

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Friday, September 18, 2020 9:23 AM
To: 'Amber L Groves'; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: 'David J. Adkins'; 'rmann@slo.state.nm.us'; Camille J Bryant
Subject: RE: [EXT] RE: NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E 0N 0E

Good morning Ms. Groves,

Plains needs to conduct additional remediation @ samples points S.SW-2, ESW-2 & W.SW-2, i.e. the sidewalls need to be less than 600 mg/kg for chlorides and 100 mg/kg for TPH, even though the depth to groundwater is over 100' and the release is on-pad. That will suffice for closure approval. Please make sure to submit all sampling notifications to ocd.enviro@state.nm.us that include the site name, incident number (or RP# if applicable), date and time of sampling event. Please note that confirmation closure samples not collected in accordance to 19.15.29.12.D may not be accepted during closure and Operators may be required to collect additional samples.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 909-0269
Victoria.Venegas@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Amber L Groves <ALGroves@paalp.com>
Sent: Friday, September 18, 2020 8:05 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: 'David J. Adkins' <dadkins@talonlpe.com>; 'rmann@slo.state.nm.us' <rmann@slo.state.nm.us>; Camille J Bryant <CJBryant@paalp.com>
Subject: RE: [EXT] RE: NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E 0N 0E

Good Morning, Ms. Venegas,

Plains is committed to gaining closure for NRM2012560155. Although remediation was conducted under and met all Table 1 criteria, it is our understanding that OCD's request is for the lateral extents to be characterized to the less than 50' to groundwater standard. As such, Plains will take delineation samples in four cardinal directions of the release area, thus exhibiting that the impacted area was contained to the tank battery production pad. Plains will have this scheduled for next week. Please let us know if this will not suffice for gaining closure or should you want to schedule a conference call for discussion.

Thank you,

Amber L. Groves
Remediation Coordinator
Plains All American
3112 W. US Hwy 82
Lovington, NM 88260
575-200-5517

From: Amber L Groves
Sent: Thursday, September 10, 2020 2:07 PM
To: 'Venegas, Victoria, EMNRD' <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: David J. Adkins <dadkins@talonlpe.com>; rmann@slo.state.nm.us; Camille J Bryant <CJBryant@paalp.com>
Subject: RE: [EXT] RE: NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E ON OE [External]

Ms. Venegas and Mr. Bratcher,

Plains would like to respectfully request a conference call with NMOCD to gain clarity on Table 1 Criteria under Rule 29 in relation to remediation activities located on in use production pads for this project as well as future projects. Please let me know a good date and time for OCD next week.

Thank you,

Amber L. Groves
Remediation Coordinator
Plains All American
3112 W. US Hwy 82
Lovington, NM 88260
575-200-5517

From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Wednesday, September 9, 2020 2:56 PM
To: Amber L Groves <ALGroves@paalp.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: David J. Adkins <dadkins@talonlpe.com>; rmann@slo.state.nm.us
Subject: RE: [EXT] RE: NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E ON OE [External]

Ms. Groves,

Thank you for the clarification. For your next submittals, please do not include information that is not required by the rule.

Regarding your questions about horizontal delineation the answer is yes; Plains needs to conduct additional remediation @ samples points S.SW-2, ESW-2 & W.SW-2, i.e. the sidewalls need to be less than 600 mg/kg for chlorides and 100 mg/kg for TPH, even though the depth to groundwater is over 100' and the release is on-pad. While vertical definition of contamination that may be acceptable is almost exclusively driven by depth to water, as determined, and as driven by

Table I, horizontal definition if different. The edges (horizontal definition) of a liquid release must be determined as well. The only value for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. This 600 mg/Kg value is discussed in detail in [19.15.29.13 D. \(1\)](#).

Therefore, horizontal soils delineation for chloride should be 600 mg/kg (again, or background) for all liquid releases, either on or off production pad. It is conceivable that in determining the horizontal extent of chloride that the edge of the production pad may be encountered, if last sample taken on pad limit, sample(s) must be obtained off pad to determine extent of release. If horizontal delineation samples on pad eventually reach a mechanical barrier, (such as pipeline or battery) sample(s) should be obtained as near as possible on the linear opposite side of said barrier and as close as possible to the barrier.

It is conceivable that a liquid release may occur with, for example, a surface soil chloride of 19,000 mg/Kg, and if it is reliably determined that groundwater is over 101 feet below ground surface, then that value may stand as a vertical definition, but nonetheless, the horizontal value(s) for lateral extent of liquid release would still, of Rule 29 necessity, be 600 mg/Kg chloride or less and 100 mg/kg for TPH. This would be inclusive of both "on-pad" of "off-pad" release area. The above if laboratory data driven, not just reported visual extent of a liquid release or calculated and reported release volumes. Generally, the top one foot sample suffices for immediate horizontal evaluation.

I hope this clarifies your questions. If you need anything else, please let me know.

Thank you,

Victoria Venegas
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811 S. First St., Artesia NM 88210
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OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Amber L Groves <ALGroves@paalp.com>
Sent: Wednesday, September 9, 2020 11:13 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: [EXT] RE: NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E 0N 0E

Good Morning, Ms. Venegas,

Just a few questions for clarification purposes. As the depth to groundwater is 265' bgs, Table 1 criteria would make total TPH 2500 mg/kg. In the closure report submittal, all sidewall samples showing horizontal remediation were 0-1053 mg/kg. Are you requesting that Plains conduct additional remediation on the two sample areas that were above 100 mg/kg?

The laboratory report that you are referring to is the waste characterization sample of the stockpile that Plains is required to run for transportation purposes. As a crude oil transporter, we are held to different standards than production and in order to legally transport those analyses are required. It was for the stockpile that was hauled to disposal.

Thank you,

*Amber L. Groves
Remediation Coordinator
Plains All American
3112 W. US Hwy 82
Lovington, NM 88260
575-200-5517*

From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Wednesday, September 9, 2020 11:46 AM

To: Amber L Groves <ALGroves@paalp.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: rmann@slo.state.nm.us; David J. Adkins <dadkins@talonlpe.com>

Subject: NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E ON OE [External]

NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E ON OE

Ms. Groves,

The OCD has denied the submitted Site Characterization/Remediation Plan/ Closure Report C-141 for incident # NRM2012560155 MATADOR FLORENCE ST. 23 #202H @ N-23-23S-34E ON OE for the following reasons:

- Horizontal delineation/remediation has not been completed. The values for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. To determine the horizontal extent, a "clean" sample is required. For the sake of consistency, the Division will consider a sample "clean" if it meets the more stringent requirements listed in Table 1. For chloride values, natural background levels will be considered. Additional horizontal delineation/remediation efforts will be required @ sample points S.SW-2, ESW-2 & W.SW-2.
- On page 106, the report says:... "the samples were analyzed for radioactive contamination"... Please clarify to which sample(s) the lab results shown from page 82 to page 120 belong to.

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through the fee portal.

Thank you,

Victoria Venegas
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Oil Conservation Division
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Victoria.Venegas@state.nm.us

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