

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 20, 2007

Ms. Camille Reynolds
Plains Pipeline, L.P.
3112 W. Hwy 82
Lovington, NM 88260

**RE: 6 Inch Central Battery Idle Line Release Site
OCD FILE #1R-407
7 Miles Southwest of Hobbs, New Mexico**

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (OCD) has reviewed Plains Pipeline, L.P. August 14, 2006 letter addressing the OCD approved closure of the above-referenced site located in the SE 1/4 NE 1/4 OF SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST OF LEA COUNTY, NEW MEXICO. The closure report was prepared on behalf of Plains Pipeline, L.P. by BBC International, Inc. This document contains Plains Pipeline, L.P.'s summary of closure the remediated release site and includes analyticals and site photographs. Mr. Ed Martin of the OCD approved the remediation efforts and subsequently approved the closure on June 21, 2006. These efforts have resulted in BTEX and TPH soil concentrations being reduced below the NMOCD threshold and eight quarters of monitoring well sampling indicate that no groundwater was impacted. It is the understanding of the OCD that the excavation site has now been properly lined and backfilled and three monitoring wells have been plugged. Notwithstanding the conditions below, no further action is required at this site.

NMOCD's confirmation of this closure does not relieve Plains Pipeline, L.P. of liability in the future, should this site become potentially harmful to public health or the environment. Nor does it relieve Plains Petroleum, L.P. of its responsibility to comply with the rules and regulations of any other federal, state, county or local governmental agency.

NEW MEXICO OIL CONSERVATION DIVISION

Ben Stone
Environmental Bureau

Cc: NMOCD Hobbs



**PLAINS
PIPELINE**

August 14, 2006

Mr. Ben Stone
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico

Re: Plains Pipeline Closure Request
6 Inch Central Battery Idle Line Release Site
SE ¼, NE ¼ of Section 5, Township 20 South, Range 37 East
Lea County, New Mexico
NMOCD File Number 1R-0407

Dear Mr. Stone:

Please find attached for your approval the Closure Request, dated August 11, 2006, for the 6 Inch Central Battery Idle Line release site located in the SE ¼, NE ¼ of Section 5, Township 20 South, Range 37 East in Lea County, New Mexico. The Closure Request details activities conducted for groundwater and soil closure of the site.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American Pipeline

Cc: Larry Johnson, NMOCD, Hobbs Office

Enclosure



PHONE (505) 397-6388 • FAX (505) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805
E-MAIL: cbrunson@bbcinternational.com

August 11, 2006

Mr. Ben Stone
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Plains Marketing, L. P.
Plains EMS No.: 2003-00207
6 Inch Central Battery Idle Line
SE/4 NE/4 of Section 5, Township 20 South, Range 37 East
Lea County, New Mexico
NMOCD File Number 1R-0407
Monument, NM**

Dear Mr. Stone:

BBC International, Inc., (BBC) on behalf of Plains Marketing, L. P. (Plains), respectfully submits this letter to finalize the closure of the above referenced site.

This site was a pipeline release in August 2003 that was addressed by excavating impacted soil and then installing three (3) groundwater monitoring wells. These wells have been sampled and analyzed since the 3rd Quarter of 2003 and every quarter since up to the 1st Quarter of 2006.

The groundwater has been analyzed for BTEX constituents and has not recorded a detectable trace of BTEX constituents. As referenced in the latest annual groundwater report of April 2006, the monitoring wells have recorded eight (8) consecutive quarters for constituent concentrations below NMOCD regulatory standards.

As referenced in the annual report dated April 2006, Plains stated that a soil boring would be advanced in the center of the existing excavation to evaluate the vertical extent of any hydrocarbons in the soil that had been detected in July 2003 above NMOCD guidelines. A soil closure plan would then be submitted.

On March 30, 2006, a soil boring was advanced in the center of the excavation to re-evaluate the TPH on the floor of the excavation and to evaluate the vertical extent of soil impacts. The excavation bottom is ten (10) feet below ground surface (bgs). Soil samples were taken at three (3) depth intervals; 13 feet bgs, 18 feet bgs, and 23 feet bgs. The soil was analyzed for BTEX and DRO/GRO TPH by Trace Analysis, Inc. in Lubbock, Texas. All results were non-

detect for the TPH and BTEX constituents. These results confirm that hydrocarbons no longer exist at this site.

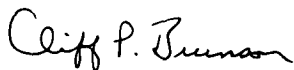
On June 16, 2006, Plains proposed to Ed Martin to close this site by backfilling the excavation with clean soil and plug and abandon the three (3) groundwater monitor wells according to NMOCD standards. Approval to close this site was issued by Ed Martin on June 21, 2006. Copies of the correspondences are attached to this letter.

Site closure activities commenced on July 12, 2006 and were completed on July 13, 2006. The open excavation was backfilled with clean soil and the three groundwater monitoring wells were plugged and abandoned in accordance with NMOCD standards. Please review the attached photographs of the site closure activities.

Plains respectfully requests from the NMOCD a confirmation letter confirming that this site has been closed and no further action is required.

If you have any questions, please feel free to contact either myself at: (505) 397-6388 or cbrunson@bbcinternational.com or Camille Reynolds at: (505) 441-0965 or cjreynolds@paalp.com.

Sincerely,
BBC International, Inc.



Cliff P. Brunson
President

attachments

cc: Camille Reynolds – Plains
Jeff Dann - Plains



PHONE (505) 397-6388 • FAX (505) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805
E-MAIL: cbrunson@bbcinternational.com

June 16, 2006

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Plains Marketing, L. P.
Plains EMS No.: 2003-00207
6 Inch Central Battery Idle Line
SE ¼ of the NE ¼ of Section 5, T 20S, R37E, Lea County, NM
Monument, NM**

Dear Mr. Martin:

Pursuant to our discussion in April 2006, BBC International, Inc., (BBC) on behalf of Plains Marketing, L. P. (Plains), respectfully submits the following closure plan to finalize the soil and groundwater remediation phase of the above referenced site.

This site was a pipeline release in August 2003 that was addressed by excavating impacted soil and then installing three (3) groundwater monitoring wells. These wells have been sampled and analyzed since the 3rd Quarter of 2003 and every quarter since up to the 1st Quarter of 2006.

The groundwater has been analyzed for BTEX constituents and has not recorded a detectable trace of BTEX constituents. As referenced in the latest annual groundwater report of April 2006, the monitoring wells have recorded eight (8) consecutive quarters for constituent concentrations below NMOCD regulatory standards.

As referenced in the annual report dated April 2006, Plains stated that a soil boring would be advanced in the center of the existing excavation to evaluate the vertical extent of any hydrocarbons in the soil that had been detected in July 2003 above NMOCD guidelines. A soil closure plan would then be submitted.

On March 30, 2006, a soil boring was advanced in the center of the excavation to re-evaluate the TPH on the floor of the excavation and to evaluate the vertical extent of soil impacts. The excavation bottom is ten (10) feet below ground surface (bgs). Soil samples were taken at three (3) depth intervals; 13 feet bgs, 18 feet bgs, and 23 feet bgs. The soil was analyzed for BTEX and DRO/GRO TPH by Trace Analysis, Inc. in Lubbock, Texas. All results were non-

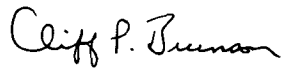
detect for the TPH and BTEX constituents. These results confirm that hydrocarbons no longer exist at this site. The laboratory data and chain of custody are attached.

Based on the March 30, 2006 data, Plains proposes to close this site by backfilling the excavation with clean soil and plug and abandon the three (3) groundwater monitor wells according to NMOCD standards.

Upon completion of these tasks and with approval from the NMOCD, the site will then be closed and no further action will be required.

I look forward to your immediate approval of this plan. If you have any questions, please feel free to contact either myself at: (505) 397-6388 or cbrunson@bbcinternational.com or Camille Reynolds at: (505) 441-0965 or cjreynolds@paalp.com.

Sincerely,
BBC International, Inc.



Cliff P. Brunson
President

cc: Camille Reynolds – Plains
Jeff Dann - Plains

Summary Report

Cliff Brunson
BBC International
1324 W. Marland
Hobbs, NM, 88240

Report Date: April 4, 2006

Work Order: 6033127



EMS#: 2003-00207
Project Location: Monument, New Mexico
Project Name: 6 Inch Idle Line

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
87420	Plains 13'	soil	2006-03-30	08:47	2006-03-31
87421	Plains 18'	soil	2006-03-30	08:56	2006-03-31
87422	Plains 23'	soil	2006-03-30	09:04	2006-03-31

Sample - Field Code	BTEX				MTBE	TPH DRO	TPH GRO
	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Xylene (mg/Kg)	MTBE (mg/Kg)	DRO (mg/Kg)	GRO (mg/Kg)
87420 - Plains 13'	<0.0100	<0.0100	<0.0100	<0.0100		<50.0	<1.00
87421 - Plains 18'	<0.0100	<0.0100	<0.0100	<0.0100		<50.0	<1.00
87422 - Plains 23'	<0.0100	<0.0100	<0.0100	<0.0100		<50.0	<1.00

TRACE ANALYSIS, INC.

6761 Aberdeen Avenue, Suite 9
155 McCutcheon, Suite H

Lubbock, Texas 79424
El Paso, Texas 79932

800•378•1296
808•588•3443

806•794•1296
915•585•3443

FAX 806•794•1298
FAX 915•585•4944

E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Cliff Brunson
BBC International
1324 W. Marland
Hobbs, NM, 88240

Report Date: April 4, 2006

Work Order: 6033127



EMS#: 2003-00207
Project Location: Monument, New Mexico
Project Name: 6 Inch Idle Line
Project Number: 6 Inch Idle Line

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
87420	Plains 13'	soil	2006-03-30	08:47	2006-03-31
87421	Plains 18'	soil	2006-03-30	08:56	2006-03-31
87422	Plains 23'	soil	2006-03-30	09:04	2006-03-31

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 9 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Analytical Report

Sample: 87420 - Plains 13'

Analysis: BTEX
QC Batch: 25614
Prep Batch: 22485

Analytical Method: S 8021B
Date Analyzed: 2006-03-31
Sample Preparation: 2006-03-31

Prep Method: S 5035
Analyzed By: KB
Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.0100	mg/Kg	10	0.00100
Toluene		<0.0100	mg/Kg	10	0.00100
Ethylbenzene		<0.0100	mg/Kg	10	0.00100
Xylene		<0.0100	mg/Kg	10	0.00100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.04	mg/Kg	10	0.100	104	74.1 - 121
4-Bromofluorobenzene (4-BFB)		1.26	mg/Kg	10	0.100	126	72.4 - 130.6

Sample: 87420 - Plains 13'

Analysis: TPH DRO
QC Batch: 25645
Prep Batch: 22515

Analytical Method: Mod. 8015B
Date Analyzed: 2006-04-03
Sample Preparation: 2006-04-03

Prep Method: N/A
Analyzed By: DS
Prepared By: DS

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		170	mg/Kg	1	150	113	50 - 150

Sample: 87420 - Plains 13'

Analysis: TPH GRO
QC Batch: 25613
Prep Batch: 22485

Analytical Method: S 8015B
Date Analyzed: 2006-03-31
Sample Preparation: 2006-03-31

Prep Method: S 5035
Analyzed By: KB
Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	10	0.100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.739	mg/Kg	10	0.100	74	70 - 131.9
4-Bromofluorobenzene (4-BFB)		0.987	mg/Kg	10	0.100	99	70 - 130

Report Date: April 4, 2006
6 Inch Idle Line

Work Order: 6033127
6 Inch Idle Line

Page Number: 7 of 9
Monument, New Mexico

Surrogate		MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	⁶⁷	1.42	1.34	mg/Kg	10	0.1	142	134	46 - 127
4-Bromofluorobenzene (4-BFB)	⁸⁹	1.31	1.34	mg/Kg	10	0.1	131	134	66.8 - 115

Matrix Spike (MS-1) QC Batch: 25645 Spiked Sample: 87422

Param	MS Result	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
DRO	209	214	mg/Kg	1	250	<10.7	84	2	70 - 130	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate		MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
n-Triacontane		162	161	mg/Kg	1	150	108	107	50 - 150

Standard (ICV-1) QC Batch: 25613

Param	Flag	Units	ICVs True Conc.	ICVs Found Conc.	ICVs Percent Recovery	Percent Recovery Limits	Date Analyzed
GRO		mg/L	1.00	0.910	91	85 - 115	2006-03-31

Standard (CCV-1) QC Batch: 25613

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
GRO		mg/L	1.00	0.938	94	85 - 115	2006-03-31

Standard (ICV-1) QC Batch: 25614

Param	Flag	Units	ICVs True Conc.	ICVs Found Conc.	ICVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/Kg	0.100	0.113	113	85 - 115	2006-03-31
Toluene		mg/Kg	0.100	0.113	113	85 - 115	2006-03-31
Ethylbenzene		mg/Kg	0.100	0.112	112	85 - 115	2006-03-31
Xylene		mg/Kg	0.300	0.336	112	85 - 115	2006-03-31

Standard (CCV-1) QC Batch: 25614

⁶⁷Analyte outside normal limits in MS/MSD. LCS/LCSD show the method to be in control.

⁷⁹Analyte outside normal limits in MS/MSD. LCS/LCSD show the method to be in control.

⁸⁹Analyte outside normal limits in MS/MSD. LCS/LCSD show the method to be in control.

⁹⁰Analyte outside normal limits in MS/MSD. LCS/LCSD show the method to be in control.

Report Date: April 4, 2006
6 Inch Idle Line

Work Order: 6033127
6 Inch Idle Line

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Monument, New Mexico

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/Kg	0.100	0.115	115	85 - 115	2006-03-31
Toluene		mg/Kg	0.100	0.115	115	85 - 115	2006-03-31
Ethylbenzene		mg/Kg	0.100	0.113	113	85 - 115	2006-03-31
Xylene		mg/Kg	0.300	0.338	113	85 - 115	2006-03-31

Standard (ICV-1) QC Batch: 25645

Param	Flag	Units	ICVs True Conc.	ICVs Found Conc.	ICVs Percent Recovery	Percent Recovery Limits	Date Analyzed
DRO		mg/Kg	250	220	88	75 - 125	2006-04-03

Standard (CCV-1) QC Batch: 25645

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
DRO		mg/Kg	250	220	88	75 - 125	2006-04-03

Param	LCS Result	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
Benzene	1.15	1.14	mg/Kg	10	0.100	<0.00691	115	1	84.2 - 115	20
Toluene	1.14	1.14	mg/Kg	10	0.100	<0.00984	114	0	83.2 - 114	20
Ethylbenzene	1.13	1.13	mg/Kg	10	0.100	<0.0107	113	0	81.6 - 118	20
Xylene	3.38	3.38	mg/Kg	10	0.300	<0.00555	113	0	73.4 - 121	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	1.12	1.14	mg/Kg	10	0.100	112	114	86.2 - 112
4-Bromofluorobenzene (4-BFB)	1.06	1.08	mg/Kg	10	0.100	106	108	77.8 - 118

Laboratory Control Spike (LCS-1) QC Batch: 25645

Param	LCS Result	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
DRO	218	215	mg/Kg	1	250	<10.7	87	2	70 - 130	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
n-Triacontane	163	166	mg/Kg	1	150	109	111	50 - 150

Matrix Spike (MS-1) QC Batch: 25613 Spiked Sample: 87422

Param	MS Result	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
CRO	11.6	11.2	mg/Kg	10	1.00	<0.236	116	4	80 - 120	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	0.904	1.02	mg/Kg	10	0.1	90	102	62 - 114
4-Bromofluorobenzene (4-BFB)	1.20	1.30	mg/Kg	10	0.1	120	130	66.9 - 136

Matrix Spike (MS-1) QC Batch: 25614 Spiked Sample: 87422

Param	MS Result	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
Benzene	1.22	1.08	mg/Kg	10	0.100	<0.00691	122	12	54.7 - 124	20
Toluene	1.15	1.09	mg/Kg	10	0.100	<0.00984	115	5	58.2 - 129	20
Ethylbenzene	1.18	1.12	mg/Kg	10	0.100	<0.0107	118	5	64.4 - 123	20
Xylene	3.48	3.35	mg/Kg	10	0.300	<0.00555	116	4	56.2 - 131	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

⁵ LCSD analyte out of range. LCS/LCSD has a RPD within limits. Therefore, LCS shows extraction occurred properly.

Parameter	Flag	MDL Result	Units	RL
GRO		1.61	mg/Kg	0.1

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.859	mg/Kg	10	0.100	86	57.8 - 112
4-Bromofluorobenzene (4-BFB)		0.664	mg/Kg	10	0.100	66	33.4 - 131

Method Blank (1) QC Batch: 25614

Parameter	Flag	MDL Result	Units	RL
Benzene		<0.00691	mg/Kg	0.001
Toluene		<0.00984	mg/Kg	0.001
Ethylbenzene		<0.0107	mg/Kg	0.001
Xylene		<0.00555	mg/Kg	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.13	mg/Kg	10	0.100	113	74.2 - 120
4-Bromofluorobenzene (4-BFB)		0.765	mg/Kg	10	0.100	76	60.5 - 135

Method Blank (1) QC Batch: 25645

Parameter	Flag	MDL Result	Units	RL
DRO		<10.7	mg/Kg	50

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		164	mg/Kg	1	150	109	50 - 150

Laboratory Control Spike (LCS-1) QC Batch: 25613

Param	LCS Result	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
GRO	9.15	9.15	mg/Kg	10	1.00	<0.236	92	0	80 - 120	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	0.939	0.933	mg/Kg	10	0.100	94	93	68.1 - 115
4-Bromofluorobenzene (4-BFB)	0.920	0.924	mg/Kg	10	0.100	92	92	68.7 - 130

Laboratory Control Spike (LCS-1) QC Batch: 25614

Sample: 87422 - Plains 23'

Analysis: BTEX	Analytical Method: S 8021B	Prep Method: S 5035
QC Batch: 25614	Date Analyzed: 2006-03-31	Analyzed By: KB
Prep Batch: 22485	Sample Preparation: 2006-03-31	Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.0100	mg/Kg	10	0.00100
Toluene		<0.0100	mg/Kg	10	0.00100
Ethylbenzene		<0.0100	mg/Kg	10	0.00100
Xylene		<0.0100	mg/Kg	10	0.00100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)	3	1.36	mg/Kg	10	0.100	136	74.1 - 121
4-Bromofluorobenzene (4-BFB)	4	1.38	mg/Kg	10	0.100	138	72.4 - 130.6

Sample: 87422 - Plains 23'

Analysis: TPH DRO	Analytical Method: Mod. 8015B	Prep Method: N/A
QC Batch: 25645	Date Analyzed: 2006-04-03	Analyzed By: DS
Prep Batch: 22515	Sample Preparation: 2006-04-03	Prepared By: DS

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		169	mg/Kg	1	150	113	50 - 150

Sample: 87422 - Plains 23'

Analysis: TPH GRO	Analytical Method: S 8015B	Prep Method: S 5035
QC Batch: 25613	Date Analyzed: 2006-03-31	Analyzed By: KB
Prep Batch: 22485	Sample Preparation: 2006-03-31	Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	10	0.100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.01	mg/Kg	10	0.100	101	70 - 131.9
4-Bromofluorobenzene (4-BFB)		1.04	mg/Kg	10	0.100	104	70 - 130

Method Blank (1) QC Batch: 25613

¹High surrogate recovery. Sample non-detect, result bias high.

²High surrogate recovery. Sample non-detect, result bias high.

Sample: 87421 - Plains 18'

Analysis: BTEX	Analytical Method: S 8021B	Prep Method: S 5035
QC Batch: 25614	Date Analyzed: 2006-03-31	Analyzed By: KB
Prep Batch: 22485	Sample Preparation: 2006-03-31	Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.0100	mg/Kg	10	0.00100
Toluene		<0.0100	mg/Kg	10	0.00100
Ethylbenzene		<0.0100	mg/Kg	10	0.00100
Xylene		<0.0100	mg/Kg	10	0.00100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)	1	1.35	mg/Kg	10	0.100	135	74.1 - 121
4-Bromofluorobenzene (4-BFB)	2	1.34	mg/Kg	10	0.100	134	72.4 - 130.6

Sample: 87421 - Plains 18'

Analysis: TPH DRO	Analytical Method: Mod. 8015B	Prep Method: N/A
QC Batch: 25645	Date Analyzed: 2006-04-03	Analyzed By: DS
Prep Batch: 22515	Sample Preparation: 2006-04-03	Prepared By: DS

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		167	mg/Kg	1	150	111	50 - 150

Sample: 87421 - Plains 18'

Analysis: TPH GRO	Analytical Method: S 8015B	Prep Method: S 5035
QC Batch: 25613	Date Analyzed: 2006-03-31	Analyzed By: KB
Prep Batch: 22485	Sample Preparation: 2006-03-31	Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	10	0.100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.974	mg/Kg	10	0.100	97	70 - 131.9
4-Bromofluorobenzene (4-BFB)		1.08	mg/Kg	10	0.100	108	70 - 130

¹ High surrogate recovery. Sample non-detect, result bias high.

² High surrogate recovery. Sample non-detect, result bias high.

Case # DA45 GL160504-7038

Page 1 of 1

<h1 style="margin:0;">TraceAnalysis, Inc.</h1>										CHAIN-OF-CUSTODY AND ANALYSIS REQUEST																																																																																									
8701 Aberdeen Avenue, Ste 9 Lubbock, Texas 79424 Tel (806) 794-1296 Fax (806) 794-1298 1 (800) 378-1366 e-mail: lab@tracanalysis.com										155 McClellan, Suite H El Paso, Texas 79932 Tel (915) 665-3143 Fax (915) 546-4944 1 (800) 546-3414																																																																																									
Company Name: <u>BBC International Inc.</u> Address: <u>1324 W. Marland Hobbs</u> Contact Person: <u>Cliff Brunsen</u>					Phone #: <u>505-397-6388</u> Fax #: <u>505-397-0397</u> e-mail:					LAB Order ID # <u>4033127</u>																																																																																									
Invoice to: <u>Plains</u> Project #: <u>2003-002-07</u>										ANALYSIS REQUEST (Circle or Specify Method No.)																																																																																									
Project Location: <u>Monument</u> Project Name: <u>6" Central Battery Ideline</u> Sampler Signature: <u>[Signature]</u>										Turn Around Time if different from standard																																																																																									
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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

June 21, 2006

Ms. Camille Reynolds
Plains Marketing, L.P.
3112 West Highway 82
Lovington, NM 88260

RE: Plains Marketing, L.P.
Plains EMS No.: 2003-00207
6-Inch Central Battery Idle Line Site
SE/4 NE/4 of Section 5, Township 20 South, Range 37 East
Lea County, New Mexico
NMOCD File Number 1R-0407

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the request for soil and groundwater closure for the above site submitted, on behalf of Plains Marketing, L.P. (Plains) by BBC International and dated June 16, 2006. This request is hereby approved with the following understandings and conditions:

1. Soil samples were taken during the drilling of the borehole and analyses results are as shown in the attachment to the request.
2. Analyses of sidewall samples taken at the site are as shown in the Remediation Work Plan, dated July 2004, and prepared by Nova Safety and Environmental.
3. Plains will backfill the site with clean soil.
4. Plains will plug and abandon the three monitor wells using a slurry containing 3% - 5% bentonite.

NMOCD approval does not relieve Plains of responsibility should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other governmental agency.

If you have any question, contact me at (505) 476-3470 or ed.martin@state.nm.us

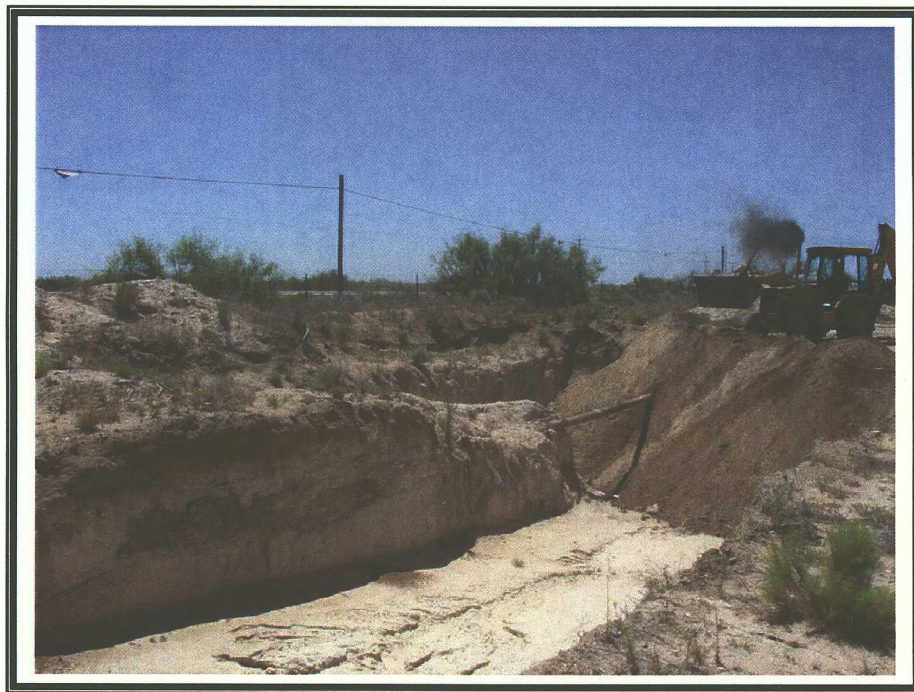
NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin
Environmental Bureau

Copy: Cliff Brunson, BBC



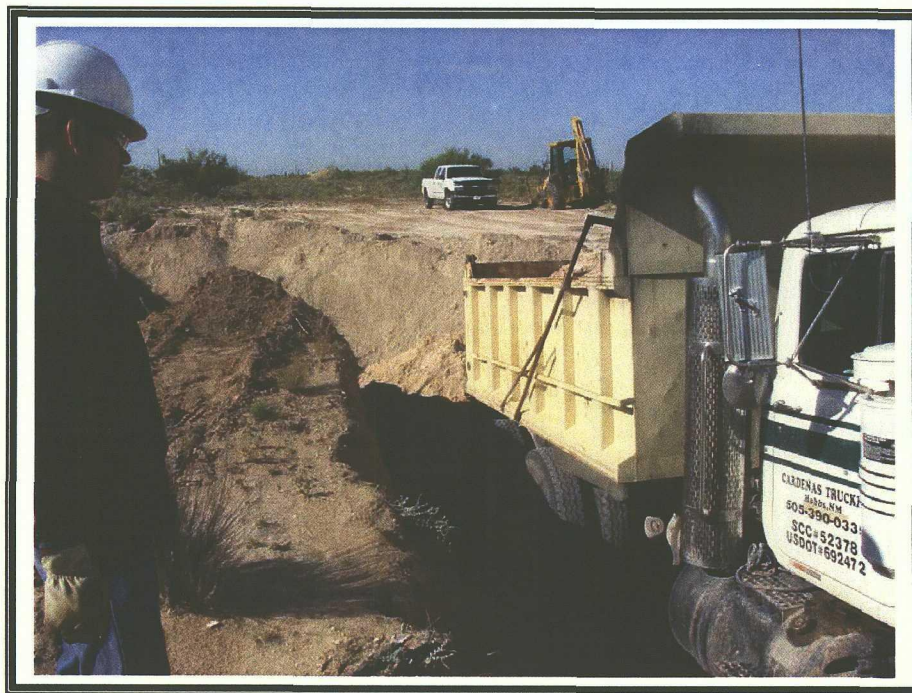
6 Inch Central Battery Idle Line – July 12, 2006



6 Inch Central Battery Idle Line - July 12, 2006



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