

From: [Amber L Groves](#)
To: [Stanley, Curtis D.](#)
Subject: [EXTERNAL] Fwd: NRM2009254898 Plains Screech Owl Variance Request & Addendum
Date: Monday, June 8, 2020 10:41:13 AM

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Hey Curt,

I just received approval on the variance for Screech Owl. Let's get confirmation samples, please!

Thank you,
Amber

Sent from my iPhone

Begin forwarded message:

From: "Billings, Bradford, EMNRD" <Bradford.Billings@state.nm.us>
Date: June 8, 2020 at 9:36:50 AM MDT
To: Amber L Groves <ALGroves@paalp.com>
Subject: RE: NRM2009254898 Plains Screech Owl Variance Request & Addendum [External]

6/08/2020

Plains Pipeline

Amber Groves – Plains

Dear Amber,

As per your request below, and with the following understanding as presented, Plains has approval to carry on with investigation as outlined below and to utilize the delineation data from other release for data source when Plains submits the likely deferral documentation.

If there are any questions please do not hesitate to contact me as needs arise. Please keep a copy of this communication and associated email sting as no paper copy will follow.

Thank you for your efforts.

Sincerely,

Bradford Billings
EMNRD/OCD

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 ground water, 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, local laws and/or regulations

From: Amber L Groves <ALGroves@paalp.com>
Sent: Monday, June 1, 2020 3:11 PM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] RE: NRM2009254898 Plains Screech Owl Variance Request & Addendum

Bradford,

To clarify from our recent conversation, Plains has a deferral in place under 2RP-4147 for the area between Plains' LACT berm and COG's containment. It is currently excavated to 3' bgs, and the previously deferred area will need to remain in place due to proximity to in place equipment. Plains will take confirmation samples of the 50 ft X 2ft area that will be requested as a deferral in the closure request, and would like to utilize the delineation data from the 2017 deferral for the impact that was left in place. Additional deferral of this area will be based on the analytical results from the monitor well installed in 2018 being above the NMWQCC standard for abatable groundwater.

Thank you,

Amber

From: Amber L Groves
Sent: Monday, June 1, 2020 2:26 PM
To: 'Billings, Bradford, EMNRD' <Bradford.Billings@state.nm.us>
Subject: FW: NRM2009254898 Plains Screech Owl Variance Request & Addendum

Good Afternoon, Bradford,

Below are the two variance requests that I sent in for our Screech Owl site. I just pasted both sets of verbiage here and the data is all attached. Please feel free to give me a call with any questions and as always it was good talking to you today!

Plains would like to respectfully add an addendum to the below variance request that was submitted to NMOCD on April 21, 2020. A portion of the March 28, 2020 release occurred directly into a flow path from a previously deferred release. 2RP-4147 occurred on March 11, 2017 and a portion of Plains' release was deferred due to its proximity to COG's CTB containment. The portion of Plains' current release that occurred in conjunction with the deferred area of 2RP-4147 is 50 ft in length X 2ft in width and has been excavated to an approximate depth of 3 ft bgs. Attached is a chemistry table outlining delineation samples from the 2017 release noting a depth of 4 ft bgs with a concentration of 2,984 mg/kg TPH and 7 ft bgs with a concentration of 33.2 mg/kg TPH. During excavation activities through 2017 and 2018, it was necessary for Plains to utilize a hammer hoe due to the geologic formation characterized as gypsum in the area. As such, utilizing a hand auger for delineation purposes has proved ineffectual. Also attached in the 2017 and 2020 combined documentation are photos indicating the infeasibility of utilizing equipment due to the existence of piping and LACT equipment in coexistence with COG's tank battery in relation to the 50 ft X 2ft area.

As indicated in the variance request below, Plains installed a monitor well at this location on October 8, 2018. Results from TDS analysis exceeded the NMWQCC standard for abatable groundwater. With the groundwater and geologic information presented, Plains respectfully requests for delineation data from 2017 to suffice in characterization of the current release for the 50 ft X 2ft area between Plains' LACT containment and COG's CTB containment. Please feel free to give me a call should you have any questions.

On March 28, 2020, Plains had an approximate 15 bbl release at COG's Screech Owl CTB. The C-141 was filed with NMOCD online on April 1, 2020 and assigned NRM2009254898. Initial delineation activities at the release site commenced on April 7, 2020 and soil sample results can be found in the attached Chemistry Table. Soil samples were advanced to 1 ft. bgs with the East (E) sample being advanced to a terminal depth of 14" with a result of 234.8 mg/kg TPH.

On September 20, 2018, Plains installed a monitor well at the COG Screech Owl CTB. Depth to water was determined to be approximately 93 feet bgs. A groundwater sample was collected on October 8, 2018 and analyzed for total dissolved solids (TDS). The analytical results indicated the TDS concentration was 485,000 mg/L. This result exceeds the NMOCD and New Mexico Water Quality Control Commission (NMWQCC) standard of 10,000 mg/L for abatable water. Please find attached the boring log and the analytical results from the groundwater sample collected from the monitor well. Also attached is published /pertinent information regarding the groundwater in the area. While Plains acknowledges the site is located in a high karst area, we respectfully request a variance for vertical delineation based on the downward trend of TPH concentrations collected from soil sample E and an impermeable gypsum layer, being

sufficed at the 234.8 mg/kg TPH. Plains also respectfully requests a variance on the 100 mg/kg confirmation sample standard to the 2,500 mg/kg standard in Table 1. Both variance requests are based on the provided groundwater data.

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, April 30, 2020 10:10 AM

To: 'Billings, Bradford, EMNRD' <Bradford.Billings@state.nm.us>;

'cristina.eads@state.nm.us' <cristina.eads@state.nm.us>;

'victoria.venegas@state.nm.us' <victoria.venegas@state.nm.us>;

'robert.hamlet@state.nm.us' <robert.hamlet@state.nm.us>

Cc: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; Camille J Bryant <CJBryant@paalp.com>; 'Stanley, Curtis D.' <CDStanley@trccompanies.com>

Subject: NRM2009254898 Plains Screech Owl Variance Request & Addendum

Good Morning,

Plains would like to respectfully add an addendum to the below variance request that was submitted to NMOCD on April 21, 2020. A portion of the March 28, 2020 release occurred directly into a flow path from a previously deferred release. 2RP-4147 occurred on March 11, 2017 and a portion of Plains' release was deferred due to its proximity to COG's CTB containment. The portion of Plains' current release that occurred in conjunction with the deferred area of 2RP-4147 is 50 ft in length X 2ft in width and has been excavated to an approximate depth of 3 ft bgs. Attached is a chemistry table outlining delineation samples from the 2017 release noting a depth of 4 ft bgs with a concentration of 2,984 mg/kg TPH and 7 ft bgs with a concentration of 33.2 mg/kg TPH. During excavation activities through 2017 and 2018, it was necessary for Plains to utilize a hammer hoe due to the geologic formation characterized as gypsum in the area. As such, utilizing a hand auger for delineation purposes has proved ineffectual. Also attached in the 2017 and 2020 combined documentation are photos indicating the infeasibility of utilizing equipment due to the existence of piping and LACT equipment in coexistence with COG's tank battery in relation to the 50 ft X 2ft area.

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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: Tuesday, April 21, 2020 9:51 AM

To: 'Billings, Bradford, EMNRD' <Bradford.Billings@state.nm.us>;
'cristina.eads@state.nm.us' <cristina.eads@state.nm.us>;
'victoria.venegas@state.nm.us' <victoria.venegas@state.nm.us>;
'robert.hamlet@state.nm.us' <robert.hamlet@state.nm.us>

Cc: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; Camille J Bryant
<CJBryant@paalp.com>; Stanley, Curtis D. <CDStanley@trccompanies.com>

Subject: NRM2009254898 Plains Screech Owl Variance Request

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Please feel free to give me a call should you have any questions!

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

Attention:

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