

AP - 54

APPROVALS

YEAR(S):

2012-2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, January 14, 2013 1:36 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com); skillingsworth@talonlpe.com
Subject: Recommendations Approval (2011) (AP-54) - Plains Hobbs Junction Mainline Release Site

**RE: 2011 Annual Groundwater Monitoring Report for the Plains Marketing's
Hobbs Junction Mainline Release Site (AP-54)
Unit Letter M, Section 26, T18S, 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 Hobbs Junction Mainline 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 “1.4 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 Section 1.4 and Table 3*).

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, March 27, 2012 10:50 AM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann
Subject: Recommendations Approval (AP-54) - Plains Hobbs Junction Mainline Release Site

**RE: 2011 Field Activity Report – Monitoring Well Installation for the Plains Marketing's
Hobbs Junction Mainline Release Site (AP-54)
Unit Letter M, Section 26, T18S, R37E, NMPM, Lea County, New Mexico
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received the 2011 Field Activity Report – Monitoring Well Installation for the Hobbs Junction Mainline Release Site, dated February, 2012, and has conducted a review of the recommendations. The proposed activities indicate that Plains Marketing (Plains) has met the requirements of 19.15.30 NMAC (Rule 30; formerly, Rule 19) for an abatement plan. Therefore, the OCD hereby approves the recommendations as proposed for above-referenced site in accordance with 19.15.30 NMAC.

Please be advised that OCD approval of these recommendations 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.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, February 27, 2012 4:31 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Kyle Waggoner
Subject: FW: Corrective Action Plan Addendum Approval (AP-54) - Plains Hobbs Junction Mainline Release Site

Dear Mr. Henry:

Please accept the email below as approval for the "soil closure proposal" of April 17, 2008.

In addition, please note that a progress report must be submitted to the OCD by July 2, 2012.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Hansen, Edward J., EMNRD
Sent: Wednesday, December 14, 2011 9:50 AM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Kyle Waggoner
Subject: Corrective Action Plan Addendum Approval (AP-54) - Plains Hobbs Junction Mainline Release Site

**RE: Corrective Action Plan Addendum for the Plains Marketing's
Hobbs Junction Mainline Release Site (AP-54)
Unit Letter M, Section 26, T18S, R37E, NMPM, Lea County, New Mexico
Corrective Action Plan Addendum Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received the Corrective Action Plan Addendum for the Hobbs Junction Mainline Release Site, dated April 17, 2008, and has conducted a review of the Addendum. The proposed Addendum indicates that Plains Marketing (Plains) has met the requirements of 19.15.30 NMAC (Rule 30; formerly, Rule 19) for an abatement plan. Therefore, the OCD hereby conditionally approves the Addendum as proposed for above-referenced site in accordance with 19.15.30 NMAC:

Plains must submit to the OCD a progress report regarding the Corrective Action Plan for the above-referenced site by **Monday, July 2, 2012**.

Please be advised that OCD approval of this addendum 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.

If you have any questions regarding this matter, please contact me at 505-476-3489.