

AP - 52

APPROVALS

Year(s)

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, June 14, 2012 3:58 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; 'Jeffrey P Dann'; 'skillingsworth@talonlpe.com'
Subject: Recommendations Approval (AP-52) - Plains C. S. Cayler Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
C. S. Cayler Release Site (AP-52)
Unit B, Section 6, T17S, 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 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 C. S. Cayler Release Site:

In addition to the replacement of MW-9 and MW-10, OCD approves the replacement of MW-13 and MW-14 as proposed on June 13, 2012, - please submit an installation report within 120 days (the report may be incorporated within a quarterly report);

Regarding 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;
- 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 correction to the “1.4 Regulatory Framework” outlined in the Report, the WQCC standard for Benzo-a-pyrene in groundwater is **0.0007** mg/L and the WQCC standard for the PAHs (**total** naphthalene **plus monomethylnaphthalenes**) is 0.03 mg/L. In addition, the following PAH 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

Also, “Non-aqueous phase liquid shall not be present floating atop of or immersed within ground water, as can be reasonably measured.”