

AP - 411

**STAGE 1  
WORKPLANS**

**DATE:**

11-30-12

## Hansen, Edward J., EMNRD

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**From:** Jason Henry <JHenry@paalp.com>  
**Sent:** Friday, November 30, 2012 11:00 AM  
**To:** Hansen, Edward J., EMNRD  
**Cc:** Jeffrey P Dann; 'kathleen buxton'; Leking, Geoffrey R, EMNRD  
**Subject:** RE: Recommendations Approval (2011 Report) (AP-41) - Plains Hugh Gathering Release Site  
**Attachments:** Hugh Gathering PMW Site Map.pdf

Ed,

In regard to the **first directive** in your message below, Plains anticipates being able to install 3 downgradient monitoring wells on the east side of Hwy. 18 in the near future. The approximate locations of the 3 proposed monitoring wells are depicted on the attached site map. I am scheduled to meet with the owner of the property on the east side of Hwy. 18 on 12/04/2012 to discuss the installation of the monitoring wells. If the landowner will grant Plains permission to access his land, then I will be able to provide you with a more specific timeframe for proceeding with the installation of the monitoring wells.

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

Thank you,  
Jason Henry  
575-441-1099

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**From:** Hansen, Edward J., EMNRD [<mailto:edwardj.hansen@state.nm.us>]  
**Sent:** Monday, October 29, 2012 6:49 PM  
**To:** Jason Henry  
**Cc:** Leking, Geoffrey R, EMNRD; Jeffrey P Dann  
**Subject:** Recommendations Approval (2011 Report) (AP-41) - Plains Hugh Gathering Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's  
Hugh Gathering Release Site (AP-41)  
Unit P, Section 11, T21S, R37E, NMPM, Lea County, New Mexico  
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including "Recommendations") the above-referenced site (dated March 2012). 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 Proposed Activities for the Hugh Gathering Release Site:

- Please submit to the OCD an evaluation regarding the installation of a downgradient groundwater monitoring well on the "east side" within 30 days;

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)].

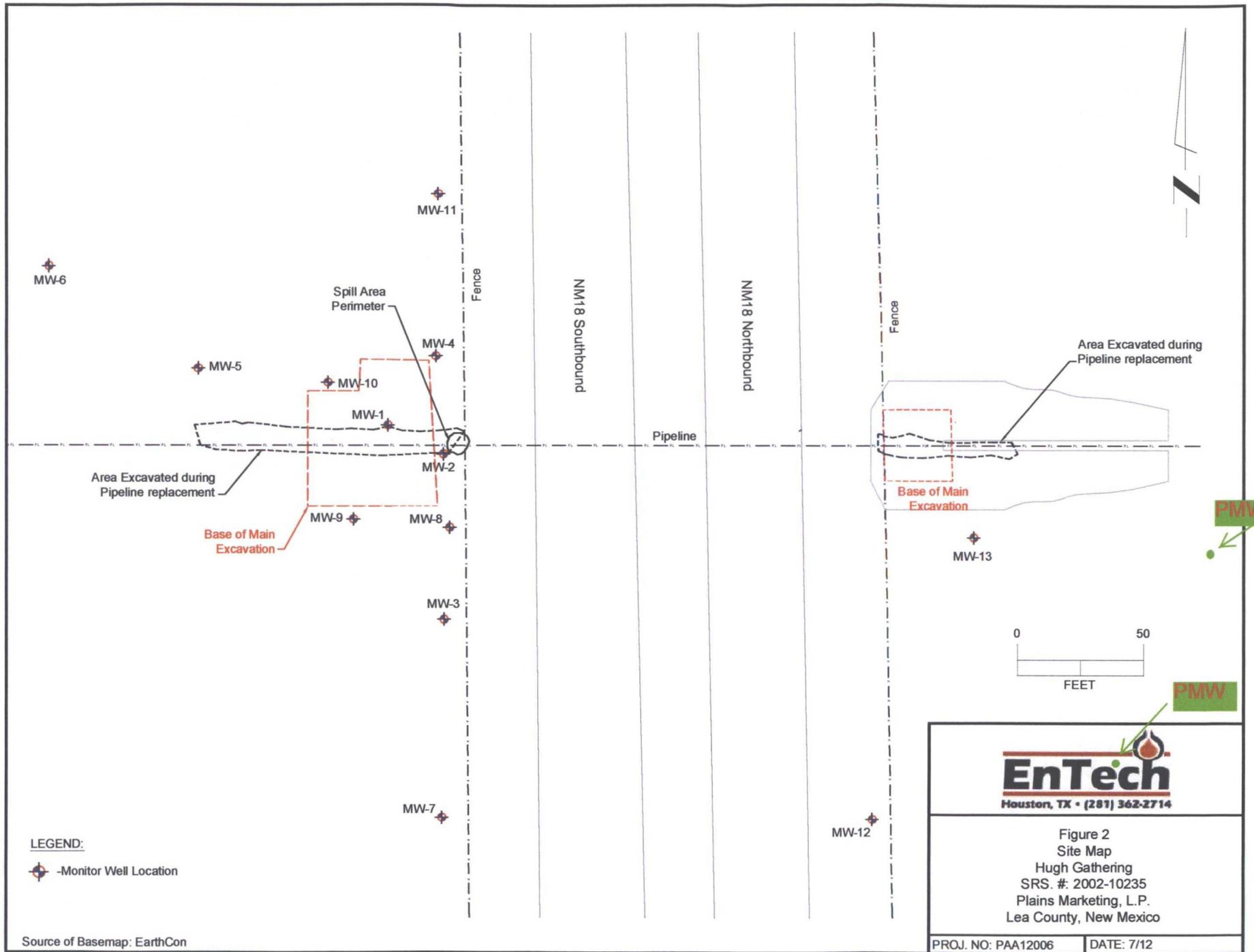
Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with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

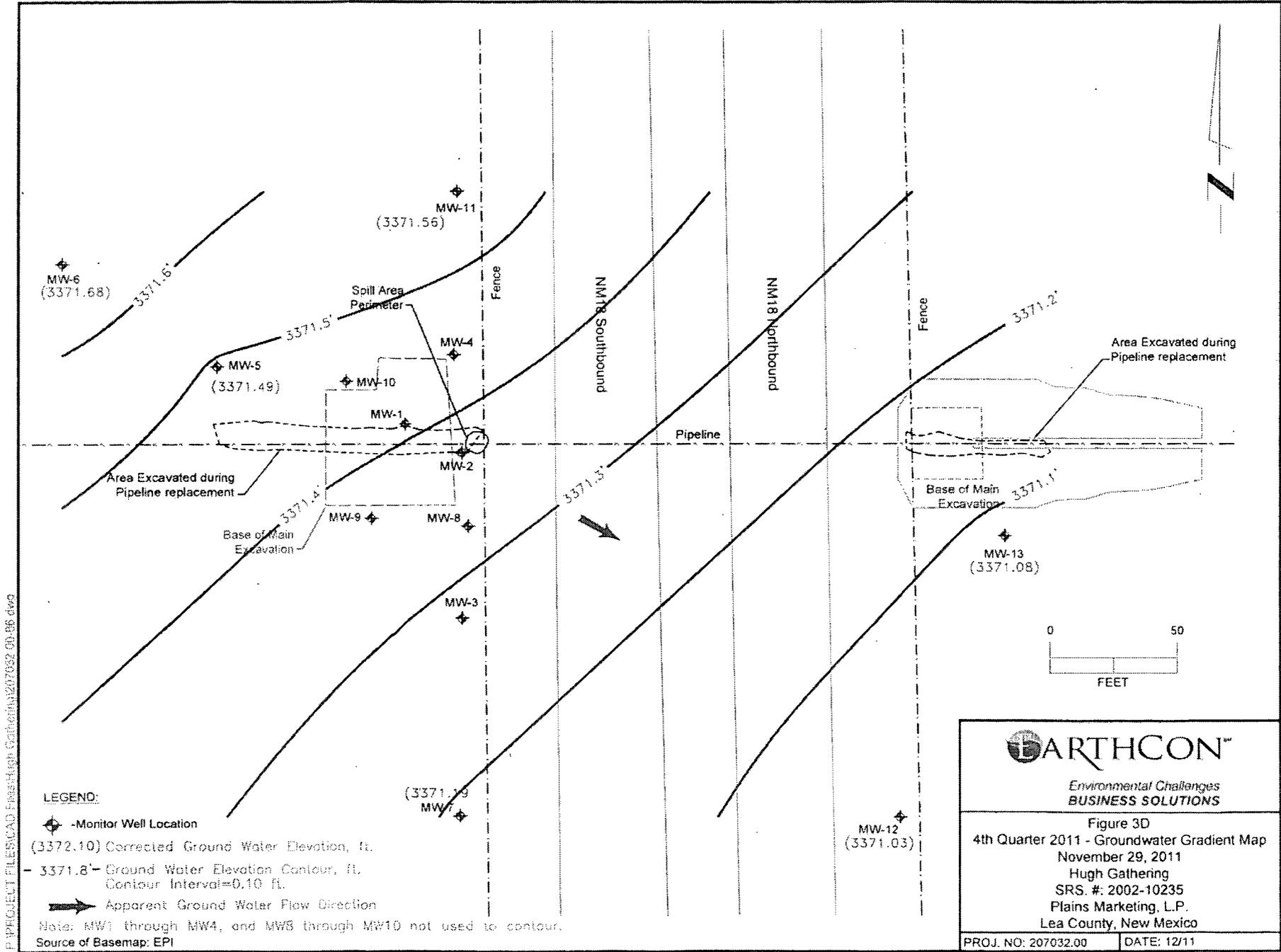
Edward J. Hansen  
Hydrologist  
Environmental Bureau

P.S.: Please keep in mind that in addition to the "1.3 Regulatory Framework" outlined in the Report, the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater:

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

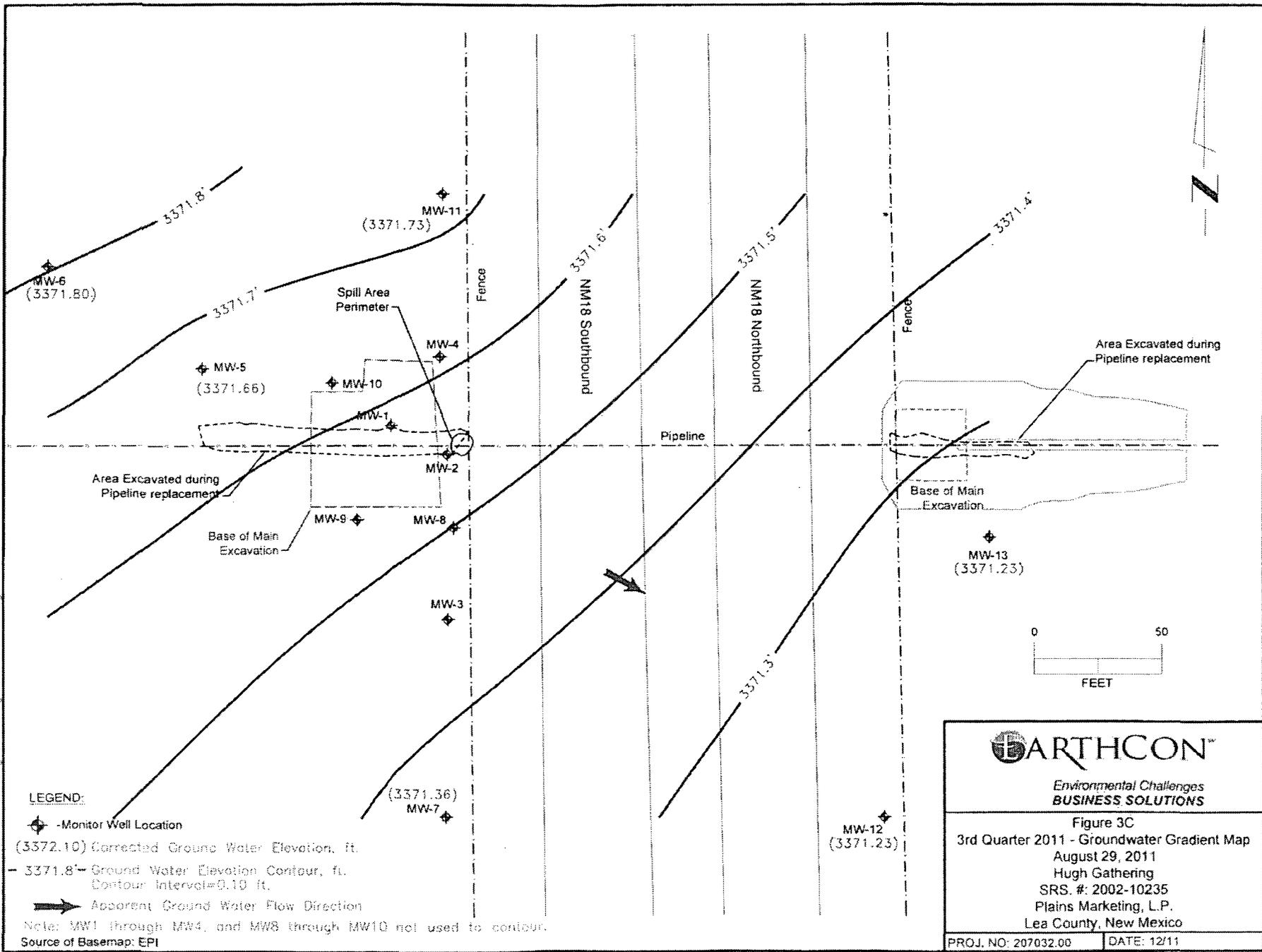


● ← PMW



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**LEGEND:**

- ◆ - Monitor Well Location
- (3372.10) Corrected Ground Water Elevation, ft.
- 3371.8' - Ground Water Elevation Contour, ft.  
Contour Interval=0.10 ft.
- ➔ Apparent Ground Water Flow Direction

Note: MW1 through MW4, and MW8 through MW10 not used to contour.  
Source of Basemap: EPI

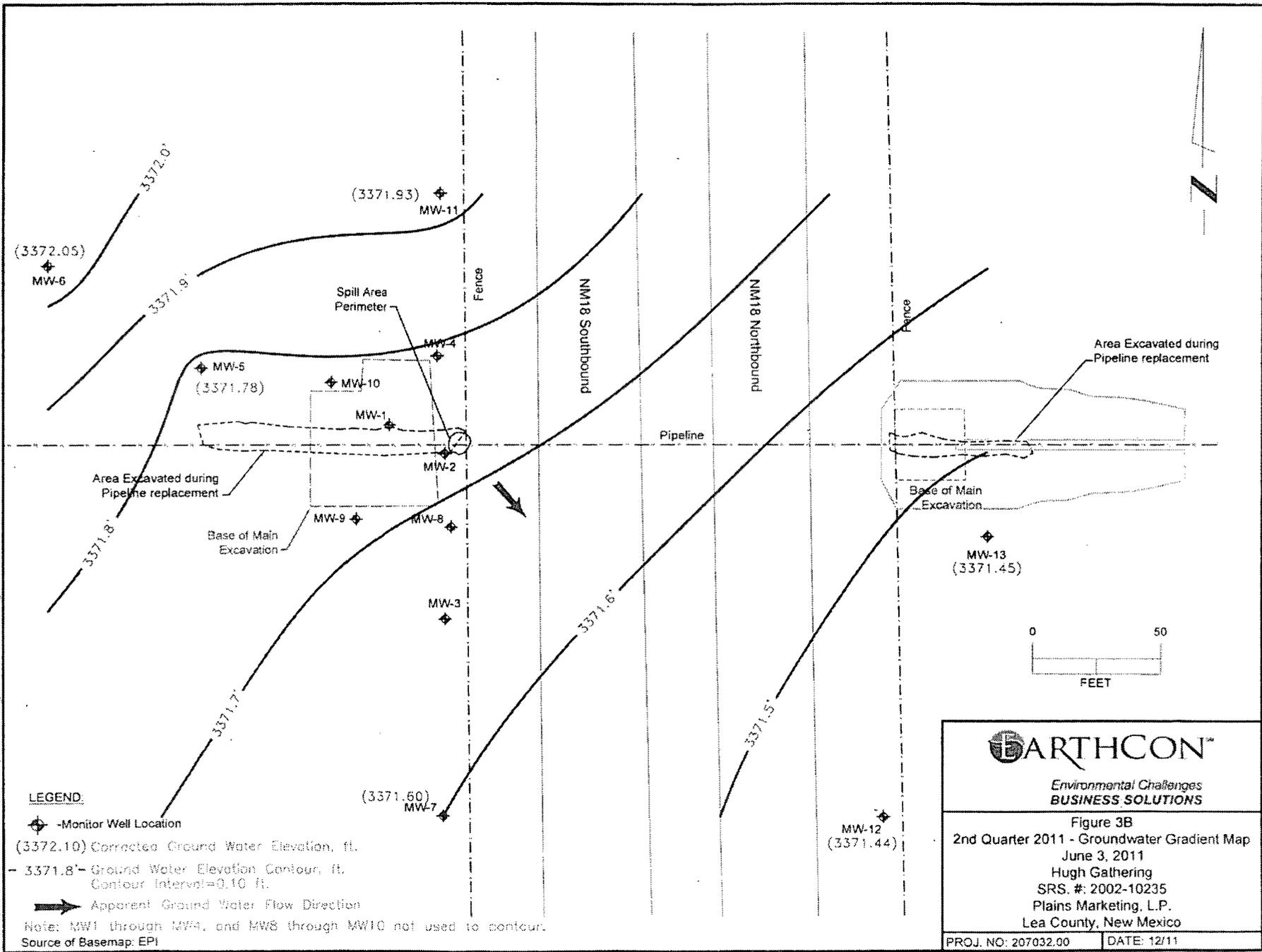


Environmental Challenges  
BUSINESS SOLUTIONS

Figure 3C  
3rd Quarter 2011 - Groundwater Gradient Map  
August 29, 2011  
Hugh Gathering  
SRS. #: 2002-10235  
Plains Marketing, L.P.  
Lea County, New Mexico

PROJ. NO: 207032.00      DATE: 12/11

P:\PROJECT FILES\CAB Files\Hugh Gathering\207032 60-65.dwg



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- ◆ -Monitor Well Location
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- 3371.8'- Ground Water Elevation Contour, ft.  
Contour Interval=0.10 ft.
- ➔ Apparent Ground Water Flow Direction

Note: MW1 through MW4, and MW8 through MW10 not used to contour.  
Source of Basemap: EPI



Environmental Challenges  
BUSINESS SOLUTIONS

Figure 3B  
2nd Quarter 2011 - Groundwater Gradient Map  
June 3, 2011  
Hugh Gathering  
SRS. #: 2002-10235  
Plains Marketing, L.P.  
Lea County, New Mexico

PROJ. NO: 207032.00	DATE: 12/11
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