

**From:** [Billings, Bradford, EMNRD](#)  
**To:** [Camille J Bryant](#); [Yu, Olivia, EMNRD](#)  
**Cc:** [Amber L Groves](#)  
**Subject:** RE: Plains Pipeline Lovington Gathering WTI Release Site NMOCD Ref. AP-96  
**Date:** Tuesday, February 27, 2018 10:41:21 AM

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February 27, 2018

Plains Pipeline  
Camille J. Bryant  
Amber L. Groves

Regarding the site identified as Plains Pipeline Lovington Gathering WTI Release Site NMOCD Ref. AP-96 the following:

Following review of data and proposed revised work plan recently submitted, that, and the work indicated to be down in this email stream is hereby approved.

Please provide opportunity for District staff to attend placement of said wells and sampling.

Please be advised to retain this email communication, as NO official paper approval will follow.

Sincerely,  
Bradford Billings  
EMNRD/OCD-Santa Fe

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations

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**From:** Camille J Bryant [mailto:CJBryant@paalp.com]  
**Sent:** Thursday, February 15, 2018 8:47 AM  
**To:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>  
**Cc:** Amber L Groves <ALGroves@paalp.com>  
**Subject:** Plains Pipeline Lovington Gathering WTI Release Site NMOCD Ref. AP-96

Mr. Billings,

Please find attached the Revised Work Plan for the Plains Pipeline, L.P. Lovington Gathering WTI Release Site NMOCD Ref# AP-96. The attached Work Plan details proposed drilling activities to be conducted at the site. With NMOCD approval, Plains will commence with the described activities.

Please contact me with any questions or concerns.

Respectfully,

*Camille J. Bryant*  
*Remediation Supervisor*  
*Plains All American*  
*505 N. Big Spring, Suite 600*  
*Midland, Texas 79701*  
*Office: 432.221.7924*  
*Cell: 575.441.1099*

Attention:

The information contained in this message and/or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you received this in error, please contact the Plains Service Desk at 713-646-4444 and delete the material from any system and destroy any copies.

This footnote also confirms that this email message has been scanned for Viruses and Content and cleared.



December 1, 2017

Reference No. 11135013

Ms. Camille Bryant  
Plains All American Pipeline, LP  
505 N. Big Spring, Suite 600  
Midland, TX 79701

VIA EMAIL ONLY  
[CJBryant@paalp.com](mailto:CJBryant@paalp.com)

Dear Ms. Bryant:

**Re: Revision of Proposed Work Plan for Plugging & Abandonment (P&A) of Dry Monitoring Wells and Drilling/Installation of a Replacement and Additional Delineation Monitoring Wells at the Plains All American Pipeline, LP-Lovington Gathering WTI Release Site (AP-96) in Lea County, New Mexico**

GHD Services, Inc., (GHD) on behalf of Plains All American Pipeline, LP (Plains), has prepared the following proposed work plan to complete plugging & abandonment (P&A) of five existing monitoring wells and installation of seven additional delineation monitoring wells at the Plains-Lovington Gathering WTI Release Site (AP-96) located in Lea County, New Mexico. This proposal includes a duration of effective use projected at 10 years for all new and replacement monitoring wells. The proposed activities are outlined below.

## 1. Project Information

The Lovington Gathering WTI Release Site (hereafter referred to as the "Site") is located approximately 6.5 miles southeast of Lovington, New Mexico and is currently the responsibility of Plains. The Site has groundwater impacted with dissolved phase hydrocarbons. GHD assumed site remediation and project management responsibilities on October 1, 2016. It is understood by GHD that subsequent to Plains' approval of this proposed work plan for AP-96, the work plan will be submitted to the New Mexico Oil Conservation Division (NMOCD) for approval. In addition, Plains will seek approval from the landowner(s) to install the proposed wells and Straub Corporation will obtain New Mexico Office of the State Engineer (NMOSE) permits for the proposed wells.

## 2. Proposed Site Scope of Work

GHD proposes the plugging and abandonment of five dry monitoring wells, installation of two additional 2-inch and five replacement 2-inch delineation monitoring wells (See Proposal Figure). Two additional monitoring wells are proposed as deeper wells in order to offset the drawdown of the potentiometric



surface when the adjacent Goff Dairy center pivot irrigation system is in seasonal operation and for continuous quarterly groundwater monitoring. The five replacement monitoring wells are proposed as deeper wells for those wells that have either been historically been gauged dry, have little water column, and go dry when the Goff Dairy center pivot irrigation system is in seasonal operation.

*Plug and Abandon Five Monitoring Wells*

- Plug and abandon five dry monitoring wells (MW-1, MW-2, MW-3, MW-4, and MW-5). The total depth of each well is approximately 88-90 feet bgs. Each well will be plugged and abandoned in accordance with NMOSE protocol. Each well's protective monument and concrete well pad will be removed and disposed of at an approved New Mexico Landfill.

*Installation of Two Additional 2-inch and Five Replacement 2-inch Delineation Monitoring Wells*

- Two additional 2-inch monitoring wells (MW-11 and MW-12) are proposed at the site. MW-11 is proposed to be installed to the southeast of existing MW-10. MW-12 is proposed to be installed approximately 150 feet to the west of proposed MW-11. These monitoring wells will be 2 inches in diameter and drilled to an estimated depth of 105 feet bgs. A 15-foot interval of 0.01-inch slot screen will be installed at estimated depths of 90 feet to 105 feet bgs. The duration of effective use for MW-11 and MW-12 is projected to be 10 years; and
- Five replacement 2-inch monitoring wells are proposed at the site. MW-1R is proposed to be installed to the northeast of existing MW-1. MW-2R is proposed to be installed to the south-southeast of existing MW-2. MW-3R is proposed to be installed to the northeast of existing MW-3. MW-4R is proposed to be installed to the southwest of existing MW-4. MW-5R is proposed to be installed to the northwest of existing MW-5. These monitoring wells will be 2 inches in diameter and drilled to an estimated depth of 105 feet bgs. A 15 foot screen interval of 0.01-inch slot will be installed at estimated depths of 90 feet to 105 feet bgs. The duration of effective use for MW-1R, MW-2R, MW-3R, MW-4R, and MW-5R is projected to be 10 years.

GHD is prepared to initiate the scope of work immediately, subsequent to Plains financial approval, the availability of a driller's resources and stakeholder concurrence. Our goal is to complete the work in an efficient manner without any incidents.



If you have any questions or comments with regard to the scope of work for each subject Site, please do not hesitate to contact our Midland office at (432) 686-0086.

Sincerely,

GHD

A handwritten signature in blue ink, appearing to read "John Ferguson", written over a light gray rectangular background.

John Ferguson, PG.  
Senior Project Manager

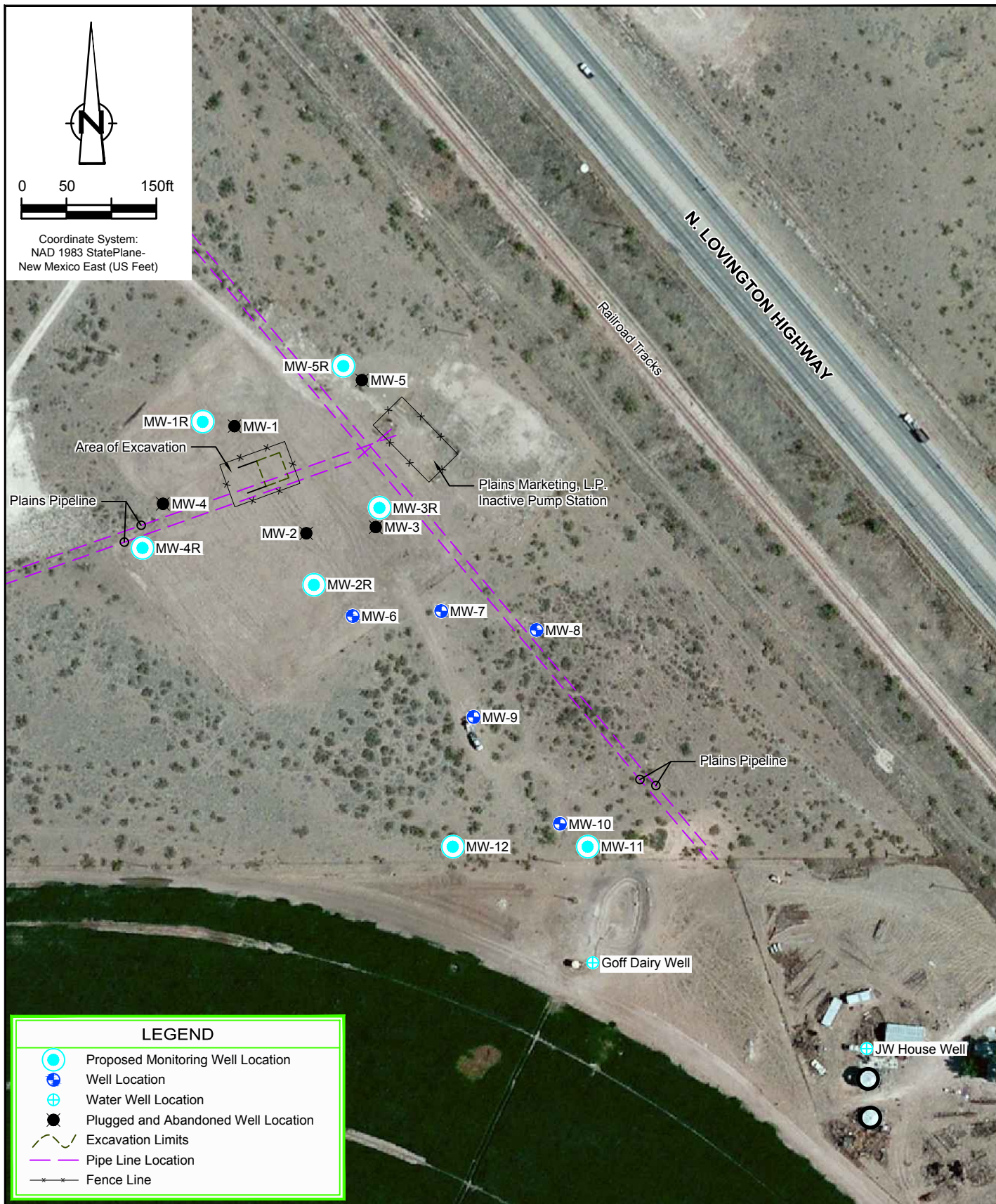
JF/pd/2

A handwritten signature in blue ink, appearing to read "Thomas C. Larson", written over a light gray rectangular background.

Thomas C. Larson, PG.  
Principal, Midland Operations Manager

Attachments: Proposal Figure





Source: Microsoft Product Screen shot(s) Reprinted with permission from Microsoft Corporation

Lat/Long: 32.8649° North, 103.2853° West



PLAINS PIPELINE L.P.  
LEA COUNTY, NEW MEXICO  
LOVINGTON GATHERING WTI

11135013-00

Dec 1, 2017

PROPOSED MONITORING WELL LOCATIONS

PROPOSAL