

CORRESPONDENCE

MISC.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

October 14, 2004

Mr. Jeffrey P. Dann
Plains All American L.P.
P.O. Box 4648
Houston, TX 77210-4648

1R-103

Dear Mr. Dann:

The New Mexico Oil Conservation Division (NMOCD) has received your letter, dated September 20, 2004, identifying the need for additional groundwater monitor and/or recovery wells at various sites. This request is hereby approved.

This approval does not relieve Plains Marketing, L.P. of any future liability at these sites should it prove that Plains' operations have caused harm to public health or the environment. Nor does it relieve Plains of its obligation to comply with the rules and regulations of any other governmental agency.

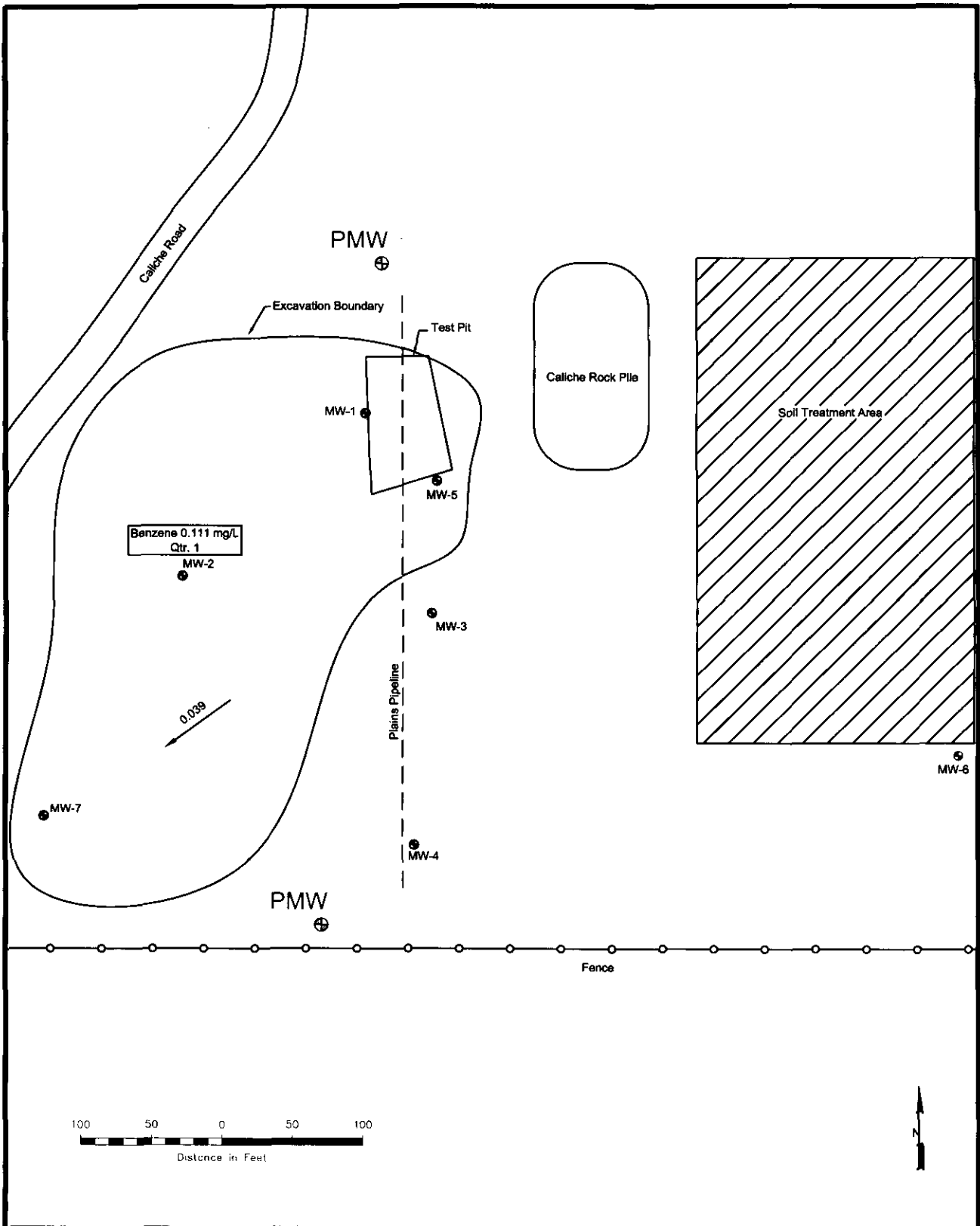
If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script, reading "Ed Martin".

Edwin E. Martin
Environmental Bureau

Cc: Larry Johnson, NMOCD, Hobbs
Camille Reynolds, Plains, Midland



LEGEND:

- Monitoring Well Locations
- ⊕ Proposed Monitor Well

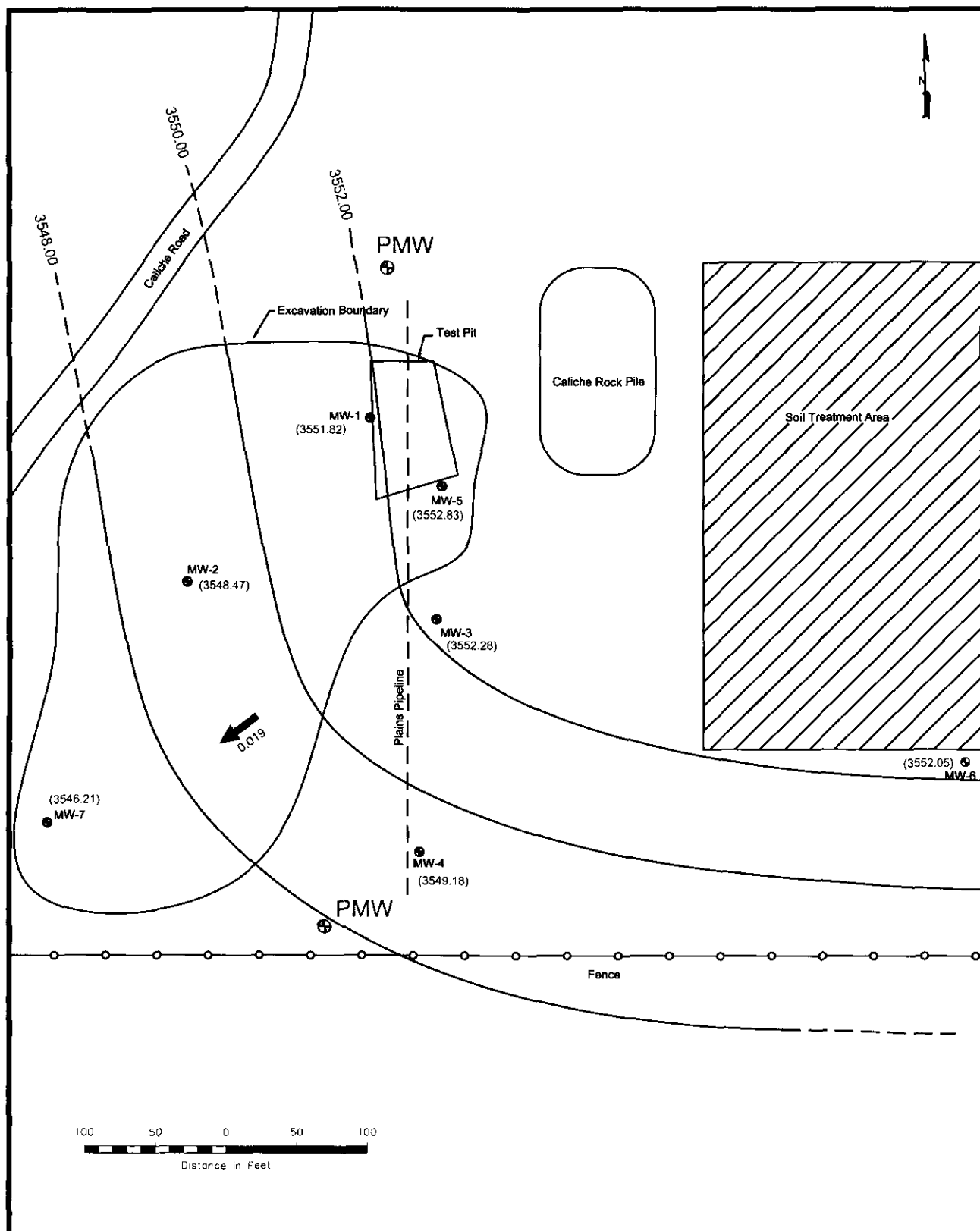
**Figure 2
Site Map**

Plains Pipeline, L.P.
LF - 59
Monument, NM

NOVA Safety and Environmental



Lat. 32° 36' 50.1"N Long 103° 16' 49.6"W	Scale: 1"=100'
NW1/4 SW1/4 Sec32 T19S R37E	Prep By: CDS
September 2, 2004	Checked By: TKC



LEGEND:

- Monitoring Well Locations
- ⊕ Proposed Monitor Well
- (3552.15) Groundwater Elevation in Feet

Figure 2
Inferred Groundwater
Gradient Map
(12/03/03) Elevations
Plains Pipeline, L.P.
LF - 59
Monument, NM

NOVA Safety and Environmental



Lat. 32° 36' 50.1"N Long 103° 16' 49.6"W	Scale: 1"=100'
NW1/4 SW1/4 Sec32 T19S R37E	Drawn By: CS Prepared By: TKC
January 27, 2004	



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

April 28, 2004

Joanna Prukop

Cabinet Secretary

Acting Director

Oil Conservation Division

Mr. Robert B. Eidson
Environmental Technology Group, Inc.
2540 West Marland
Hobbs, NM 88240

1R-103

RE: Your "Annual Sampling and Quarterly Gauging of Groundwater Monitor Wells Meeting Regulatory Cleanup Standards" letter dated March 25, 2004

Sampling of the below-listed monitor wells may be done in the timeframes indicated:

Darr Angell #1: MW-4, 11, 15, 16, 19, and 20 may be sampled annually; MW-7 may be sampled semi-annually.

Darr Angell #2: MW-1, 5, 6, 7, 8, 9, and 10 may be sampled annually; MW-3, and 4 may be sampled semi-annually.

Darr Angell #4: MW-1, 2, 4, 5, 7, and 12 may be sampled annually; MW-9 may be sampled semi-annually.

HDO 90-23: MW-1, 7, and 8 may be sampled annually; MW-4, and 5 may be sampled semi-annually.

LF-37: MW-1, 2, 5, 6, 7, 8, and 9 may be sampled annually; MW-4 may be sampled semi-annually.

LF-59: MW-3, 5, and 6 may be sampled annually; MW-7 may be sampled semi-annually.

Monument 2: MW-6, and 7 may be sampled annually; MW-4 may be sampled semi-annually.

Monument 10: MW-4 may be sampled annually; MW-6, and 7 may be sampled semi-annually.

Monument 11: MW-1, 2, and 3 may be sampled annually.

Monument 17: MW-5, and 8 may be sampled annually. MW-4, and 6 may be sampled semi-annually.

Monument 18: MW-2, 6, 7, and 8 may be sampled annually. MW-5 may be sampled semi-annually.

TNM 97-04: MW-1, 7, 8, 10, and 12 may be sampled annually.

TNM 97-17: MW-1, 3, 11, 12, 13, 16, 17, 18, and 28 may be sampled annually. MW-22, 23, 24, 25, and 27 may be sampled semi-annually.

TNM 97-18: MW-1, 8, 9, 11, 12, 13, 14, 15, 16, 19, 20, and 21 may be sampled annually. MW-22, 26, 28, 29, and 30 may be sampled semi-annually.

TNM 97-23: MW-1, 2, 3, and 5 may be sampled annually.

TNM 98-05: MW-3, and 4 may be sampled annually.

TNM 98-05A: MW-5, and 8 may be sampled annually. MW-6, and 7 may be sampled semi-annually.

SPS-11: MW-2, 3, 13, 19, 20, 21, 22, 25, 27, 30, and 31 may be sampled annually. MW-10, and 18 may be sampled semi-annually.

Conditions:

1. Gauging of all monitor wells will continue on a quarterly basis.
2. A request for a change in sampling frequency for any other monitor wells must be made specifically for those wells. This approval of annual and semi-annual sampling for the above wells does not constitute a "blanket" approval for any other monitor well not shown above.

If you have any questions, do not hesitate to contact me.

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script, appearing to read "Ed Martin".

Ed Martin
Environmental Bureau

March 25, 2004

Mr. Ed Martin
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Annual sampling and quarterly gauging of groundwater monitor wells meeting regulatory cleanup standards.

Mr. Martin:

Environmental Technology Group, Inc. (ETGI) for Link Energy is requesting that the groundwater sampling schedule of the wells listed below be changed from a quarterly to an annual sampling schedule. Quarterly gauging will continue on all site monitor wells during the regularly scheduled monitoring events. Benzene and total BTEX concentrations have been below regulatory standards in all of the monitor wells listed below for at least eight consecutive monitoring periods:

- ✓ HDO 90-23: MW-1, 4, 5, 7 and 8;
- ✓ LF-37: MW-1, 2, 4, 5, 6, 7, 8 and 9;
- ✓ LF-59: MW-3, 5, 6 and 7;
- ✓ Monument 2: MW-4, 6 and 7;
- ✓ Monument 10: MW-1, 4, 5, 6 and 7;
- ✓ Monument 11: MW-1, 2 and 3;
- ✓ Monument 17: MW-4, 5, 6 and 8;
- ✓ Monument 18: MW-2, 5, 6, 7 and 8;
- ✓ TNM 97-04: MW-1, 7, 8, 10 and 12;
- ✓ TNM 97-17: MW-1, 3, 11, 12, 13, 16, 17, 18, 22, 23, 24, 25, 27 and 28;
- ✓ TNM 97-18: MW-1; + E-mail
- ✓ TNM 97-23: MW-1, 2, 3 and 5;
- ✓ TNM 98-05: MW-3 and 4;
- ✓ TNM 98-05A: MW-5, 6, 7 and 8;
- ✓ SPS-11: MW-2, 3, 13, 15, 18, 19, 20, 21, 22, 25, 27, 30 and 31. + E-mail (#10)

As additional monitor wells meet the eight consecutive monitoring events requirement with concentrations below regulatory standards we will formally request that they too be sampled on an annual basis.

DRAFT

Please contact me with any questions you have concerning ETGI's proposed groundwater sampling schedule at these sites.

Sincerely;

Robert B. Edison
Geologist / Senior Project Manager
ETGI, Hobbs, New Mexico

(505) 397-4882 office phone
(505) 631-2974 cell
(505) 397-4701 fax

From: Robert Eidson [reidson@etgi.cc]
Sent: Tuesday, April 27, 2004 10:53 AM
To: Ed Martin
Subject: Groundwater sampling frequency letter
 Ed:
 The letter is attached for your reference.

Tabulated analytical results are included in all of the Annual Groundwater Monitoring reports. The Figure 3's should also be helpful in determining sampling frequency changes. Of those sites which show only seven consecutive quarters of acceptable groundwater sampling results, I checked the first quarter results of this year to meet the requirement (8). All wells will continue to be gauged during each sampling event.

- ✓ At the **Darr Angell 1 site (AP-07)** we would like to sample monitor wells MW-4, 7, 11, 15, 16, 19 and 20 annually.
- ✓ At the **Darr Angell 2 site (AP-07)** we would like to sample monitor wells MW-1, 3, 4, 5, 6, 7, 8, 9 and 10 annually.
- ✓ At the **Darr Angell 4 site (AP-07)** we would like to sample monitor wells MW-1, 2, 4, 5, 7, 9 and 12 annually.

Additionally, we would like to add the following monitor wells to the list shown on the attached letter:

- ✓ At **TNM 97-18 (AP-13)** monitor wells MW-8, 9, 11, 12, 13, 14, 15, 16, 19, 20, 21, 22, 26, 28, 29 and 30. and SPS-11.
- ✓ At **SPS-11** monitor wells MW-10 and MW-19.

I will send the corresponding maps in groups to speed transmission and delivery.

Sincerely,
 Robert B. Eidson
 Geologist / Sr. Project Manager
 ETGI
 Hobbs, New Mexico
 505-397-4882 office
 505-397-4701 fax
 505-631-2974 cell

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EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-2761

October 15, 1999

State of New Mexico
Oil Conservation Division - Hobbs District Office
1625 N. French Dr.
Hobbs, NM 88240
Attn: Donna Williams

684-3400
RECEIVED

OCT 25 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

RE: Installation of Additional Monitor Wells in Lea County, NM

Dear Ms. Williams:

Below is a list of old Texas-New Mexico Pipeline sites that require additional monitor wells to be installed. Also on this list are 3 EOTT sites that require additional and/or new monitor wells.

TNM - SPS-11	TNM - 98-05A
TNM - 97-14	TNM - 97-16
TNM - 97-17	TNM - 97-18
EOTT - Darr Angell site #1	
EOTT - Darr Angell site #2	
EOTT - leak #TNM-LF-59	

We will begin drilling these wells on Monday, October 25, 1999 and will proceed from site to site on a geographic basis. The SPS-11 site is scheduled first. I will be out of town that week but Wayne Brunette will be coordinating drilling activity with our contractor Jerry Nickell and Allan Eades of Eades Drilling. Wayne's number is 915/556-0190. If you would like to be present at any of these installations, please contact Wayne to verify time and locations for each day's drilling.

Donna, I hope this meets with your approval but if you have any questions or need additional information, please don't hesitate to call me.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: William Olson - NMOCD - Santa Fe
Wayne Brunette
Glenn Waldrop

6" GATHERING LINE – EOTT
TAKE BY DONNA WILLIAMS ON 06-15-99



6" GATHERING LINE – EOTT
TAKE BY DONNA WILLIAMS ON 06-15-99



6" GATHERING LINE – EOTT
TAKE BY DONNA WILLIAMS ON 06-15-99
GROUND WATER IMPACTED –
EOTT/DYNEGY

