

Venegas, Victoria, EMNRD

From: Amber L Groves <ALGroves@paalp.com>
Sent: Tuesday, April 21, 2020 8:51 AM
To: Billings, Bradford, EMNRD; Eads, Cristina, EMNRD; Venegas, Victoria, EMNRD; Hamlet, Robert, EMNRD
Cc: Bratcher, Mike, EMNRD; Camille J Bryant; Stanley, Curtis D.
Subject: [EXT] NRM2009254898 Plains Screech Owl Variance Request
Attachments: COG Screech Owl Brine Well Docs.pdf; Screech Owl Table and Site Map.pdf

Good Morning,

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.

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

Thank you,

*Amber L. Groves
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