

Basin Environmental Service Technologies, LLC

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

Effective Solutions



**PRELIMINARY SITE INVESTIGATION REPORT
and
WORK PLAN**

**PLAINS MARKETING, L.P.
Lovington Pump Station
Lea County, New Mexico
Plains EMS # 2005-00015**

**UNIT D (NW/NW), Section 16, Township 17 South, Range 37 East
Latitude 32°, 50', 30.7" North, Longitude 103°, 15', 45.3" West**

Prepared For:

Plains Marketing, L.P.
333 Clay Street
Suite 1600
Houston, Texas 77002

Prepared By:

Basin Environmental Service Technologies, LLC
P. O. Box 301
Lovington, New Mexico 88260

21 March 2005


Ken Dutton

Basin Environmental Service Technologies, LLC

RP 920

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TO CR
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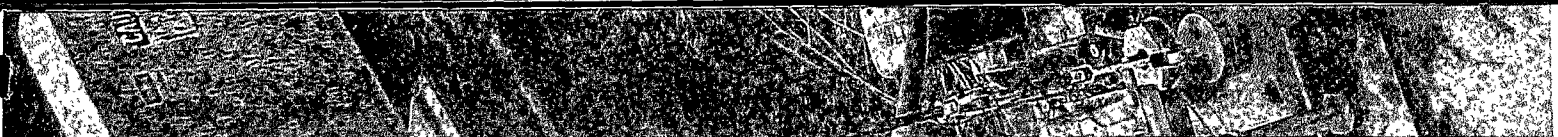


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INTRODUCTION

Basin Environmental Service Technologies, LLC (Basin), responded to a crude oil release for Plains Marketing, L.P. (Plains), located at the Lovington Pump Station on 14 January 2005. The equipment malfunction was repaired and excavation of the impacted soil was initiated and stockpiled on a 6-mil poly-liner.

This site is located in Unit D (NW/NW), Section 16, Township 17 South, Range 37 East, in Lea County, New Mexico (topographic Site Location Map is attached as Figure 1). The latitude is 32°, 50', 30.7" North, and longitude is 103°, 15', 45.3" West. The site is characterized as an operational pipeline pumping station containing various pieces of crude oil pumping equipment. The visually stained area includes the release point and covers an area approximately 15 feet long by 20 feet wide. It is estimated 6 barrels of crude oil were released from the Lovington Pump Station and 0 barrels were recovered.

Plains Pipeline operations personnel marked their respective lines inside the pumping station before excavation activities commenced.

Mr. Larry Johnson, New Mexico Oil Conservation Division (NMOCD), Hobbs, New Mexico District 1 was verbally notified of the release on 14 January 2005. Mr. Leon Anderson and Ms. Myra Meyers, New Mexico State Land Office (NMSLO), Hobbs Office, were notified 14 January 2005. A Right of Entry Permit was not required as the crude oil release occurred in a Plains leased area.

SUMMARY OF FIELD ACTIVITIES

On 14 January 2005, Basin arrived at the Lovington Pump Station crude oil release to repair and contain the crude oil pipeline release under the direction of Plains operations personnel. After repairing the malfunctioning equipment, excavation of the impacted soil was initiated. The visually stained area is approximately 15 feet long by 20 feet wide and is approximately 5 feet below ground surface (bgs) at the release point.

On 26 January 2005, Basin excavated the release point area to a depth of 14 feet bgs attempting to delineate the vertical and horizontal extent of crude oil impacted soil at the release point (see Site Map, Figure 2). Photoionization Detector (PID) readings indicate elevated concentrations of Volatile Organic Compounds (VOC) remain in place. Approximately 75 cubic yards of impacted soil was excavated and stockpiled on-site as a result of this delineation activity.

New Mexico Oil Conservation Division (NMOCD) Soil Classification

Actual groundwater gauging data obtained from the Plains Moore to Jal # 2 remediation site, located less than one-half mile to the south, southeast, indicates the depth to groundwater ranges from 77 feet to 79 feet bgs. There are no surface water bodies or water wells within 1000 feet of the release site. Based on this data, the site has an NMOCD Ranking Score of 10 -19, which sets the remediation levels at:

| | |
|----------|----------|
| Benzene: | 10 ppm |
| BTEX: | 50 ppm |
| TPH: | 1000 ppm |

The above criterion is assumed and may be adjusted based on the actual results of the soil delineation activities.

Distribution of Hydrocarbons in the Unsaturated Zone

The release point and visually stained area has been excavated to a depth of approximately 14 feet bgs and evidence of crude oil impact still exists on the floor at the release point. PID readings indicate elevated concentrations of VOC's remain in place. Approximately 75 cubic yards of impacted soil was excavated and stockpiled on a 6-mil poly-liner.

RECOMMENDATIONS FOR DELINEATION/REMEDIATION

Approximately 75 cubic yards of impacted soil has been excavated and stockpiled on-site resulting from the emergency response and equipment repair. Based on the preliminary soil delineation investigation, the release point will require further vertical and horizontal delineation.

Plains proposes to mobilize a drill rig to install five (5) soil borings to determine the vertical and horizontal depth of the hydrocarbon-impacted soil at the release point as well as one soil boring up gradient, one soil boring cross gradient, and two (2) soil borings down gradient (see Figure 2, proposed soil boring locations). In the event, groundwater has been impacted, proposed monitoring well locations are depicted on Figure 2. Soil boring soil samples will be collected at 5 feet intervals; field screened with a PID, and selected samples will be delivered to a certified laboratory for analysis. The soil samples will be analyzed for BTEX and TPH-GRO/DRO. The soil borings will be plugged with cement at total depth, filled with bentonite chips and water to the ground surface. A remedial work plan will be submitted to the NMOCD, Hobbs District, for approval once delineation of the site is completed and remedial options have been evaluated.

QA/QC PROCEDURES

Soil Sampling

Soil samples will be delivered to Environmental Lab of Texas, Inc. in Odessa, Texas for BTEX, TPH analyses using the methods described below. Soil samples will be analyzed for BTEX, TPH-GRO/DRO within fourteen days following the collection date.

The soil samples will be analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8021B, 5030
- TPH concentrations in accordance with modified EPA Method 8015M GRO/DRO

Groundwater Sampling

The groundwater monitoring wells will be developed utilizing the Environmental Protection Agency (EPA) protocol of approximately nine well volumes of groundwater or until the monitoring wells are dry using an electrical Grundfos Pump. Within forty-eight hours of development, the monitoring wells will be measured and purged of approximately three well volumes utilizing an electrical Grundfos Pump. Groundwater samples will be collected using a disposable Teflon sampler and the groundwater samples will be stored in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water will be collected in a polystyrene tank and disposed of at a licensed New Mexico disposal facility. Groundwater samples will be delivered to Environmental Lab of Texas, Odessa, Texas for analysis of BTEX concentrations using the method described below. All samples will be analyzed within approved holding times following the collection date.

- BTEX concentrations in accordance with EPA Method 8021B

Decontamination Of Equipment

Cleaning of the sampling equipment will be the responsibility of the environmental technician. Prior to use, and between each sample, the sampling equipment will be cleaned with Liqui-Nox[®] detergent and rinsed with distilled water.

Laboratory Protocol

The laboratory will be responsible for proper QA/QC procedures after signing the chain-of-custody form. These procedures will be either transmitted with the laboratory reports or are on file at the laboratory.

LIMITATIONS

Basin Environmental Service Technologies, LLC, has prepared this Preliminary Investigation Report and Work Plan to the best of its ability. No other warranty, expressed or implied, is made or intended.

Basin Environmental Service Technologies, LLC, has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. Basin Environmental Service Technologies, LLC, 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. Basin Environmental Service Technologies, LLC, has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Basin Environmental Service Technologies, LLC, 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 Marketing, L.P. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express consent of Basin Environmental Service Technologies, LLC, and Plains Marketing, L.P.

DISTRIBUTION

- Copy 1: Jeff Dann
Plains All American
333 Clay Street
Suite 1600
Houston, Texas 77002
ipdann@paalp.com
- Copy 2: Camille Reynolds
Plains All American
214 W. C-61
Hobbs, New Mexico 88240
cireynolds@paalp.com
- Copy 3: Mr. Larry Johnson
New Mexico Oil Conservation Division
1625 Francis Dr.
Hobbs, New Mexico 88240
LWJohnson@state.nm.us
- Copy 4: New Mexico State Land Office
P. O. Box 1148
Santa Fe, New Mexico 87404-1148
cmorrow@slo.state.nm.us
- Copy 5: Basin Environmental Service Technologies LLC
P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com

Copy 3

FIGURES

FIGURE 1

SITE LOCATION MAP

FIGURE 2

SITE MAP



Fence

Plains
Pipeline

Berm

Release
Point

Pump

Plains Marketing, L. P.
Lovington Pump Station
Lea County, New Mexico
NW/NW S16, T17S, R37E
EMS: 2005-00015

Excavated
Area

Plains
Pipeline

Proposed Soil
Borings/Monitor
Wells

TITLE

Figure 1, Site Map
Lovington Pump Station

DRAWN BY

Basin Environmental Svc.
kad

FIGURE 3

DIGITAL PHOTOS OF SITE

Release Point

Plains Marketing, L.P.
Lovington Pump Station
Lea County, New Mexico
Unit D, S16, T17S, R37E
EMS: 2005-00015

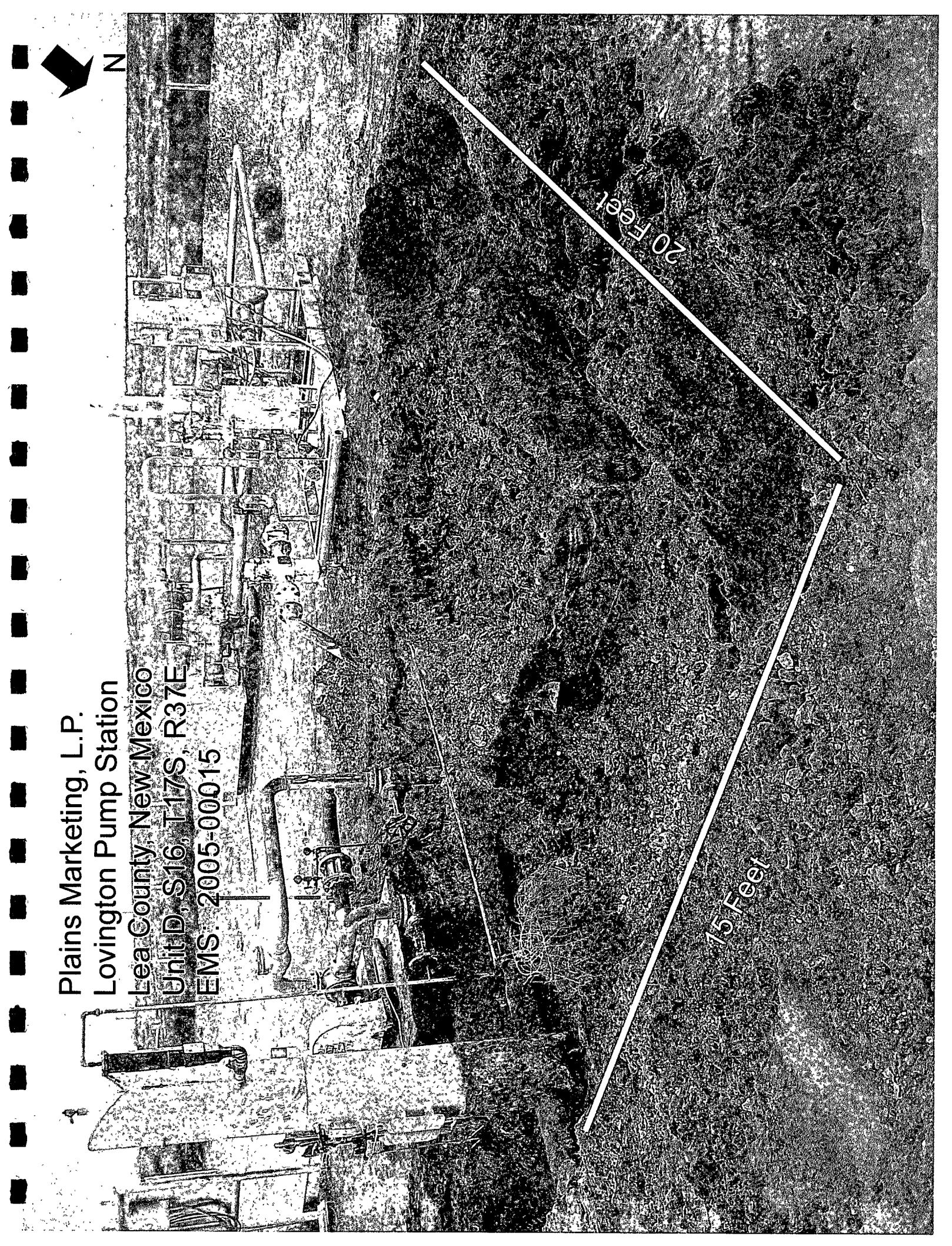


Plains Marketing, L.P.
Lovington Pump Station
Lea County, New Mexico
Unit D, S16, T17S, R37E
EMS: 2005-00015



20 Feet

15 Feet



APPENDICES

APPENDIX A

NEW MEXICO OFFICE OF THE STATE ENGINEER WATER WELL DATABASE REPORT

New Mexico Office of the State Engineer
Well Reports and Downloads

Township:17S

Range:37E

Sections:16

NAD27

X:

Y:

Zone:

Search Radius:

County:

Basin:

Number:

Suffix:

Owner Name: (First)

(Last)

☐ Non-Domestic

☐ Domestic

☒

All

Well / Surface Data Report

Avg Depth to Water Report

Water Column Report

Clear Form

WATERS Menu

Help

AVERAGE DEPTH OF WATER REPORT 01/31/2005

| Bsn | Tws | Rng | Sec | Zone | X | Y | Wells | (Depth Water in Feet) | | |
|-----|-----|-----|-----|------|---|---|-------|-----------------------|-----|-----|
| | | | | | | | | Min | Max | Avg |
| L | 17S | 37E | 16 | | | | 2 | 40 | 40 | 40 |

Record Count: 2

APPENDIX B

NMOCD C-141

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

FLWT
0522455048

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

x Initial Report ☐ Final Report

| | | |
|--|---------------------------------|-----------|
| Name of Company Plains Marketing, LP | Contact Camille Reynolds | |
| Address 5805 East Hwy. 80, Midland, TX 79706 | Telephone No. 505-441-0965 | |
| Facility Name Lovington Station | Facility Type 4" Steel Pipeline | |
| Surface Owner State Of New Mexico | Mineral Owner | Lease No. |

LOCATION OF RELEASE

| | | | | | | | | |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|--------|
| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
| D | 16 | 17S | 37E | | | | | Lea |

Latitude 32°50'31.2" Longitude 103°15'45.5"

NATURE OF RELEASE

| | | |
|--|--|---|
| Type of Release Crude Oil | Volume of Release 6 barrels | Volume Recovered 0 barrels |
| Source of Release 4" Steel Pipeline | Date and Hour of Occurrence 1/14/05 @ 08:55 | Date and Hour of Discovery 1/14/05 @ 09:00 |
| Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | If YES, To Whom? Larry Johnson | |
| By Whom? Camille Reynolds | Date and Hour 1/14/05 @ 15:15 | |
| Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Failure of packing on pump caused release of sour crude oil. Pump was repaired. The line has approximately 70 psi and produces approximately 780 barrels of crude oil per day. The gravity on the crude is 35.7 and the H2S content is less than 10 ppm.

Describe Area Affected and Cleanup Action Taken.* The pump was repaired and the saturated soil was excavated. Aerial extent of surface impact was approximately 15 x 20 feet.

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> | OIL CONSERVATION DIVISION | |
| Printed Name: Camille Reynolds | Approved by District Supervisor: | |
| Title: Remediation Coordinator | Approval Date: | Expiration Date: |
| E-mail Address: cgreynolds@paalp.com | Conditions of Approval: | Attached <input type="checkbox"/> |
| Date 1/20/05 | Phone: 505-441-0965 | |

Attach Additional Sheets If Necessary