

# Basin Environmental Service Technologies, LLC

Verbal  
07/2  
5.17.05  
SA

P. O. Box 301  
Lovington, New Mexico 88260  
kdutton@basinenv.com  
Office: (505) 396-2378 Fax: (505) 396-1429



16 May 2005

Mr. Larry Johnson  
New Mexico Oil Conservation Division  
Hobbs District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240



Re: Request Approval for Backfill of Excavation  
Plains Marketing, L. P. (C-141, dated 07 Dec 04)  
Lea to Dublin 8"  
Unit G (SW ¼, NE ¼) Section 28, Township 20 South, Range 37 East  
Lea County, New Mexico

Dear Mr. Johnson:

Basin Environmental Services (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for approval to backfill the Lea to Dublin 8" remediation site at the above referenced location. As indicated on the attached Soil Chemistry Table and Sampling Location Site Map, confirmation soil samples are below New Mexico Oil Conservation Division (NMOCD) standards (<100 ppm) for the site, with the exception of the North P/L Floor, 15 feet sample which is 112 mg/kg TPH concentration. Based on a previous discussion of this remediation site with yourself, you stated that a TPH concentration of 112 mg/kg would be acceptable for closure based on the reduction from a TPH concentration of 176 mg/kg to 112 mg/kg. Plains and Millard Deck Estates have reached an agreement to purchase backfill from the Estate. The impacted soil will be transported to the Plains Marketing Lea Station Land Farm. A C-138 will be submitted once your approval is received.

Basin responded and clamped the pipeline release on 04 Dec 04, located on the Lea to Dublin 8" Pipeline. The impacted soils were excavated and stockpiled on a poly liner. As reported on the C-141, dated 07 Dec 04, approximately 910 barrels of crude oil were released and 860 barrels recovered. Excavation of the visually stained area was accomplished and confirmation soil samples were collected for laboratory analysis. Initial soil sampling results reported concentrations of total petroleum hydrocarbons (THP) and benzene, toluene, ethyl-benzene, and xylenes (BTEX) below NMOCD

incident - n LWS 0525737873  
application - PPAC060431119

standards with the exception of the North P/L Floor, 8 feet sample that was 176 mg/kg (TPH). Further excavation was accomplished to a depth of 15 feet below ground surface and a soil sample collected which indicated a TPH concentration of 112 mg/kg. Confirmation soil samples are below NMOCD standards, with the exception of the North P/L Floor, 15 feet sample, which is 112 mg/kg TPH concentration. Backfilling of the site will begin once your approval is received.

Upon completion of the backfilling activities a Site Remediation Report and Closure Request will be submitted to the Hobbs District 1, NMOCD office.

Should you have any questions or comments, please contact me at (505) 441-2124.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Dutton", with a stylized, cursive script.

Ken Dutton  
Basin Environmental Services

Attachments: Site Map, Sampling Locations  
Soil Chemistry Table  
NMOCD C-141

# **ATTACHMENT 1**

## **SITE MAP, SAMPLING LOCATIONS**



Pig Trap 8" Pipeline

152 feet

19 feet

130 feet

14 feet bgs

4 feet bgs

14 feet bgs

4 feet bgs

10 feet bgs

North P/L N/SW

6" Pipeline to Lea Station

North P/L Floor 15'

North P/L Floor

North P/L S/SW

North Floor

North Exc N/SW

North Exc Floor

North Exc S/SW

Middle Floor North

Middle Floor East

Middle Floor South

South Exc SW

South Exc Floor

Plains Marketing  
Lea to Dublin 8"  
Unit G, S28, T20S, R37E  
Lea County, New Mexico

● Sampling Locations

DRAWN BY

TITLE  
Site Map, Lea to Dublin  
8"

Stockpiled Material

Basin Environmental Services  
kad

## **ATTACHMENT 2**

### **SOIL CHEMISTRY TABLE**

TABLE 1

## SOIL CHEMISTRY

PLAINS MARKETING, L.P.  
LEA TO DUBLIN 8" LINE  
LEA COUNTY, NEW MEXICO  
EMS: 2004-00223

SAMPLE LOCATION	SAMPLE DEPTH	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M		TOTAL
			BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL- BENZENE (mg/kg)	M,P- XYLENES (mg/kg)	O-XYLENE (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	
South Exc SW	3'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	30.8	30.8
South Exc Floor	6'	01/03/05	<0.025	<0.025	<0.025	0.101	0.061	<10.0	14.5	14.5
Middle Floor East	4'	01/03/05	0.109	1.49	2.66	3.76	1.68	37.2	34.6	71.8
Middle Floor South	4'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	29.6	29.6
Middle Floor North	4'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
North Exc Floor	14'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
North Exc S/SW	6'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
North Exc N/SW	6'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
North P/L Floor	8'	01/03/05	<0.025	0.37	0.552	1.09	0.618	44.9	131	176
North P/L N/SW	4'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
North P/L S/SW	4'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
North Floor	3'	01/03/05	<0.025	0.315	0.169	0.096	0.06	<10.0	<10.0	<10.0
Stockpile North	6'	01/03/05	0.160	7.24	7.71	11.7	4.51	188	184	372
Stockpile South	6'	01/03/05	0.041	1.3	2.1	2.89	1.21	81.2	98.5	180
Stockpile East	6'	01/03/05	21.3	340	257	230	92.9	10400	9420	19800
Stockpile West	6'	01/03/05	<0.025	0.133	0.132	0.711	0.426	110	232	342
North P/L Floor 15'	15'	01/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	112	112

# **ATTACHMENT 3**

**NMOCD C-141**

625 N. French Dr., Hobbs, NM 88240  
District II  
301 W. Grand Avenue, Artesia, NM 88210  
District III  
000 Rio Brazos Road, Aztec, NM 87410  
District IV  
220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

x Initial Report ☐ Final Report

Name of Company Plains Marketing, LP	Contact Camille Reynolds	
Address 5805 East Hwy. 80, Midland, TX 79706	Telephone No. 505-441-0965	
Facility Name Lea to Dublin	Facility Type 8" Steel Pipeline	
Surface Owner Millard Deck Estate	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter G	Section 28	Township 20S	Range 37E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32° 32' 46.8"

Longitude 103° 15' 19.5"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 910 barrels	Volume Recovered 860 barrels
Source of Release 8" Steel Pipeline	Date and Hour of Occurrence 12-04-04 @ 6:57	Date and Hour of Discovery 12-4-04 @ 7:00
Was Immediate Notice Given? x Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Gary Wink	
By Whom? Camille Reynolds	Date and Hour 12-4-04 @ 18:00	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* Failure of a 2" valve caused release of sour crude. The valve was replaced to mitigate the release. The line is a 8 inch steel transmission pipeline that produces approximately 872 barrels per hour. The pressure on the line is approximately 369 psi and the gravity of the sour crude oil is 36. The H<sub>2</sub>S content of the sour crude is less than 10 parts per million.

Describe Area Affected and Cleanup Action Taken.\* The crude oil was vacuumed up and the impacted soil was excavated and stockpiled on plastic. The aerial extent of surface impact was approximately 150' x 128'.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Camille Reynolds</i>	OIL CONSERVATION DIVISION	
Printed Name: Camille Reynolds	Approved by District Supervisor:	
Title: Remediation Coordinator	Approval Date:	Expiration Date:
E-mail Address: cgreynolds@paalp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 12-7-04	Phone: 505-441-0965	
Attach Additional Sheets If Necessary		