1R - 234

APPROVALS

YEAR(S):

2011-2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD

Sent: Wednesday, December 12, 2012 5:13 PM

To: Jason Henry (JHenry@paalp.com)

Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)

Subject: Recommendations Approval (1R-234) - Plains Denton Station Release Site

RE: Annual Monitoring Report (2011) for the Plains Marketing's Denton Station Release Site (1R-234)
Unit H, 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 19.15.29 NMAC (Rule 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby conditionally approves the Recommendations for the Denton Station Release Site:

Regarding Polynuclear Aromatic Hydrocardons (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:

Thursday, November 03, 2011 5:19 PM

To:

'Jason Henry'

Cc:

Leking, Geoffrey R, EMNRD; 'Jeffrey P Dann'

Subject:

Anticipated Actions Approval (1R-234) - Plains Denton Station Release Site

RE: Annual Monitoring Report (2010) for the Plains Marketing's **Denton Station Release Site (1R-234)** Unit H, Section 14, 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 19.15.29 NMAC (Rule 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby conditionally approves the Anticipated Actions for the Denton Station Release Site:

Plains must continue to sample on an annual basis for PAHs in MW-4.

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