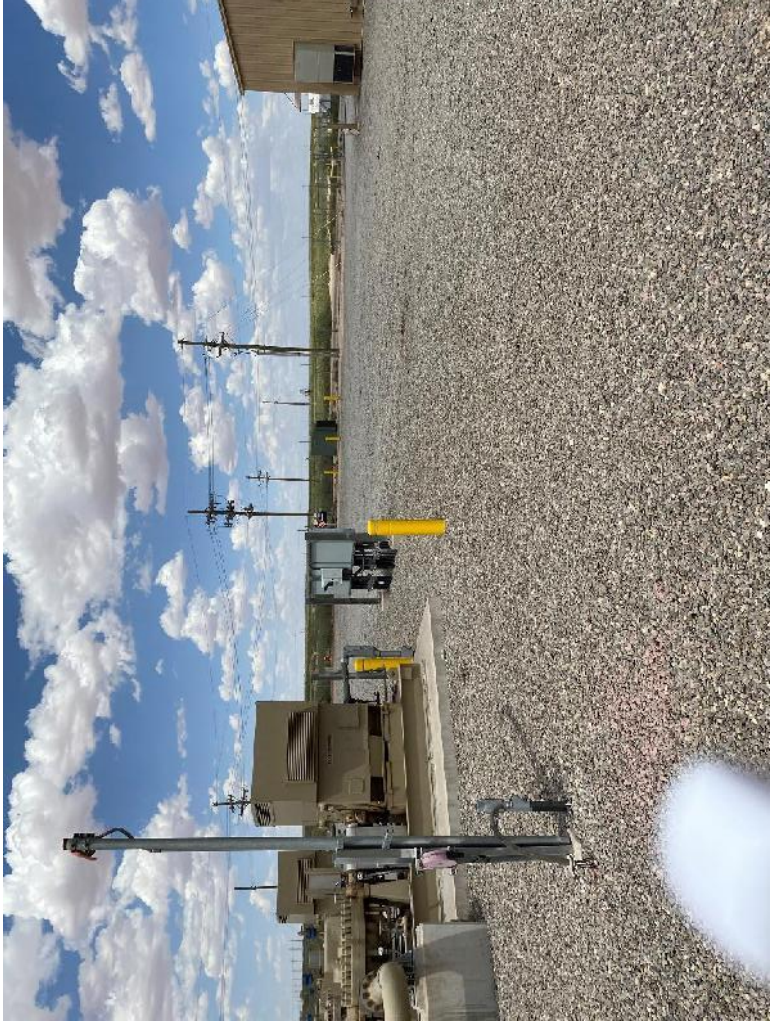


Photograph location 6. August 22, 2024. Northwest corner of building facing south. View of safety equipment, aboveground pipelines, utilities, and berm on the north side of the release/excavation area.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	3 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 7. August 22, 2024. Central portion of the site, just north of the berm and aboveground piping located north of the release/excavation area facing northeast toward SB-North location. View of equipment, utilities, and building.



Photograph location 8. August 22, 2024. Central portion of the site, just north of the berm and aboveground piping located north of the release/excavation area facing due east. View of building with nearby aboveground pipelines.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	4 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 9. August 22, 2024. Central portion of the site, just north of the berm and aboveground piping located north of the release/excavation area facing west. View of aboveground pipelines and supports.

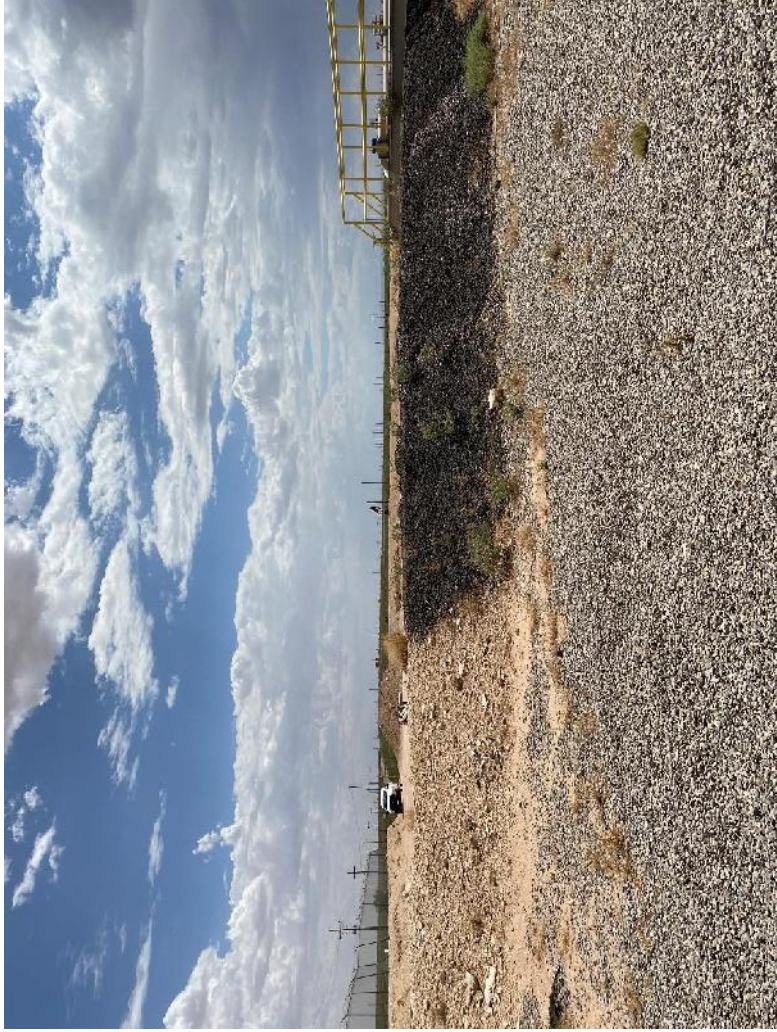


Photograph location 10. August 22, 2024. Southeast of building facing north. View of building, utilities, equipment and fence along CR 229.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	5 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 11. August 22, 2024. Southeast of building facing south. View of the northern tank berm of former Tank 970 – SB-3 location south of berm.

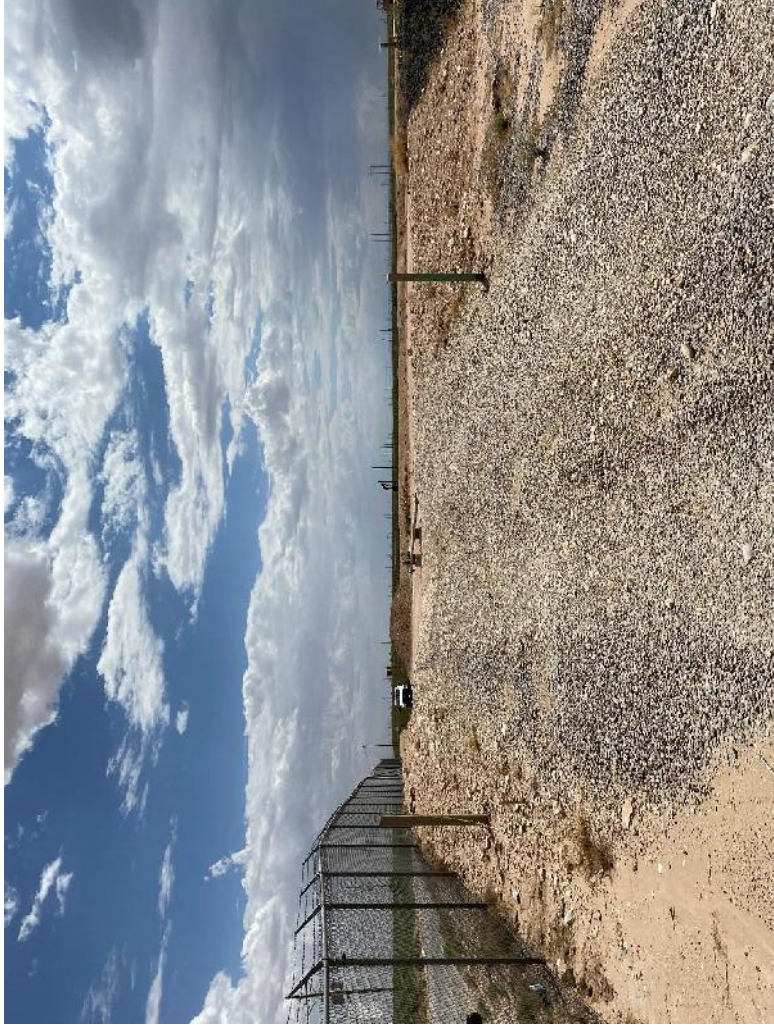


Photograph location 12. August 22, 2024. Central-eastern property boundary (near northeast corner of proposed deferral area) facing west. View of northern berm of former Tank 970 with view of aboveground pipelines.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
690999	HEP	6 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 13. August 22, 2024. Central-eastern property boundary (at northeast corner of proposed deferral area) facing south facing southwest. View of the northern berm of former Tank 974 (SB-3 location on southern side of berm).



Photograph location 14. August 22, 2024. Central portion of the site, between the north berm of former Tank 970 and aboveground pipelines facing west (south of photograph location 9). View of berms and aboveground pipelines.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
660999	HEP	7 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 15. August 22, 2024. Central portion of the site facing east. View looking down northern berm of former Tank 970 between aboveground pipelines.



Photograph location 16. August 22, 2024. Central-eastern property boundary facing west. View of SB-3 location, aboveground pipelines, and northern berm of former Tank 970. Electric, gas, and ground lines present but not visible.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	8 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 17. August 22, 2024. Central portion of the facility, inside northern berm of former Tank 970 facing north. View of aboveground piping and stairs that pass through and over the berm, respectively.



Photograph location 18. August 22, 2024. Central portion of the facility, inside northern berm of former Tank 970 facing northeast. View of SB-3 location, fence and berm along eastern property/CR 229. Electric, gas, and ground lines present but not visible.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	9 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 18A. August 22, 2024. Central portion of the facility, standing on stairs above northern berm of former Tank 970 facing southeast. View of SB-3 location, fence and berm along eastern property/CR 229. Electric, gas, and ground lines present but not visible. Distant view of HA-East location.



Photograph location 19. August 22, 2024. Central portion of the facility, inside northern berm of former Tank 970 facing southeast. View of aboveground pipelines.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	10 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 20. August 22, 2024. Central portion of the facility, inside northern berm of former Tank 970 facing east. View of HA-North location and adjacent aboveground pipelines and concrete supports.



Photograph location 21. August 22, 2024. Central portion of the facility on northern berm of former Tank 970 facing east. View of northern berm of former Tank 970 joining northern berm of Tank 974, aboveground pipelines, and excavation area to the south.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	11 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 22. August 22, 2024. Western central property boundary facing southwest. View of western side of Tank 974, berm and fence line along western property boundary and lease road.



Photograph location 23. August 22, 2024. Southwestern corner of facility facing northeast. View of western side of Tank 974 and western berm/property boundary.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	12 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 24. August 22, 2024. South and slightly east of Tank 974 facing northeast. View of eastern side of Tank 974, utilities, aboveground pipelines, and shared Tank 974 and former Tank 970 berm.



Photograph location 25. August 22, 2024. Eastern side of Tank 970 facing north/northwest. View of Tank 974, aboveground pipelines, utilities, and shared Tank 974 and former Tank 970 berm..

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	13 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 26. August 22, 2024. Inside western berm of former Tank 970 facing east. View of release/excavation/liner area.



Photograph location 27. August 22, 2024. On western berm of former Tank 970 facing south. View of intersection of berms surrounding Tank 970 and former Tank 970, equipment, and aboveground pipelines.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	14 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 28. August 22, 2024. Northwestern extent of excavation/liner area facing northwest. View of berm shared by Tank 974 and former Tank 970.



Photograph location 29. August 22, 2024. Northern extent of excavation/lining area facing north/northeast. View of berm, aboveground pipelines, and HA-North location.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	TRC
580999	HEP	15 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 30. August 22, 2024. Northeastern extent of excavation/liner area facing northeast. View of SB-3 location, aboveground pipelines, and northeastern corner of former Tank 970 berm.



Photograph location 31. August 22, 2024. Southwestern corner of excavation/liner area facing southwest. View of berm/lease road on southern property boundary, southwestern corner of former Tank 970 berm, and Tank 974.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	16 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 32. August 22, 2024. Midway point of southern berm of former Tank 970 facing east. View of HA-South location, berm, fence line, lease road along southern boundary of property. Underground utilities present but not visible.



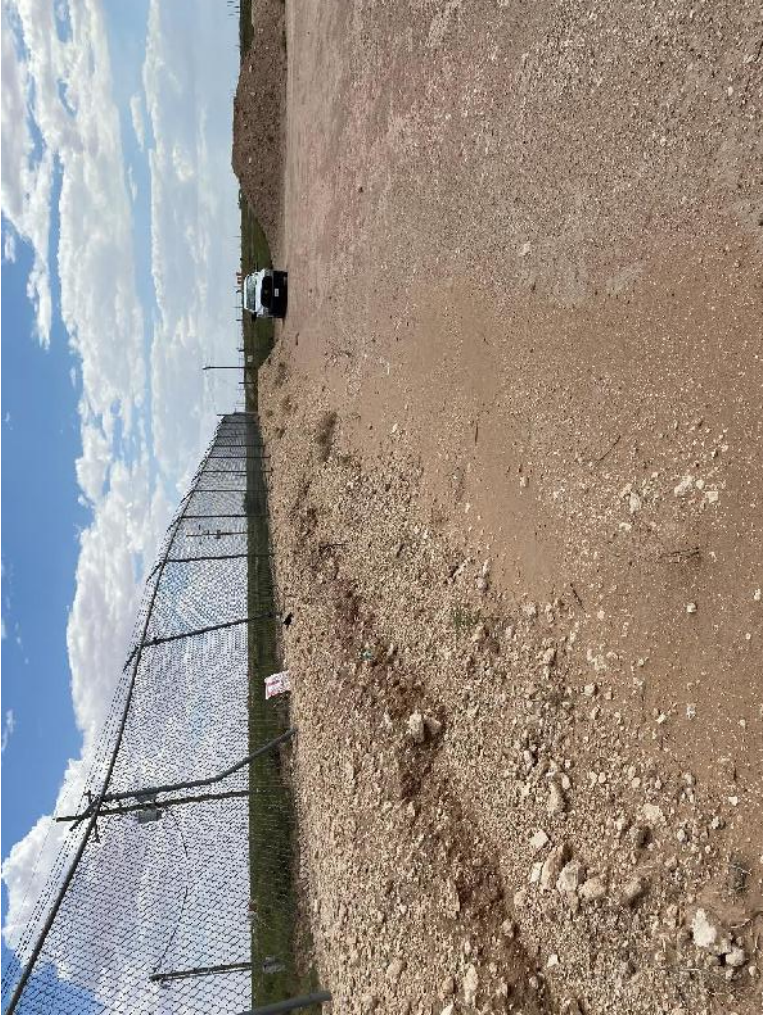
Photograph location 33. August 22, 2024. Southeastern quadrant of the excavation/liner area facing southeast. View of eastern berm of former Tank 970, fence line, State Road CR 229, and tanks at adjacent property. Gas lines present within/inside berm are not visible.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	17 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 34. August 22,2024. Southeastern quadrant of excavation/liner area (south of Photograph location 33) facing southwest. View of HA-South location, berm, fence line, and lease road along southern border of facility.



Photograph location 35. August 22, 2024. Midway along eastern property boundary facing south. View of eastern berm of former Tank 970, fence line, and State Road CR 229 along eastern property boundary. Gas lines present within/inside berm are not visible.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	18 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 36. August 22, 2024. Facing west. View of aboveground pipelines located near the berm surrounding former Tank 970.



Photograph location 37. August 22, 2024. Northeast extent of excavation/lining area facing northwest. View of aboveground utilities, concrete support structures, and flush-mounted vapor extraction well VW-01.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	19 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 38. August 22, 2024. Eastern extent of excavation/liner area facing west/northwest. View of former Tank 970 excavation/liner area, vapor extraction wells VW-01 (left) and VW-04 (right). Gas line in immediate vicinity not visible.



Photograph location 39. August 22, 2024. Southeastern corner of site facing north. View of berm of former Tank 970, fence line, and State Road CR 229 along eastern boundary of the site. Gas line running north/south on interior side of berm present but not visible.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	20 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 40. August 22, 2024. Southwestern corner of the Site facing west. View of HA-South location, southern berm of former Tank 970, fence line, and lease road along southern property boundary. Underground lines running east-west are present but not visible.

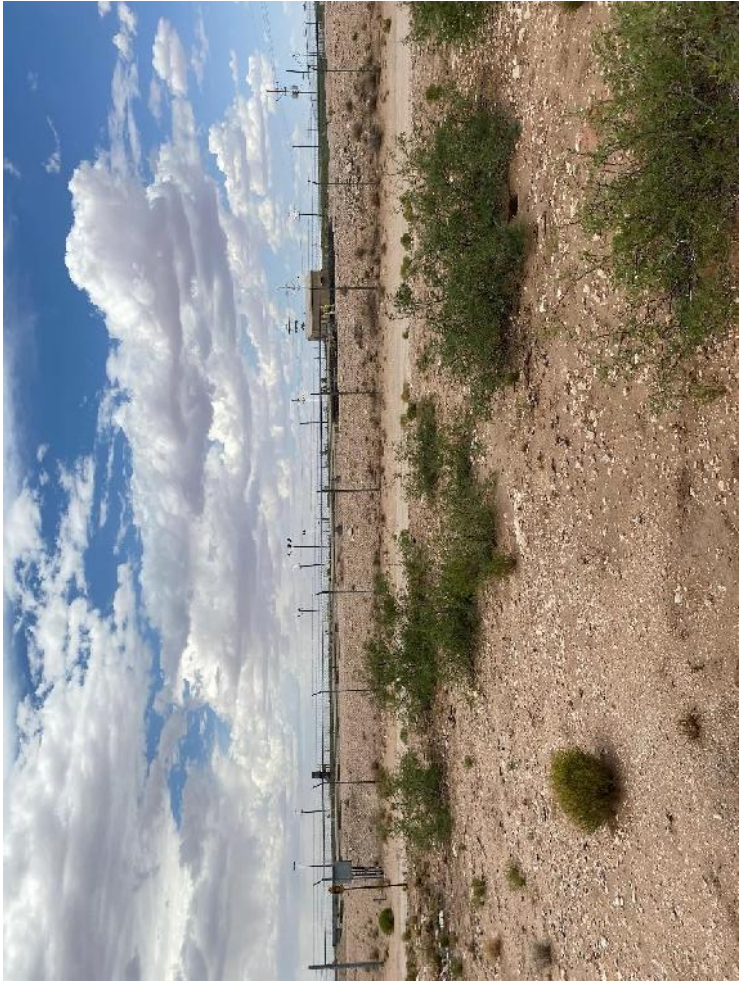


Photograph location 41. August 22, 2024. Southeastern corner of the facility facing north. View of berm of former Tank 970, fence line, and State Road CR 229 along eastern boundary of the site. Gas line running north/south on interior side of berm present but not visible.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
580999	HEP	21 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico



HEP Tank 970 Remediation Activities – Photographic Documentation



Photograph location 42. August 22, 2024. Outside of southern property boundary facing north close to the HB-South location. View of adjacent property, lease road, fence line, and berm of former Tank 970 along southern property boundary.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
580999	HEP	22 of 22	Holly Energy Partners Operating, L.P.	Former Tank 970/Artesia Station West Eddy County, New Mexico	

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State of New Mexico
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1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 383469

QUESTIONS

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:
	282505
	Action Number:
	383469
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nCE2003752717
Incident Name	NCE2003752717 ARTESIA WEST STATION @ 0
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	ARTESIA WEST STATION
Date Release Discovered	01/22/2020
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Oil Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Other Tank (Any) Crude Oil Released: 0 BBL (Unknown Released Amount) Recovered: 0 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	Not answered.
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 383469

QUESTIONS (continued)

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:	282505
	Action Number:	383469
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Melanie Nolan Title: Environmental Specialist Email: melanie.nolan@hollyenergy.com Date: 09/13/2024
--	--

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QUESTIONS, Page 3

Action 383469

QUESTIONS (continued)

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:	282505
	Action Number:	383469
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	Direct Measurement
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 500 and 1000 (ft.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride	(EPA 300.0 or SM4500 Cl B)	3850
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	29900
GRO+DRO	(EPA SW-846 Method 8015M)	27400
BTEX	(EPA SW-846 Method 8021B or 8260B)	114
Benzene	(EPA SW-846 Method 8021B or 8260B)	13

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	11/01/2024
On what date will (or did) the final sampling or liner inspection occur	12/31/2024
On what date will (or was) the remediation complete(d)	09/13/2025
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	51000
What is the estimated volume (in cubic yards) that will be remediated	60000

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 383469

QUESTIONS (continued)

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:	282505
	Action Number:	383469
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS**Remediation Plan (continued)**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	<i>Not answered.</i>
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	<i>Not answered.</i>
(In Situ) Soil Vapor Extraction	Yes
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	<i>Not answered.</i>
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	<i>Not answered.</i>
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	<i>Not answered.</i>
Ground Water Abatement pursuant to 19.15.30 NMAC	<i>Not answered.</i>
OTHER (Non-listed remedial process)	<i>Not answered.</i>

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Melanie Nolan Title: Environmental Specialist Email: melanie.nolan@hollyenergy.com Date: 09/13/2024
--	---

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 5

Action 383469

QUESTIONS (continued)

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:
	282505
	Action Number:
	383469
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6
Action 383469

QUESTIONS (continued)

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID: 282505
	Action Number: 383469
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
Requesting a remediation closure approval with this submission	No

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CONDITIONS

Action 383469

CONDITIONS

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:
	282505
	Action Number:
	383469
Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

CONDITIONS

Created By	Condition	Condition Date
rhamlet	The Remediation Plan/Pilot Test Full SVE Report is Conditionally Approved. The OCD wants to reaffirm that the SVE System may need to be augmented depending on the data collected. Additional SVE wells may need to be installed based on the SVE operation and maintenance (O&M) data. The OCD may request the verification of light end hydrocarbon depletion through additional borehole installations in between the SVE vent holes to ensure that the light end hydrocarbon removal has taken place. This would require additional sampling at the corresponding depths to ensure removal of light end hydrocarbons.	10/2/2024