



2057 Commerce Drive
Midland, TX 79703

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432.520.7701 FAX

www.trcsolutions.com

APPROVED

By Olivia Yu at 3:37 pm, Apr 20, 2018

NMOCD approves of the
delineation and remediation
completed for 1RP-4964.
Backfill request is granted.

April 9, 2017

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

Re: Remediation Workplan and Backfill Request
Mewbourne Marathon 15 PA (1RP-4964)
GPS: N 32.56721° W 103.54050°
Unit Letter "P", Section 15, Township 20 South, Range 34 East
Lea County, New Mexico

Dear Ms. Yu,

TRC Environmental Corporation (TRC) has prepared the following "Remediation Workplan and Backfill Request" on behalf of Plains Pipeline, L.P. (Plains), in regard to the Mewbourne Marathon 15 PA crude oil release site (1RP-4964). The release site is located approximately sixteen (16) miles southeast of Monument in Lea County, New Mexico, in Unit Letter "P", Section 15, Township 20 South, Range 34 East. The GPS coordinates for the site are N 32.56721° and W 103.54050°. The affected property is located on private land. A "Site Location Map" is provided as Attachment #1

On February 1, 2018, a release was discovered on the LACT Unit at Mewbourne Oil Company's Marathon 15 PA production facility. The release was attributed to a one-half (1/2) inch (in.) valve which appeared to be tampered with and forced open, resulting in the release of approximately thirty-five (35) barrels (bbls) of crude oil. A majority of the release was confined to within the earthen containment and portions of the release affected the adjacent caliche well pad. During initial response activities, approximately two (2) bbls of crude oil were recovered and saturated soils were excavated and stockpiled on-site atop a polyurethane liner.

A reference map utilized by the New Mexico Oil Conservation Division (NMOCD) indicated groundwater should be encountered at approximately one hundred fifty (150) 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).

Summary of Field Activities

On February 23, 2018, remediation activities resumed at the release site. Impacted soil within the release margins remaining in-situ was excavated and stockpiled on-site, atop an impermeable liner, pending final disposition. The floor and sidewalls of the excavation were advanced until field observations suggested hydrocarbon impacts had been mitigated.

On February 27, 2018, TRC collected seventeen (17) soil samples (LU FL 1, FL 2, FL 3, FL 4, NSW 1, NSW 2, NSW 3, ESW 1, ESW 2, ESW 3, ESW 4, WSW 1, WSW 2, WSW 3, SSW 1, SSW 2 and SSW 3) from the floor and sidewalls of the excavated area and submitted them to the laboratory for analysis of BTEX and TPH concentrations using EPA Methods SW-846 8021b and 8015 M Ext., respectively. Laboratory analytical results indicated benzene concentrations ranged from less than the applicable laboratory reporting limit (RL) in soil samples FL4, NSW1, NSW2, NSW3, ESW2, ESW3, ESW4, WSW2, WSW3 and SSW3 to 0.364 mg/kg in soil sample SSW1. Analytical results indicated BTEX concentrations ranged from less than the applicable laboratory RL in soil samples FL4, ESW2 and SSW3 to 70.564 mg/kg in soil sample SSW1. TPH concentrations ranged from less than the applicable laboratory RL in soil samples FL4 and WSW2 to 11,444 mg/kg in soil sample NSW1. Laboratory analytical results indicated benzene, BTEX and TPH concentrations were below the NMOCD Recommended Remediation Action Levels in each of the submitted soil samples with the exception of the TPH concentrations in soil samples LU FL 1 (7,203 mg/kg), FL3 (7,075 mg/kg), NSW1 (11,444 mg/kg), ESW1 (5,786.5 mg/kg), WSW1 (10,324 mg/kg) and SSW1 (9,528 mg/kg) and the BTEX concentration in soil sample SSW1 (70.564 mg/kg). The excavation was advanced in the areas characterized by soil samples LU FL 1, FL3, NSW1, ESW1, WSW1 and SSW1. A "Site & Sample Location Map" is provided as Attachment #2. A "Soil Chemistry Table" is provided as Attachment #3.

On March 22, 2018, TRC collected six (6) excavation confirmation soil samples (FL-3b @ 4', LU FL-1b @ 2', NSW1b, ESW1b, SSW1b and WSW1b) from the floor and sidewalls of the excavated area and submitted them to the laboratory for analysis of TPH. Laboratory analytical results indicated TPH concentrations were less than the applicable laboratory RL in each of the submitted soil samples with the exception of soil sample LU FL-1b @ 2' (29.4 mg/kg) and SSW 1b (707.3 mg/kg). Soil samples FL-3b @ 4' and LU FL-1b @ 2' were also analyzed for concentration of chloride, which were determined to be 36.4 mg/kg and 52.2 mg/kg, respectively. Soil sample SSW1b was also analyzed for concentrations of BTEX, which were determined to be less than the applicable laboratory RL. Laboratory analytical results indicated BTEX, TPH and/or chloride concentrations were below the NMOCD Recommended Remediation Action Levels in each of the submitted soil samples.

In addition, two (2) confirmation soil samples (FL-3 @ 6' and LU FL-1 @ 4') were collected from deeper intervals beneath the confirmation floor samples in an effort to further characterize soil beneath the affected area. The collected soil samples were submitted to the laboratory for analysis of TPH concentration, which were determined to be less than the applicable laboratory RL.

On March 20 and 21, 2018, approximately 100 cubic yards (cy) of impacted soil was transported to Lazy Ace Landfarm, LLC (NMOCD Permit No. NM-01-0041) for disposal.

Backfill Request

Based on laboratory analytical results and field activities conducted to date, TRC requests permission to backfill the excavated area with locally-sourced, non-impacted material. Excavation backfill will be compacted and contoured to meet the needs of the facility.

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 Joel Lowry or Amber Groves by phone or email.

Respectfully,



Joel Lowry
TRC Environmental Corporation

Curt Stanley
TRC Environmental Corporation

Attachments:

Figure 1 – Site Location Map
Figure 2 – Site & Sample Map
Table 1 – Concentrations of Benzene, BTEX, TPH and Chloride in Soil
Photographic Log
Release Notification and Corrective Action (Form C-141)

cc: Camille Bryant
Plains Pipeline, L.P.
505 North Big Spring, Suite 600
Midland, TX 79701

File

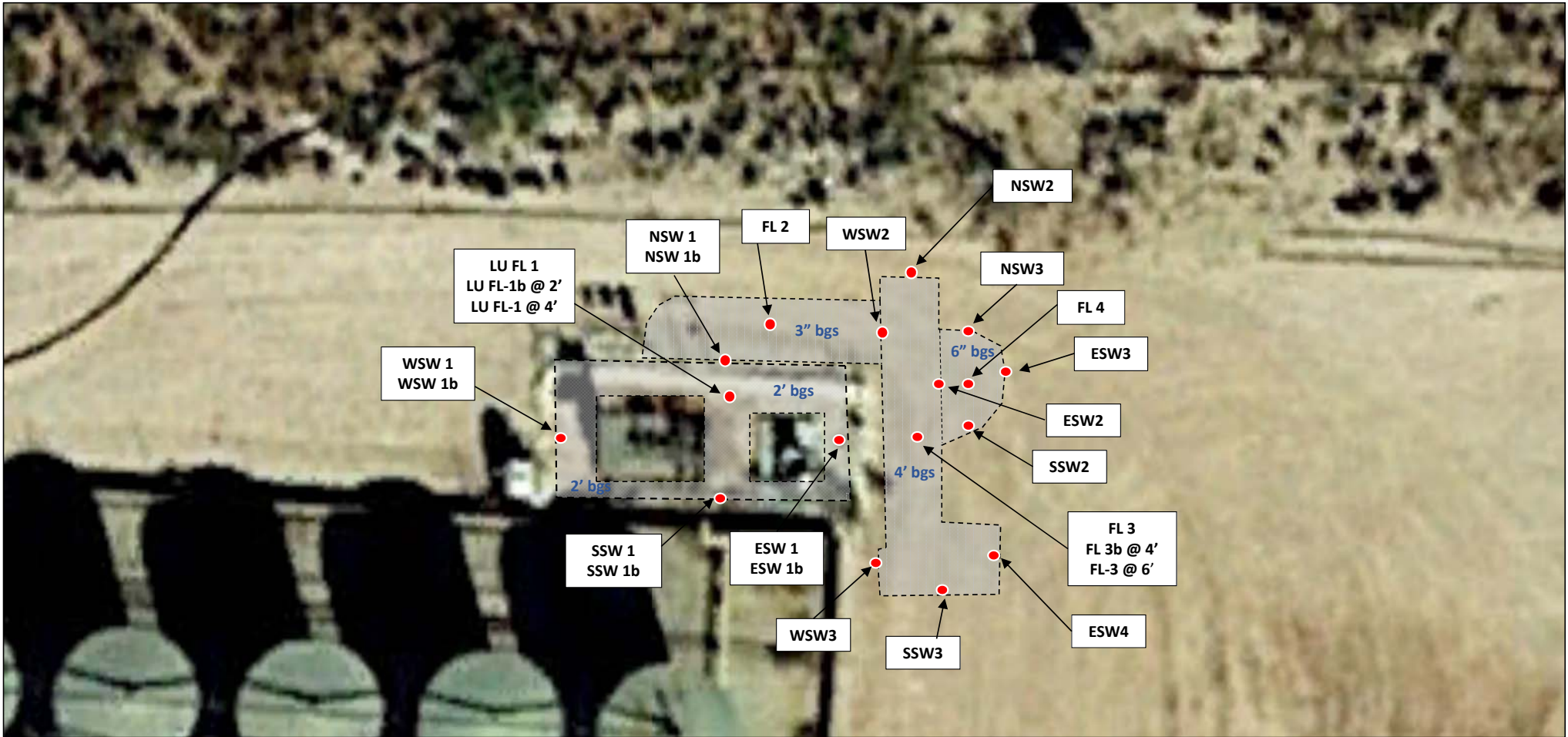


Figure 1
 Site Location Map
 Plains Pipeline, LP
 Marathon 15 PA
 Lea County, New Mexico

Scale 1" = ~6,000'	
Drafted by: ZC	Checked by: JL
Draft: April 5, 2018	
Lat. N 32.56721 Long. W 103.54050	
UL "P", Sec. 15, T20S, R34E	
TRC Proj. No.: 296710	



2057 Commerce Drive
 Midland, Texas 79703
 432.520.7720



LEGEND:

- Confirmation Sample Location
- ▭ Excavated Area

Figure 2
Site & Sample Location Map
Plains Pipeline, LP
Marathon 15 PA
Lea County, New Mexico

Scale 1" = ~60'

Drafted by: ZC Checked by: JL

Draft: April 5 2018

Lat. N 32.56721 Long. W 103.54050

UL "P", Sec. 15, T20S, R34E

TRC Proj. No.: 296710



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Midland, Texas 79703
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Figure 1 - View of surface staining from the initial release, facing Southwest.



Figure 2 - View of surface staining from the initial release, facing Southeast.



Figure 3 - View of portion of the excavated area, facing West.



Figure 4 - View of portion of the excavated area, facing Northeast.

TABLE 1
CONCENTRATIONS OF BENZENE, BTEX, TPH, AND CHLORIDE IN SOIL
Marathon 15 PA
PLAINS PIPELINE, L.P.
LEA COUNTY, NM
NMOCD REF. No. 1RP-4964

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH	STATUS	Methods: EPA SW 846-8021B, 5030					Methods:				Method:
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	XYLENES, TOTAL (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M				E300 CHLORIDE (mg/Kg)
									GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TOTAL TPH (mg/Kg)	
FL 2	2/27/2018	6"	In-Situ	0.052	0.369	0.0592	0.19	0.6776	82.9	1,590	99.4	1,772.30	-
FL 3	2/27/2018	3'	In-Situ	0.000468	0.0257	0.0666	0.3058	0.398568	373	6,230	472	7,075	-
FL 4	2/27/2018	6"	In-Situ	<0.000383	<0.000454	<0.000563	<0.000343	<0.000343	<7.99	<8.11	<8.11	<7.99	-
NSW1	2/27/2018	6"	In-Situ	<0.000386	0.0623	0.0766	0.293	0.4319	395	10,600	449	11,444	-
NSW2	2/27/2018	1.5'	In-Situ	<0.000386	0.00151	<0.000567	0.00573	0.00724	<7.97	13.8	<8.10	13.8	-
NSW3	2/27/2018	3"	In-Situ	<0.000383	0.00309	<0.000563	0.0038	0.00689	<7.99	11.7	<8.12	11.7	-
ESW1	2/27/2018	6"	In-Situ	0.0601	4.40	5.58	19.56	29.6001	1,090	4,630	66.5	5,786.5	-
ESW2	2/27/2018	1.5'	In-Situ	<0.000639	<0.000757	<0.000938	<0.000572	<0.000572	<7.98	90.0	<8.10	90.0	-
ESW3	2/27/2018	3"	In-Situ	<0.000388	0.00159	0.0034	0.02132	0.02631	15.5	245	13.0	273.5	-
ESW4	2/27/2018	1.5'	In-Situ	<0.000383	0.00549	0.0182	0.2633	0.28699	20.4	422	14.1	456.5	-
WSW1	2/27/2018	6"	In-Situ	0.109	5.3500	6.18	23.85	35.489	1780	8,200	344	10,324	-
WSW2	2/27/2018	1.5	In-Situ	<0.000384	0.0029	0.00402	0.0305	0.03745	<7.99	<8.11	<8.11	<7.99	-
WSW3	2/27/2018	1.5	In-Situ	<0.000384	0.0023	0.000589	0.00189	0.004739	<7.98	257	11.6	268.6	-
SSW1	2/27/2018	6"	In-Situ	0.364	12.4	13.1	44.7	70.564	1,660	7,590	278	9,528	-
SSW2	2/27/2018	3"	In-Situ	0.000625	0.1300	0.114	0.494	0.738625	185	1,900	46.7	2,131.7	-
SSW3	2/27/2018	6"	In-Situ	<0.000383	<0.000453	<0.000561	<0.000342	<0.000342	8.33	<8.13	<8.13	8.33	-
LU FL 1	2/27/2018	8"	In-Situ	0.145	3.36	3.01	10.87	17.385	649	6,150	404	7,203	-
FL-3b @ 4'	3/22/2018	4'	In-Situ	-	-	-	-	-	<3.87	<25.0	<25.0	<25.0	36.4
LU FL-1b @ 2'	3/22/2018	2'	In-Situ	-	-	-	-	-	<3.90	29.4	<25.0	29.4	52.2
NSW 1b	3/22/2018	1'	In-Situ	-	-	-	-	-	<3.82	<25.0	<25.0	<25.0	-
ESW 1b	3/22/2018	1'	In-Situ	-	-	-	-	-	<3.94	<25.2	<25.2	<25.2	-
SSW 1b	3/22/2018	1'	In-Situ	<0.000383	<0.000454	<0.000563	<0.000343	<0.000343	7.30	631	69.0	707.3	-
WSW 1b	3/22/2018	1'	In-Situ	-	-	-	-	-	<7.99	<25.3	<25.3	<25.3	-
FL-3 @ 6'	3/22/2018	6'	In-Situ	-	-	-	-	-	<3.57	<25.0	<25.0	<25.0	-
LU FL-1 @ 4'	3/22/2018	4'	In-Situ	-	-	-	-	-	<3.97	<24.9	<24.9	<24.9	-
NMOCD Regulatory Guideline				10	-	-	-	50	-	-	-	5,000	600

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

Form C-141
Revised April 3, 2017

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	Contact Amber Groves
Address 1911 Connie Rd, Carlsbad NM 88220	Telephone No. (575)200-5517
Facility Name Mewbourne Marathon 15 PA	Facility Type Tank Battery

Surface Owner Kenneth Smith	Mineral Owner Federal	API No.
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LOCATION OF RELEASE

Unit Letter P	Section 15	Township 20S	Range 34E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32.56721 Longitude -103.540506 NAD83

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 30 bbls	Volume Recovered 2 bbls
Source of Release 1/2 inch valve	Date and Hour of Occurrence 2/1/2018 @ 1:01 PM	Date and Hour of Discovery 2/1/2018 @ 1:01 PM
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? Amber Groves	Date and Hour 2/1/2018 @ 3:47 PM	
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.*

RECEIVED

By Olivia Yu at 9:11 am, Feb 12, 2018

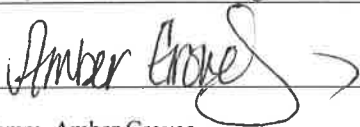

Describe Cause of Problem and Remedial Action Taken.*

1/2" valve on top of a tee with a test port with 3/8" tubing running to the sump box was tampered with and forced open.

Describe Area Affected and Cleanup Action Taken.*

The impacted area is contained to the pad and will be remediated per current 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: Amber Groves	Approved by Environmental Specialist: 	
Title: Remediation Coordinator	Approval Date: 2/12/2018	Expiration Date:
E-mail Address: algroves@paalp.com	Conditions of Approval: see attached directive	Attached <input checked="" type="checkbox"/>
Date:	Phone:	

* Attach Additional Sheets If Necessary

1RP-4964

nOY1804333422

fOY1804333238

pOY1804333712