

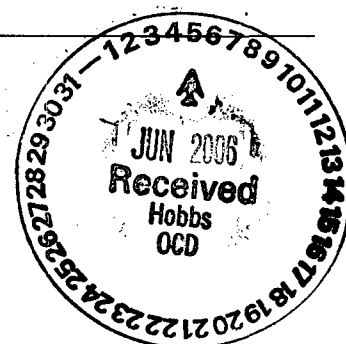
# *Basin Environmental Service Technologies, LLC*

P. O. Box 301  
Lovington, New Mexico 88260  
kdutton@basinenv.com  
Office: (505) 396-2378 Fax: (505) 396-1429



31 May 2006

Mr. Larry Johnson  
New Mexico Oil Conservation Division, District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240



Re: Closure Request, Maljamar to Lynch Abandoned 10" (231735)  
Plains Marketing, L. P. Preliminary Site Investigation Report and Remediation  
Plan, dated 19 December 2005  
Unit A (NE ¼, NE ¼) Section 19, Township 20 South, Range 34 East  
Lea County, New Mexico

Dear Mr. Johnson:

Basin Environmental Services (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for closure of the Maljamar to Lynch Abandoned 10" remediation site at the above referenced location. Soil remediation activities were successfully accomplished as proposed in the New Mexico Oil Conservation Division (NMOCD) approved Preliminary Site Investigation Report and Remediation Plan, dated 19 December 2005. The only remaining task to be completed is reseeding with an approved Bureau of Land Management (BLM) grass seed, which is projected to be in the spring of 2006. Once reseeding of the Maljamar to Lynch Abandoned 10" release site has been accomplished, a request will be submitted to BLM for release of Plains from further activities on-site.

Basin Environmental Service Technologies, LLC (Basin) responded and clamped the pipeline release on 09 December 2004, located on the Maljamar to Lynch Abandoned 10" Pipeline. The impacted soils were excavated and stockpiled on a 6-mil poly-liner adjacent to the site. As reported on the C-141, dated 10 December 2004, approximately 120 barrels of crude oil were released and 100 barrels recovered. The NMOCD ranking criteria for the Maljamar to Lynch Abandoned 10" release site was 0-9 which sets the soil remediation levels for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – gasoline range organics/diesel range organics (TPH-GRO/DRO) at 50 mg/kg for total BTEX and 5000 mg/kg for TPH-GRO/DRO.

*application - p PAC06 04029714*

The following NMOCD approved remedial activities were accomplished at the Maljamar to Lynch Abandoned 10" pipeline release site:

- In December 2004, Basin conducted excavation activities at the release point and flow path. The excavation was approximately 181 feet long by 50 feet wide and ranging in depth from 2 to 6 feet below ground surface (bgs). The impacted soils were placed on a 6-mil poly-liner adjacent to the excavation for future remedial activities. Approximately 1300 cubic yards of segregated clean overburden and impacted soil were excavated and stockpiled on-site.
- On 03 January 2005, seven (7) confirmation soil samples were collected from the excavation floor and walls ranging in depth from 3 to 6 feet bgs and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated that the seven (7) confirmation soil samples were either below NMOCD regulatory standards or not detected above laboratory detection methods with the exception of the release point soil sample which exceeded NMOCD regulatory standards for concentrations of BTEX and TPH-GRO/DRO.
- In May 2005, a delineation soil boring was installed adjacent to the release point to evaluate the vertical extent of crude oil impact utilizing an air rotary drill rig operated by Straub Corporation, Stanton, Texas. Soil samples were collected at 5 feet intervals and the selected soil samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results are attached as Table 1, Soil Chemistry Table.
- In November 2005, Basin ramped and excavated the release point area to a depth of approximately 23 feet bgs. A confirmation soil sample was collected on 23 November 2005 and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated that constituent concentrations of BTEX were not detected above laboratory method detection limits and TPH-GRO/DRO concentrations were detected, but were below NMOCD regulatory standards. Based on the laboratory results, no further excavation of the site was required.
- A Preliminary Site Investigation Report and Remediation/Closure Plan, dated 19 December 2005, was submitted to NMOCD and BLM and subsequently approved by both. The approved plan proposed blending of the impacted soil on-site and backfilling of the excavation. The blended soil was to be divided into equal grid cells of approximately 500 cubic yards and confirmation soil samples were to be collected from each grid cell to ensure TPH-GRO/DRO concentrations were below 5000 mg/kg. Once backfilling activities were completed and the site contoured to the original rangeland, reseeding with an approved BLM seed mixture would be completed.
- In January 2006, the blending of the impacted soil was conducted. Cells were divided into approximately 500 cubic yards and confirmation soil samples were collected 31 January 2006 and analyzed for constituent concentrations of BTEX

and TPH-GRO/DRO. Laboratory results indicated that the eight (8) confirmation soil samples exhibited detectable concentrations of BTEX and TPH-GRO/DRO, however, the eight (8) soil samples were below NMOCD regulatory standards. Laboratory results are attached as Table 1, Soil Chemistry.

- In April 2006, backfilling of the Maljamar to Lynch Abandoned 10" excavation site was completed and the site was contoured to the surrounding undulating dunal pastureland. As proposed and approved by NMOCD and BLM, reseeding is scheduled in May 2006.

The remediation activities were completed in accordance with the NMOCD approved Plains Marketing, L. P., Preliminary Site Investigation Report and Remediation/Closure Plan, dated 19 December 2005. Based on the results of the NMOCD approved remediation activities conducted at the Maljamar to Lynch Abandoned 10" release site, Basin, on behalf of Plains, requests that the NMOCD consider this site as eligible for closure under the *New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills and Releases (1993)*.

Should you have any questions or comments, please contact me at (505) 441-2124.

Sincerely,

Ken Dutton  
Basin Environmental Services

Attachments: Excavation Site Map  
Table 1, Soil Chemistry  
Digital Photographs  
NMOCD C-141 (Initial)  
NMOCD C-141 (Final)

Cc: Mr. Jim Amos, BLM



Caliche Lease Road

50 feet wide

Stockpiled  
Excavated Soil on  
6-mil Poly-liner

Plains Abandoned  
Pipeline

Release Point

6 feet  
bgs

23 feet  
bgs




6 feet  
bgs

181 feet long

Plains 10 inch Abandoned  
Line

Plains Active 8 inch  
Line

6 feet  
bgs

-  Pipeline Valve
-  Excavated Area
-  Excavation Limits

DESCRIPTION	TITLE	DRAWN BY
Plains Marketing, L.P. Mallamar to Lynch Abandoned 10" NE/NE S19, T20S, R34E Lea County, New Mexico	Figure 2 Excavation Site Map	Basin Environmental Services kad

TABLE 1

## SOIL CHEMISTRY

PLAINS MARKETING, L.P.  
MALJAMAR TO LYNCH ABANDONED 10"  
LEA COUNTY, NEW MEXICO  
EMS: 2004-00227

SAMPLE LOCATION	SAMPLE DEPTH	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M		TOTAL TPH (mg/kg)
			BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	M,P-XYLENES (mg/kg)	O-XYLENE (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	
Stockpile East	6'	01/03/05	0.233	6.98	24.4	38.7	18.8	6100	16600	22700
Stockpile West	6'	01/03/05	0.091	4.25	13.7	16.9	7.7	4400	16500	20900
West Exc N/SW	3'	01/03/05	<0.025	<0.025	0.115	0.308	0.156	416	1720	2130
West Exc W/SW	3'	01/03/05	<0.025	0.203	1.41	2.31	1.27	327	701	1030
West Exc Floor	6'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	12.6	98.3	111
RP East Sidewall	3'	01/03/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	<10.0
RP Floor North	6'	01/03/05	<0.025	0.025	0.203	0.48	0.319	185	527	712
RP Floor South	6'	01/03/05	26.2	118	105	102	44.6	8320	10900	19200
Valve SW	3'	01/03/05	<0.025	<0.0125	0.042	0.073	0.04	<10.0	39.6	39.6
SB-1 5'	11'	05/02/05	<0.025	0.036	0.197	0.402	0.174	95.3	289	384
SB-1 10'	16'	05/02/05	<0.025	<0.025	<0.025	0.044	<0.025	<10	<10	<10
SB-1 15'	21'	05/02/05	<0.025	<0.025	<0.025	0.036	<0.025	<10	<10	<10
SB-1 20'	26'	05/02/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
SB-1 25'	31'	05/02/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
SB-1 30'	36'	05/02/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
SB-1 35'	41'	05/02/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
SB-1 40'	46'	05/02/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
SB-1 45'	51'	05/02/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
R/P 17'	23' bgs	11/23/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	140	140

## SOIL CHEMISTRY

PLAINS MARKETING, L.P.  
MALJAMAR TO LYNCH ABANDONED 10"  
LEA COUNTY, NEW MEXICO  
EMS: 2004-00227

[illegible]

Plains Marketing, L. P.  
Maljamar to Lynch Abandoned 10"  
Lea County, New Mexico  
NE/NE S19, T20S, R34E  
Plains EMS: 2004-00227





Mallamartio Lynch Abandoned 10

Plains active 8

Excavated area  
south of release point

Mallamartio Lynch Abandoned 10

Plains Marketing, L.P.

Lea County, New Mexico

NE/NE S19 T20S R34E



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☒ Final Report

Name of Company	Plains Marketing, L. P.	Contact	Camille Reynolds
Address	3112 W. US Hwy 82, Lovington, NM 88260	Telephone No.	(505) 441-0965
Facility Name	Maljamar to Lynch Abandoned 10"	Facility Type	10" Steel Pipeline

Surface Owner	BLM	Mineral Owner		Lease No.	
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**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	19	20S	34E					

Latitude 32°, 33', 55.3" North Longitude 103°, 35', 35.9"

**NATURE OF RELEASE**

Type of Release	Crude Oil	Volume of Release	120 barrels	Volume Recovered	100 barrels
Source of Release	10" Steel Pipeline	Date and Hour of Occurrence	09 December 2004 @ 0800	Date and Hour of Discovery	09 December 2004 @ 0830
Was Immediate Notice Given?	XX Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Paul Sheeley		
By Whom?	Camille Reynolds	Date and Hour	09 December 2004 @ 1450		
Was a Watercourse Reached?	<input type="checkbox"/> Yes XX <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse			

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* Internal corrosion of the 10-Inch steel pipeline resulted in a release of crude oil. A line clamp was installed to mitigate the release. The line is idle so information concerning volume and pressure on the pipeline is not applicable.

Describe Area Affected and Cleanup Action Taken.\* Per the approved NMOCD Plains Marketing, L. P., Remediation/Closure Plan, dated 19 December 2005, the crude oil release site was excavated; the impacted soil placed on a poly-liner adjacent to the excavation, confirmation soil samples were collected from the floor & walls of the excavation. Once the excavation confirmation soil samples were below NMOCD regulatory standards; the stockpiled soils were blended, confirmation soil samples collected, and the site was backfilled with the blended material and contoured to the original rangeland topography.

**SEE ATTACHED BASIN ENVIRONMENTAL SERVICE TECHNOLOGIES LETTER DATED 31 MAY 2006, CLOSURE REQUEST, WITH ATTACHMENTS FOR DETAILS OF REMEDIAL ACTIVITIES CONDUCTED.**

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: <i>Camille Reynolds</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Camille Reynolds		Approved by District Supervisor: <i>[Signature]</i>	
Title: Remediation Coordinator		Approval Date: 6-5-06	Expiration Date: _____
E-mail Address: cgreynolds@paalp.com		Conditions of Approval: _____	Attached <input type="checkbox"/>
Date: 05 June 2006	Phone: (505) 441-0965		

\* Attach Additional Sheets If Necessary