

AP - 41

ANNUAL MONITORING REPORT

YEAR(S):
2007



**2007 ANNUAL REPORT
HUGH GATHERING 090402**

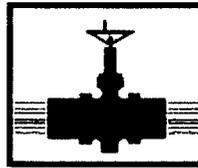
PLAINS SRS NO.: 2002-10235

UL-P, SECTION 11, T21S, R37E

Lea County, New Mexico

NMOCD No. AP-0041

PREPARED FOR



PLAINS
ALL AMERICAN
PIPELINE, L.P.

333 CLAY STREET, SUITE 1600
HOUSTON, TEXAS 77002

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PREMIER

ENVIRONMENTAL SERVICES, INC
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Project No. 207032.00

March 2008

Chan Patel
Senior Project Manager

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Environmental Bureau
Oil Conservation Division



**PLAINS
ALL AMERICAN**

March 27, 2008

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MAR 31 2008

Environmental Bureau
Oil Conservation Division

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

Re: Plains All American – Annual Monitoring Reports
4 Sites in Lea County, New Mexico

Dear Mr. Hansen:

Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico Oil Conservation Division (NMOCD). In accordance with the rules and regulations of the NMOCD, Plains All American hereby submits our Annual Monitoring reports for the following sites:

DS Hugh	Section 26, Township 21 South, Range 37 East, Lea County
Vacuum to Jal 14" Mainline #3	Section 35, Township 21 South, Range 37 East, Lea County
Vacuum to Jal 14" Mainline #5	Section 2, Township 22 South, Range 37 East, Lea County
Hugh Gathering	Section 11, Township 21 South, Range 37 East, Lea County

Premier prepared these documents and has vouched for their accuracy and completeness, and on behalf of Plains All American, I have personally reviewed the documents and interviewed Premier in order to verify the accuracy and completeness of these documents. It is based upon these inquiries and reviews that Plains All American submits the enclosed Annual Monitoring Reports for the above facilities.

If you have any questions or require further information, please contact me at (432) 686-1769.

Sincerely,

Daniel Bryant
Environmental & Regulatory Compliance Specialist
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

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Appendix D C-141 NMOCD Release Notification Form

Distribution

DISCLAIMER

Premier has examined and relied upon the file information provided by Plains. Premier has not conducted an independent examination of the information contained in the Plains files; furthermore, we assume the genuineness of the documents reviewed and that the information provided in these documents to be true and accurate. Premier has prepared this report using the level of care and professionalism in the industry for similar projects under similar conditions. Premier will not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time this report was prepared. Premier believes the conclusions stated herein are factual, but no guarantee is made or implied.

1.0 INTRODUCTION

1.1 Objectives and Site Background

This report includes a summary of activities completed during 2006 at the Hugh Gathering Site, located in Unit Letter P (the SE¼ of the SE¼) of Section 11, T21S, R37E, of Lea County, New Mexico, approximately 3 miles northeast of Eunice, New Mexico (Figure 1, Appendix A, latitude 32°29'11.007"N and longitude 103°07'33.864"W). Premier was retained by Plains Pipeline L.P. (Plains) to complete remediation and reporting activities for delineation and remediation undertaken at the Hugh Gathering Site, SRS No. 2002-10235. The release was initially reported internally to be less than 1 barrel (bbl) of crude oil because of the small extent surface impact; however, during replacement of the line EOTT Energy Pipeline (EOTT) upgraded the release to 50 bbls. The initial response notification form (Form No. C-141, Appendix D), prepared by Plains, provides documentation of reporting the release to Larry Johnson with the New Mexico Oil Conservation Division (NMOCD). The leak was apparently caused by corrosion from a 6" steel pipeline which was replaced, tested and put back into service. The crude oil release volume was estimated to be approximately 50 barrel (bbls) with no crude oil recovered.

1.2 Previous Environmental Investigations

At the time of the intital release, the pipeline was owned by EOTT Energy Pipeline (the EOTT name changed to Link Energy in October 2003) and as of April 1, 2004, Plains Pipeline, L.P. (Plains) purchased the assets from Link Energy. According to Environmental Plus, Inc. (EPI) documents, this May 2002 release resulted in crude oil impacting two areas on either side of New Mexico State Road 18 (NMSR 18), the East and West release areas. Approximately 100 square feet (10' x 10') of surface area was initially impacted, associated with a raised vent connected to the under highway conduit on the west side of NMSR 18. Impacted soils to a depth of approximately 4' feet below ground surface (bgs) were excavated and disposed of in an NMOCD approved landfarm. Soil and groundwater delineation activities were initiated in September 2002 when phase separated hydrocarbons (PSH) were found in groundwater from monitor well (MW-1) at approximately 60 feet bgs. The East side of the release was delineated with the installation of borings BH1 to BH8. The horizontal extent of soil impact appears to extend radially approximately 25 feet from the point of release.. The vertical extent of soil impact was delineated to approximately 25 feet below ground surface (bgs).

In June and July 2003, with NMOCD approval, groundwater monitoring wells MW-2, MW-3, MW-4 and MW-5 were installed. Recovery of PSH from groundwater monitoring wells MW-1, MW-2 and MW-4 was initiated on a weekly basis and in August 2003, daily recovery began using a gasoline powered eductor type PSH recovery system.

In 2004, with NMOCD approval, groundwater monitoring wells MW-6, MW-7, MW-8, MW-9, MW-10, MW-11 and MW-12 were installed to further delineate the horizontal extent of PSH and dissolved phase hydrocarbons. PSH was observed in groundwater monitoring

wells MW-8, MW-9 and MW-10. Dissolved phase hydrocarbons consisting of benzene, toluene, ethylbenzene, and total xylenes (BTEX) and polynuclear aromatic hydrocarbons (PAH) were detected in the 2004 analytical results from groundwater monitoring well MW-5. BTEX and PAH were not detected at or above the respective method detection limits in 2004 samples from groundwater monitoring wells MW-6, MW-7, MW-11 and MW-12 located on the site periphery. PSH was present in groundwater monitoring wells MW-1, MW-2, MW-3, MW-4, MW-8, MW-9 and MW-10 with thicknesses ranging from 11.13 feet to 0.25 feet.

In May 2005, Plains submitted a Stage 1 and Stage 2 Abatement Plan (Abatement Plan) to the NMOCD for approval (prepared by EPI). After a public comment period, the NMOCD subsequently approved implementation of the Abatement Plan in a November 5, 2005 letter to Plains.

Site surveillance continued in 2005 with bi-weekly inspections, monthly monitoring of groundwater and PSH levels and quarterly sampling of groundwater monitoring wells not impacted with PSH. In August 2005, because of declining PSH thicknesses and production rates, PSH recovery was changed from daily deployment of the PSH recovery system to weekly hand bailing of PSH impacted wells and installation of absorbent socks. In 2005, approximately 550 gallons of crude oil were recovered and reintroduced into the Plains pipeline system. The total recovery volume as of December 31, 2005, including the 600 gallons recovered from 2002 through 2004, was approximately 1,150 gallons.

During June and July 2006, EPI conducted a subsurface investigation at the site which included the installation of six borings (BH9 through BH14) on the east side of Highway 18. During December 2006, EPI conducted excavation, confirmation soil sampling, treatment of residual soils using MicroBlaze Spill Control[®] (MicroBlaze), installation of a passive vapor recovery system, clay liner placement, and backfilling of the site on the West side of NMSR 18 (the Bryant Property). Details of these field activities were presented in the **2006 Annual Report**.

2.0 REGULATORY FRAMEWORK

In New Mexico, the NMOCD oversees and regulates oil, gas and geothermal activities, including enforcement and compliance with environmental regulations. Guidance for cleanup of crude oil releases is provided in the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* (August 13, 1993) document. Primary contaminants, or chemicals of concern (COCs), associated with crude oil releases include TPH and BTEX. Guidelines for these COCs in soil are evaluated based on a Site ranking system. The ranking system estimates the likelihood of exposures to the COCs and is based on the following three parameters to protect groundwater and surface water resources:

- Depth to groundwater.

- Wellhead protection area.
- Distance to surface water body.

2.1 NMOCD Site Ranking

Based on the proximity of the Site to area water wells, surface water bodies, and depth to groundwater, the Site has a NMOCD ranking score of **20 points**, with the soil remedial goals specified below in the Site Ranking Matrix.

Site Ranking Matrix

1. Groundwater		2. Wellhead Protection Area	3. Distance to Surface Water Body
If Depth to GW <50 feet: <i>20 points</i>		If <1000' from water source, or, <200' from private domestic water source: <i>20 points</i>	<200 horizontal feet: 20 points
If Depth to GW 50 to 99 feet: <i>10 points</i>			200-100 horizontal feet: 10 points
If Depth to GW >100 feet: <i>0 points</i>			>1000 horizontal feet: 0 points
<i>Groundwater Score: 20</i>		<i>Wellhead Protection Area Score: 0</i>	<i>Surface Water Score: 0</i>
Site Rank (1+2+3) = 20+0+0=20			
Total Site Ranking Score and Initial Guidance Cleanup Concentrations			
Parameter	20 or >	10	0
Benzene	10 ppm	10 ppm	10 ppm
BTEX	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

2.2 Site Remediation Goals

Based on data gathered from previous investigations, guidelines outlined in EPI's **Abatement Plan**, and the November 5, 2005 NMOCD Remediation Plan approval letter, the following site-specific remediation standards were established and met based on the excavation activities completed in 2006:

- TPH target concentration of 1,000 mg/kg, benzene target concentration of 10 mg/kg and total BTEX target concentration of 50 mg/kg in excavation wall confirmation soil samples from surface to 8 feet bgs.
- TPH target concentration of 100 mg/kg, benzene target concentration of 10 mg/kg and total BTEX target concentration of 50 mg/kg in excavation wall confirmation soil samples from 8 feet bgs to groundwater at 58 feet bgs.
- For the base of the excavation, NMOCD approved a risk-based closure as an alternative to total removal of soils impacted above the site specific NMOCD

remedial goals. The installation of an engineered barrier to prevent surface water infiltration and migration to groundwater, eliminating the groundwater exposure pathway (vertical transport mechanism) with a compacted clay or 20-mil high density polyethylene liner was required for a risk-based closure.

The remedial goals that remain are the removal of free phase hydrocarbons in groundwater and remediation of dissolved phase hydrocarbons in accordance with the New Mexico Water Quality Control Commission (WQCC) groundwater standards for benzene (10.0 microgram per liter ($\mu\text{g/L}$)), toluene (750 $\mu\text{g/L}$), ethylbenzene (750 $\mu\text{g/L}$) and total xylene (620 $\mu\text{g/L}$) and a risk-based soil closure for these impacted soils on the east side of NMSR18.

3.0 2007 SOIL REMEDIATION ACTIVITIES

The objectives presented in the approved *Abatement Plan*, (November 5, 2005) to excavate, where possible, contaminated soil in the sidewalls of the excavation and to isolate and control residual COCs in the soils in the base of the excavation to prevent further impact to groundwater, were completed in 2006. All excavation, remediation (liner placement and soil treatment) and backfill activities were completed at the site on the West side of NMSR 18 (the Bryant Property)

Remediation on the East side remains to be completed since property access to conduct the NMOCD-approved remediation activities has been denied by the landowner (McNeill Property).

3.1 Passive Soil Vapor Ventilation System

The passive organic vapor ventilation system installed in the floor of the excavation to promote attenuation and remediate impacted soil isolated below the compacted clay barrier is still in operation. PID readings taken from the exhaust point indicate hydrocarbon vapors are still being removed by the passive soil vapor extraction system.

The system consists of two equally spaced trenches, 2' wide x 2' deep x 25' long, in the impacted portion of the floor of the excavation and partially filled with coarse sand. The slotted 4" PVC pipe was wrapped with an inert permeable fabric to prevent sand from filling the laterals, was laid on top of the sand pack and the trenches were brought to grade with additional coarse sand. A plastic liner was placed over the trench to prevent the compacted clay from entering the gravel in the trench. A riser was installed at the east end of each slotted lateral to approximately 3-feet above the site grade. A 14-inch diameter wind turbine was permanently affixed to the 4" PVC riser. The turbines, when rotated by the wind, create a negative pressure inside the slotted laterals, pulling vadose zone vapors into the system and exhausting the vapor to the atmosphere.

4.0 2007 GROUNDWATER ACTIVITIES

4.1 2007 activities

During 2007, because of diminishing PSH thicknesses and production rates, the PSH recovery method was changed from weekly deployment of the trailer mounted eductor type PSH recovery system to weekly hand bailing of PSH impacted wells and installation of absorbent socks. Site surveillance continued in 2007 with weekly inspections and PSH removal, monthly monitoring of groundwater and quarterly sampling of groundwater monitoring wells not impacted with PSH.

4.2 Groundwater Gradient

Groundwater levels during 2007 fluctuated slightly in most of the wells. The groundwater gradient continues to trend to the southeast, determined using measurements from the groundwater monitoring wells not impacted with PSH, (i.e., MW-5, MW-6, MW-7, MW-11 and MW-12) (Figures 3A, 3B 3C and 3D, Appendix A, Table 1, Appendix B). Groundwater gradient is 0.002 ft/ft as measured across the site between monitor wells MW-6 to MW-12 and consistent with the gradient in previous years based on historical gauging data (Table 1, Appendix B).

4.3 Groundwater Sampling and Analytical Data

Groundwater monitoring wells MW-1, MW-2, MW-3, MW-4, MW-8, MW-9 and MW-10 were not sampled during 2007 due to the presence of PSH. Groundwater monitoring wells MW-5, MW-6, MW-7, MW-11 and MW-12 were sampled on March 1, June 1, September 6 and November 13, 2007. Prior to sampling, each well was purged a minimum of 3 well volumes or dry. Groundwater samples were collected and submitted under standard chain of custody protocols to a qualified, independent laboratory for quantification of benzene, toluene, ethylbenzene, and total xylenes (BTEX) (Table 2, Appendix B). Samples collected during the June 1, 2007 sampling event were also submitted for polynuclear aromatic hydrocarbons (PAHs) analysis (Table 3, Appendix B). The New Mexico Water Quality Control Commission (WQCC) groundwater standards are as follows: benzene-10.0 µg/L, toluene-750 µg/L, ethylbenzene-750 µg/L and total xylene-620 µg/L. Laboratory reports for samples collected during the 2007 groundwater sampling activities are included in Appendix C.

4.3.1 1st Quarter Groundwater Results

During 1st quarter 2007, groundwater samples were collected from the five wells without PSH or hydrocarbon sheen and analyzed for BTEX. Benzene concentrations were detected in one of five wells sampled above the method detection limit (0.00035 mg/L) and above target cleanup levels at 0.172 mg/L in monitor wells MW-5 (Figure 4A, Appendix A). All other parameters for all wells sampled were reported below target cleanup levels.

BTEX analytical results for the first quarter were compared to historical analytical data collected by EPI and previously presented in the *2006 Annual Report*, appeared to be consistent with previous years for all wells.

4.3.2 2nd Quarter Groundwater Results

Groundwater samples collected from the five wells without PSH or hydrocarbon sheen showed benzene above target cleanup levels for only monitor well MW-5 at a concentrations of 0.121 mg/L. All other parameters for all wells sampled were reported below target cleanup levels. Benzene was not detected in groundwater from MW6, MW-7 MW-11 and MW-12 (Figure 4B, Appendix A).

Groundwater samples from the five wells were also analyzed for PAHs during this quarter. The Naphthalene concentration detected in MW-5, was well below regulatory standards, but slightly above the method detection limit. (Table 3, Appendix B). All other PAH compounds were not detected in any sample above the method detection limits.

4.3.3 3rd Quarter Groundwater Results

Groundwater samples collected from the five wells without PSH or hydrocarbon sheen showed benzene concentrations above target cleanup levels for only monitor well MW-5 at 0.0477 mg/L. Other parameters for wells sampled were reported below target cleanup levels (Figure 4C, Appendix A).

4.3.4 4th Quarter Groundwater Results

Groundwater samples were collected from the five wells that did not contain PSH or hydrocarbon sheen. Benzene concentrations above target cleanup levels were found only in groundwater from monitor well MW-5 at 0.0775 mg/L. Parameters from all other wells sampled were below remediation goals (Figures 4D, Appendix A).

4.4 PSH Recovery

According to the EPI data, the total PSH recovery volume as of December 31, 2006, is approximately 1,222 gallons. In 2007, PSH recovery was limited to removal of fluids from monitor well MW-1. Due to the problems with a bend in the monitor well riser, it proved difficult to recover PSH using a bailer. An absorbent sock was lowered into the well, allowed to saturate with PSH, removed, the PSH extracted and the process repeated. In May, a mini monsoon pump was used to remove fluids from monitor well MW-1. This continued for a month before the impellers became corroded. Therefore, between mid July and the end of September, absorbents socks were again used to remove PSH. In early October, a new mini monsoon pump with stainless steel impellers was used to remove PSH. Based on visual evidence of the discharge water, after approximately 20 to 30 gallons of groundwater are removed from this well, the fluid appears free of dissolved phase hydrocarbons. In 2007, approximately 28 gallons of PSH were recovered from a

total fluid volume of about 473 gallons. PSH thickness in monitor well MW-1 has decreased from 4.5 feet in February 2007 of the year to 3.5 feet in December 2007.

5.0 CONCLUSIONS and RECOMMENDATIONS

Soil excavation activities at the Site were conducted in accordance with the Abatement Plan approved by the NMOCD in November 2005.. These activities included excavation, confirmation sampling, clay barrier installment, and backfilling activities on the west side of NMSR 18. EPI also completed treatment of residual soils using MicroBlaze Spill Control® (MicroBlaze), confirmation sampling and backfilling.

Excavation on the east side of NMSR 18 remains to be completed as property access has been denied by the landowner.

The activities completed during 2007 were related to quarterly groundwater sampling, monitoring and PSH removal. In monitor wells that did not contain PSH, monitor well MW-5 was the only well with benzene above NMOCD target levels. The benzene concentrations have decreased from 0.172 mg/L to 0.0775 mg/L. Toluene, ethylbenzene, and total xylene are all below target cleanup levels.

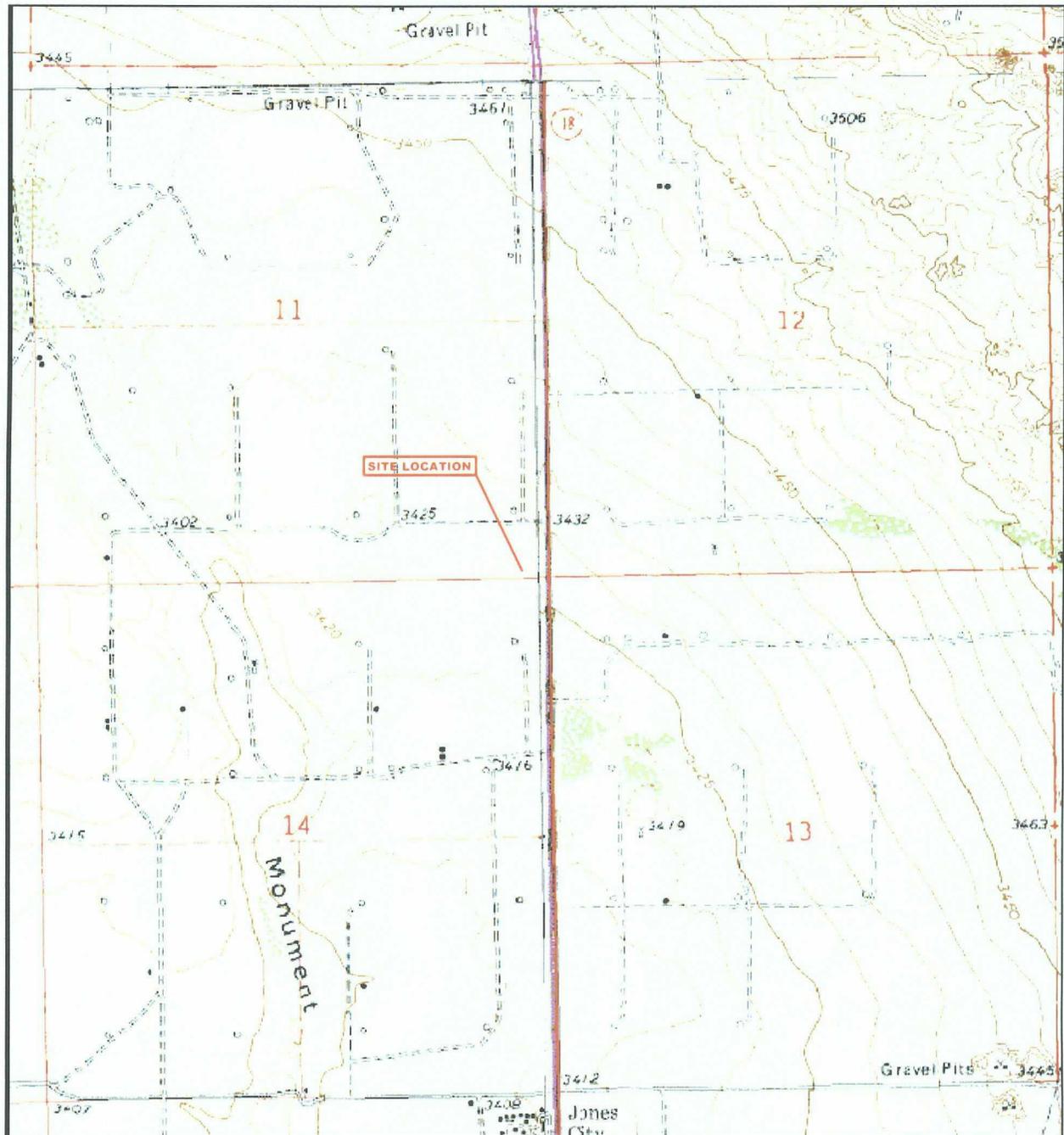
Based on the field monitoring and analytical results of groundwater samples collected and analyzed during the past year, PSH was present in monitor wells MW-2, MW-3, MW-4, MW-8, MW-9, and MW-10 with thickness ranging from sheen or 0.01 to 0.65 feet. In monitor well MW-1, PSH thickness ranged from 2.0 feet to 4.58 feet. Based on site activities completed as of December 2007, the following recommendations are made:

- Continue quarterly groundwater sampling.
- Analyze PAHs in 2008 to confirm 2nd quarter 2007 results, and reevaluate the need for PAH analysis in groundwater from all monitor wells except MW-5.
- Measure groundwater levels monthly.
- Continue manual PSH recovery weekly, and
- Implement the remainder of the Abatement Plan as approved by the NMOCD, for the area of the site located on the east side of NMSR 18, upon being granted access from the property land owner.

Appendix A Figures

Figure 1	Site Location Map
Figure 2	Site Layout Map
Figure 3A	1st Quarter 2007 Groundwater Gradient Map
Figure 3B	2nd Quarter 2007 Groundwater Gradient Map
Figure 3C	3rd Quarter 2007 Groundwater Gradient Map
Figure 3D	4th Quarter 2007 Groundwater Gradient Map
Figure 4A	1st Quarter 2007 Groundwater Analytical Data Map
Figure 4B	2nd Quarter 2007 Groundwater Analytical Data Map
Figure 4C	3rd Quarter 2007 Groundwater Analytical Data Map
Figure 4D	4th Quarter 2007 Groundwater Analytical Data Map

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Eunice NE Quadrangle
32°29'11"N Latitude & 103°07'31"W Longitude

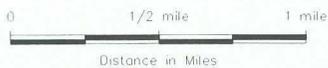


Figure 1
 Site Location Map
 Hugh Gathering
 Plains Marketing, L.P.
 SRS. #: 2002-10235
 Lea County, New Mexico

PROJ. NO: 207032.00 CK: DATE: 3/08

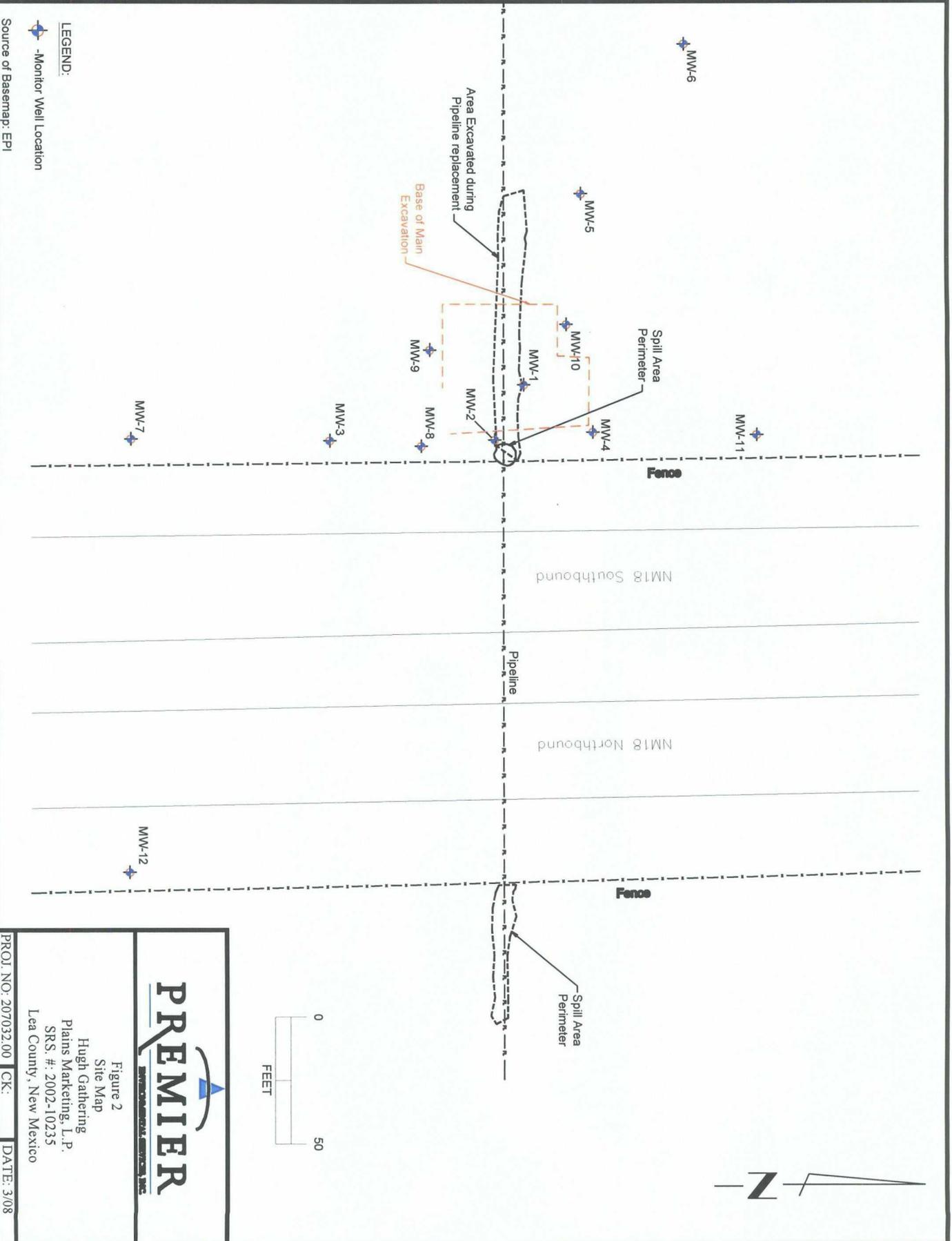




Figure 3-A

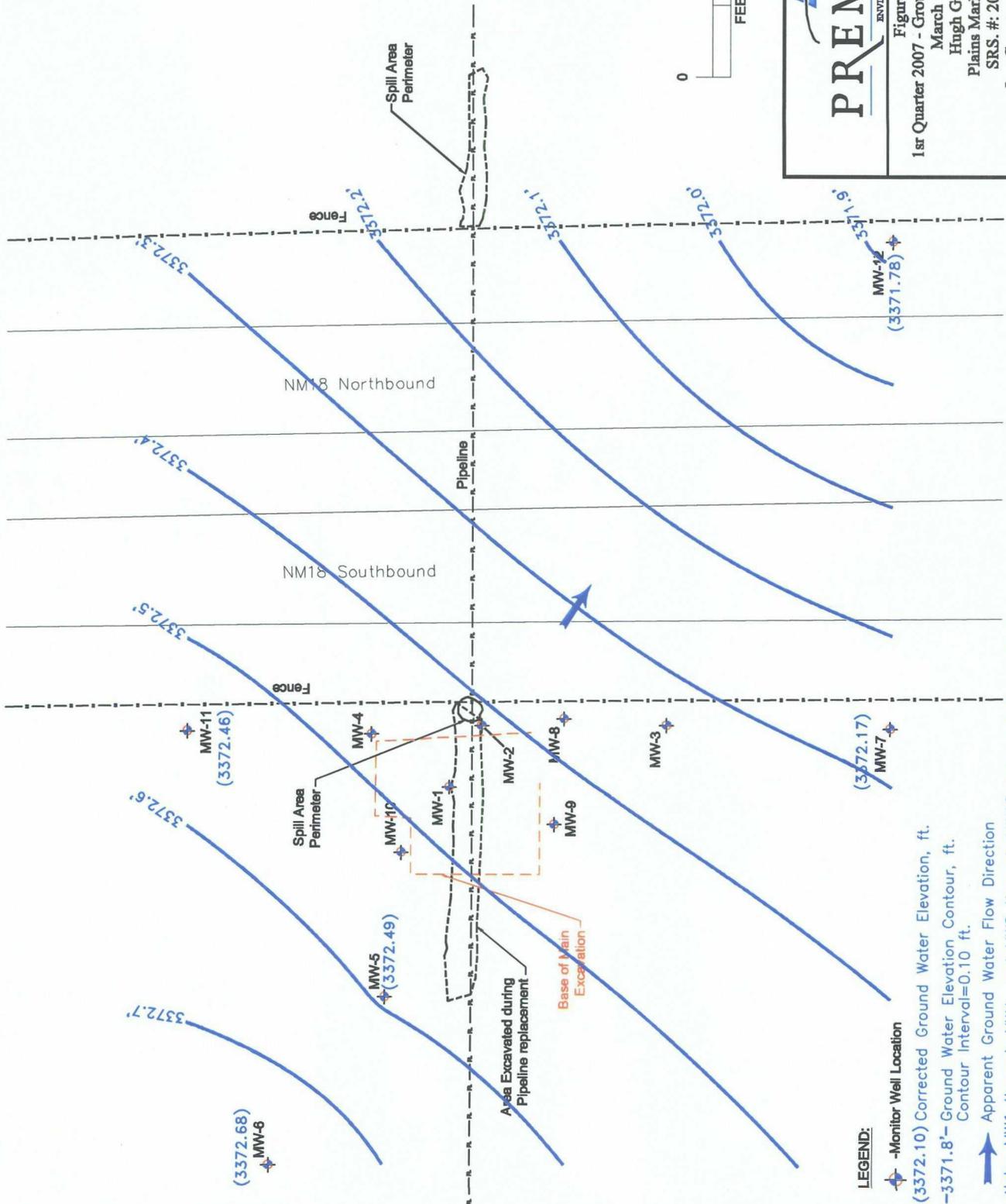
1st Quarter 2007 - Groundwater Gradient Map

March 1, 2007

Hugh Gathering
Plains Marketing, L.P.

SRS #: 2002-10235
Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



LEGEND:

◆ - Monitor Well Location

(3372.10) Corrected Ground Water Elevation, ft.

-3371.8'- Ground Water Elevation Contour, ft.
Contour Interval=0.10 ft.

➔ Apparent Ground Water Flow Direction

Note: MW1 through MW4, and MW8 through MW10 not used to contour.

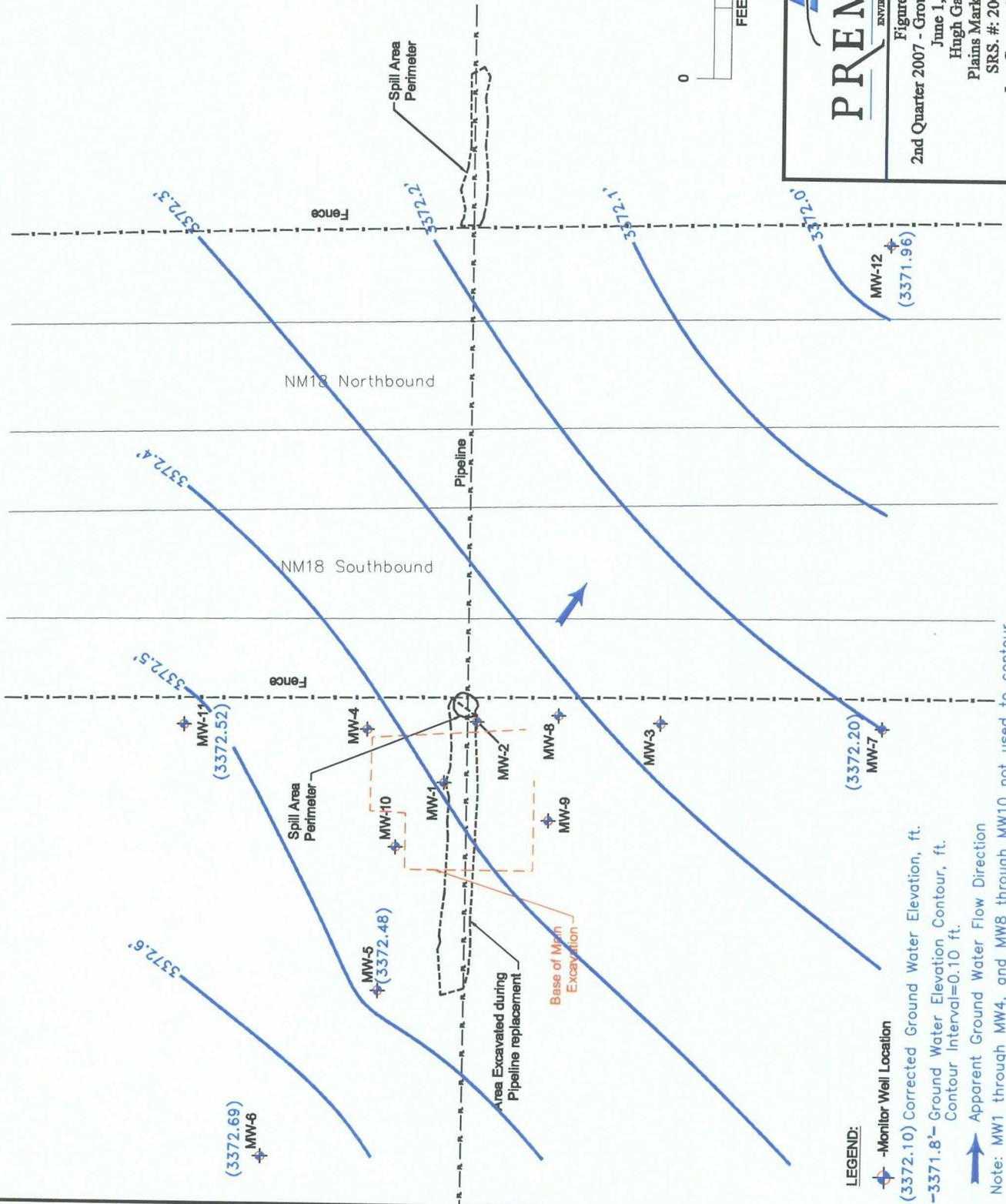
Source of Basemap: EPI



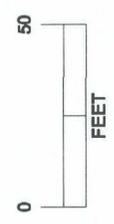
PREMIER
ENVIRONMENTAL SERVICES, INC.

Figure 3-B
2nd Quarter 2007 - Groundwater Gradient Map
June 1, 2007
Hugh Gathering
Plains Marketing, L.P.
SRS. #: 2002-10235
Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



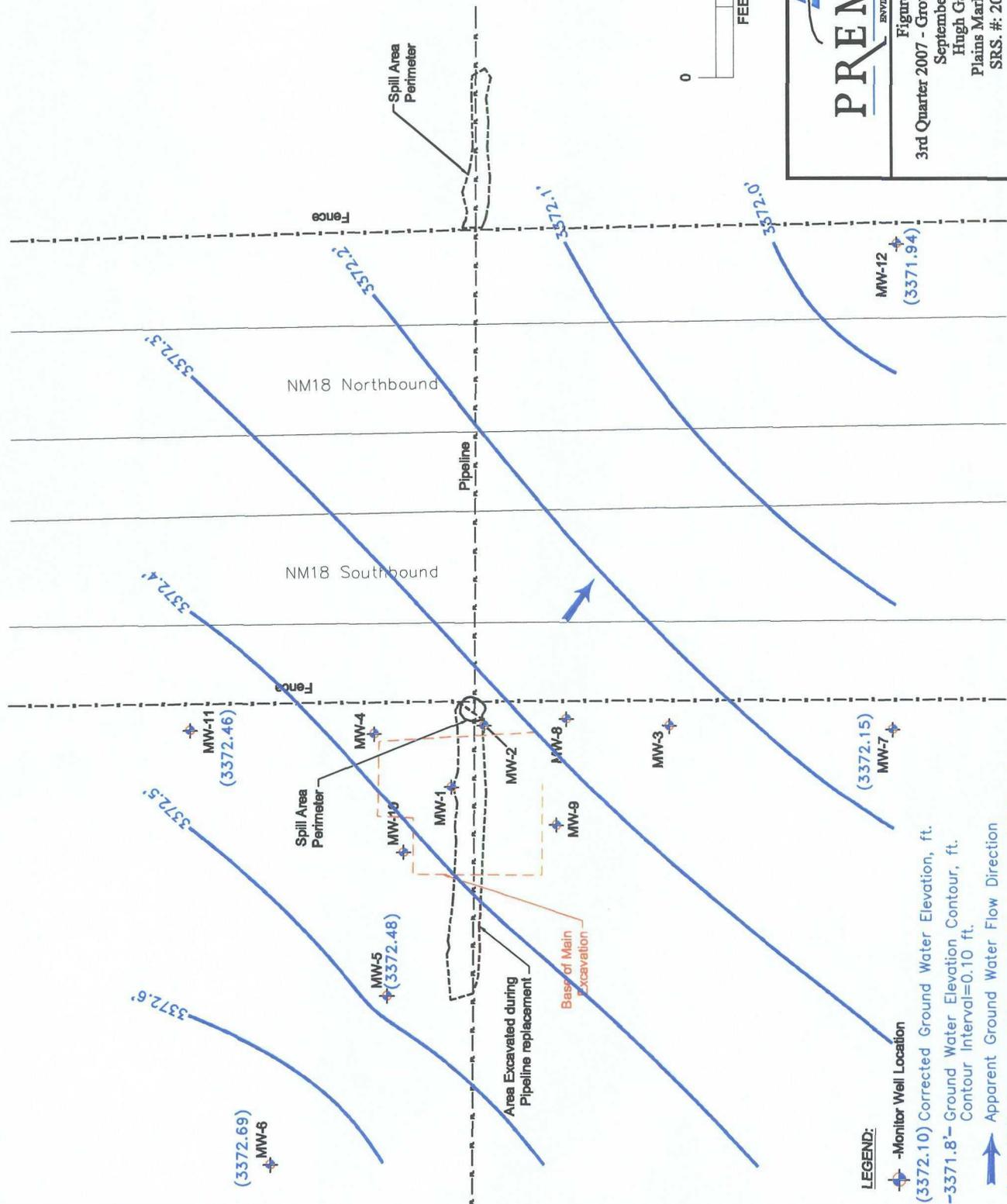
- LEGEND:**
- ✦ - Monitor Well Location
 - (3372.10) Corrected Ground Water Elevation, ft.
 - 3371.8'- Ground Water Elevation Contour, ft.
Contour Interval=0.10 ft.
 - ➡ Apparent Ground Water Flow Direction
- Note: MW1 through MW4, and MW8 through MW10 not used to contour.
Source of Basemap: EPI



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Figure 3-C
3rd Quarter 2007 - Groundwater Gradient Map
September 6, 2007
Hugh Gathering
Plains Marketing, L.P.
SRS. #: 2002-10235
Lea County, New Mexico

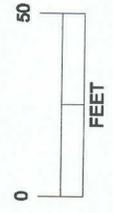
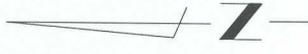
PROJ. NO: 207032.00 CK: DATE: 3/08



LEGEND:

- ★ - Monitor Well Location
- (3372.10) Corrected Ground Water Elevation, ft.
- 3371.8'- Ground Water Elevation Contour, ft. Contour Interval=0.10 ft.
- ➡ Apparent Ground Water Flow Direction

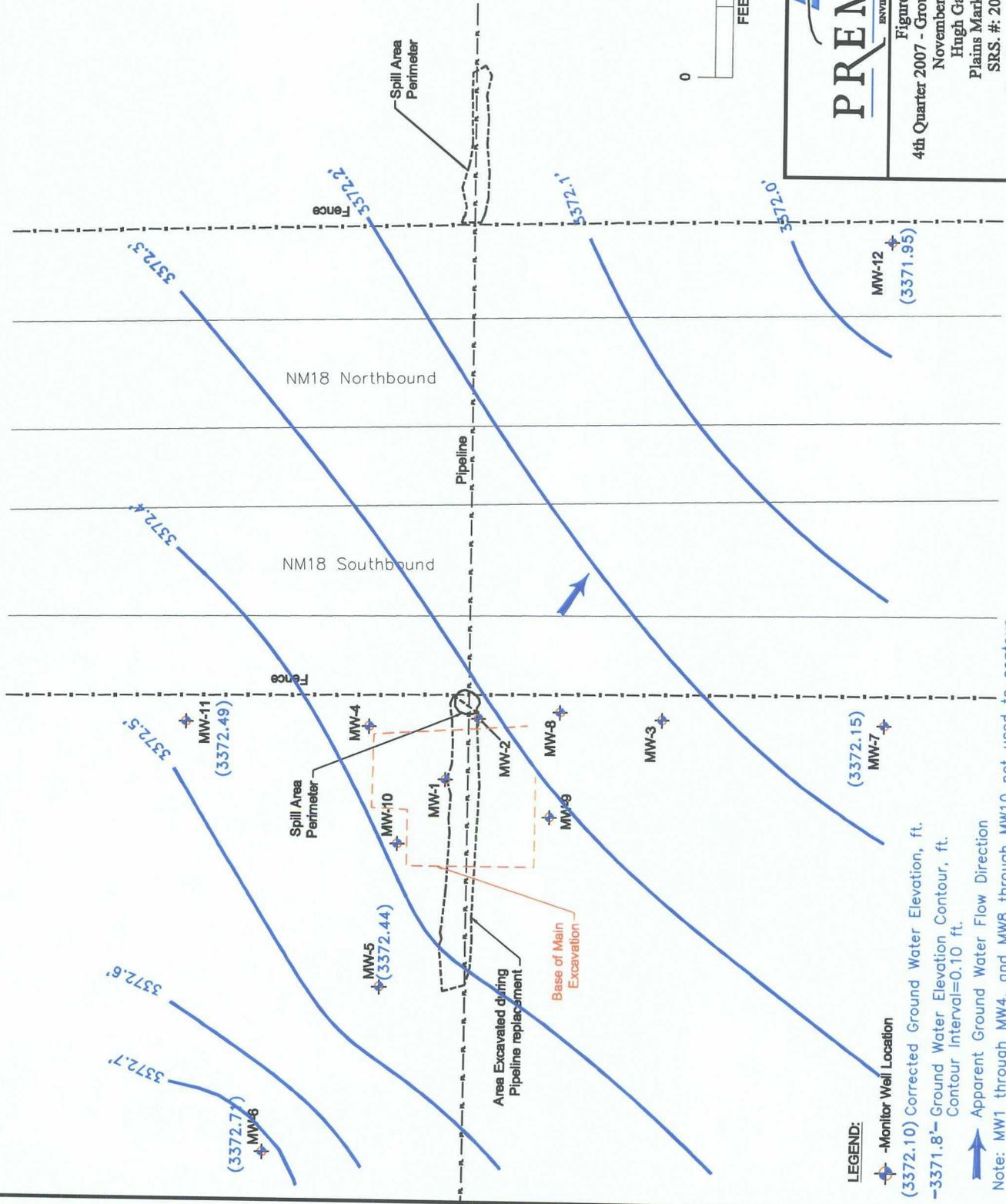
Note: MW1 through MW4, and MW8 through MW10 not used to contour.
Source of Basemap: EPI



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Figure 3-D
4th Quarter 2007 - Groundwater Gradient Map
November 13, 2007
Hugh Gathering
Plains Marketing, L.P.
SRS: #: 2002-10235
Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



- LEGEND:**
- ◆ - Monitor Well Location
 - (3372.10) Corrected Ground Water Elevation, ft.
 - 3371.8'- Ground Water Elevation Contour, ft.
Contour Interval=0.10 ft.
 - ➔ Apparent Ground Water Flow Direction
- Note: MW1 through MW4, and MW8 through MW10 not used to contour.
Source of Basemap: EPI

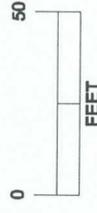
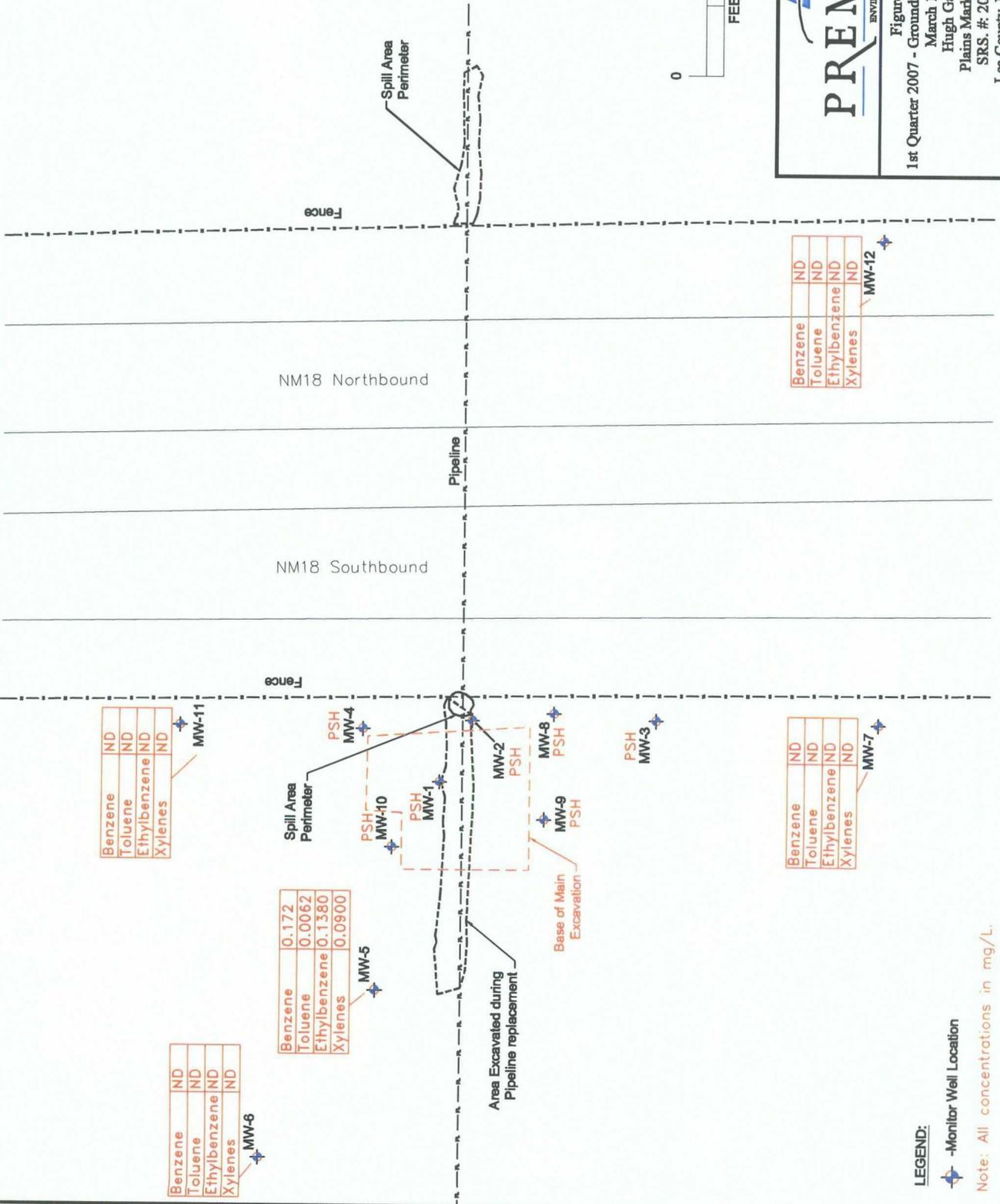


Figure 4-A
 1st Quarter 2007 - Groundwater Analytical Data Map
 March 1, 2007
 Hugh Gathering
 Plains Marketing, L.P.
 SRS. # 2002-10235
 Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

Benzene	0.172
Toluene	0.0062
Ethylbenzene	0.1380
Xylenes	0.0900

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

LEGEND:

Monitor Well Location

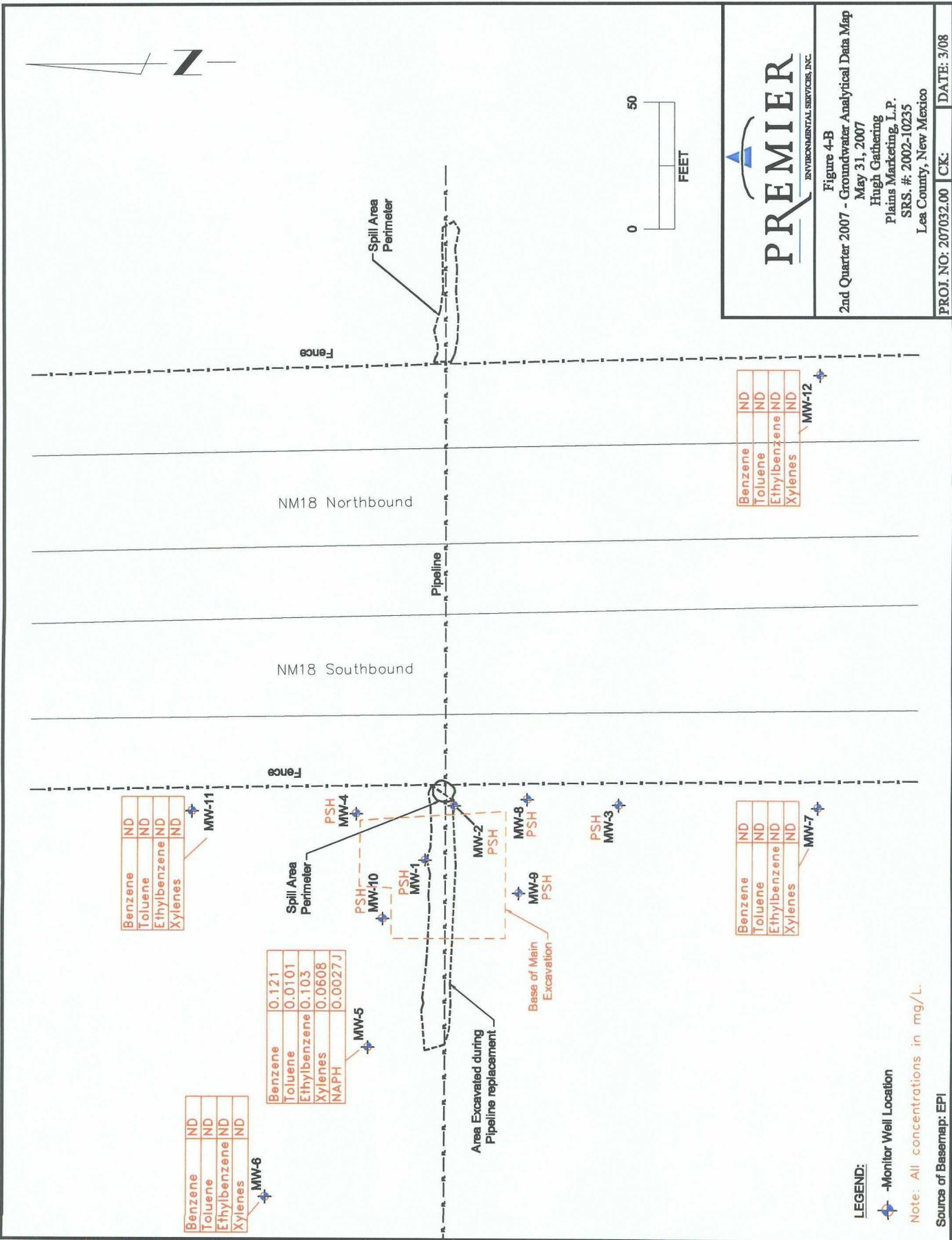
Note: All concentrations in mg/L.

Source of Basemap: EPI



Figure 4-B
 2nd Quarter 2007 - Groundwater Analytical Data Map
 May 31, 2007
 Hugh Gathering
 Plains Marketing, L.P.
 SRS. #: 2002-10235
 Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

MW-11

Benzene	0.121
Toluene	0.0101
Ethylbenzene	0.103
Xylenes	0.0608
NAPH	0.0027 J

MW-5

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

MW-6

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

MW-4

PSH

MW-10

PSH

MW-1

PSH

MW-2

PSH

MW-8

PSH

MW-9

PSH

MW-3

PSH

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

MW-7

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

MW-12

LEGEND:

◆ - Monitor Well Location

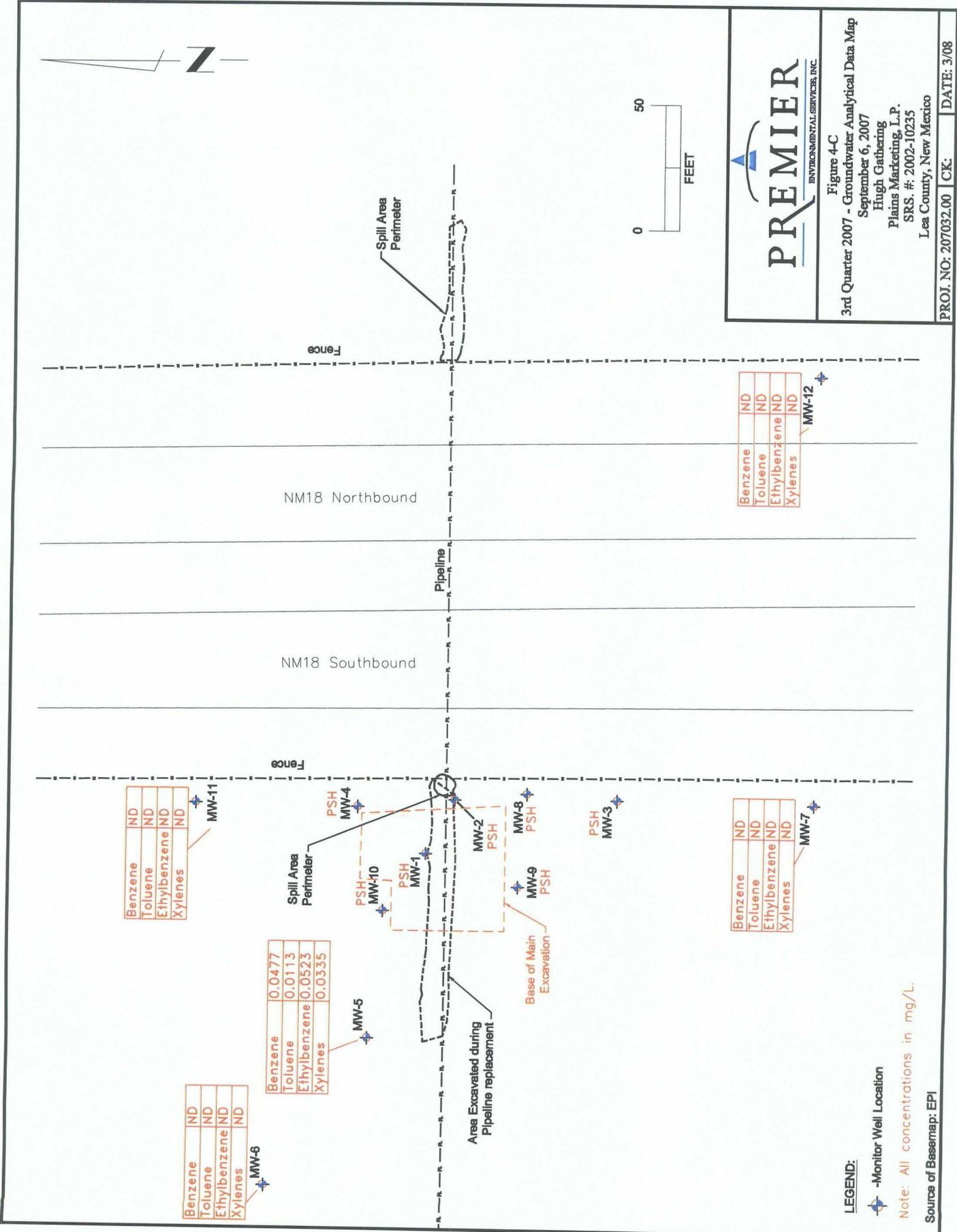
Note: All concentrations in mg/L.

Source of Basemap: EPI



Figure 4-C
 3rd Quarter 2007 - Groundwater Analytical Data Map
 September 6, 2007
 Hugh Gathering
 Plains Marketing, L.P.
 SRS. #: 2002-10235
 Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



LEGEND:

◆ - Monitor Well Location

Note: All concentrations in mg/L.

Source of Basemap: EPI



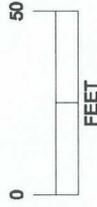
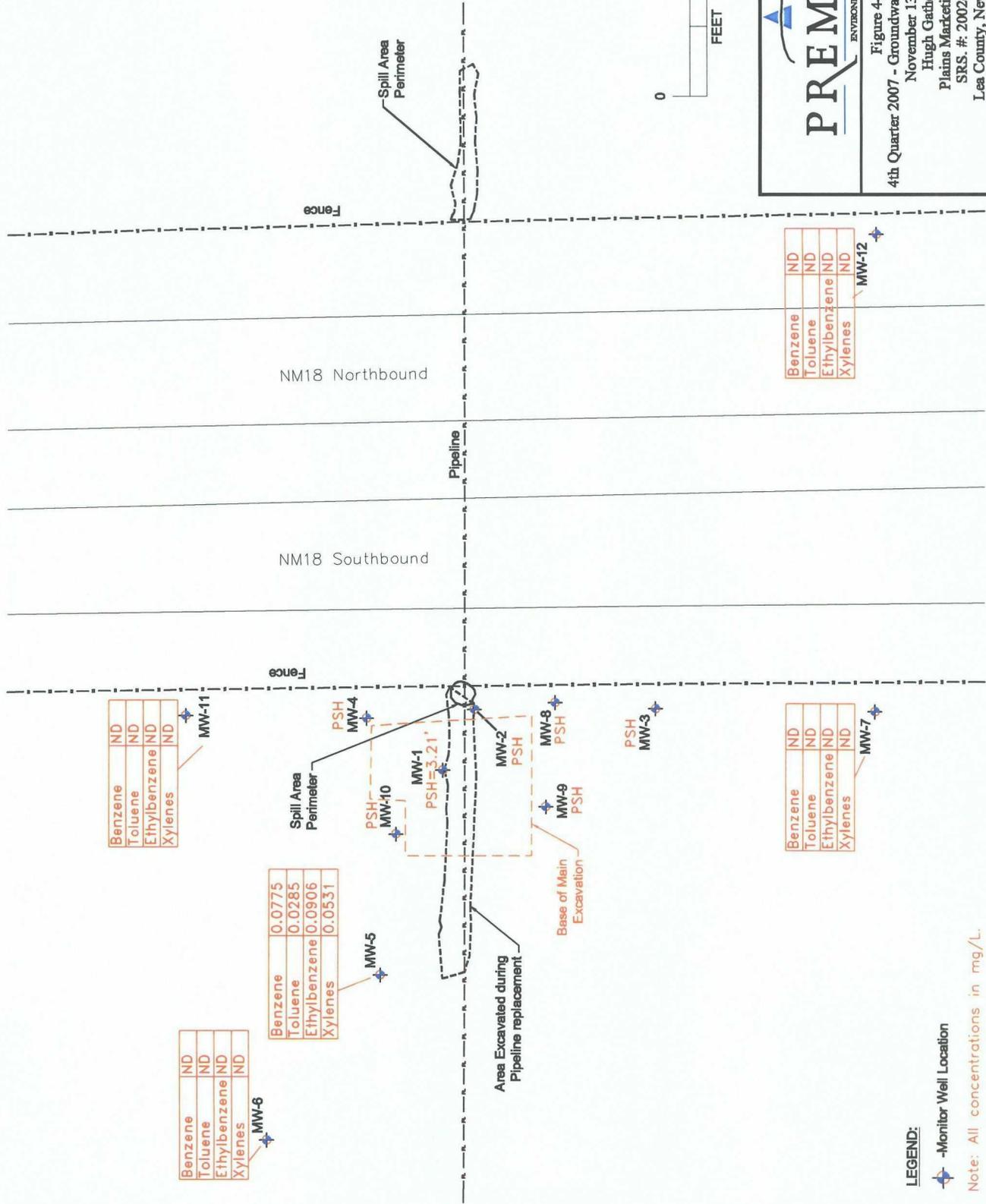


Figure 4-D
 4th Quarter 2007 - Groundwater Analytical Data Map
 November 13, 2007
 Hugh Gathering
 Plains Marketing, L.P.
 SRS. # 2002-10235
 Lea County, New Mexico

PROJ. NO: 207032.00 | CK: | DATE: 3/08



Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

Benzene	0.0775
Toluene	0.0285
Ethylbenzene	0.0906
Xylenes	0.0531

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

Benzene	ND
Toluene	ND
Ethylbenzene	ND
Xylenes	ND

LEGEND:

➡ -Monitor Well Location

Note: All concentrations in mg/L.

Source of Basemap: EPI

Appendix B Tables

Table 1 2007 Groundwater Elevation Data

Table 2 2007 Groundwater Analytical Results

Table 3 2006 and 2007 PAH Groundwater Analytical Results

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation	
MW-1	2/21/2007	3429.95		56.80	61.20	4.40			3368.75	
	3/7/2007			56.75	61.25	4.50			3368.70	
	3/14/2007			56.80	61.29	4.49		PSH 1.25 H2O .25	3368.66	
	3/14/2007			57.55	57.75	0.20			3372.20	
	3/21/2007			57.00	61.00	4.00		PSH 1 H2O .50	3368.95	
	3/21/2007			57.86	57.90	0.04			3372.05	
	3/28/2007			57.24	61.82	4.58			3368.13	
	3/28/2007			57.45	57.65	0.20	Install Sock	PSH 1 H2O .25	3372.30	
	4/3/2007			57.04	59.98	2.94	Removed Sock		3369.97	
	4/10/2007			57.02	60.01	2.99	No Sock		3369.94	
	4/18/2007			56.82	60.80	3.98	No Sock		3369.15	
	4/24/2007			57.03	60.79	3.76	No Sock		3369.16	
	5/3/2007			56.87	60.40	3.53	No Sock		3369.55	
	5/11/2007			57.00	59.95	2.95	No Sock		3370.00	
	5/16/2007			57.20	59.20	2.00	No Sock		3370.75	
	5/16/2007			57.80	57.80	0.00	No Sock	Purge 100 gal	3372.15	
	5/23/2007			56.16	59.30	3.14	No Sock		3370.65	
	5/23/2007			64.40	64.40	0.00	No Sock	Purge 80 gal	3365.55	
	5/31/2007			57.10	59.28	2.18	No Sock		3370.67	
	6/6/2007			57.08	59.86	2.78	No Sock		3370.09	
	6/6/2007			59.92	60.09	0.17	No Sock	Purge 30 gal	3369.86	
	6/13/2007			57.08	59.38	2.30	No Sock		3370.57	
	6/19/2007			56.94	60.00	3.06	No Sock	PSH .75 H2O 0	3369.95	
	6/19/2007			57.50	57.60	0.10	No Sock		3372.35	
	6/27/2007			57.42	59.68	2.26	No Sock	PSH .50 H2O 0	3370.27	
	6/27/2007			57.49	57.53	0.04	No Sock		3372.42	
	7/5/2007			67.73	56.97	59.92	2.95	No Sock	PSH 1 H2O 0	3370.03
	7/5/2007				57.50	57.73	0.23	No Sock		3372.22
	7/11/2007			67.73	57.21	59.74	2.53	No Sock	PSH .75 H2O 0	3370.21
	7/11/2007				57.77	57.98	0.21	No Sock		3371.97
	7/19/2007			67.73	56.90	60.22	3.32	No Sock	PSH 1 H2O 0	3369.73
	7/19/2007				57.60	57.75	0.15	No Sock		3372.20
	7/24/2007			67.73	56.82	60.24	3.42	No Sock	PSH 1 H2O 0	3369.71
	7/24/2007				57.55	57.86	0.31	No Sock		3372.09
	7/31/2007			67.71	56.71	60.28	3.57	No Sock		3369.67
	8/9/2007			67.71	56.60	60.36	3.76	No Sock	PSH 1 H2O 0	3369.59
	8/9/2007				57.60	57.82	0.22	No Sock		3372.13
	8/16/2007			67.71	57.21	59.74	2.53	No Sock		3370.21
	8/22/2007			67.71	56.23	60.34	4.11	No Sock	PSH 1 H2O 0	3369.61
	8/22/2007				57.71	57.88	0.17	No Sock		3372.07
	8/28/2007			67.71	55.94	60.35	4.41	No Sock	PSH 1 H2O 0	3369.60
	8/28/2007				57.52	57.68	0.16	No Sock		3372.27
9/6/2007			67.74	55.71	60.18	4.47	No Sock		3369.77	
9/13/2007				56.90	60.96	4.06	No Sock		3368.99	
9/13/2007			67.74	57.78	58.00	0.22	No Sock	PSH 1 H2O 0	3371.95	
9/18/2007				56.80	60.76	3.96	No Sock		3369.19	
9/18/2007			67.74	57.90	57.97	0.07	No Sock	PSH 1 H2O 0	3371.98	
9/26/2007				56.76	60.83	4.07	No Sock		3369.12	
10/4/2007				56.42	60.88	4.46	No Sock	PSH 1 H2O 0	3369.07	
10/4/2007			67.75	57.00	57.12	0.12	No Sock		3372.83	
10/10/2007				56.91	60.29	3.38	No Sock	PSH 1 H2O 50	3369.66	
10/10/2007				57.75	57.77	0.02	No Sock		3372.18	
10/17/2007				56.81	60.34	3.53	No Sock	PSH 1 H2O 50	3369.61	
10/17/2007				57.91	57.96	0.05	No Sock		3371.99	
10/24/2007				56.95	60.15	3.20	No Sock	PSH 1 H2O 50	3369.80	
10/24/2007				57.60	57.65	0.05	No Sock		3372.30	

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation
MW-1	10/31/2007			57.00	59.77	2.77	No Sock	PSH 1 H2O 30	3370.18
	10/31/2007			57.60	57.60	0.00	No Sock		3372.35
	11/7/2007			57.00	59.77	2.77	No Sock	PSH 1 H2O 39	3370.18
	11/7/2007			57.50	57.53	0.03	No Sock		3372.42
	11/13/2007			56.98	60.04	3.06	No Sock		3369.91
	11/20/2007			56.84	60.10	3.26	No Sock	PSH 1 H2O 3	3369.85
	11/20/2007			57.68	57.74	0.06	No Sock		3372.21
	11/27/2007			56.80	60.15	3.35	No Sock	PSH 1 H2O 8	3369.80
	11/27/2007			57.62	57.66	0.04	No Sock		3372.29
	12/5/2007			56.72	60.12	3.40	No Sock	PSH 1 H2O 8	3369.83
	12/5/2007			57.56	57.62	0.06	No Sock		3372.33
	12/12/2007			56.68	60.14	3.46	No Sock	PSH 1 H2O 8	3369.81
	12/12/2007			57.40	57.42	0.02	No Sock		3372.53
	12/18/2007			57.00	60.27	3.27	No Sock	PSH 1 H2O 8	3369.68
	12/18/2007			57.60	57.62	0.02	No Sock		3372.33
12/27/2007			56.92	60.33	3.41	No Sock	PSH 1 H2O 8	3369.62	
12/27/2007			57.41	57.50	0.09	No Sock		3372.45	
MW-2	2/21/2007	3429.97		57.60	57.60	0.00			3372.37
	3/7/2007			57.56	57.56	0.00	Install Sock		3372.41
	3/14/2007			57.60	57.60	0.00	Sock		3372.37
	3/21/2007			57.56	57.56	0.00	Sock		3372.41
	3/28/2007			57.54	57.54	0.00	Sock		3372.43
	4/3/2007			57.60	57.60	0.00	Sock		3372.37
	4/10/2007			57.65	57.65	0.00	Sock		3372.32
	4/18/2007			57.58	57.58	0.00	Sock		3372.39
	4/24/2007			57.63	57.63	0.00	Sock		3372.34
	5/3/2007			57.64	57.64	0.00	Sock		3372.33
	5/11/2007			57.62	57.62	0.00	Sock		3372.35
	5/16/2007			57.65	57.65	0.00	Sock		3372.32
	5/23/2007			57.65	57.65	0.00	Sock		3372.32
	5/31/2007		70.81	57.58	57.58	0.00	New Sock		3372.39
	6/6/2007		70.83	57.53	57.53	0.00	Sock		3372.44
	6/13/2007		70.83	57.57	57.57	0.00	Sock		3372.40
	6/19/2007		70.83	57.56	57.56	0.00	Sock		3372.41
	6/27/2007		70.83	57.57	57.57	0.00	Sock		3372.40
	7/5/2007		71.74	57.54	57.54	0.00	Sock		3372.43
	7/11/2007		71.74	57.57	57.57	0.00	Sock		3372.40
	7/19/2007		71.74	57.55	57.55	0.00	Flip Sock		3372.42
	7/24/2007		71.74	57.59	57.59	0.00	Sock		3372.38
	7/31/2007		71.75	57.62	57.62	0.00	Sock		3372.35
	8/9/2007		71.75	57.70	57.70	0.00	Sock		3372.27
	8/16/2007		71.75	57.57	57.70	0.13	Sock		3372.27
	8/22/2007		71.75	57.54	57.54	0.00	Sock		3372.43
	8/28/2007		71.75	57.70	57.70	0.00	Sock		3372.27
	9/6/2007		71.75	57.56	57.56	0.00	Sock		3372.41
	9/13/2007		71.75	57.75	57.75	0.00	Sock		3372.22
	9/18/2007		71.75	57.73	57.73	0.00	Sock		3372.24
9/26/2007		71.75	57.78	57.78	0.00	Sock		3372.19	
10/4/2007		71.75	57.77	57.77	0.00	New Sock		3372.20	
10/10/2007		71.75	57.67	57.67	0.00	Sock		3372.30	
10/17/2007		71.75	57.70	57.70	0.00	Sock		3372.27	
10/24/2007		71.75	57.75	57.75	0.00	Sock		3372.22	
10/31/2007		71.75	57.76	57.76	0.00	Sock		3372.21	

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation
MW-2	11/7/2007		71.75	57.83	57.83	0.00	Sock		3372.14
	11/13/2007		71.75	57.70	57.70	0.00	Sock		3372.27
	11/20/2007		71.75	57.86	57.86	0.00	Sock		3372.11
	11/27/2007		71.75	57.84	57.84	0.00	Sock		3372.13
	12/5/2007		71.75	57.71	57.71	0.00	Flip Sock		3372.26
	12/12/2007		71.75	57.70	57.70	0.00	Sock		3372.27
	12/18/2007		71.75	57.73	57.73	0.00	Sock		3372.24
	12/27/2007		71.75	57.70	57.70	0.00	Sock		3372.27
MW-3	2/21/2007	3429.89		57.71	57.71	0.00			3372.18
	3/7/2007			57.66	57.66	0.00	No Sock		3372.23
	3/14/2007			57.68	57.68	0.00	No Sock		3372.21
	3/21/2007			57.66	57.66	0.00	No Sock		3372.23
	4/3/2007			55.92	55.92	0.00	No Sock		3373.97
	4/10/2007			55.97	55.97	0.00	No Sock		3373.92
	4/18/2007			57.62	57.62	0.00	No Sock		3372.27
	4/24/2007			57.65	57.65	0.00	No Sock		3372.24
	5/3/2007			55.97	55.97	0.00	No Sock		3373.92
	5/11/2007			51.68	51.68	0.00	No Sock		3378.21
	5/16/2007			56.22	56.22	0.00	No Sock		3373.67
	5/23/2007			57.36	57.36	0.00	No Sock		3372.53
	5/31/2007		65.58	57.60	57.60	0.00	No Sock		3372.29
	6/6/2007		65.60	57.64	57.64	0.00	No Sock		3372.25
	6/13/2007		65.60	57.65	57.65	0.00	No Sock		3372.24
	6/19/2007		65.60	57.52	57.52	0.00	No Sock		3372.37
	6/27/2007		65.60	57.70	57.70	0.00	No Sock		3372.19
	7/5/2007		65.52	57.63	57.63	0.00	No Sock		3372.26
	7/11/2007		65.52	57.65	57.65	0.00	No Sock		3372.24
	7/19/2007		65.52	57.63	57.63	0.00	No Sock		3372.26
	7/24/2007		65.52	57.66	57.66	0.00	No Sock		3372.23
	7/31/2007		65.54	57.69	57.69	0.00	No Sock		3372.20
	8/9/2007		65.54	57.67	57.67	0.00	No Sock		3372.22
	8/16/2007		65.54	57.65	57.65	0.00	No Sock		3372.24
	8/22/2007		65.54	57.51	57.51	0.00	No Sock		3372.38
	8/28/2007		65.54	57.71	57.71	0.00	No Sock		3372.18
	9/6/2007		65.55	57.49	57.49	0.00	No Sock		3372.40
	9/13/2007		65.55	57.72	57.72	0.00	No Sock		3372.17
	9/18/2007		65.55	57.70	57.70	0.00	No Sock		3372.19
	9/26/2007		65.55	57.74	57.74	0.00	No Sock		3372.15
	10/4/2007		65.55	57.71	57.71	0.00	No Sock		3372.18
	10/10/2007		65.55	57.79	57.79	0.00	No Sock		3372.10
10/17/2007		65.55	57.80	57.80	0.00	No Sock		3372.09	
10/24/2007		65.55	57.69	57.69	0.00	No Sock		3372.20	
10/31/2007		65.55	57.68	57.68	0.00	No Sock		3372.21	
11/7/2007		65.55	57.73	57.73	0.00	No Sock		3372.16	
11/13/2007		65.55	57.72	57.72	0.00	No Sock		3372.17	
11/20/2007		65.55	57.76	57.76	0.00	No Sock		3372.13	
11/27/2007		65.55	57.74	57.74	0.00	No Sock		3372.15	
12/5/2007		65.55	57.72	57.72	0.00	No Sock		3372.17	
12/12/2007		65.55	57.70	57.70	0.00	No Sock		3372.19	
12/18/2007		65.55	57.70	57.70	0.00	No Sock		3372.19	
12/27/2007		65.55	57.68	57.68	0.00	No Sock		3372.21	

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation	
MW-4	2/21/2007	3430.36		58.02	58.14	0.12			3372.22	
	3/7/2007			57.98	57.99	0.01	Install Sock		3372.37	
	3/14/2007			58.18	58.19	0.01	Flip Sock		3372.17	
	3/21/2007			58.17	58.19	0.02	Sock		3372.17	
	3/28/2007			58.10	58.10	0.00	New Sock		3372.26	
	4/3/2007			58.27	58.27	0.00	Sock		3372.09	
	4/10/2007			58.31	58.31	0.00	Sock		3372.05	
	4/18/2007			58.26	58.26	0.00	Sock		3372.10	
	4/24/2007			58.33	58.33	0.00	Sock		3372.03	
	5/3/2007			58.36	58.36	0.00	New Sock		3372.00	
	5/11/2007			58.04	58.15	0.11	Flip Sock		3372.21	
	5/16/2007			58.09	58.09	0.00	Sock		3372.27	
	5/23/2007			58.12	58.12	0.00	Sock		3372.24	
	5/31/2007			72.00	58.09	58.09	0.00	Sock		3372.27
	6/6/2007			72.01	58.00	58.00	0.00	Sock		3372.36
	6/13/2007			72.01	58.05	58.05	0.00	New Sock		3372.31
	6/19/2007			72.01	58.04	58.04	0.00	Flip Sock		3372.32
	6/27/2007			72.01	58.12	58.12	0.00	Sock		3372.24
	7/5/2007			71.89	58.00	58.00	0.00	Sock		3372.36
	7/11/2007			71.89	58.03	58.03	0.00	Sock		3372.33
	7/19/2007			71.89	58.02	58.02	0.00	Flip Sock		3372.34
	7/24/2007			71.89	58.06	58.06	0.00	Sock		3372.30
	7/31/2007			71.90	58.06	58.06	0.00	Sock		3372.30
	8/9/2007			71.90	58.16	58.16	0.00	New Sock		3372.20
	8/16/2007			71.90	58.13	58.13	0.00	Sock		3372.23
	8/22/2007			71.90	58.06	58.06	0.00	Sock		3372.30
	8/28/2007			71.90	58.12	58.12	0.00	Sock		3372.24
	9/6/2007			71.90	57.94	57.94	0.00	Sock		3372.42
	9/13/2007			71.90	58.09	58.09	0.00	Sock		3372.27
	9/18/2007			71.90	58.07	58.07	0.00	Sock		3372.29
	9/26/2007			71.90	58.12	58.12	0.00	Sock		3372.24
	10/4/2007			71.90	58.20	58.20	0.00	New Sock		3372.16
10/10/2007			71.90	58.19	58.19	0.00	Sock		3372.17	
10/17/2007			71.90	58.21	58.21	0.00	Sock		3372.15	
10/24/2007			71.90	58.15	58.15	0.00	Sock		3372.21	
10/31/2007			71.90	58.16	58.16	0.00	Sock		3372.20	
11/7/2007			71.90	58.20	58.20	0.00	Sock		3372.16	
11/13/2007			71.90	58.12	58.12	0.00	Sock		3372.24	
11/20/2007			71.90	58.14	58.14	0.00	Sock		3372.22	
11/27/2007			71.90	58.11	58.11	0.00	Sock		3372.25	
12/5/2007			71.90	58.17	58.17	0.00	Flip Sock		3372.19	
12/12/2007			71.90	58.16	58.16	0.00	Sock		3372.20	
12/18/2007			71.90	58.20	58.20	0.00	Sock		3372.16	
12/27/2007			71.90	58.16	58.16	0.00	Sock		3372.20	
MW-5	2/21/2007	3428.93			56.47	0.00			3372.46	
	3/1/2007		72.52		56.44	0.00			3372.49	
	4/3/2007		72.52		56.51	0.00			3372.42	
	5/3/2007		72.52		56.42	0.00			3372.51	
	5/31/2007		72.48		56.45	0.00			3372.48	
	6/6/2007		72.48		56.41	0.00			3372.52	
	7/5/2007		72.52		56.40	0.00			3372.53	
	7/31/2007		72.53		56.45	0.00			3372.48	
	9/6/2007		72.53		56.45	0.00			3372.48	
	10/4/2007		72.53		56.50	0.00			3372.43	
11/13/2007		72.44		56.49	0.00			3372.44		

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation
MW-5	12/5/2007		72.44		56.56	0.00			3372.37
MW-6	2/21/2007	3429.24			56.58	0.00			3372.66
	3/1/2007		77.32		56.56	0.00			3372.68
	4/3/2007		77.32		56.64	0.00			3372.60
	5/3/2007		77.32		56.52	0.00			3372.72
	5/31/2007		76.83		56.55	0.00			3372.69
	6/6/2007		76.83		56.50	0.00			3372.74
	7/5/2007		76.76		56.50	0.00			3372.74
	7/31/2007		76.76		56.52	0.00			3372.72
	9/6/2007		76.75		56.55	0.00			3372.69
	10/4/2007		76.75		56.58	0.00			3372.66
	11/13/2007		76.70		56.53	0.00			3372.71
	12/5/2007		76.70		56.57	0.00			3372.67
MW-7	2/21/2007	3429.8			57.65	0.00			3372.15
	3/1/2007		72.68		57.63	0.00			3372.17
	4/3/070		72.68		57.68	0.00			3372.12
	5/3/2007		72.68		57.60	0.00			3372.20
	5/31/2007		72.57		57.60	0.00			3372.20
	6/6/2007		72.58		57.60	0.00			3372.20
	7/5/2007		72.30		57.55	0.00			3372.25
	7/31/2007		72.30		57.58	0.00			3372.22
	9/6/2007		72.29		57.65	0.00			3372.15
	10/4/2007		72.29		57.67	0.00			3372.13
	11/13/2007		72.18		57.65	0.00			3372.15
	12/5/2007		72.18		57.67	0.00			3372.13
MW-8	2/21/2007	3430.21		57.89	57.95	0.06			3372.26
	3/7/2007			57.83	57.89	0.06	Install Sock		3372.32
	3/14/2007			57.89	57.89	0.00	Flip Sock		3372.32
	3/21/2007			57.87	57.87	0.00	Sock		3372.34
	3/28/2007			57.88	57.88	0.00	Sock		3372.33
	4/3/2007			57.89	57.89	0.00	Sock		3372.32
	4/10/2007			57.95	57.95	0.00	Sock		3372.26
	4/18/2007			57.88	57.88	0.00	Sock		3372.33
	4/24/2007			57.88	57.88	0.00	Sock		3372.33
	5/3/2007			57.91	57.91	0.00	New Sock		3372.30
	5/11/2007			57.87	57.87	0.00	Sock		3372.34
	5/16/2007			57.89	57.89	0.00	Sock		3372.32
	5/23/2007			57.84	57.84	0.00	Sock		3372.37
	5/31/2007		62.33	57.86	57.86	0.00	Sock		3372.35
	6/6/2007		62.35	57.80	57.80	0.00	Sock		3372.41
	6/13/2007		62.35	57.84	57.84	0.00	Flip Sock		3372.37
	6/19/2007		62.35	57.82	57.82	0.00	Sock		3372.39
	6/27/2007		62.35	57.91	57.91	0.00	Sock		3372.30
	7/5/2007		62.25	57.82	57.82	0.00	Sock		3372.39
	7/11/2007		62.25	57.83	57.83	0.00	Sock		3372.38
	7/19/2007		62.25	57.83	57.83	0.00	New Sock		3372.38
	7/24/2007		62.25	57.85	57.85	0.00	Sock		3372.36
	7/31/2007		62.27	57.88	57.88	0.00	Sock		3372.33
	8/9/2007		62.27	57.90	57.90	0.00	Flip Sock		3372.31
8/16/2007		62.27	57.83	57.90	0.07	Sock		3372.31	
8/22/2007		62.27	57.73	57.73	0.00	Sock		3372.48	
8/28/2007		62.27	57.94	57.94	0.00	New Sock		3372.27	

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation	
MW-8	9/6/2007		62.28	57.76	57.76	0.00	Sock		3372.45	
	9/13/2007		62.28	57.90	57.90	0.00	Sock		3372.31	
	9/18/2007		62.28	57.06	57.06	0.00	Sock		3373.15	
	9/26/2007		62.28	57.90	57.90	0.00	Sock		3372.31	
	10/4/2007		62.28	57.92	57.92	0.00	Flip Sock		3372.29	
	10/10/2007		62.28	57.91	57.91	0.00	Sock		3372.30	
	10/17/2007		62.28	57.94	57.94	0.00	Sock		3372.27	
	10/24/2007		62.28	57.90	57.90	0.00	Sock		3372.31	
	10/31/2007		62.28	57.90	57.90	0.00	Sock		3372.31	
	11/7/2007		62.28	57.97	57.97	0.00	Sock		3372.24	
	11/13/2007		62.28	57.87	57.87	0.00	Sock		3372.34	
	11/20/2007		62.28	57.89	57.89	0.00	Sock		3372.32	
	11/27/2007		62.28	57.85	57.85	0.00	Sock		3372.36	
	12/5/2007		62.28	57.91	57.91	0.00	Sock		3372.30	
12/12/2007		62.28	57.88	57.88	0.00	Sock		3372.33		
12/18/2007		62.28	57.90	57.90	0.00	Sock		3372.31		
12/27/2007		62.28	57.85	57.85	0.00	New Sock		3372.36		
MW-9	2/21/2007	3429.88		57.50	57.55	0.05			3372.33	
	3/7/2007			57.48	57.53	0.05	Install Sock		3372.35	
	3/14/2007			57.62	57.76	0.14	Flip Sock		3372.12	
	3/21/2007			57.72	57.75	0.03	Sock		3372.13	
	3/28/2007			57.50	57.90	0.40	New Sock		3371.98	
	4/3/2007			57.60	57.68	0.08	New Sock		3372.20	
	4/10/2007			57.64	57.64	0.00	New Sock		3372.24	
	4/18/2007			57.50	57.50	0.00	Sock		3372.38	
	4/24/2007			57.70	57.70	0.00	Sock		3372.18	
	5/3/2007			57.58	57.68	0.10	Flip Sock		3372.20	
	5/11/2007			57.49	57.79	0.30	New Sock		3372.09	
	5/16/2007			57.55	57.55	0.00	New Sock		3372.33	
	5/23/2007			57.56	57.56	0.00	Sock		3372.32	
	5/31/2007			69.25	57.52	57.52	0.00	Sock		3372.36
	6/6/2007			69.23	57.44	57.44	0.00	Sock		3372.44
	6/13/2007			69.23	57.64	57.64	0.00	New Sock		3372.24
	6/19/2007			69.23	57.50	57.50	0.00	Flip Sock		3372.38
	6/27/2007			69.23	57.86	57.86	0.00	Sock		3372.02
	7/5/2007			67.15	57.45	57.51	0.06	Sock		3372.37
	7/11/2007			67.15	57.54	57.54	0.00	Sock		3372.34
	7/11/2007			67.15	57.47	57.47	0.00	Flip Sock		3372.41
	7/24/2007			67.15	57.50	57.50	0.00	Sock		3372.38
	7/31/2007			67.17	57.52	57.52	0.00	Sock		3372.36
	8/9/2007			67.17	57.77	57.77	0.00	New Sock		3372.11
	8/16/2007			67.17	57.54	57.54	0.00	Sock		3372.34
	8/22/2007			67.17	57.44	57.44	0.00	Sock		3372.44
	8/28/2007			67.17	57.61	57.61	0.00	Sock		3372.27
	9/6/2007			67.15	57.49	57.49	0.00	Sock		3372.39
	9/13/2007			67.15	57.85	57.85	0.00	Flip Sock		3372.03
	9/18/2007			67.15	57.83	57.83	0.00	Sock		3372.05
	9/26/2007			67.15	57.88	57.88	0.00	Sock		3372.00
	10/4/2007			67.15	58.00	58.01	0.01	New Sock		3371.87
10/10/2007			67.15	57.62	57.62	0.00	Flip Sock		3372.26	
10/17/2007			67.15	57.64	57.64	0.00	Sock		3372.24	
10/24/2007			67.15	57.83	57.89	0.06	Sock		3371.99	
10/31/2007			67.15	57.97	58.00	0.03	new Sock		3371.88	
11/7/2007			67.15	58.10	58.10	0.00	Sock		3371.78	
11/13/2007			67.15	57.75	57.79	0.04	Sock		3372.09	

**Table 1
GROUNDWATER ELEVATION DATA**

Plains Marketing L.P.
SRS #2002-10235
Hugh Gathering
Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation	
MW-9	11/20/2007		67.15	57.79	57.79	0.00	New Sock		3372.09	
	11/27/2007		67.15	57.77	57.77	0.00	Sock		3372.11	
	12/5/2007		67.15	57.73	57.74	0.01	Flip Sock		3372.14	
	12/12/2007		67.15	57.72	57.72	0.00	Sock		3372.16	
	12/18/2007		67.15	57.88	57.88	0.00	New Sock		3372.00	
	12/27/2007		67.15	57.72	57.74	0.02	Flip Sock		3372.14	
MW-10	2/21/2007	3430.65		58.20	58.30	0.10			3372.35	
	3/7/2007			58.19	58.29	0.10	Install Sock		3372.36	
	3/14/2007			58.46	58.46	0.00	Flip Sock		3372.19	
	3/21/2007			58.42	58.42	0.00	Sock		3372.23	
	3/28/2007			58.72	58.72	0.00	New Sock		3371.93	
	3/28/2007			58.72	58.72	0.00	New Sock		3371.93	
	4/3/2007			58.30	58.30	0.00	Sock		3372.35	
	4/10/2007			58.38	58.38	0.00	Sock		3372.27	
	4/18/2007			58.17	58.17	0.00	Flip Sock		3372.48	
	4/24/2007			58.23	58.23	0.00	Sock		3372.42	
	5/3/2007			58.24	58.24	0.00	Sock		3372.41	
	5/11/2007			58.26	58.26	0.00	Sock		3372.39	
	5/16/2007			58.32	58.32	0.00	Sock		3372.33	
	5/23/2007			58.32	58.32	0.00	Sock		3372.33	
	5/31/2007			69.25	58.31	58.31	0.00	Sock		3372.34
	6/6/2007			62.88	58.18	58.18	0.00	Sock		3372.47
	6/13/2007			62.88	58.35	58.35	0.00	New Sock		3372.30
	6/19/2007			62.88	58.20	58.20	0.00	Sock		3372.45
	6/27/2007			62.88	58.75	58.75	0.00	Sock		3371.90
	7/5/2007			59.88	58.19	58.19	0.00	Sock		3372.46
	7/11/2007			59.88	58.21	58.21	0.00	Sock		3372.44
	7/19/2007			59.88	58.18	58.18	0.00	Flip Sock		3372.47
	7/24/2007			59.88	58.21	58.21	0.00	Sock		3372.44
	7/31/2007			59.87	58.22	58.22	0.00	Sock		3372.43
	8/9/2007			59.87	58.25	58.25	0.00	Sock		3372.40
	8/16/2007			59.87	58.21	58.21	0.00	Sock		3372.44
	8/22/2007			59.87	58.13	58.13	0.00	Sock		3372.52
	8/28/2007			59.87	57.95	57.95	0.00	New Sock		3372.70
	9/6/2007			59.90	57.74	57.74	0.00	Sock		3372.91
	9/13/2007			59.90	58.29	58.29	0.00	Sock		3372.36
	9/18/2007			59.90	58.27	58.27	0.00	Sock		3372.38
	9/26/2007			59.90	58.32	58.32	0.00	Sock		3372.33
	10/4/2007			59.90	58.38	58.38	0.00	New Sock		3372.27
	10/10/2007			59.90	58.31	58.31	0.00	New Sock		3372.34
10/17/2007			59.90	58.32	58.32	0.00	Sock		3372.33	
10/24/2007			59.90	58.30	58.30	0.00	Sock		3372.35	
10/31/2007			59.90	58.33	58.33	0.00	Sock		3372.32	
11/7/2007			59.90	58.40	58.40	0.00	Sock		3372.25	
11/13/2007			59.90	58.28	58.28	0.00	Sock		3372.37	
11/20/2007			59.90	58.31	58.31	0.00	Flip Sock		3372.34	
11/27/2007			59.90	58.29	58.29	0.00	Sock		3372.36	
12/5/2007			59.90	58.29	58.29	0.00	Sock		3372.36	
12/12/2007			59.90	58.28	58.28	0.00	Sock		3372.37	
12/18/2007			59.90	58.31	58.31	0.00	Sock		3372.34	
12/27/2007			59.90	58.26	58.26	0.00	Sock		3372.39	

Table 1
GROUNDWATER ELEVATION DATA
 Plains Marketing L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

Well No.	Date Measured	TOC Elevation	Depth of Well	Depth to PSH	Depth to Water	PSH Thickness	Recovery Method	PSH Recovered (gallons)	Corrected Groundwater Elevation
MW-11	2/21/2007	3430.94			58.52	0.00			3372.42
	3/1/2007		73.53		58.48	0.00			3372.46
	4/3/2007		73.53		58.54	0.00			3372.40
	5/3/2007		73.53		58.45	0.00			3372.49
	5/31/2007		73.50		58.42	0.00			3372.52
	6/6/2007		73.50		58.46	0.00			3372.48
	7/5/2007		73.59		58.45	0.00			3372.49
	7/31/2007		73.59		58.48	0.00			3372.46
	9/6/2007		73.59		58.48	0.00			3372.46
	10/4/2007		73.59		58.53	0.00			3372.41
	11/13/2007		73.40		58.45	0.00			3372.49
12/5/2007		73.40		58.50	0.00			3372.44	
MW-12	2/21/2007	3426.47			54.58	0.00			3371.89
	3/1/2007		65.4		54.52	0.00			3371.95
	4/2/2007		65.4		54.57	0.00			3371.90
	5/3/2007		65.4		54.50	0.00			3371.97
	5/31/2007		65.42		54.51	0.00			3371.96
	6/6/2007		65.42		54.53	0.00			3371.94
	7/5/2007		65.40		54.50	0.00			3371.97
	7/31/2007		65.40		54.50	0.00			3371.97
	9/6/2007		65.40		54.53	0.00			3371.94
	10/4/2007		65.40		54.56	0.00			3371.91
	11/13/2007		65.30		54.52	0.00			3371.95
12/5/2007		65.30		54.56	0.00			3371.91	
Tank	3/28/2007		5.29	Sheen	5.18	Sheen			
	7/19/2007		5.29	4.63	4.65	0.02			

TABLE 2
GROUNDWATER SAMPLE ANALYTICAL RESULTS
 Plains Marketing, L.P.
 SRS #2002-10235
 Hugh Gathering
 Lea County, New Mexico

SAMPLE LOCATION	SAMPLE ID	SAMPLE DATE	BTEX 8260b			
			BENZENE	TOLUENE	ETHYL-BENZENE	XYLENES
			mg/L	mg/L	mg/L	mg/L
			NMOCD Remediation Criteria			
			0.010	0.750	0.750	0.620
MW 5	T16511-1	3/1/2007	0.172^a	0.0062	0.1380	0.0900
MW 5	T17665-2	6/1/2007	0.1210	0.0101	0.1030	0.0608
MW 5	T18805-1	9/6/2007	0.0477	0.0113	0.0523	0.0335
MW 5	T19776-1	11/13/2007	0.0775	0.0285	0.0906	0.0531
MW 6	T16511-2	3/1/2007	<0.00035	<0.00020	<0.00033	<0.00036
MW 6	T17665-1	6/1/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 6	T18805-2	9/6/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 6	T19776-2	11/13/2007	<0.0005	<0.0005	<0.0005	<0.001
MW 7	T16511-3	3/1/2007	<0.00035	<0.00020	<0.00033	<0.00036
MW 7	T17665-3	6/1/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 7	T18805-3	9/6/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 7	T19776-3	11/13/2007	<0.0005	<0.0005	<0.0005	<0.001
MW 11	T16511-4	3/1/2007	<0.00035	<0.00020	<0.00033	<0.00036
MW 11	T17665-4	6/1/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 11	T18805-4	9/6/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 11	T19776-4	11/13/2007	<0.0005	<0.0005	<0.0005	<0.001
MW 12	T16511-5	3/1/2007	<0.00035	<0.00020	<0.00033	<0.00036
MW 12	T17665-5	6/1/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 12	T18805-5	9/6/2007	<0.00021	<0.00023	<0.00035	<0.00055
MW 12	T19776-5	11/13/2007	<0.0005	<0.0005	<0.0005	<0.001

^a Result is from Run #2.

Concentration in **Bold** = above NMOCD

TABLE 3
2006 and 2007 Polynuclear Aromatic Hydrocarbons (PAH) Groundwater Analytical Results
 Hugh Gathering
 SRS #2002-10235
 Plains Marketing, L.P.
 Lea County, NM

Monitoring Well	Sample Date	Lab Report #	PAHs															
			Napthalene	Acenaphthylene	Acenaphthene	Flourene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo[a]-anthracene	Chrysene	Benzo[b]-fluoranthene	Benzo[k]-fluoranthene	Benzo[a]-pyrene	Indeno[1,2,3-cd]-pyrene	Dibenz[a,h]-anthracene	Benzo[g,h,i]-perylene
NMOC	Target Level	30 µg/L	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
MW-1	2-Mar-06																	
MW-1	1-Jun-07																	
MW-2	2-Mar-06																	
MW-2	1-Jun-07																	
MW-3	2-Mar-06																	
MW-3	1-Jun-07																	
MW-4	2-Mar-06																	
MW-4	1-Jun-07																	
MW-5	2-Mar-06	177440	7.08	<0.05	<0.05	0.060	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
MW-5	1-Jun-07	T17665	2.7 J	<2.4	<2.3	<2.3	<2.7	<2.7	<2.7	<2.9	<3.6	<3.2	<2.8	<3.0	<2.5	<2.9	<2.9	<2.7
MW-6	2-Mar-06	177441	0.574	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
MW-6	1-Jun-07	T17665	<1.6	<2.4	<2.3	<2.3	<2.7	<2.7	<2.9	<3.6	<3.6	<3.2	<2.8	<3.0	<2.5	<2.9	<2.9	<2.7
MW-7	2-Mar-06	177442	0.649	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
MW-7	1-Jun-07	T17665	<1.6	<2.4	<2.3	<2.3	<2.7	<2.7	<2.9	<3.6	<3.6	<3.2	<2.8	<3.0	<2.5	<2.9	<2.9	<2.7
MW-8	2-Mar-06																	
MW-8	1-Jun-07																	
MW-9	2-Mar-06																	
MW-9	1-Jun-07																	
MW-10	2-Mar-06																	
MW-10	1-Jun-07																	
MW-11	2-Mar-06	177443	0.577	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
MW-11	1-Jun-07	T17665	<1.6	<2.4	<2.3	<2.3	<2.7	<2.7	<2.9	<3.6	<3.6	<3.2	<2.8	<3.0	<2.5	<2.9	<2.9	<2.7
MW-12	2-Mar-06	177461	0.548	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
MW-12	1-Jun-07	T17665	<1.6	<2.4	<2.3	<2.3	<2.7	<2.7	<2.9	<3.6	<3.6	<3.2	<2.8	<3.0	<2.5	<2.9	<2.9	<2.7

*Bold values exceed NMWRCC groundwater standards per NMAC 20.6.2.3103
 All data prior to 2007 collected by EPI*

Appendix C

Groundwater Analytical Reports

(Available Electronically on CD Only)

- 1st Quarter 2007 Analytical Reports– T16511**
- 2nd Quarter 2007 Analytical Reports– T17665**
- 3rd Quarter 2007 Analytical Reports– T18805**
- 4th Quarter 2007 Analytical Reports– T19776**

Appendix D
C-141 NMOCD Release Notification Form

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 - Informational
OPERATOR

Initial Report Final Report

Name of Company: Plains Pipeline, L.P.		Contact: Camille Reynolds	
Address PO Box 1660 5805 East Highway 80 Midland, Texas 79702		Telephone No. 505.393.5611	
Facility Name Hugh Gathering 090402 # 2002-10235		Facility Type 6" Steel Pipeline	
Surface Owner: Bryant		Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter P	Section 11	Township T21S	Range R37E	Feet from the	North/South Line	Feet from the	East/West Line	County: Lea
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Latitude: 3229'11.007"N Longitude: 10307'33.864"W

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 50 bbls barrels	Volume Recovered 0 bbls barrels
Source of Release 6" Steel Pipeline	Date and Hour of Occurrence 9-4-02 @ 1:20 PM	Date and Hour of Discovery 9-4-02 @ 1:30 PM
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 9-4-02 @ 3:30 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse. NA	
If a Watercourse was Impacted, Describe Fully.*		

Describe Cause of Problem and Remedial Action Taken.*
6" Steel Pipeline The leak was due to internal/external corrosion. Near surface impacted soil was disposed of in an NMOCD approved landfarm.

Describe Area Affected and Cleanup Action Taken.*
100 sqft 10' X 10': Site delineated. Remedial Goals: TPH 8015m = 1000 & 100 mg/Kg, Benzene = 10 mg/Kg, and BTEX, i.e., the mass sum of Benzene, Ethyl Benzene, Toluene, and Xylenes = 50 mg/Kg.

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 groundwater, 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:	OIL CONSERVATION DIVISION	
Printed Name: Camille Reynolds	Approved by District Supervisor:	
E-mail Address: CJReynolds@PAALP.com	Approval Date:	Expiration Date:
Title: District Environmental Supervisor	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 9/6/2002 Phone: 505.393.5611		

Attach Additional Sheets If Necessary

Plains Pipeline, L.P. Site Information and Metrics		Incident Date: 9-4-02 @ 1:20 PM	NMOCD Notified: 9-4-02 @ 3:30 PM
SITE: Hugh Gathering 090402		Assigned Site Reference #: 2002-10235	
Company: Plains Pipeline, L.P.		NATIONAL RESPONSE CENTER - 800.424.8802	
Street Address: PO Box 1660		Notified Date/Time:	
Mailing Address: 5805 East Highway 80		Notified by: Camille Reynolds	
City, State, Zip: Midland, Texas 79702		Person Notified:	
Representative: Camille Reynolds		NRC Report# :	
Representative Telephone: 505.393.5611			
Telephone:			
Fluid volume released (bbls): 50 bbls		Recovered (bbls): 0 bbls	
<small>>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas) 5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)</small>			
Leak, Spill, or Pit (LSP) Name: Hugh Gathering 090402			
Source of contamination: 6" Steel Pipeline			
Land Owner, i.e., BLM, ST, Fee, Other: Bryant			
LSP Dimensions 10' X 10'		East side - 10' x 10'	
LSP Area: 100 ft ²		East side - 100 ft ²	
Location of Reference Point (RP)			
Location distance and direction from RP			
Latitude: 3229°11.007"N		32°29'11.080"N	
Longitude: 10307°33.864"W		103°07'29.637"W	
Elevation above mean sea level: 3,425' amsl			
Feet from South Section Line			
Feet from West Section Line			
Location- Unit or ¼ ¼: SE¼ of the SE¼ UL-P		East side - SW¼ of the SW¼ UL-M	
Location- Section: 11		East side - Section 12	
Location- Township: T21S			
Location- Range: R37E			
Surface water body within 1000' radius of site: none			
Surface water body within 1000' radius of site:			
Domestic water wells within 1000' radius of site: none			
Domestic water wells within 1000' radius of site:			
Agricultural water wells within 1000' radius of site: none			
Agricultural water wells within 1000' radius of site:			
Public water supply wells within 1000' radius of site: none			
Public water supply wells within 1000' radius of site:			
Depth from land surface to groundwater (DG) 60'bgs			
Depth of contamination (DC) - 60'bgs			
Depth to groundwater (DG - DC = DtGW) - zero feet			
1. Groundwater		2. Wellhead Protection Area	3. Distance to Surface Water Body
If Depth to GW <50 feet: 20 points		If <1000' from water source, or; <200' from private domestic water source: 20 points	<200 horizontal feet: 20 points
If Depth to GW 50 to 99 feet: 10 points		If >1000' from water source, or; >200' from private domestic water source: 0 points	200-100 horizontal feet: 10 points
If Depth to GW >100 feet: 0 points		Wellhead Protection Area Score = 0	>1000 horizontal feet: 0 points
Groundwater Score = 10			Surface Water Score = 0
Site Rank (1+2+3) = 10			
Total Site Ranking Score and Acceptable Concentrations			
Parameter	>19	10-19	0-9
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm
¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis			

DISTRIBUTION

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