# GROUNDWATER AND SITE CLOSURE REQUEST

## BOB DURHAM

**LEA COUNTY, NEW MEXICO**
**UNIT LETTER "D" SECTION 32, TOWNSHIP 19 SOUTH, RANGE 37 EAST**
**UNIT LETTER "M" SECTION 29, TOWNSHIP 19 SOUTH, RANGE 37 EAST**
**UNIT LETTER "P" SECTION 30, TOWNSHIP 19 SOUTH, RANGE 37 EAST**
**UNIT LETTER "A" SECTION 31, TOWNSHIP 19 SOUTH, RANGE 37 EAST**
**PLAINS SRS NUMBER: TNM LF2000-07**
**NMOCD File Number: AP-0016**

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## INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), TRC Environmental Corporation (TRC) is pleased to submit this Groundwater and Site Closure Request for the Bob Durham Release Site (Site). The Site, which was formerly the responsibility of Enron Oil Trading and Transportation (EOTT), later known as Link Energy, LLC (Link), is now the responsibility of Plains.

In January 2000, project management responsibilities were assigned to Environmental Technology Group Incorporated (ETGI). On May 29, 2004, project management responsibilities were assumed by TRC, previously known as NOVA Safety and Environmental, Inc. (NOVA).

This report is intended to be viewed as a complete document with figures, appendices, tables, and text. The report presents the results of groundwater monitoring and sampling from Project inception in the 1st quarter of 2000 through the 2nd quarter of 2017. Please note, from January 2003 through the 2nd quarter of 2004, access to the Site and monitor wells was restricted by the landowner. For reference, a Site Location Map is provided as Figure 1 and a Site Map is provided as Figure 2.

## SITE DESCRIPTION AND BACKGROUND INFORMATION

The site is located approximately two (2) miles west of the city of Monument, New Mexico, in Unit Letter "D" Section 32, Township 19 South, Range 37 East, Unit Letter "M" Section 29, Township 19 South, Range 37 East, Unit Letter "P" Section 30, Township 19 South, Range 37 East, and Unit Letter "A" Section 31, Township 19 South, Range 37 East. The topography of the site is relatively flat with a slight topographic slope to the south. The site is located in a rural and residential area with a single-family residence located approximately five hundred (500) feet west of the release point. Generally, the surface consists of a thin veneer of unconsolidated sand over caliche, vegetated by sparse grasses, and mesquite trees. Oil and gas production is commonplace in the vicinity of the site.

The crude oil release was discovered during excavation activities associated with the installation of a polyethylene liner inserted inside the steel pipeline. During the initial response activities, an estimated two thousand (2,000) cubic yards (cy) of impacted soil was excavated and transported from the area immediately north of State Highway 322. EOTT personnel indicated the excavated soil was transported to J & L Landfarm, located near Eunice, New Mexico, for disposal.

From January 25, 2000 through February 10, 2000, ETGI installed twenty-five (25) monitor wells (MW-1 through MW-25) on-site. From June 7, 2000 through June 28, 2000, ETGI installed ten (10) monitor wells (MW-26 through MW-36). On June 17, 2002, ETGI installed two (2) additional monitor wells (MW-37 and MW-38). On June 10, 2010, an NMOCD Representative requested monitor well MW-56 (a down-gradient monitor well) be included in the Bob Durham Release Site monitoring and sampling array.

In September 2005, seven (7) of the groundwater monitor wells (MW-17 through 19, MW-22, and MW-34 through 36) were plugged and abandoned, with NMOCD approval. On May 28, 2010, four (4) of the monitor wells (MW-9, MW-14, MW-26, and MW-29) were plugged and abandoned, with NMOCD approval. On September 26, 2016, (3) three of the monitor wells (MW-20, MW-21, and MW-24) were plugged and abandoned, with NMOCD approval.

Currently, twenty-five (25) groundwater monitor wells remain on-site (MW-1 through MW-8, MW-10 through MW-13, MW-15, MW-16, MW-23, MW-25, MW-27, MW-28, MW-30 through MW-33, MW-37, MW-38, and MW-56). An automated product recovery system, consisting of pneumatic pumps installed in monitor wells MW-5, MW-7, MW-12, and MW-16, operated at the site until mid-2004 when the system was removed from operation due to decreasing PSH thicknesses. Recovery of PSH at the Release Site since 2004 was conducted manually on a bi-monthly schedule.

On April, 29 2010, a *Soil Closure Proposal dated* October 2008 and supplemental information to the *Soil Closure Proposal* dated April 28, 2010 were approved by the NMOCD. The Work Plan proposed soil remediation activities intended to progress the site toward an NMOCD approved soil closure.

Following the completion of soil remediation activities, a *Soil Closure Request* dated August 2010 was submitted to the NMOCD for approval. On January 26, 2011, Plains received an email from the NMOCD approving the *Soil Closure Request* at the Bob Durham Release Site. Please reference the above stated documents for detailed information associated with the soil remediation activities at the Bob Durham Release Site.

## SUMMARY OF COMPREHENSIVE MONITOR WELL GROUNDWATER DATA

### Product Recovery Efforts

Approximately 915.76 gallons (approximately 21.80 barrels) of PSH has been recovered from the Site by automated systems and by manual recovery methods since project inception.

### Groundwater Monitoring

Quarterly monitoring events were conducted in accordance with NMOCD directives and modified by NMOCD correspondence dated April 28, 2004, June 10, 2010 and October 31, 2012.

The current approved NMOCD sampling frequency for the Bob Durham Release Site is depicted below.

| NMOCD Approved Sampling Schedule | | | | | | | |
|---|---|---|---|---|---|---|---|
| MW-1 | Quarterly | MW-11 | Annual | MW-21 | P & A | MW-31 | Semi-Annual |
| MW-2 | Quarterly | MW-12 | Quarterly | MW-22 | P & A | MW-32 | Quarterly |
| MW-3 | Semi-Annual | MW-13 | Quarterly | MW-23 | Semi-Annual | MW-33 | Annual |
| MW-4 | Quarterly | MW-14 | P & A | MW-24 | P & A | MW-34 | P & A |
| MW-5 | Quarterly | MW-15 | Semi-Annual | MW-25 | Annual | MW-35 | P & A |
| MW-6 | Semi-Annual | MW-16 | Semi-Annual | MW-26 | P & A | MW-36 | P & A |
| MW-7 | Semi-Annual | MW-17 | P & A | MW-27 | Annual | MW-37 | Semi-Annual |
| MW-8 | Semi-Annual | MW-18 | P & A | MW-28 | Annual | MW-38 | Quarterly |
| MW-9 | P & A | MW-19 | P & A | MW-29 | P & A | MW-56 | Quarterly |
| MW-10 | Semi-Annual | MW-20 | P & A | MW-30 | Annual | | |

Groundwater monitoring was conducted at the Site during each quarter to assess the levels and extent of dissolved phase constituents and PSH. Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH on the water column and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled as per a NMOCD directive.

During each sampling event, monitor wells were purged of a minimum of three (3) well volumes of water or until the wells failed to produce water. Purging was performed using a disposable polyethylene bailer for each well or electrical Grundfos pump and dedicated tubing. Groundwater was allowed to recharge and samples were collected using disposable Teflon samplers. Water samples were placed in clean glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of at a NMOCD permitted disposal facility.

Inferred Groundwater Gradient Maps, which were constructed from groundwater measurements collected during the final eight (8) quarterly sampling events (2nd quarter of 2015 through 2nd quarter of 2017) are provided as Figures 3A through 3H. Comprehensive Groundwater Elevation Data is provided as Table 1.

The most recent Groundwater Gradient Map (2nd quarter 2017), indicated a general gradient of 0.014 feet/foot to the south.

## LABORATORY RESULTS

Groundwater samples collected at the Release Site were analyzed by Environmental Lab of Texas, Inc. of Odessa, Texas, AnalySys, Inc. of Corpus Christi, Texas, Trace Analysis, Inc. of Midland, Texas, and/or Xenco Laboratories, Inc. of Midland, Texas for determination of Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) concentrations by EPA Method 8021B.

A comprehensive listing of BTEX constituent concentrations from the Site inception through the 2nd quarter of 2017 is provided in Table 2. The quarterly groundwater sample results for BTEX constituent concentrations during the final eight (8) quarterly sampling events (2nd quarter of 2015 through 2nd quarter of 2017) are depicted on Figures 4A through 4H. Copies of the laboratory reports are provided on the enclosed data disk.

**Please note, from January 2003 through the 2nd quarter of 2004, access to the Site and monitor wells was restricted by the landowner.**

**Monitor well MW-1** was installed on January 25, 2000 and completed to a depth of approximately thirty (30) feet below ground surface (bgs). Monitor well MW-1 has been monitored/sampled quarterly since installation of the monitor well. A PSH thickness of 0.11 feet was observed during the 1st quarter sampling event of 2000, immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-1 was 0.16 feet as recorded on June 5, 2001. PSH has not been observed in the monitor well since August 11, 2005 (0.01 feet).

The initial sampling of monitor well MW-1 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well

exhibited a maximum benzene concentration of 0.376 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was 0.00250 mg/L during the 3rd quarter of 2008. The maximum ethylbenzene concentration was 0.151 mg/L during the 3rd quarter of 2002. The maximum xylene concentration was 0.4396 mg/L during the 3rd quarter of 2002.

From the 2nd quarter of 2012 sampling event through the 2nd quarter of 2017, (twenty-one [21] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-2** was installed on January 25, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-2 has been monitored/sampled quarterly since installation of the monitor well. A PSH thickness of 0.29 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-2 was 0.45 feet as recorded on March 3, 2003. PSH has not been observed in the monitor well since March 21, 2006 (0.01 feet).

The initial sampling of monitor well MW-2 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.335 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was 0.00421 mg/L during the 2nd quarter of 2017. The maximum ethylbenzene concentration was 0.169 mg/L during the 3rd quarter of 2002. The maximum xylene concentration was 0.19813 mg/L during the 3rd quarter of 2002.

From the 2nd quarter of 2012 sampling event through the 2nd quarter of 2017, (twenty-one [21] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-3** was installed on January 25, 2000 and completed to a depth of approximately twenty-four (24) feet bgs. Monitor well MW-3 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. No PSH was observed in monitor well MW-3 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-3 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.480 mg/L during the 1st quarter of 2000. The maximum toluene concentration was 0.235 mg/L during the 1st quarter of 2000. The maximum ethylbenzene concentration was 0.153 mg/L during the 1st quarter of 2000. The maximum xylene concentration was 0.611 mg/L during the 1st quarter of 2000.

From the 4th quarter of 2004 sampling event through the 2nd quarter of 2017, (forty-two [42] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-4** was installed on January 25, 2000 and completed to a depth of approximately twenty-four (24) feet bgs. Monitor well MW-4 has been monitored/sampled quarterly since installation of the monitor well. A PSH thickness of 0.80 feet was observed

during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-4 was 0.93 feet as recorded on June 9, 2000. PSH has not been observed in the monitor well since October 31, 2008 (0.01 feet).

The initial sampling of monitor well MW-4 occurred during the 3rd quarter of 2007. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.00360 mg/L during the 1st quarter of 2008. The maximum toluene concentration was 0.00770 mg/L during the 3rd quarter of 2009. The maximum ethylbenzene concentration was 0.0203 mg/L during the 1st quarter of 2008. The maximum xylene concentration was 0.0344 mg/L during the 1st quarter of 2008.

From the 4th quarter of 2008 sampling event through the 2nd quarter of 2017, (thirty-five [35] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-5** was installed on January 25, 2000 and completed to a depth of approximately twenty-four (24) feet bgs. Monitor well MW-5 has been monitored/sampled quarterly since installation of the monitor well. A PSH thickness of 0.08 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-5 was 1.72 feet as recorded on June 5, 2001. PSH has not been observed in the monitor well since October 16, 2008 (0.01 feet).

The initial sampling of monitor well MW-5 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.451 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was 0.00564 mg/L during the 2nd quarter of 2017. The maximum ethylbenzene concentration was 0.185 mg/L during the 3rd quarter of 2002. The maximum xylene concentration was 0.508 mg/L during the 3rd quarter of 2002.

From the 2nd quarter of 2012 sampling event through the 2nd quarter of 2017, (twenty-one [21] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-6** was installed on January 25, 2000 and completed to a depth of approximately twenty-four (24) feet bgs. Monitor well MW-6 was monitored/sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. A PSH thickness of 0.23 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-6 was 0.72 feet as recorded on August 1, 2002. PSH has not been observed in the monitor well since March 3, 2003 (0.02 feet).

The initial sampling of monitor well MW-6 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.0582 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was less than the laboratory MDL during each sampling event.

The maximum ethylbenzene concentration was 0.0431 mg/L during the 3rd quarter of 2002. The maximum xylene concentration was 0.1115 mg/L during the 3rd quarter of 2002.

From the 2nd quarter of 2007 sampling event through the 2nd quarter of 2017, (thirty-two [32] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-7** was installed on January 25, 2000 and completed to a depth of approximately twenty-four (24) feet bgs. Monitor well MW-7 was monitored/sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. A PSH thickness of 0.91 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-7 was 0.91 feet as recorded on February 16, 2000. PSH has not been observed in the monitor well since October 8, 2004 (0.23 feet).

The initial sampling of monitor well MW-7 occurred during the 4th quarter of 2004. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.00990 mg/L during the 4th quarter of 2004. The maximum toluene concentration was less than the laboratory MDL during each sampling event. The maximum ethylbenzene concentration was 0.0156 mg/L during the 4th quarter of 2004. The maximum xylene concentration was 0.0252 mg/L during the 4th quarter of 2004.

From the 4th quarter of 2004 sampling event through the 2nd quarter of 2017, (forty-two [42] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-8** was installed on January 26, 2000 and completed to a depth of approximately twenty-two (22) feet bgs. Monitor well MW-8 was monitored/sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. A PSH thickness of 0.29 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-8 was 0.29 feet as recorded on February 16, 2000. PSH has not been observed in the monitor well since June 17, 2005 (0.02 feet).

The initial sampling of monitor well MW-8 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.0516 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was less than the laboratory MDL during each sampling event. The maximum ethylbenzene concentration was 0.00252 mg/L during the 3rd quarter of 2002. The maximum xylene concentration was 0.0110 mg/L during the 3rd quarter of 2006.

From the 4th quarter of 2004 sampling event through the 2nd quarter of 2017, (forty-one [41] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines. Please note, PSH was reported in the monitor well on June 17, 2005 (0.02 feet).

**Monitor well MW-9** was installed on January 26, 2000 and completed to a depth of approximately twenty-two (22) feet bgs. Monitor well MW-9 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2010. Monitor well MW-9 was plugged and abandoned with NMOCD approval on May 28, 2010. No measurable PSH was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-9 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2010 indicated the monitor well exhibited a maximum benzene concentration of 0.078 mg/L during the 2nd quarter of 2000. The maximum toluene concentration was 0.007 mg/L during the 1st quarter of 2000. The maximum ethylbenzene concentration was 0.003 mg/L during the 4th quarter of 2000. The maximum xylene concentration was 0.006 mg/L during the 1st quarter of 2000.

Monitor well MW-9 was plugged and abandoned with NMOCD approval on May 28, 2010.

**Monitor well MW-10** was installed on January 26, 2000 and completed to a depth of approximately twenty-two (22) feet bgs. Monitor well MW-10 was monitored/sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. The maximum observed PSH thickness in monitor well MW-10 was 0.02 feet as recorded on June 17, 2005 and September 22, 2005. PSH has not been observed in the monitor well since September 22, 2005 (0.02 feet).

The initial sampling of monitor well MW-10 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.164 mg/L during the 3rd quarter of 2001. The maximum toluene concentration was 0.004 mg/L during the 1st quarter of 2000. The maximum ethylbenzene concentration was 0.0524 mg/L during the 3rd quarter of 2006. The maximum xylene concentration was 0.0937 mg/L during the 4th quarter of 2004.

From the 4th quarter of 2006 sampling event through the 2nd quarter of 2017, (thirty-four [34] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-11** was installed on January 27, 2000 and completed to a depth of approximately twenty-two and one half (22.5) feet bgs. Monitor well MW-11 was monitored/sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. From the 3rd quarter of 2005 through the 2nd quarter of 2017, sampling was conducted on an annual frequency. No measurable PSH was detected in the monitor well at any time from installation through 2nd quarter of 2017.

The initial sampling of monitor well MW-11 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.027 mg/L during the 1st quarter of 2000. The maximum toluene concentration was 0.009 mg/L during the 1st quarter of 2000. The maximum ethylbenzene concentration was 0.002 mg/L during the 1st quarter of 2000. The maximum xylene concentration was 0.005 mg/L during the 1st quarter of 2000.

From the 4th quarter of 2000 sampling event through the 2nd quarter of 2017, (twenty-five [25] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-12** was installed on January 27, 2000 and completed to a depth of approximately twenty-two and one half (22.5) feet bgs. Monitor well MW-12 has been monitored/sampled quarterly since installation of the monitor well. A PSH thickness of 1.39 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-12 was 1.39 feet as recorded on January 16, 2000. PSH has not been observed in the monitor well since April 17, 2015 (0.04 feet).

The initial sampling of monitor well MW-12 occurred during the 1st quarter of 2005. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.0776 mg/L during the 1st quarter of 2005. The maximum toluene concentration was 0.00891 mg/L during the 2nd quarter of 2017. The maximum ethylbenzene concentration was 0.0672 mg/L during the 4th quarter of 2008. The maximum xylene concentration was 0.144 mg/L during the 4th quarter of 2008.

From the 2nd quarter of 2015 sampling event through the 2nd quarter of 2017, (nine [9] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-13** was installed on January 27, 2000 and completed to a depth of approximately twenty-two and one half (22.5) feet bgs. Monitor well MW-13 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2017. No measurable PSH was detected in the monitor well at any time from installation through 2nd quarter of 2017.

The initial sampling of monitor well MW-13 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.946 mg/L during the 3rd quarter of 2000. The maximum toluene concentration was 0.134 mg/L during the 3rd quarter of 2001. The maximum ethylbenzene concentration was 0.227 mg/L during the 3rd quarter of 2001. The maximum xylene concentration was 0.236 mg/L during the 2nd quarter of 2001.

From the 2nd quarter of 2014 sampling event through the 2nd quarter of 2017, (thirteen [13] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-14** was installed on January 27, 2000 and completed to a depth of approximately twenty-two (22) feet bgs. Monitor well MW-14 was sampled quarterly from the installation of the monitor well through the 3rd quarter of 2004. Monitor well MW-14 was plugged and abandoned with NMOCD approval on May 28, 2010. No measurable PSH was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-14 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2010 indicated the monitor well

exhibited a maximum benzene concentration of 0.005 mg/L during the 3rd quarter of 2000. The maximum toluene concentration was 0.001 mg/L during the 1st quarter of 2000. The maximum ethylbenzene and xylene concentrations were less than the laboratory MDL during each sampling event.

Monitor well MW-14 was plugged and abandoned with NMOCD approval on May 28, 2010.

**Monitor well MW-15** was installed on January 25, 2000 and completed to a depth of approximately thirty (30) feet bgs. Monitor well MW-15 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. No measurable PSH was detected in the monitor well at any time from installation through 2nd quarter of 2017.

The initial sampling of monitor well MW-15 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.012 mg/L during the 3rd quarter of 2000. The maximum toluene concentration was less than the laboratory MDL during each sampling event. The maximum ethylbenzene concentration was 0.00170 mg/L during the 3rd quarter of 2006. The maximum xylene concentration was 0.00150 mg/L during the 3rd quarter of 2006.

From the 4th quarter of 2000 sampling event through the 2nd quarter of 2017, (fifty-two [52] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-16** was installed on January 25, 2000 and completed to a depth of approximately thirty (30) feet bgs. Monitor well MW-16 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. A PSH thickness of 0.48 feet was observed during the 1st quarter of 2000 sampling event immediately following the installation of the monitor well. The maximum observed PSH thickness in monitor well MW-16 was 0.48 feet as recorded on February 16, 2000. Measureable PSH has not been observed in the monitor well since December 2, 2005 (0.01 feet).

The initial sampling of monitor well MW-16 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.182 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was 0.0035 mg/L during the 2nd quarter of 2017. The maximum ethylbenzene concentration was 0.146 mg/L during the 3rd quarter of 2002. The maximum xylene concentration was 0.3256 mg/L during the 3rd quarter of 2002.

From the 4th quarter of 2006 sampling event through the 2nd quarter of 2017, (thirty-four [34] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-17** was installed on February 7, 2000 and completed to a depth of approximately twenty-seven (27) feet bgs. Monitor well MW-17 was sampled quarterly from the installation of the monitor well through the 3rd quarter of 2004. Monitor well MW-17 was plugged and abandoned with NMOCD approval on September 13, 2005. No measurable PSH

was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-17 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited a maximum benzene concentration of 0.001 mg/L during the 3rd quarter of 2000. The maximum toluene concentration was less than the laboratory MDL during each sampling event. The maximum ethylbenzene concentration was 0.00279 mg/L during the 4th quarter of 2001. The maximum xylene concentration was 0.00132 mg/L during the 4th quarter of 2001.

Monitor well MW-17 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-18** was installed on February 7, 2000 and completed to a depth of approximately twenty-seven (27) feet bgs. Monitor well MW-18 was sampled quarterly from the installation of the monitor well through the 3rd quarter of 2004. Monitor well MW-18 was plugged and abandoned with NMOCD approval on September 13, 2005. No measurable PSH was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-18 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited the maximum benzene concentration was less than the laboratory reporting limit during each sampling event. The maximum toluene concentration was 0.001 mg/L during the 3rd quarter of 2000. The maximum ethylbenzene concentration was 0.001 mg/L during the 3rd quarter of 2000. The maximum xylene concentration was 0.009 mg/L during the 3rd quarter of 2000.

Monitor well MW-18 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-19** was installed on February 9, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-19 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. Monitor well MW-19 was plugged and abandoned with NMOCD approval on September 13, 2005. No measurable PSH was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-19 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited a maximum benzene, toluene, ethylbenzene, and xylene concentration less than the laboratory MDL during each quarterly sampling event.

Monitor well MW-19 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-20** was installed on February 9, 2000 and completed to a depth of approximately twenty-two and one half (22.5) feet bgs. Monitor well MW-20 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. From the 3rd quarter of 2005 through the 2nd quarter of 2016, sampling was conducted on an annual

frequency. No PSH was observed in monitor well MW-20 from the installation of the monitor well through the 2nd quarter of 2016.

The initial sampling of monitor well MW-20 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 3rd quarter of 2016 indicated the monitor well exhibited a maximum benzene concentration of 0.004 mg/L during the 1st quarter of 2000. The maximum toluene concentration was 0.001 mg/L during the 1st quarter of 2000. The maximum ethylbenzene concentration was 0.001 mg/L during the 1st quarter of 2000. The maximum xylene concentration was 0.003 mg/L during the 1st quarter of 2000.

Monitor well MW-20 was plugged and abandoned with NMOCD approval on September 1, 2016.

**Monitor well MW-21** was installed on February 9, 2000 and completed to a depth of approximately thirty (30) feet bgs. Monitor well MW-21 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. From the 3rd quarter of 2005 through the 3rd quarter of 2016, sampling was conducted on an annual frequency. No measurable PSH was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-21 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 3rd quarter of 2016 indicated the monitor well exhibited a maximum benzene concentration of 0.004 mg/L during the 3rd quarter of 2000. The maximum toluene concentration was 0.001 mg/L during the 1st quarter of 2000. The maximum ethylbenzene concentration was 0.001 mg/L during the 2nd quarter of 2000. The maximum xylene concentration was 0.003 mg/L during the 1st quarter of 2000.

Monitor well MW-21 was plugged and abandoned with NMOCD approval on September 1, 2016.

**Monitor well MW-22** was installed on February 10, 2000 and completed to a depth of approximately twenty (20) feet bgs. Monitor well MW-22 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. Monitor well MW-22 was plugged and abandoned with NMOCD approval on September 13, 2005. No measurable PSH was detected in the monitor well at any time from installation through the plugging and abandonment of the monitor well.

The initial sampling of monitor well MW-22 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited a maximum benzene, toluene, ethylbenzene, and xylene concentration less than the laboratory MDL during each quarterly sampling event.

Monitor well MW-22 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-23** was installed on February 10, 2000 and completed to a depth of approximately twenty-seven (27) feet bgs. Monitor well MW-23 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. Monitor

well MW-23 was not sampled from the 2nd quarter of 2000 through 2nd quarter of 2002 and in the 4th quarter of 2002 due to a reportedly observed "sheen" in the monitor well. A measurable thickness of PSH was observed on August 1, 2002 (0.01 feet) and March 3, 2003 (0.03 feet). No measurable PSH was detected in the monitor well since the March 3, 2003 gauging and recovery event.

The initial sampling of monitor well MW-23 occurred during the 3rd quarter of 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.00324 mg/L during the 3rd quarter of 2002. The maximum toluene, ethylbenzene, and xylene concentrations for all monitor well MW-23 sampling events was less than the laboratory MDL.

From the 4th quarter of 2004 sampling event through the 2nd quarter of 2017, (forty-one [41] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-24** was installed on February 10, 2000 and completed to a depth of approximately twenty-two and one half (22.5) feet bgs. Monitor well MW-24 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. From the 3rd quarter of 2005 through the 4th quarter of 2008, sampling was conducted on a semi-annual frequency. From the 1st quarter of 2009 through the 3rd quarter of 2016, sampling was conducted on a annual frequency. No PSH was observed in monitor well MW-24 from the installation of the monitor well through the 3rd quarter of 2016.

The initial sampling of monitor well MW-24 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 3rd quarter of 2016 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

Monitor well MW-24 was plugged and abandoned with NMOCD approval on September 1, 2016.

**Monitor well MW-25** was installed on February 10, 2000 and completed to a depth of approximately twenty-two and one half (22.5) feet bgs. Monitor well MW-25 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. From the 3rd quarter of 2005 through the 4th quarter of 2017, sampling was conducted on an annual frequency. No measurable PSH was observed in monitor well MW-25 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-25 occurred during the 1st quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

From the 2nd quarter of 2000 sampling event through the 2nd quarter of 2017, (twenty-seven [27] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-26** was installed on June 7, 2000 and completed to a depth of approximately twenty-nine (29) feet bgs. Monitor well MW-26 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2010. No PSH was observed in monitor well MW-26 from the installation of the monitor well through the 2nd quarter of 2010.

The initial sampling of monitor well MW-26 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2010 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

Monitor well MW-26 was plugged and abandoned with NMOCD approval on May 28, 2010.

**Monitor well MW-27** was installed on June 7, 2000 and completed to a depth of approximately twenty-nine (29) feet bgs. Monitor well MW-27 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2006. From the 3rd quarter of 2006 through the 4th quarter of 2008, sampling was conducted on a semi-annual frequency. From the 1st quarter of 2009 through the 2nd quarter of 2017, sampling was conducted on an annual frequency. No measurable PSH was observed in monitor well MW-27 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-27 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

From the 2nd quarter of 2000 sampling event through the 2nd quarter of 2017, (thirty-one [31] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-28** was installed on June 26, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-28 lacked sufficient groundwater for a sample collection from the installation of the monitor through the 3rd quarter of 2004 and the 4th quarter of 2013 through the 3rd quarter of 2015. Monitor well MW-28 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012, if sufficient ground was present for collection. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on an annual frequency. No measurable PSH was observed in monitor well MW-28 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-28 occurred during the 4th quarter of 2004. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

From the 4th quarter of 2004 sampling event through the 2nd quarter of 2017, (thirty-five [35] consecutive sampling events), excluding sampling events in which groundwater was insufficient for sample collection), all BTEX constituent concentrations were below the NMOCD regulatory guidelines when sample collection was feasible.

**Monitor well MW-29** was installed on June 26, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-29 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2004. From the 1st quarter of 2005 through the 4th quarter of 2005, sampling was conducted on a semi-annual frequency. From the 1st quarter of 2006 through the 1st quarter of 2010, sampling was conducted on an annual frequency. No PSH was observed in monitor well MW-29 from the installation of the monitor well through the 1st quarter of 2010.

The initial sampling of monitor well MW-29 occurred during the 3rd quarter of 2000. Comprehensive BTEX analysis through the 4th quarter of 2009 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

Monitor well MW-29 was plugged and abandoned with NMOCD approval on May 28, 2010.

**Monitor well MW-30** was installed on June 27, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-30 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. From the 3rd quarter of 2005 through the 2nd quarter of 2017, sampling was conducted on an annual frequency. No measurable PSH was observed in monitor well MW-30 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-30 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated monitor well MW-30 exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event, with the exception of the 2nd quarter of 2000. Monitor well MW-30 exhibited toluene, ethylbenzene, and xylene concentrations of 0.001 mg/L, 0.001 mg/L, and 0.002 mg/L, respectively, during the 2nd quarter of 2000.

From the 2nd quarter of 2000 sampling event through the 2nd quarter of 2017, (twenty-seven [27] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-31** was installed on June 27, 2000 and completed to a depth of approximately twenty-three (23) feet bgs. Monitor well MW-31 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. No measurable PSH was observed in monitor well MW-31 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-31 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.00782 mg/L during the 3rd quarter of 2001. The maximum toluene concentration of 0.002 mg/L during the 2nd quarter of 2000. The maximum ethylbenzene concentration of 0.002 mg/L during the 1st quarter of 2001. The maximum xylene concentration was less than the laboratory MDL.

From the 2nd quarter of 2000 sampling event through the 2nd quarter of 2017, (fifty-four [54] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-32** was installed on June 27, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-32 has been monitored/sampled quarterly since installation of the monitor well. The maximum observed PSH thickness in monitor well MW-32 was 0.30 feet as recorded on September 26, 2001 and August 8, 2002. PSH has not been observed in the monitor well since September 30, 2005 (0.01 feet).

The initial sampling of monitor well MW-32 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.00790 mg/L during the 1st quarter of 2005. Please note, benzene analysis conducted during the 4th quarter of 2004 indicated the benzene concentration was less than 0.0200 mg/L. The maximum toluene concentration was 0.0030 mg/L during the 2nd quarter of 2000. The maximum ethylbenzene concentration was 0.00860 mg/L during the 3rd quarter of 2006. The maximum xylene concentration was 0.0165 mg/L during the 3rd quarter of 2006 and 2nd quarter of 2009.

From the 4th quarter of 2005 sampling event through the 2nd quarter of 2017, (forty-seven [47] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-33** was installed on June 27, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-33 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on an annual frequency. No PSH was observed in monitor well MW-33 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-33 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.008 mg/L during the 2nd quarter of 2000. The maximum toluene concentration was 0.002 mg/L during the 2nd quarter of 2000. The maximum ethylbenzene concentration was less than the laboratory MDL during each sampling event. The maximum xylene concentration was 0.002 mg/L during the 2nd quarter of 2000.

From the 2nd quarter of 2000 sampling event through the 2nd quarter of 2017, (forty-nine [49] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-34** was installed on June 28, 2000 and completed to a depth of approximately twenty-five (25) feet bgs. Monitor well MW-34 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. No PSH was observed in monitor well MW-34 from the installation of the monitor well through the 2nd quarter of 2005.

The initial sampling of monitor well MW-34 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

Monitor well MW-34 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-35** was installed on June 28, 2000 and completed to a depth of approximately twenty-three (23) feet bgs. Monitor well MW-35 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. No PSH was observed in monitor well MW-35 from the installation of the monitor well through the 2nd quarter of 2005.

The initial sampling of monitor well MW-35 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

Monitor well MW-35 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-36** was installed on June 28, 2000 and completed to a depth of approximately twenty-three (23) feet bgs. Monitor well MW-36 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2005. No PSH was observed in monitor well MW-36 from the installation of the monitor well through the 2nd quarter of 2005.

The initial sampling of monitor well MW-36 occurred during the 2nd quarter of 2000. Comprehensive BTEX analysis through the 2nd quarter of 2005 indicated the monitor well exhibited benzene, toluene, ethylbenzene, and xylene concentrations less than the applicable laboratory MDL during each sampling event.

Monitor well MW-36 was plugged and abandoned with NMOCD approval on September 13, 2005.

**Monitor well MW-37** was installed on June 17, 2002 and completed to a depth of approximately thirty (30) feet bgs. Monitor well MW-37 was sampled quarterly from the installation of the monitor well through the 4th quarter of 2012. From the 1st quarter of 2013 through the 2nd quarter of 2017, sampling was conducted on a semi-annual frequency. PSH (0.01 feet) was observed in monitor well MW-37 during the initial gauging event (August 1, 2002) following the installation of the monitor well. No PSH has been observed in the monitor well since the August 1, 2002 gauging event.

The initial sampling of monitor well MW-37 occurred on August 14, 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.0417 mg/L during the 3rd quarter of 2002. The maximum toluene concentration was less than the laboratory MDL during each sampling event. The maximum ethylbenzene concentration was 0.00390 mg/L during the 4th quarter of 2006. The maximum xylene concentration was 0.0135 mg/L during the 3rd quarter of 2006.

From the 2nd quarter of 2005 sampling event through the 2nd quarter of 2017, (forty [40] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-38** was installed on June 17, 2002 and completed to a depth of approximately twenty-nine (29) feet bgs. Monitor well MW-38 was sampled quarterly from the installation of the monitor well through the 2nd quarter of 2017. No measurable PSH was observed in monitor well MW-38 from the installation of the monitor well through the 2nd quarter of 2017.

The initial sampling of monitor well MW-38 occurred on August 13, 2002. Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited a maximum benzene concentration of 0.0371 mg/L during the 3rd quarter of 2002. The maximum toluene concentration less than the laboratory MDL during each sampling event. The maximum ethylbenzene concentration was 0.6540 mg/L during the 4th quarter of 2002. The maximum xylene concentration was 0.166 mg/L during the 4th quarter of 2002.

From the 4th quarter of 2011 sampling event through the 2nd quarter of 2017, (twenty-three [23] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

**Monitor well MW-56** was installed on July 30, 2002 and completed to a depth of approximately twenty-eight (28) feet bgs. Monitor well MW-56 was initially associated with a Release Site located down-gradient of the Bob Durham Release Site. On June 10, 2010, a NMOCD representative approved the inclusion of monitor well MW-56 with the Bob Durham monitor well array. Monitor well MW-56 was sampled quarterly from the 2nd quarter of 2010 through the 2nd quarter of 2017 and no measurable PSH was observed in monitor well MW-56 during the period.

Comprehensive BTEX analysis through the 2nd quarter of 2017 indicated the monitor well exhibited BTEX constituent concentrations less than the laboratory MDL during each sampling event.

From the 2nd quarter of 2010 sampling event through the 2nd quarter of 2017, (nineteen [19] consecutive sampling events), all concentrations of BTEX constituents were below the NMOCD regulatory guidelines.

Laboratory analytical results from groundwater samples were compared to NMOCD regulatory guidelines based on the New Mexico groundwater guidelines found in Section 20.6.2.3103 of the New Mexico Administrative Code (NMAC).

## GROUNDWATER CLOSURE REQUEST

Based on the analytical results of quarterly groundwater monitoring and sampling events, from Site inception through the 2nd quarter of 2017, analysis indicates BTEX constituent concentrations are now less than NMOCD regulatory guidelines. Pursuant to NMOCD guidelines, the BTEX constituent concentrations have remained below the NMOCD regulatory guidelines for eight (8) consecutive quarters, and as such, Plains requests NMOCD approval to cease quarterly monitor well monitoring, sampling activities and a “no further action determination” for the Bob Durham Release Site.

On NMOCD approval, a licensed State of New Mexico water well Driller will submit plugging and abandonment permit applications to the New Mexico Office of the State Engineer (NMOSE). On receipt of the NMOSE plugging and abandonment permits the monitor wells will

be plugged and abandoned in accordance with New Mexico Office of the State Engineer regulations by a State of New Mexico licensed Driller. Following the plugging and abandonment of the monitor wells, the plugging and abandonment reports will be forwarded to the NMOCD.

## SITE CLOSURE REQUEST

On January 26, 2011, Plains received NMOCD Soil Closure Request approval for the Bob Durham Release Site. Contingent on NMOCD approval of the Groundwater Closure Request, Plains requests Site Closure Status for the Bob Durham Release Site. A Final NMOCD C-141 is included for your consideration.

## LIMITATIONS

TRC has prepared this Groundwater and Site Closure Request to the best of its ability. No other warranty, expressed or implied, is made or intended.

TRC has examined and relied upon documents referenced in the report and has relied on oral and written statements made by certain individuals. TRC has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. TRC has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants.

TRC also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report. This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of TRC and/or Plains.

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