

AP - 41

APPROVALS

YEAR(S):

2011-2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, December 04, 2012 10:52 AM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; 'kathleen buxton'
Subject: Ground Water Monitoring Plan Amendment Approval (AP-41) - Plains Hugh Gathering Release Site

**RE: Ground Water Monitoring Plan Amendment for the Plains Marketing's
Hugh Gathering Release Site (AP-41)
Unit P, Section 11, T21S, R37E, NMPM, Lea County, New Mexico
Ground Water Monitoring Plan Amendment Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' proposed ground water monitoring plan amendment for the above-referenced site (dated November 30, 2012). The above-referenced amendment, submitted in partial fulfillment of 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the ground water monitoring plan amendment as proposed for the Hugh Gathering Release Site:

- Plains must submit an implementation schedule to the OCD within 30 days.

Please be advised that OCD approval of this amendment 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

From: Jason Henry [mailto:JHenry@paalp.com]
Sent: Friday, November 30, 2012 11:00 AM
To: Hansen, Edward J., EMNRD
Cc: Jeffrey P Dann; 'kathleen buxton'; Leking, Geoffrey R, EMNRD
Subject: RE: Recommendations Approval (2011 Report) (AP-41) - Plains Hugh Gathering Release Site

Ed,

In regard to the **misdirective** in your message below, Plains anticipates being able to install 3 downgradient monitoring wells on the east side of Hwy. 18 in the near future. The approximate locations of the 3 proposed monitoring wells are depicted on the attached site map. I am scheduled to meet with the owner of the property on the east side of Hwy. 18

on 12/04/2012 to discuss the installation of the monitoring wells. If the landowner will grant Plains permission to access his land, then I will be able to provide you with a more specific timeframe for proceeding with the installation of the monitoring wells.

Please let me know if you have any questions or need more information.

Thank you,
Jason Henry
575-441-1099

From: Hansen, Edward J., EMNRD [<mailto:edwardj.hansen@state.nm.us>]
Sent: Monday, October 29, 2012 6:49 PM
To: Jason Henry
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann
Subject: Recommendations Approval (2011 Report) (AP-41) - Plains Hugh Gathering Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
Hugh Gathering Release Site (AP-41)
Unit P, Section 11, T21S, 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 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Proposed Activities for the Hugh Gathering Release Site:

- Please submit to the OCD an evaluation regarding the installation of a downgradient groundwater monitoring well on the "east side" within 30 days.

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 “1.3 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: Monday, October 29, 2012 5:49 PM
To: Jason Henry (JHenry@paalp.com)
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com)
Subject: Recommendations Approval (2011 Report) (AP-41) - Plains Hugh Gathering Release Site

**RE: Annual Monitoring Report (2011) for the Plains Marketing's
Hugh Gathering Release Site (AP-41)
Unit P, Section 11, T21S, 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 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Proposed Activities for the Hugh Gathering Release Site:

- Please submit to the OCD an evaluation regarding the installation of a downgradient groundwater monitoring well on the "east side" within 30 days;

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 “1.3 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: Tuesday, November 29, 2011 2:01 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann
Subject: Proposed Activities Approval (AP-41) - Plains Hugh Gathering Release Site

**RE: Annual Monitoring Report (2010) for the Plains Marketing's
Hugh Gathering Release Site (AP-41)
Unit P, Section 11, T21S, R37E, NMPM, Lea County, New Mexico
Proposed Activities Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "2011 Proposed Activities") the above-referenced site (dated March 2011). The above-referenced report, submitted in partial fulfillment of 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Proposed Activities for the Hugh Gathering Release Site:

Plains must sample on an annual basis for PAHs in groundwater monitoring well, MW-13.

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