

## Venegas, Victoria, EMNRD

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**From:** Amber L Groves <ALGroves@paalp.com>  
**Sent:** Thursday, April 30, 2020 9:10 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 & Addendum  
**Attachments:** COG Screech Owl Brine Well Docs.pdf; Screech Owl Table and Site Map.pdf; Screech Owl CTB Combined 2017 and 2020 Release Data.pdf

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.

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.

Thank you,

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

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**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

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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