

SITE INVESTIGATION AND CLOSURE PROPOSAL

Friscoe Skelly #2 Ref. # 2004-00197

SE¼ of the NW¼ of Section 6, R37E, T17S Latitude 32°52'4.316"N and Longitude 103°17'38.146"W Elevation ~3,810'amsl

~7 miles southeast of Lovington, Lea County, New Mexico

April 2005

Prepared by

Environmental Plus, Inc.
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incident # 1 LWJ 0523857888

application-pPACO606755907



STANDARD OF CARE

Site Investigation and Closure Proposal

Friscoe Skelly #2 Ref. # 2004-00197

The information provided in this report was collected consistent with the Mexico Oil Conservation Division (NMOCD) Guidelines Remediation of Leaks, Spills and Releases (August 13, 1993), the NMOCD Unlined Surface Impoundment Closure Guidelines (February 1993), and the Environmental Plus, Inc. (EPI) Standard Operating Procedures and Quality The conclusions are based on field Assurance/Quality Control Plan. observations and laboratory analytical reports as presented in the report. Recommendations follow NMOCD guidance and represent the professional opinions of EPI staff. These opinions were arrived at with currently accepted geologic, hydrogeologic and engineering practices at this time The report was prepared or reviewed by a certified or and location. EPIprofessional with a background in engineering, environmental, and/or the natural sciences.

This report was prepared by:

Patrick W. McCasland May 2, 2005
Date

This report was reviewed by:

Iain Olness, PG

Date



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Company or Agency	NMOCD	NMOCD	Plains	Plains	EPI
Title	Title Environmental Engineer		Environmental Supervisor	Environmental Director	
Name	Paul Sheeley	Larry Johnson	Camille Reynolds	Jeff Dann	fle

NMOCD - New Mexico Oil Conservation Division

Plains - Plains Pipeline, L.P. EPI - Environmental Plus, Inc. BLM - U.S. Department of Interior Bureau of Land Management



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1.0 Introduction and Summary

This site is located in UL-F (SE¼ of the NW¼) of Section 6, R37E, T17S at a latitude of 32°52'4.316"N and a longitude of 103°17'38.146"W, approximately 7 miles southeast of Lovington, New Mexico on property owned by the Robert C. Rice. Site and topographical maps are included in Attachment I. The estimated 10 barrel (bbl) crude oil leak attributed to internal/external corrosion, occurred in the Plains Pipeline, L.P. (Plains) Friscoe Skelly 4" steel pipeline with no fluids recovered. Approximately 338 square feet (ft²) (18' x 20') of surface area was impacted. Local groundwater is estimated to occur at approximately 73-feet below ground surface ('bgs) and is based on water level measurements of monitoring wells associated with a Plains site approximately 1,300 feet due east of the site at a similar elevation. There are no surface water bodies or domestic or agricultural water wells observed to be within a 1,000 foot radius of the site. This gives the site a 10 point New Mexico Oil Conservation Division (NMOCD) ranking score for soil from the surface to 23'bgs and 20 points for soil >23'bgs. These rankings apply the following remedial guidelines for the "constituents/contaminants of concern" (CoCs):

CONSTITUENTS/CONTAMINANTS OF CONCERN	REMEDIAL GOAL
Benzene	10 mg/Kg
BTEX (mass sum of benzene, toluene, ethylbenzene, and xylenes	50 mg/Kg
Total Petroleum Hydrocarbon 8015m (TPH ^{8015m}) Soil from the surface to 23'bgs	1,000 mg/Kg
TPH ^{8015m} (Soil >23'bgs)	100 mg/Kg

In September 2004, Environmental Plus, Inc. (EPI) with direction from Plains, excavated 1,138 cubic yards (yd3) of impacted soil from the release area and disposed of the soil in the NMOCD approved and permitted Plains Lea Station Landfarm GW-351. Samples collected in October 2004 from the sidewalls of the 16-feet deep excavation indicated that the horizontal extent of impact had been delineated; however, contaminant levels in the floor of the excavation at 16'bgs remained above the remedial goals. In November 2004, to delineate the vertical extent of impact, a trench was excavated beneath the leak origin and sampled. Analytical results for the samples collected from the leak origin trench indicated a decreasing TPH8015m gradient; however, the analytical results for the sample collected from the floor of the trench at 24'bgs were above the remedial goals for TPH^{8015m}. Subsequently, a leak origin soil boring (BH1) was advanced in the bottom of the excavation. The analytical results established a decreasing TPH8015m gradient (i.e., 2,070 mg/Kg at 21'bgs to an acceptable 46.8 mg/Kg at 36'bgs). However, the TPH^{8015m} concentration from the 41'bgs sample was 125 mg/Kg, in excess of the 100 mg/Kg remedial goal. On 12 April 2005, at the request of the NMOCD, additional samples were collected from a soil boring advanced to 46' bgs and 51' bgs adjacent to the leak origin soil boring (BH1). The TPH^{8015m} concentration from the 46'bgs sample was an acceptable 37.6 mg/Kg. The TPH^{8015m} concentration from the 51'bgs sample was reported as non-detectable at or above the method detection limits (MDL). The results establish a consistent decreasing gradient supporting the conclusion that the groundwater has not been impacted. The benzene and BTEX data also support this conclusion, i.e.,



analytical results from the 36'bgs, 41'bgs, 46'bgs, and the 51'bgs samples were reported as not being detected at or above each analytes respective MDL.

To remediate and close the site, Plains proposes to install an oversized 20 mil thick polyethylene liner at 16'bgs over the remaining hydrocarbon source term centered beneath the leak origin. This will interrupt the vertical transport mechanism effectively isolating the crude oil residual and protecting the groundwater. Prior to liner installation, the excavation bottom will be screened in the field with a photoionization detector (PID) to determine the extent of the top of the contaminated soil column. This is necessary so that the excavation perimeter can be made to accommodate the oversized liner. Because of the rock at the site and the need to protect the liner from abrasion, the excavation bottom will be contoured with a 6 to 8-inch layer of cushioning sand prior to liner installation, similarly, a 6 to 8-inch layer of cushioning sand will be placed on top of the liner prior to backfilling with clean soil. Plains will implement this proposal upon NMOCD approval and submit a report documenting successful implementation of the proposal along with the final C-141 and a request that the NMOCD require "no further action" at the site, except follow-up reseeding of the disturbed work area and resurfacing of the caliche road, consistent with the landowner.

2.0 Environmental Media Characterization

Chemical parameters of the soil and ground water were characterized consistent with the characterization and remediation/abatement goals and objectives set forth in the New Mexico Oil Conservation Division (NMOCD) approved "General Work Plan for Remediation of E.O.T.T. Pipeline Spills, Leaks and Releases in New Mexico, July 2000" and the NMOCD guidelines published in the following documents:

- Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- Unlined Surface Impoundment Closure Guidelines (February 1993)

Acceptable thresholds for contaminants/constituents of concern (CoCs) (i.e., TPH, benzene, and the mass sum of benzene, toluene, ethylbenzene, and total xylene (BTEX)), will be determined based on the NMOCD Ranking Criteria as follows:

- Depth to Ground water (i.e., distance from the lower most acceptable concentration to the ground water),
- Wellhead Protection Area (i.e., distance from fresh water supply wells), and
- Distance to Surface Water Body (i.e., horizontal distance to all down gradient surface water bodies).

2.1 GEOLOGICAL DESCRIPTION

The United States Geological Survey (USGS) Ground-Water Report 6, "Geology and Ground-Water Conditions in Southern Lea County, New Mexico" (A. Nicholson and A. Clebsch, 1961), describes the near surface geology of south



central Lea County as an intergrade of the Quaternary Alluvium (QA) sediments (i.e., fine to medium sand) with the mostly eroded Cenozoic Ogallala (CO) formation. Typically, the QA and CO formations in the area are capped by a thick interbed of caliche.

2.2 ECOLOGICAL DESCRIPTION

The area is an intergrade of the Great Plains and the Upper Chihuahuan Desert biomes consisting primarily of flat to rolling hills with Honey Mesquite (*Prosopis glandulosa*) along with typical desert grasses and weeds. Mammals represented, include Orrd's and Merriam's kangaroo rats, deer mice, White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit, and Mule Deer. Reptiles, amphibians, and birds are numerous and typical of area. A survey of Listed, Threatened, or Endangered species was not conducted.

2.3 AREA GROUND WATER

Local ground water is estimated to occur at 73 'bgs and is based primarily on November 2004 measurements of monitoring wells at a similar surface elevation, located approximately 1,300 feet east of the site at a Plains site. New Mexico Office of the State Engineer (NMOSE) Well #4712, at an elevation 10-feet lower than the site, is located approximately 0.65 mile south with a recorded water level of 75'bgs and is consistent with the November 2004 measurements. However, water well #2474 listed in the NMOSE water well database, located approximately 0.4 mile southwest of the site at a similar surface elevation, has a groundwater level of 40'bgs that was recorded in 1954, but can not be considered to be representative of the site groundwater given the distance and direction from the site. Further, the leak origin soil boring was advanced to 51'bgs and did not encounter groundwater or moist soil typically encountered when approaching the zone of saturation. According to the USGS, the ground water elevation decreases generally to the southeast.

2.4 AREA WATER WELLS

The area water wells recorded by the New Mexico Office of the State Engineer are annotated on the USGS topographical map included in Attachment I and the water well reports are included in Attachment IV.

2.5 AREA SURFACE WATER BODIES

There are no permanent or intermittent surface water bodies within a 1,000 feet radius of the site.

3.0 NMOCD SITE RANKING

Based on the proximity of the site to protectable area water wells, surface water bodies, and depth to ground water, the site has an NMOCD ranking score of 10 for soil down to 23'bgs and 20 points for soil >23'bgs with the soil remedial goals highlighted below in the Site Ranking Matrix.



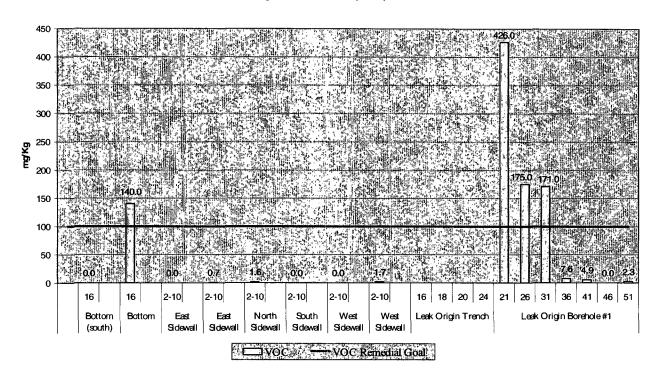
1. Gro	ound Water	2. V	Wellhead Protection Area	3. Distance to Surface Water Body		
points	GW <50 feet: 20 GW 50 to 99 ts		' from water source, or;<200' vate domestic water source: 20	<200 horizontal feet: 20 points 200-100 horizontal feet: 10 points		
If Depth to points	GW >100 feet: 0		' from water source, or; >200' vate domestic water source: 0	>1000 horizontal feet: 0 points		
Ground water	Score = 10 &20	Wellhead	Protection Area Score= 0	Surface Water Score= 0		
Site Rank ((1+2+3) = 20 + 0	+ 0 =	10 and 20 points			
Total S	ite Ranking So	core and	Acceptable Remedial G	oal Concentrations		
Parameter	>19 (23 to 73	'bgs)	10-19 (surface to 23'bgs)	0-9		
Benzene ¹	10 ppm		10 ppm	10 ppm		
BTEX1	50 ppm		50 ppm	50 ppm		
TPH	100 ppm		1000 ppm	5000 ppm		

4.0 SUBSURFACE SOIL INVESTIGATION

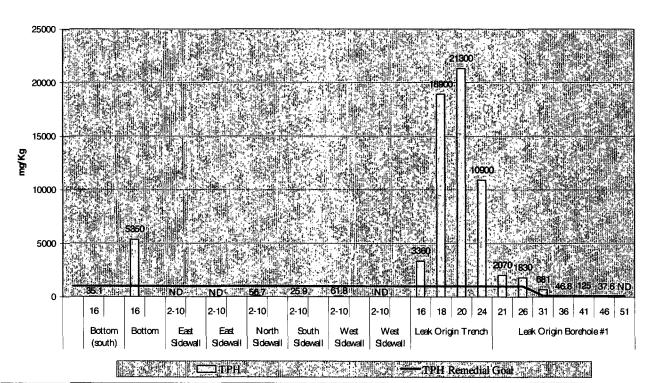
In September 2004, Environmental Plus, Inc. (EPI) with direction from Plains, excavated 1,138 cubic yards (yd3) of impacted soil from the release area and disposed of the soil in the NMOCD approved and permitted Plains Lea Station Landfarm GW-351. Samples collected in October 2004 from the sidewalls of the 16-feet deep excavation indicated that the horizontal extent of impact had been delineated; however, contaminant levels in the floor of the excavation at 16'bgs remained above the remedial goals. In November 2004, to delineate the vertical extent of impact, a trench was excavated beneath the leak origin and sampled. Analytical results for the samples collected from the leak origin trench indicated a decreasing TPH 8015m gradient; however, the analytical results for the sample collected from the floor of the trench at 24'bgs were above the remedial goals for TPH^{8115m}. Subsequently, a leak origin soil boring (BH1) was advanced in the bottom of the excavation. The analytical results established a decreasing TPH 8015m gradient (i.e., 2,070 mg/Kg at 21'bgs to an acceptable 46.8 mg/Kg at 36'bgs). However, the TPH^{8015m} concentration from the 41'bgs sample was 125 mg/Kg, in excess of the 100 mg/Kg remedial goal. On 12 April 2005, at the request of the NMOCD, additional samples were collected from a soil boring advanced to 46' bgs and 51' bgs adjacent to the leak origin soil boring (BH1). The TPH8015m concentration from the 46'bgs sample was an acceptable 37.6 mg/Kg. The TPH^{8015m} concentration from the 51'bgs sample was reported as non-detectable at or above the method detection limits (MDL). The results establish a consistent decreasing gradient supporting the conclusion that the groundwater has not been impacted. The benzene and BTEX data also support this conclusion, i.e., analytical results from the 36'bgs, 41'bgs, 46'bgs, and the 51'bgs samples were reported as not being detected at or above each analytes respective MDL. The laboratory reports are summarized and provided in Attachment III and illustrated below.



Plains All American Pipeline Friscoe Skelly #2 #2004-00197 Volatile Organic Constituents (VOC) Delineation

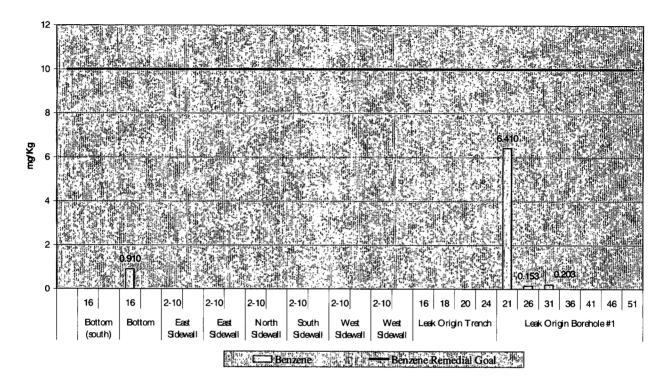


Plains All American Pipeline Friscoe Skelly #2 #2004-00197 Total Petroleum Hydrocarbon 8015M Delineation

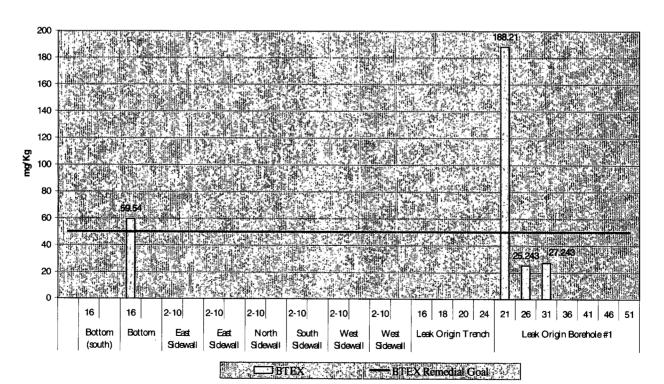




Plains All American Pipeline Friscoe Skelly #2 #2004-00197 Benzene Delineation



Plains All American Pipeline Friscoe Skelly #2 #2004-00197 BTEX Delineation





5.0 GROUND WATER INVESTIGATION

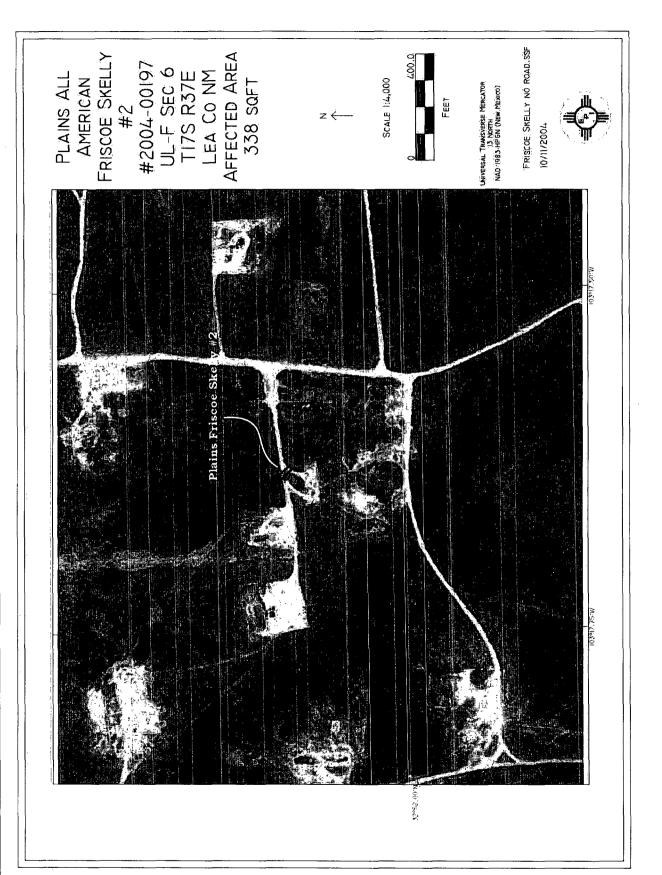
The soil investigation indicates the groundwater has not been impacted.

6.0 SOIL REMEDIATION PROPOSAL

To remediate and close the site, Plains proposes to install an oversized 20 mil thick polyethylene liner at 16'bgs over the remaining hydrocarbon source term centered beneath the leak origin. This will interrupt the vertical transport mechanism effectively isolating the crude oil residual and protecting the groundwater. Prior to liner installation the excavation bottom will be screened in the field with a PID to determine the extent of the top of the contaminated soil column. This is necessary so that the excavation perimeter can be made to accommodate the oversized liner. Because of the rock at the site and the need to protect the liner from abrasion, the excavation bottom will be contoured with a 6 to 8-inch layer of cushioning sand prior to liner installation, similarly, a 6 to 8inch layer of cushioning sand will be placed on top of the liner prior to backfilling with clean soil. Plains will implement this proposal upon NMOCD approval and submit a report documenting successful implementation of the proposal along with the final form C-141 and a request that the NMOCD require "no further action" at the site, except follow-up reseeding of the disturbed work area and resurfacing the caliche road, consistent with the landowner. Plains will also ensure that the NMOCD is notified at least 48 hours prior to liner installation.



ATTACHMENT I SITE MAPS

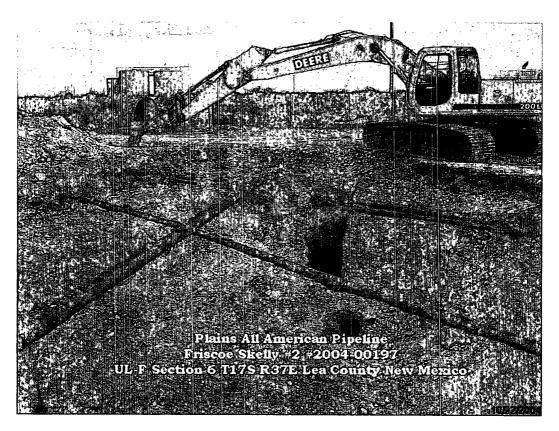


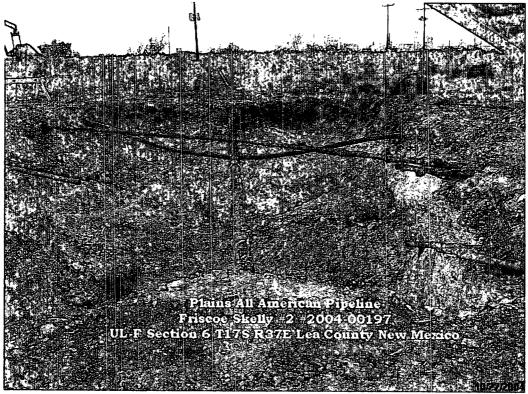
PLAINS ALLANERICAN



ATTACHMENT II PHOTOGRAPHS

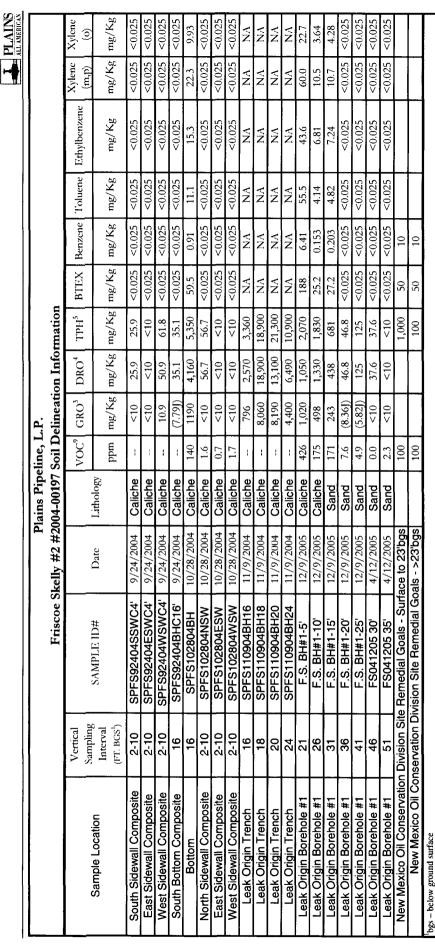








ATTACHMENT III ANALYTICAL REPORTS AND SUMMARY



Ugs - Octow Bround Surface

GRO-Gasoline Range Organics C₆-C₁₀

DRO-Diesel Range Organics C10-C35

TPH-Total Petroleum Hydrocarbon = GRO+DRO.

Bolded values are in excess of the New Mexico Oil Conservation Division guideline threshold for the parameter

Soil chloride residuals must not be capable of impacting groundwater or surface water above Water Quality Control Commission (WQCC) standard of 250 mg/L.

NA - not analyzed

VOC - Volatile Organic Constituent/Contaminant Headspace

- Parameter detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag)



ATTACHMENT IV AREA WATER INFORMATION

New Mexico Office of the State Engineer Well Reports and Downloads

Township: 178 Range: 37E Sections: 5,6,7,8								
NAD27 X: Y: Zone: Search Radius:								
County: Basin: Number: Suffix:								
Owner Name: (First) (Last) C Non-Domestic C Domestic								
Well / Surface Data Report Avg Depth to Water Report								
Water Column Report Clear Form WATERS Menu Help								

AVERAGE DEPTH OF WATER REPORT 03/09/2005

								(Depth	Water in	Feet)
Bsn	Tws	Rng	Sec	Zone	x	Y	Wells	Min	Max	Avg
Ŀ	17S	37E	05				18	38	76	62
L	178	37E	0.6				2	40	40	40
L	17S	37E	07				.8	39	75	65
L	17S	37E	08				1	50	50	50

Record Count: 29

New Mexico Office of the State Engineer Well Reports and Downloads

Township: 168 Range:	37E Sections: 31,32							
NAD27 X: Y:	Zone: Search Radius:							
County: Basin:	Number: Suffix:							
Owner Name: (First)	(Last) Non-Domestic C Domestic							
Well / Surface Data Report Avg Depth to Water Report								
Water Column Report Clear Form WATERS Menu Help								
Clear	orm WATERS Menu Help							

AVERAGE DEPTH OF WATER REPORT 03/09/2005

								(nebru	water in	reet)
Bsn	Tws	Rng S	Sec	Zone	x	Ý	Wells	Min	Max	Avg
Ŀ	165	37E 3	31				-8	50	72	53
L	168	37E 3	32				3	35	45	3.8

Record Count: 11



New Mexico Office of the State Engineer

Record Count: 6

Page 1 of 1

New Mexico Office of the State Engineer Well Reports and Downloads Township: 16S Range: 36E Sections: 36 NAD27 X: Y: [Zone: Search Radius: (**T** $\overline{\mathbf{v}}$ County: Basin: Number: Suffix: Owner Name: (First) (Last) C Non-Domestic C Domestic e All Well / Surface Data Report Avg Depth to Water Report Water Column Report Clear Form WATERS Menu Heip AVERAGE DEPTH OF WATER REPORT 03/09/2005 (Depth Water in Feet) Tws Rng Sec x Min Max Avg 16S 36E 36 40 257 116

New Mexico Office of the State Engineer Well Reports and Downloads

Township: 178 Range: 36E S	ections: 1,12							
NAD27 X: Y:	Zone: Search Radius:							
County: Basin:	Number: Suffix:							
Owner Name: (First) (Last)	Non-Domestic C Domestic							
Well / Surface Data Report Avg Depth to Water Report								
Water Column Report Clear Form WATERS Menu Help								
Clear Com	TATE TO WINDING. THOU							

AVERAGE DEPTH OF WATER REPORT 03/09/2005

Bsn	Tws	Rng	Sec	Zone	×	Ý	Wells	(Depth Min	Water in Max	Feet) Avg
Ŀ	17Ş	36E	01		•		6	48	110	64
L	178	36E	12				3	45	47	46

Record Count: 9



ATTACHMENT V SITE INFORMATION & METRICS FORM AND INFORMATIONAL C-141



NMOCD Notified: Incident Date: Plains Pipeline, L.P. Site Information and Metrics SITE: Friscoe Skelly #2 Assigned Site Reference #: 2004-00197 Company: Plains Pipeline, L.P. NATIONAL RESPONSE CENTER - 800.424.8802 Street Address: PO Box 1660 Notified Date/Time: Mailing Address: 5805 East Highway 80 Notified by: City, State, Zip: Midland, Texas 79702 Person Notified: Representative: Camille Reynolds NRC Report#: Representative Telephone: 505.393.5611 Telephone: Fluid volume released (bbls): 10 bbls Recovered (bbls): 0 bbls >25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas) 5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas) Leak, Spill, or Pit (LSP) Name: Friscoe Skelly #2 Source of contamination: 4" Steel Pipeline Land Owner, i.e., BLM, ST, Fee, Other: Robert C. Rice LSP Dimensions 18' x 20' LSP Area: 338 sqft ft² Location of Reference Point (RP) Location distance and direction from RP 32°52'4.316"N Latitude: Longitude: 103°17'38.146"W Elevation above mean sea level: 3,810'ams1 Feet from South Section Line Feet from West Section Line Location- Unit or 1/41/4: SE1/4 of the NW1/4 Unit Letter: F Location- Section: 6 Location- Township: T17S Location- Range: R37E Surface water body within 1000 'radius of site: none Surface water body within 1000 'radius of site: Domestic water wells within 1000' radius of site: none Agricultural water wells within 1000' radius of site: none Public water supply wells within 1000' radius of site: none Public water supply wells within 1000' radius of site: Depth from land surface to ground water (DG) ~78 'bgs Depth of contamination (DC) -Depth to ground water (DG - DC = DtGW)3. Distance to Surface Water 1. Ground Water 2. Wellhead Protection Area Body If Depth to GW <50 feet: 20 <200 horizontal feet: 20 If <1000' from water source. or; < 200' from private domestic water If Depth to GW 50 to 99 feet: 10 200-100 horizontal feet: 10 source: 20 points points If >1000' from water source, or; If Depth to GW >100 feet: 0 >1000 horizontal feet: 0 >200' from private domestic water points points source: 0 points Ground water Score = Wellhead Protection Area Score = 0 10 & 20 Surface Water Score = 0 Site Rank (1+2+3) = 10 & 20 Total Site Ranking Score and Acceptable Concentrations Parameter >19 0-9 10-19 Benzene¹ 10 ppm 10 ppm 10 ppm BTEX¹ 50 ppm 50 ppm 50 ppm TPH 100 ppm 5000 ppm 1000 ppm 1100 ppm field VOC headspace measurement may be substituted for lab analysis

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II
1301 W. Grand Avenue, Artesia, NM 88210
District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

Attach Additional Sheets If Necessary

State of New Mexico **Energy Minerals and Natural Resources**

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

Release Notification and Corrective Action

Revised October 10, 2003

Form C-141

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

OPERA'	ΓOR		☐ In	☐ Initial Report ☐ Final Report					
Name of Con	npany: Plai	, L.P.	Contact: C	amille	Reynol	ds			
Address: 1	PO Box 311	19 (3705 E H	lwy 158)	Telephone	No.				
Midland, Te	xas 79702		505.396.33						
Facility Nam	e				Facility Typ	эе			
Friscoe Skel					4" Steel Pi				
Surface Own	er: Robe	rt C. Rice			Mineral C)wner		L	ease No.
		,	LOCATI	on o	F RELEASE	E			
Unit Letter:	Section	Township	Range	Feet	North/South	Feet	East/We	est	County: Lea
F	6	T178	R37E	from the	Line	from	Line		
	<u> </u>	Latitudas	22°52'4 2		Longitudo	1	17:20 14	16 11 111	· · · · · · · · · · · · · · · · · · ·
		Latitude: _	32°52'4.3		Longitude RELEASE	: 103	17 38.14	<u> </u>	_
Type of Relea	2.0		1471101	<u> </u>	Volume of Rel	lease		Volu	me Recovered
Crude Oil	3.0				10 barrels	icasc			barrels
Source of Rela	ease	-			Date and Hou	rof			and Hour of
4" Steel Pipe	line				Occurrence			Disc	overy
Was Immediat		ven? No N	Not Require	d	If YES, To WI	hom?	-	_	
By Whom?					Date and Hou				
Was a Waterco	ourse Reach	ed? Yes	No		If YES, Volum		cting the	Wate	ercourse.
			_		NA	1	0		
If a Watercou NA	rse was Imp	acted, Describ	oe Fully.*						
Describe Caus external corr	e of Problemosion. Con	m and Remedi	al Action T	aken.*4 n a plas	" Steel Pipelin	e The	cause wa	s eit	her internal or
Describe Area					<u> </u>				
					I disposed of i	n the L	ea Statio	n La	ndfarm. Remedial
Goals: TPH	8015m = 100	00&100 mg/K	g, Benzene	= 10 m	g/Kg, and BT	EX, i.e.	, the ma	ss su	m of Benzene, Ethyl
Benzene, To	uene, and l	xylenes = 30	mg/kg.						
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.									
	OIL CONSERVATION DIVISION				<u>ON DIVISION</u>				
Signature:									
Printed Name	Approved	Approved by District Supervisor:							
E-mail Addres	ss: CJReynol	ds@PAALP.c	om		Approval	Date:		1	Expiration Date:
Title: Distric	t Environme	ental Supervis	or		Condition	Conditions of Approval: Attached			Attached 🔲
Date		05 306 3341	1						