1R - 85

## APPROVALS

VEAR(S):

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## Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD

**Sent:** Thursday, December 27, 2012 5:33 PM **To:** Jason Henry (JHenry@paalp.com)

Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann (jpdann@paalp.com);

'bjarquijo@basinenv.com' (bjarquijo@basinenv.com)

Subject: Anticipated Actions Approval (2011) (1R-85) - Plains Red Byrd #1 Release Site

RE: Annual Monitoring Report (2011) for the Plains Marketing's Red Byrd #1 Release Site (1R-85)
Unit H, Section 1, T20S, R36E, NMPM, Lea County, New Mexico Anticipated Actions Approval

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Anticipated Actions") the above-referenced site (dated March 2012). The above-referenced report, submitted in partial fulfillment of 19.15.29 NMAC (Rule 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby approves the Anticipated Actions for the Red Byrd #1 Release Site.

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 the following compounds must not be present (i.e., at 0.001 mg/L or less) in groundwater (therefore, the detection limit must be no greater than 0.001 mg/L, not 0.005 as indicated in Table 3):

- (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 (therefore, the detection limit must be no greater than 0.0007 mg/L, not 0.005 as indicated in Table 3).

## Hansen, Edward J., EMNRD

From:

Hansen, Edward J., EMNRD

Sent:

Tuesday, July 24, 2012 6:11 PM

To:

'Jason Henry'

Cc:

Leking, Geoffrey R, EMNRD; Jeffrey P Dann

**Subject:** 

Corrective Actions Amendment Approval (1R-0085) - Plains Red Byrd #1 Release Site

RE: Amendment to the Corrective Actions Plan for the Plains Marketing's

Red Byrd #1 Release Site (1R-0085)

Unit H, Section 1, T20S, R36E, NMPM, Lea County, New Mexico

Corrective Actions Amendment Approval

## Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' proposed amendment to the corrective actions plan for the above-referenced site (dated July 24, 2012). The amendment, submitted in partial fulfillment of 19.15.29 NMAC (Rule 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby conditionally approves the amendment to the corrective actions plan for the Red Byrd #1 Release Site:

Plains must submit to the OCD the proposed report within 30 days following the curtailment period.

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: Tuesday, July 24, 2012 3:56 PM

To: Hansen, Edward J., EMNRD

Cc: Jeffrey P Dann

**Subject:** Plains Red Byrd #1 Release Site (1R-0085)

Ed,

Plains respectfully requests NMOCD approval to implement a 180-day curtailment period at the above-referenced site. The purpose of the proposed curtailment period is to allow for the observance of the PSH level in monitor well MW-12 in the absence of the once weekly PSH recovery efforts that are currently being conducted. During the curtailment period, Plains proposes to limit the site activities to a once monthly groundwater gauging event. Following the end of the 180 day curtailment period, Plains will submit the groundwater gauging data to you for your review.

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

Thank you, Jason Henry 575-441-1099