

AP - 54

STAGE 1 & 2 WORKPLANS

DATE:

3-5-08

Hansen, Edward J., EMNRD

From: Camille J Reynolds [cjreynolds@paalp.com]
Sent: Wednesday, March 05, 2008 7:23 AM
To: Hansen, Edward J., EMNRD
Subject: Plains HobbsJunction Mainline Release Site (AP-054)

Attachments: Junction Addendum Letter.doc; Hobbs Junction Main Line PDF (03-03-2008).pdf



Junction Addendum Letter.doc (...)
Hobbs Junction Main Line PDF (...)

Mr. Hansen,

Please find attached below for your approval the Abatement Plan Amendment as requested for the Plains Hobbs Junction Mainline Release Site NMOCD Ref# AP-054. 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

<<Junction Addendum Letter.doc>> <<Hobbs Junction Main Line PDF (03-03-2008).pdf>>

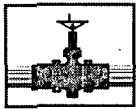
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PLAINS PIPELINE

March 5, 2008

Mr. Edward Hansen
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Plains Pipeline, L.P. Hobbs Junction Mainline (Plains SRS#2003-00017)
NMOCD Reference # AP-054
UL-M (SW¼ of the SW¼) of Section 26, T18S, R37E
Latitude: 32° 42' 40.85"N and Longitude: 103° 13' 42.01"W
Landowner: State of New Mexico and Ms. Faye Klein
Lea County, New Mexico

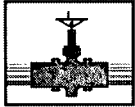
Dear Mr. Hansen:

Plains Pipeline, L.P. (Plains), submits this response to the email sent by the New Mexico Oil Conservation Division (OCD) dated February 20, 2008. This Addendum corresponds to the Stage 1 and Stage 2 Abatement Plan dated August 2004. The recommendations are reiterated below followed by the Plains response.

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."

Response: Plains is currently researching different soil remediation options to achieve the OCD's request. Safety and structural integrity issues are being researched due to the presence of gas and crude oil pipelines, electrical power lines, and cathodic lines that will be encountered during any potential excavation. The options being researched for soil remediation are as follows:

- ! Soil removal to a depth of 30 feet below ground surface, upon engineering approval
- ! In situ treatment by Chemical Induced Oxidation (CIO)
- ! In situ treatment by Soil Vapor Extraction (SVE) inducing a vacuum from various extraction point
- ! Combination of soil removal to a depth of 15 to 20 feet and introducing CIO to the subsurface below the caliche zone



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The excavated soils that exhibit TPH concentrations less than 100 mg/kg will be utilized for backfill material, if approved by the OCD. The remaining soil, that contains TPH concentrations above 100 mg/kg, will be transported offsite to a licensed disposal facility. If additional soil is required, Plains will purchase it locally.

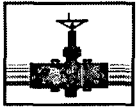
2. "The groundwater remediation program must specify that a more aggressive non-aqueous phase liquid (NAPL) removal program (which may include recovery wells) will be implemented. This must also include the method(s) for treatment and/or disposal of the oil and groundwater removed."

Response: Plains is experiencing on-going negotiation and logistical delays in evaluating viable groundwater disposal options. Additionally, Plains continues to research the optimum long term remediation method to achieve the OCD's request. At this time, it is anticipated an additional three or four total fluid pumps will be added to the existing total fluid pump recovery program. These total fluid pumps will be utilized in the source area to accommodate a more aggressive NAPL removal program. Subsequent to Plains selection of a viable treatment and/or disposal option, a specific Work Plan will be provided to the OCD for approval. The options being researched for groundwater treatment and/or disposal are as follows:

- ! Set an additional two to four frac tanks onsite to gravity separate the NAPL and groundwater and utilize vacuum trucks for disposal
- ! Install a groundwater remediation system that will separate the NAPL and treat the groundwater onsite for re-injection into the shallow aquifer, upon approval
- ! Utilize a commercial injection well, upon approval, and pump the removed groundwater to the well for disposal
- ! Install a groundwater remediation system that will separate the NAPL and utilize carbon vessels to treat the removed groundwater and irrigate the surrounding area with the treated groundwater, upon approval

3. "The groundwater monitoring program must specify that at least two additional groundwater monitoring wells will be installed downgradient of the existing monitoring wells (including the proposed well locations)."

Response: As requested, two monitor wells will be installed downgradient from the existing monitor wells in March 2008. One monitor well will be located approximately 200 feet east of monitor well MW-21. The other requested monitor well will be installed approximately 200 feet southeast of monitor well MW-22.



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4. "The abatement schedule must be revised to include the more aggressive NAPL removal program and the installation of the additional groundwater monitoring wells."

Response: Plains will install two additional monitor wells as requested during March 2008. Due to the complex nature of evaluating the structural integrity and safety of the requested soil excavation/remediation plan and groundwater remediation/disposal issues, Plains requests a 45 day extension in order to further evaluate site-specific soil and groundwater options for this site.

If you have any questions or require further information, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains Pipeline

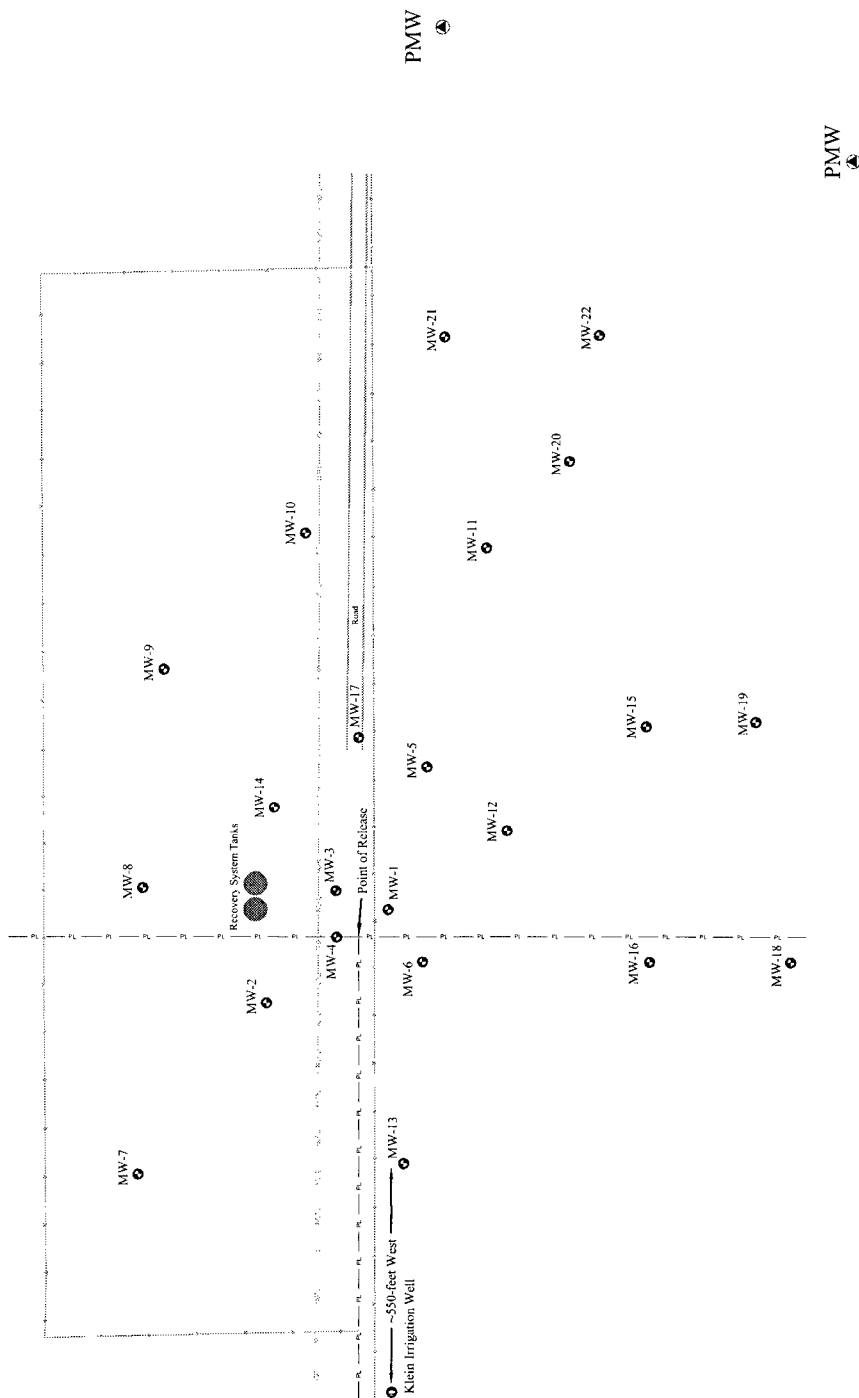
Enclosure



0 60 120
Scale in Feet

Legend

- - Monitor Well
- ▲ - Proposed Monitor Well
- - Underground Cable
- DP — - Overhead Powerline



Hobbs Junction Mainline #2003-00017

SW 1/4, SW 1/4, of Sec. 26, T18S, R37E

Lea County, New Mexico

Proposed Monitor Well Location

Date: 03/03/2008

Scale: 1" = 120'

Drawn By: WDR

