



2057 Commerce Drive
Midland, TX 79703

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APPROVED

By Olivia Yu at 1:12 pm, Oct 05, 2017

NMOCD approves of the proposed delineation plan for 1RP-4813. Permissible chloride levels in delineation and remediation soil samples is 600 mg/kg.

September 25, 2017

Olivia Yu
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240

Amber Groves
Hobbs Field Office
New Mexico State Land Office
2827 N. Dal Paso St., Suite 117
Hobbs, New Mexico 88240

Re: Delineation Plan and Remediation Strategy
Alpha Gathering A-2 Main (1RP-4813)
GPS: N 32.355942° W 103.468296°
Unit Letter "P", Section 28, Township 22 South, Range 34 East
Lea County, New Mexico

Dear Ms. Yu and Ms. Groves,

TRC Environmental Corporation (TRC) has prepared the following "Delineation Plan" and "Remediation Strategy" on behalf of Plains Pipeline, L.P. (Plains), in regard to the Alpha Gathering A-2 Main crude oil release site (1RP-4813). The release site is located approximately eighteen (18) miles southeast of Eunice in Lea County, New Mexico, in Unit Letter "P", Section 28, Township 22 South, Range 34 East. The GPS coordinates for the site are N 32.355942° and W 103.468296. The affected property is owned by the State of New Mexico and administered by the New Mexico State Land Office (NMSLO).

On September 8, 2017, a release was discovered on the LACT Unit at COG Operating's Smalls Federal #001H production facility. The release was attributed to the top plate on a PD pump coming loose, resulting in a release of approximately twelve (12) barrels (bbls) of crude oil. During initial response activities, approximately ten (10) bbls of crude oil were recovered and saturated soils were excavated by hand and stockpiled on-site atop a polyurethane liner. The release affected an area on the caliche well pad measuring approximately 1,500 sq. ft.; a majority of the release was confined to within the earthen containment.

A reference map utilized by the New Mexico Oil Conservation Division (NMOCD) indicated groundwater should be encountered at approximately one hundred twenty-five (125) ft. below ground

surface (bgs). No surface waters or water wells were observed within one thousand (1,000) ft. of the release site. Based on the NMOCD Site Classification criteria, the Recommended Remediation Action Levels (RRAL) are 10 mg/kg for benzene, 50 mg/kg for benzene, toluene, ethylbenzene and xylene (BTEX) and 5,000 mg/kg for total petroleum hydrocarbons (TPH).

Proposed Activities

Plains proposes the following field activities designed to advance the Alpha Gathering A-2 Main Release toward and NMOCD and NMSLO-approved closure:

Delineation Plan

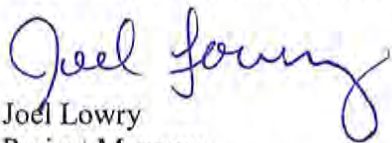
- A hand-auger will be utilized to collect a minimum of four (4) soil samples (DS-1 through DS-4) from within the release margins.
- During the advancement of the hand-augered soil boring, soil samples will be collected from the interval below the maximum depth at which soil is inferred to be affected above the NMOCD RRAL.
- Collected soil samples will be submitted to the laboratory for analysis of BTEX and TPH. Select soil samples will also be analyzed for chloride.

Please see the attached "Site and Sample Location Map", proposing representative sample locations.

Remediation Strategy

- Utilization of mechanical equipment and shovel crews to excavate impacted soil with the release margins. The floor and sidewalls of the excavation will be advanced until laboratory analytical results from confirmation soil samples indicate BTEX and TPH concentrations are below the NMOCD RRAL. Excavated soil will be stockpiled on-site, atop a polyurethane liner, pending final disposition.
- The collection of representative soil samples from the floor and sidewalls of the excavated area at increments not to exceed every fifty 50 linear ft. for confirmation analysis of BTEX and TPH. Select soil samples will also be analyzed for chloride.
- Upon receiving laboratory analytical from excavation confirmation soil samples, the excavated area will be backfilled with locally sourced, non-impacted material.
- Excavated soil will be transported to an NMOCD-permitted facility for disposal.

Upon completion of remediation activities, a "Remediation Summary and Soil Closure Request" will be prepared summarizing field activities and laboratory analytical results from confirmation soil samples. If you have any questions or need any additional information, please feel free to contact Camille or myself by phone or email.



Joel Lowry
Project Manager
TRC Environmental Corporation



Curt Stanley
Senior Project Manager
TRC Environmental Corporation

Attachments:

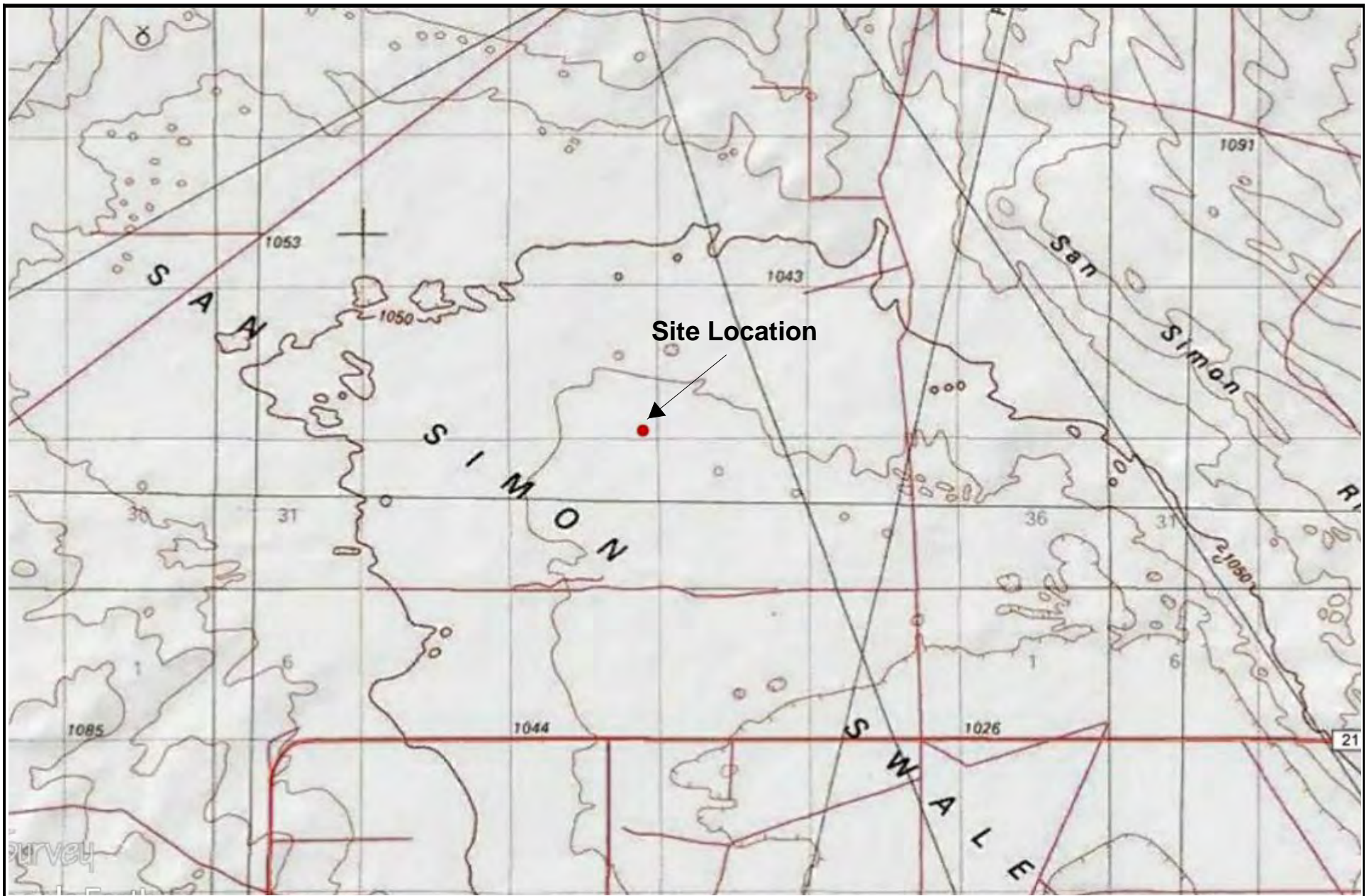
Figure 1 – Site Location Map

Figure 2 – Site & Sample Map

Release Notification and Corrective Action (Form C-141)

cc: Camille Bryant
Plains Pipeline, L.P.
577 US Highway 385 North
Seminole, TX 79360

File



LEGEND:

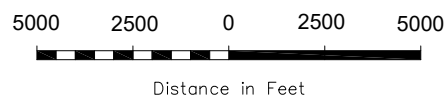


Figure 1

Site Location Map
Plain's Pipeline, L.P.
Alpha Gathering A-2 Main
Lea County, NM

Scale 1" = 5,000'

Drafted By: JL | Checked By: CS

Draft: September 25, 2017

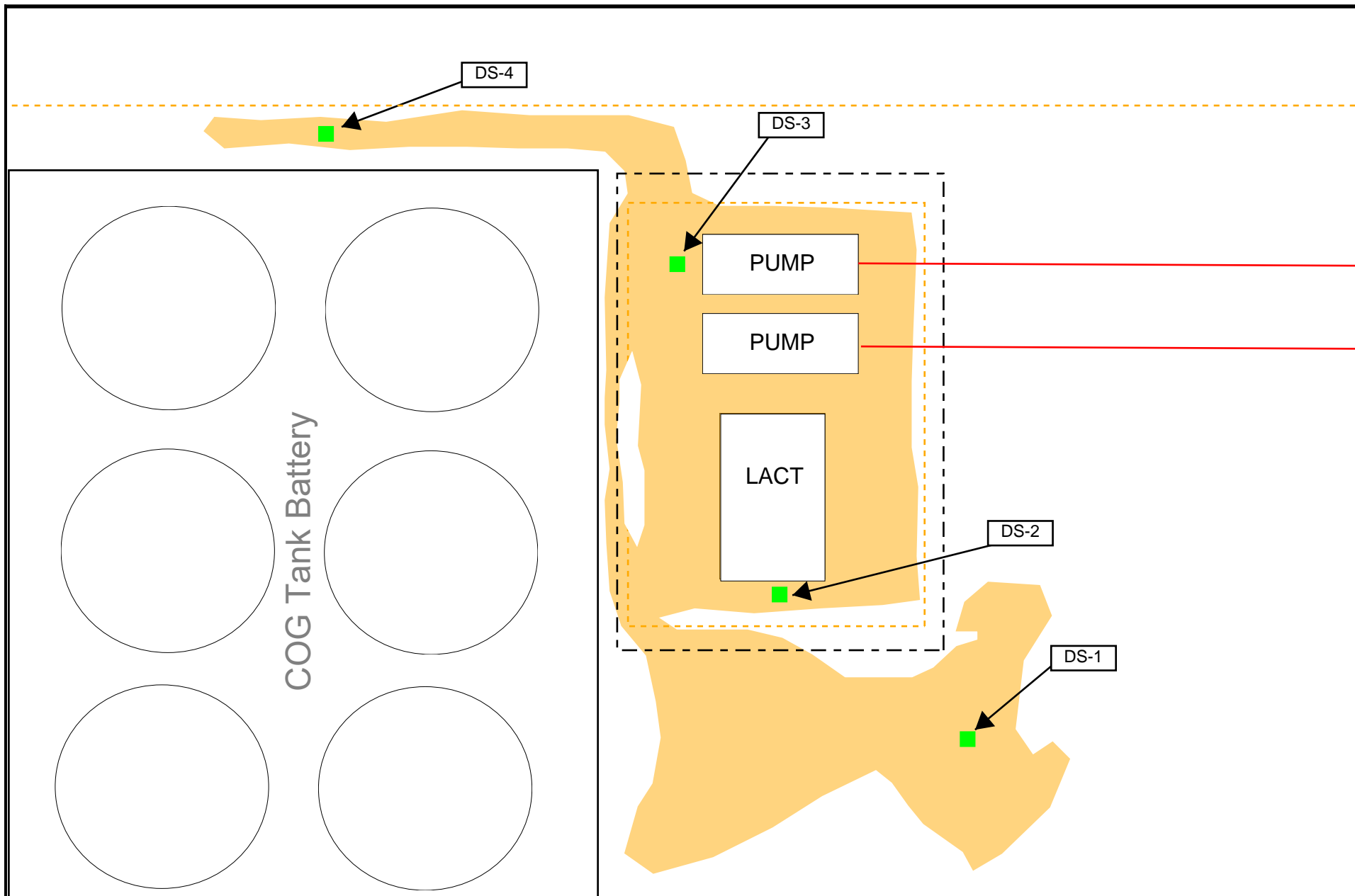
Lat. N 32.35594 Long. W103.46829

UL "B", Sec. 1, T21S, R33E

TRC Proj. No.: 286973



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432.520.7720



LEGEND:






- | | | | |
|---|-----------------------------|---|----------|
|  | Delineation Sample Location |  | Fence |
|  | Excavated Area |  | Pipeline |
|  | Firewall | | |

Figure 2

Site & Sample Location Map
 Plain's Pipeline, L.P.
 Alph Gathering A-2 Main
 Lea County, NM

Scale 1" = 10'

Drafted By: JL Checked By: CS

Draft: September 25, 2017

Lat. N 32.35594 Long. W103.46829

UL "B", Sec. 1, T21S, R33E

TRC Proj. No.: 286973



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District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised April 3, 2017

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

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company Plains Pipeline LP	Contact Camille Bryant
Address 577 US Hwy 385 N. Seminole, TX 79360	Telephone No 575.441.1099.
Facility Name Alpha Gathering A-2 Main	Facility Type Pump
Surface Owner New Mexico State Land Office	Mineral Owner BLM API No.

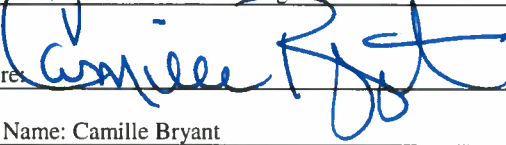

LOCATION OF RELEASE

Unit Letter P	Section 28	Township 22S	Range 34E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32.355942 Longitude 103.468296 NAD83

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 12 barrels	Volume Recovered 10 barrels
Source of Release Pump	Date and Hour of Occurrence 09/08/2017 @ 06:00	Date and Hour of Discovery 09/08/2017 @ 06:00
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Voicemail to Olivia Yu	
By Whom? Camille Bryant	Date and Hour 09/08/2017 @ 13:25	
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.* Top plate on PD pump came loose resulting in a release of crude oil.		
Describe Area Affected and Cleanup Action Taken.* The released crude oil impacted an area of approximately 1,500 square of the facility. The impacted area will be remediated as per applicable NMOCD guidelines.		
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: 	OIL CONSERVATION DIVISION	
Printed Name: Camille Bryant	Approved by Environmental Specialist: 	
Title: Remediation Coordinator	Approval Date: 9/18/2017	Expiration Date:
E-mail Address: cjbrant@paalp.com	Conditions of Approval:	Attached <input checked="" type="checkbox"/>
Date: 9/18/2017	Phone: 575.441.1099	see attached directive

* Attach Additional Sheets If Necessary

FOY1726143954

1RP-4813

nOY1726144138

pOY1726144339