

Venegas, Victoria, EMNRD

From: Amber L Groves <ALGroves@paalp.com>
Sent: Tuesday, March 10, 2020 1:20 PM
To: Eads, Cristina, EMNRD; Hamlet, Robert, EMNRD; Venegas, Victoria, EMNRD
Cc: Bratcher, Mike, EMNRD; Billings, Bradford, EMNRD; Camille J Bryant
Subject: [EXT] NVV2003536983-Plains COG Craig State 3H Variance Request
Attachments: CraigSt3-13Htablemaps.pdf; COG Craig Brine Well Docs.pdf; COG Craig AH-3.jpg; COG Craig AH-3 (2).jpg

Good Afternoon,

On January 11, 2020, Plains had a crude oil release of approximately 8 bbls at the COG Craig State 3H and the C-141 was filed with NMOCD on January 15, 2020. OCD assigned this release #NVV2003536983 on February 4, 2020. Initial delineation activities at the release site commenced on January 15, 2020. Soil sample results can be found in the attached Chemistry Table. Soil sample AH-3 was advanced to a terminal depth of approximately 7 ft, where resistance was met. The soil sample AH-3 @ 7' exhibited a TPH concentration of 731.4 mg/kg .

On September 20, 2018, Plains installed a monitor well approximately 3.42 miles southeast of the COG Craig State 3H 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 as shown on the attached map, we respectfully request a variance for vertical delineation based on the downward trend of TPH concentrations collected from soil samples AH-3 @1' through AH-3 @7' , the impermeable layer and the close proximity of numerous structures, being sufficed at the 731.4 mg/kg TPH based on the provided information.

The majority of the release area is confined to Plains' LACT unit. Due to the nature of equipment and plethora of pipeline and conduit found in the release area, Plains is also requesting a variance to excavate to 3' bgs and install a 20-mil polyethylene liner. Please see attached photos showing the limited access in the LACT area.

Thank you and please feel free to give me a call at the number below should you have any questions.

*Amber L. Groves
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