

AP - 52

APPROVALS

YEAR(S):

2008

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, September 15, 2008 10:20 AM
To: 'Camille J Bryant'
Subject: RE: Caylor replacement well (AP-52)

Dear Ms. Bryant:

The New Mexico Oil Conservation Division (OCD) has reviewed the proposed amendment to the Abatement Plan (AP-52). The OCD hereby approves the amendment as proposed.

Also, please be advised that NMOCD approval of this amendment does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Camille J Bryant [mailto:CJBryant@paalp.com]
Sent: Wednesday, September 10, 2008 9:04 AM
To: Hansen, Edward J., EMNRD
Subject: FW: Caylor replacement well

Ed,

Attached below is the plan for installing the new replacement monitor well at the CS Caylor release site, AP-52. Please call with any questions.

Sincerely,
Camille

-----Original Message-----

From: Raymond Straub [mailto:straubcorp@sbcglobal.net]
Sent: Thursday, September 04, 2008 11:55 AM
To: Camille J Bryant
Subject: Caylor replacement well

Camille,
Shana with TalonLPE asked me to send you an explanation of the procedure we intended to use on the Caylor site.

Thank you,
Raymond Straub

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9/15/2008

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Hansen, Edward J., EMNRD

From: Camille J Bryant [CJBryant@paalp.com]
Sent: Wednesday, September 10, 2008 9:04 AM
To: Hansen, Edward J., EMNRD
Subject: FW: Caylor replacement well
Attachments: Caylor replacement well.pdf

Ed,

Attached below is the plan for installing the new replacement monitor well at the CS Caylor release site, AP-52. Please call with any questions.

Sincerely,
Camille

-----Original Message-----

From: Raymond Straub [mailto:straubcorp@sbcglobal.net]
Sent: Thursday, September 04, 2008 11:55 AM
To: Camille J Bryant
Subject: Caylor replacement well

Camille,
Shana with TalonLPE asked me to send you an explanation of the procedure we intended to use on the Caylor site.

Thank you,
Raymond Straub

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9/11/2008



STRAUB CORPORATION

P.O. Box 192 Stanton, Texas 79782 (432) 756-3489

Date: September 4, 2008

Client:

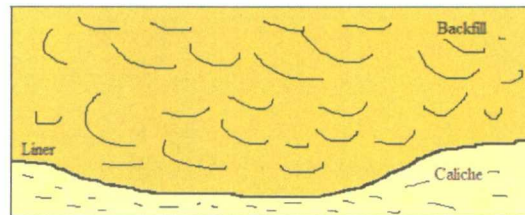
Plains Marketing, LP
Camille Bryant
3112 West US Hwy 82
Lovington, NM 88260
Tel: 505-441-0965
Fax: 505-396-2754

Re: Caylor Replacement Well through plastic liner

Specifications:

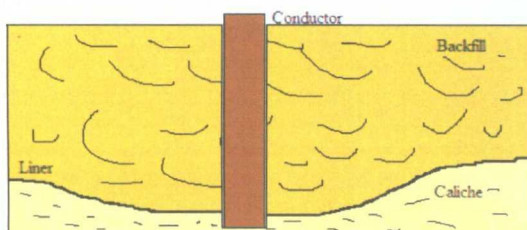
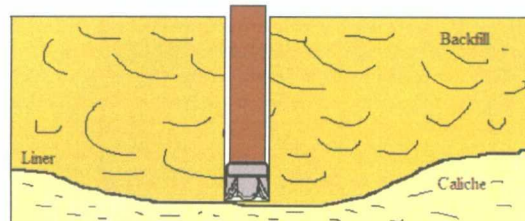
Due to an apparent drop in ground water elevation at the C.S. Caylor Site near Lovington New Mexico, a replacement well will be installed near one of the now dry wells within the boundaries of the original excavation. This excavation has a 20 Mil plastic liner at approximately 10' in depth. (See figure 1.)

Drilling in backfill is difficult due to the loose uncompressed nature of the soil combined with a plastic liner at the bottom of the excavation. It will be necessary to utilize a conductor casing to help prevent caving of the excavation into the bore hole and to prevent any subsequent damage to the liner.



An initial boring will be advanced through the liner into the underlying caliche. (see figure 2.)

Once the initial boring is drilled a section of steel casing will be drilled down to the bottom of the initial bore to help prevent caving of the bore and damage to the liner. (See figure 3.)



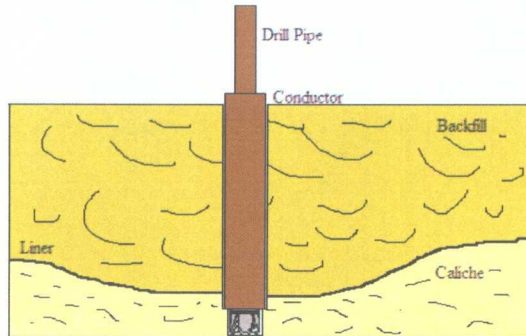


STRAUB CORPORATION

P.O. Box 192 Stanton, Texas 79782 (432) 756-3489

After the conductor casing is installed the final boring will be advanced to the total depth of the well. (See figure4.)

After the drilling is complete and the well is constructed the conductor casing will be removed and a pliable bentonite seal will be placed through the liner area. The well will then be finished as a standard monitor well.



Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, August 27, 2008 5:13 PM
To: 'Camille J Bryant'
Cc: Price, Wayne, EMNRD
Subject: C. S. Cayler Release Site (AP-52) - Recommendations Approval

Dear Ms. Bryant:

The New Mexico Oil Conservation Division (NMOCD) has reviewed the 2008 Status Letter and Second Quarter 2008 Summary for the above referenced site submitted by Talon, dated July 31, 2007. The NMOCD hereby approves the recommendations as proposed in the Letter. However, the "new" 4" well must be installed within 30 days.

Also, please be advised that NMOCD approval of these recommendations does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

8/27/2008

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, July 30, 2008 4:05 PM
To: 'Jeffrey P Dann'
Cc: Camille J Bryant; Douglas S Kennedy; Price, Wayne, EMNRD
Subject: RE: Plains - Hobbs Jct Mainline (AP-54) and CS Caylor (AP-52) Sites - AP Amendment Approval

Dear Mr. Dann:

The New Mexico Oil Conservation Division (OCD) has reviewed your proposal for the disposal of recovered water from the above referenced sites. The OCD hereby conditionally approves the respective amendments to the abatement plans (AP-52 and AP-54). Please commence the disposal of the recovered water as specified for each site within 30 days.

Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please use the respective OCD case #s on future correspondence regarding the sites listed above.

From: Jeffrey P Dann [mailto:jpdann@paalp.com]
Sent: Thursday, July 17, 2008 1:14 PM
To: Price, Wayne, EMNRD; Hansen, Edward J., EMNRD
Cc: Camille J Bryant; Douglas S Kennedy
Subject: Plains - Hobbs Jct Mainline and CS Caylor Sites

Wayne and Ed:

Pursuant to your request for Plains to increase our groundwater pumping and oil recovery rates at the C.S. Caylor and Hobbs Jct Mainline remediation sites in Lea County, New Mexico, Plains has installed total fluid pumps and larger water storage tanks at these sites and increased our recovery efforts. During our last meeting in Santa Fe in February 2008, you had mentioned to Plains that a produced water/fluids disposal option available to Plains was to pipe the produced fluids to a nearby permitted disposal well or injection facility (water flood unit). We have evaluated this option and located facilities within close proximity to each site and we are in the process of negotiating agreements with both of these firms to dispose of our produced fluids. The water generated from a groundwater remediation system is not a typical E&P generated waste and does not exactly meet the definition of "produced water" or "oil field waste" based on New Mexico Oil Conservation Division (NMOCD) Rule 19.15.2.52, "Disposition of Produced Water and Other Oil Field Waste". Plains seeks division authorization [pursuant to 19.15.2.52 B(2)] to dispose of "produced water" in the manner

7/30/2008

described below:

C.S. Caylor Site - Total fluid pumps and skimmer pumps will recover oil and water and the recovered fluids will be placed in storage tanks located at the site. The storage tanks will be equipped with high levels switches will kick on at the appropriate level and pump the produced fluids via pipeline to the disposal facility. The produced water will be disposed at the Miller Oil & Gas Assets III, LLC (API # 3002503857) disposal well located in Section 6, Township 17 South and Range 36 East, Lea County, New Mexico. The system will be equipped with a flow meter and Plains will report the monthly volume of fluid disposal to the NMOCD. The operator of this well has obtained a representative sample of this water and has deemed it acceptable for disposal through their system.

Hobbs Jct Mainline Site - Total fluid pumps and skimmer pumps will recover oil and water and the recovered fluids will be placed in storage tanks located at the site. The storage tanks will be equipped with high levels switches will kick on at the appropriate level and pump the produced fluids via pipeline to the disposal facility. The produced water will be transported to the Oxy Satellite #25 battery where the water will be utilized in their water flood operations. The Oxy Satellite #25 facility is located in Section 26, Township 18 South and Range 37 East, Lea County, New Mexico. The system will be equipped with a flow meter and Plains will report the monthly volume of fluid disposal to the NMOCD. The operator of this system has obtained a representative sample of this water and has deemed it acceptable for use in their water flood system.

As a matter of Plains policy, Plains will not execute these disposal agreements with Miller and Oxy until we have NMOCD concurrence. Your prompt attention to this matter would be greatly appreciated.

Regards

*Jeffrey P. Dann, P.G.
Senior Environmental Specialist
Plains All American
(713) 646-4657 (o)
(713) 646-4199 (f)
(713) 201-3548 (c)
email: jpdann@paalp.com*

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Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 08, 2008 6:11 PM
To: 'Camille J Bryant'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'seay04@leaco.net'
Subject: RE: Plains CS Caylor release site AP-052

Dear Ms. Bryant:

The New Mexico Oil Conservation Division (OCD) has received the backfilling work plan for the Plains C.S. Caylor Release Site, dated April 8, 2008, and has conducted a review of the plan. The plan, submitted for the above reference site, indicates that the site meets the closure requirements as recommended by the OCD. Therefore, the OCD hereby approves the commencement of backfilling activities at the site as specified in the work plan.

Please be advised that NMOCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Camille J Bryant [mailto:CJBryant@paalp.com]
Sent: Wednesday, April 09, 2008 3:19 PM
To: Hansen, Edward J., EMNRD
Subject: Plains CS Caylor release site AP-052

Mr. Hansen,

Please find attached below for your approval the Abatement Plan Amendment as requested for the Plains CS Caylor Release Site (AP-052). This document addresses the soil remediation activities to be conducted at the site. A hard copy will follow.

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

Sincerely,

Camille Bryant
Remediation Coordinator
Plains All American

5/8/2008

office: 505/396-3341
fax: 505/396-2754
cellular: 505/441-0965

<<Cayler Backfill Letter.doc>> <<Sidewall-Soil Lift Data.xls>>

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5/8/2008

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Friday, April 18, 2008 2:04 PM
To: 'seay04@leaco.net'
Cc: Price, Wayne, EMNRD; 'Pat Wise'; 'hsncpbm@leaco.net'; 'cjbryant@paalp.com'
Subject: FW: Plains CS Caylor Release Site (AP-052)

Dear Mr. Seay:

Per our telephone conversation today, I am forwarding you this email message regarding the OCD recommendations for approval of the Abatement Plan (AP-052) for the CS Caylor Release Site. Please let me know if you have any comments regarding these recommendations. Thank you.

Edward J. Hansen
Hydrologist
Environmental Bureau
Oil Conservation Division
505-476-3489

-----Original Message-----

From: Hansen, Edward J., EMNRD
Sent: Wednesday, February 20, 2008 10:07 AM
To: 'Camille J Reynolds'
Cc: Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Plains CS Caylor Release Site (AP-052)

Dear Ms. Reynolds,

The New Mexico Oil Conservation Division (NMOCD) has reviewed your submitted the Abatement Plan (AP-052) Response, dated September 5, 2006, for the 'CS Caylor Release Site. To expedite the approval process the NMOCD recommends that Plains amend its Abatement Plan (AP-052) as follows:

1. The soil remediation programs must specify that the soils intended for use as backfill will have a TPH concentration of no more than 100 mg/Kg.
2. The groundwater remediation program must specify that a more aggressive non-aqueous phase liquid (NAPL) removal program (which may include recovery wells). This must also include the method(s) for treatment and / or disposal of the oil and groundwater removed.
3. The abatement schedule must be revised to include the more aggressive NAPL removal program.

Please submit the amended Abatement Plan (AP-052) within 15 days to the NMOCD.

If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

-----Original Message-----

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]
Sent: Friday, February 15, 2008 10:59 AM
To: Hansen, Edward J., EMNRD
Subject: Plains CS Caylor Release Site

Ed,

Pursuant to our conversation upon NMOCD approval Plains will conduct soil remediation activities at the CS Caylor release site. EPI on behalf of Plains submitted the Abatement Plan Response dated September 5, 2006 NMOCD Ref# AP-052 which responds to the conditions

and understandings outlined in the NMOCD Abatement Plan approval letter dated January 18, 2006.

Please contact me with any questions or comments.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

office: 505/396-3341
fax: 505/396-2754
cellular: 505/441-0965

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Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, March 13, 2008 11:22 AM
To: 'Camille J Reynolds'
Cc: Price, Wayne, EMNRD; 'jpdann@paalp.com'
Subject: RE: Plains CS Caylor Release Site (AP-052)

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (OCD) has reviewed the Amendment to Abatement Plan (AP-052) for the Plains CS Caylor Release Site (dated March 5, 2008). The OCD hereby conditionally approves Plains request for a 45 day extension to finalize options for groundwater remediation and the schedule for such provided that:

1. Plains Pipeline immediately starts a more aggressive (i.e., continuous) NAPL removal program at the site.
2. Plains Pipeline installs the proposed groundwater monitoring well at the site this month. Plains shall commence quarterly groundwater monitoring immediately after the wells have been properly developed and submit analytical results to the OCD on a quarterly basis.
3. Plains Pipeline will immediately schedule and implement the proposed soil backfill plan.
4. Plains Pipeline submits to the OCD a revised Amendment to the Abatement Plan (AP-052) within 45 days.

Please contact me at 505-476-3489 if you have any questions regarding this matter.

Edward J. Hansen
Hydrologist
Environmental Bureau

-----Original Message-----

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]
Sent: Tuesday, March 04, 2008 2:14 PM
To: Hansen, Edward J., EMNRD
Subject: Plains CS Caylor Release Site (AP-052)

Mr. Hansen,

Please find attached below for your approval the Abatement Plan Amendment as requested for the Plains CS Caylor Release Site NMOCD Ref# AP-052. This is a response to the recommendations set forth in the NMOCD e-mail dated February 20. A hard copy will follow.

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

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

office: 505/396-3341
fax: 505/396-2754
cellular: 505/441-0965

<<Cayler Addendum Letter.doc>> <<CS Cayler-Proposed Well PDF (03-03-2008).pdf>>

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Hansen, Edward J., EMNRD

AP-52

From: Hansen, Edward J., EMNRD
Sent: Wednesday, February 20, 2008 10:07 AM
To: 'Camille J Reynolds'
Cc: Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Plains CS Caylor Release Site (AP-052)

Approval

2008

Dear Ms. Reynolds,

The New Mexico Oil Conservation Division (NMOCD) has reviewed your submitted the Abatement Plan (AP-052) Response, dated September 5, 2006, for the CS Caylor Release Site. To expedite the approval process the NMOCD recommends that Plains amend its Abatement Plan (AP-052) as follows:

1. The soil remediation programs must specify that the soils intended for use as backfill will have a TPH concentration of no more than 100 mg/Kg.
2. The groundwater remediation program must specify that a more aggressive non-aqueous phase liquid (NAPL) removal program (which may include recovery wells). This must also include the method(s) for treatment and / or disposal of the oil and groundwater removed.
3. The abatement schedule must be revised to include the more aggressive NAPL removal program.

Please submit the amended Abatement Plan (AP-052) within 15 days to the NMOCD.

If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

-----Original Message-----

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]
Sent: Friday, February 15, 2008 10:59 AM
To: Hansen, Edward J., EMNRD
Subject: Plains CS Caylor Release Site

Ed,

Pursuant to our conversation upon NMOCD approval Plains will conduct soil remediation activities at the CS Caylor release site. EPI on behalf of Plains submitted the Abatement Plan Response dated September 5, 2006 NMOCD Ref# AP-052 which responds to the conditions and understandings outlined in the NMOCD Abatement Plan approval letter dated January 18, 2006.

Please contact me with any questions or comments.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

office: 505/396-3341
fax: 505/396-2754
cellular: 505/441-0965

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Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, February 21, 2008 10:48 AM
To: 'Pat Wise'
Cc: 'Patrick B. McMahon, alternate for Pat Wise'; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD
Subject: FW: Plains CS Caylor Release Site (AP-052)

Dear Mr. Wise,

I am copying you on this email that I recently sent to Plains Pipeline. This pertains to a release of crude oil near the Lovington well field. We wanted to let you know that we are requiring a more aggressive oil removal program at this site. You can view the progress reports at our website:

<http://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pEEM0601845699>

If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau
Oil Conservation Division
State of New Mexico Energy, Minerals and Natural Resources Department

-----Original Message-----

From: Hansen, Edward J., EMNRD
Sent: Wednesday, February 20, 2008 10:07 AM
To: 'Camille J Reynolds'
Cc: Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: Plains CS Caylor Release Site (AP-052)

Dear Ms. Reynolds,

The New Mexico Oil Conservation Division (NMOCD) has reviewed your submitted the Abatement Plan (AP-052) Response, dated September 5, 2006, for the CS Caylor Release Site. To expedite the approval process the NMOCD recommends that Plains amend its Abatement Plan (AP-052) as follows:

1. The soil remediation programs must specify that the soils intended for use as backfill will have a TPH concentration of no more than 100 mg/Kg.
2. The groundwater remediation program must specify that a more aggressive non-aqueous phase liquid (NAPL) removal program (which may include recovery wells). This must also include the method(s) for treatment and / or disposal of the oil and groundwater removed.
3. The abatement schedule must be revised to include the more aggressive NAPL removal program.

Please submit the amended Abatement Plan (AP-052) within 15 days to the NMOCD.

If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

2/21/2008

-----Original Message-----

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]
Sent: Friday, February 15, 2008 10:59 AM
To: Hansen, Edward J., EMNRD
Subject: Plains CS Caylor Release Site

Ed,

Pursuant to our conversation upon NMOCD approval Plains will conduct soil remediation activities at the CS Caylor release site. EPI on behalf of Plains submitted the Abatement Plan Response dated September 5, 2006 NMOCD Ref# AP-052 which responds to the conditions and understandings outlined in the NMOCD Abatement Plan approval letter dated January 18, 2006.

Please contact me with any questions or comments.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

office: 505/396-3341
fax: 505/396-2754
cellular: 505/441-0965

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