

AP - 7

APPROVALS

YEAR(S):

2011-2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, December 20, 2012 4:34 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Recommendations Approval (AP-007) - Plains Darr Angell #1 Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
Darr Angell #1 Release Site (AP-007)
Unit J, Section 11, T15S, R37E, NMPM, Lea County, New Mexico
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Recommendations") the above-referenced site (dated March 2012). The above-referenced report, submitted in partial fulfillment of 19.15.30 NMAC (Rule 30, formally, Rule 19), indicates that Plains has partially met the requirements of 19.15.30 NMAC for this site. Therefore, the OCD hereby conditionally approves the Recommendations for the Darr Angell #1 Release Site:

Regarding Polynuclear Aromatic Hydrocarbons (PAHs), Plains must:

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

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please keep in mind that in addition to the "2.0 Regulatory Framework" outlined in the Report, the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater:

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

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, December 24, 2012 1:32 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Recommendations Approval (AP-007) - Plains Darr Angell #2 Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
Darr Angell #2 Release Site (AP-007)
Unit 0, Section 11 & Unit B, Section 14, T15S, R37E, NMPM, Lea County, New Mexico
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Recommendations") the above-referenced site (dated April 2012). The above-referenced report, submitted in partial fulfillment of 19.15.30 NMAC (Rule 30, formally, Rule 19), indicates that Plains has partially met the requirements of 19.15.30 NMAC for this site. Therefore, the OCD hereby conditionally approves the Recommendations for the Darr Angell #2 Release Site:

Regarding Polynuclear Aromatic Hydrocarbons (PAHs), Plains must:

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

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please keep in mind that in addition to the "2.0 Regulatory Framework" outlined in the Report, the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater:

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

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

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, December 26, 2012 3:24 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Recommendations Approval (AP-007) - Plains Darr Angell #4 Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
Darr Angell #4 Release Site (AP-007)
Unit B, Section 11 & Unit O, Section 2, T15S, R37E, NMPM, Lea County, New Mexico
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Recommendations") the above-referenced site (dated March 2012). The above-referenced report, submitted in partial fulfillment of 19.15.30 NMAC (Rule 30, formally, Rule 19), indicates that Plains has partially met the requirements of 19.15.30 NMAC for this site. Therefore, the OCD hereby conditionally approves the Recommendations for the Darr Angell #4 Release Site:

- Plains must increase the sampling frequency from annually to at least semi-annually for MW-12;

Regarding Polynuclear Aromatic Hydrocarbons (PAHs), Plains must:

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

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please keep in mind that in addition to the “2.0 Regulatory Framework” outlined in the Report, the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater:

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

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

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, October 24, 2011 4:40 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; 'Jeffrey P Dann'
Subject: Anticipated Actions Approval (AP-007) - Plains Darr Angell #1, #2 & #4 Release Sites

**RE: Annual Monitoring Report (2010) for the Plains Marketing's
Darr Angell #1, #2 & #4 Release Sites (AP-007)
Sections 2 & 11, T15S, R37E, NMPM, Lea County, New Mexico
Anticipated Actions Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Anticipated Actions") the above-referenced site (dated March 2011). The above-referenced report, submitted in partial fulfillment of 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Anticipated Actions for the Darr Angell #1, #2 & #4 Release Sites:

Plains must not limit the analyses for PAHs to MW-2 and MW-3 only at the Darr Angell #1 Release Site.

Plains must not limit the analyses for PAHs to MW-3 only at the Darr Angell #2 Release Site.

Plains must not limit the analyses for PAHs to RW-6 only at the Darr Angell #4 Release Site.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau