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WORKPLANS Additional Date: -24-10



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February 24, 2010

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

RE: Plains Pipeline, L.P. DCP Plant to Lea Station 6-inch Sec. 31 NMOCD Reference # 1R-2166 Unit Letter K of Section 31, Township 20 South, Range 37 East Lea County, New Mexico

Dear Mr. Hansen:

Plains Pipeline, L.P. is pleased to submit the attached *Additional Soil Remediation Strategy*, dated February 2010, for the DCP Plant to Lea Station 6-inch Sec. 31 site. This site is located in Section 31 of Township 20 South, and Range 37 East of Lea County, New Mexico. This document details the proposed soil remediation activities to be performed at the North Trench #1 and the East Trench #1.

Should you have any questions or comments, please contact me at (575) 441-1099.

Sincerely,

Jason Henry Remediation Coordinator Plains All American

CC: Larry Johnson, NMOCD, Hobbs Office Brian Henington, NMSLO, Santa Fe Office

Enclosure

Basin Environmental Consulting, LLC

2800 Plains Highway P. O. Box 381 Lovington, New Mexico 88260 Phone: 575-396-2378 Fax: 575-396-1429



February 9, 2010

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

Re: Plains Pipeline, L.P. – DCP Plant to Lea Station 6-Inch Sec. 31 Additional Soil Remediation Strategy NMOCD Reference # 1RP-2166 Plains SRS #2009-084 ULT "K" (NE/SW), Section 31, Township 20 South, Range 37 East Latitude 32.52733° N, Longitude 103.2906° W Lea County, New Mexico Landowner: State of New Mexico

Dear Mr. Hansen,

Basin Environmental Consulting, LLC (Basin), on behalf of Plains Pipeline, LP (Plains), is pleased to submit the following Additional Soil Remediation Strategy for the release site known as DCP Plant to Lea Station 6-Inch Sec. 31.

In July, 2009, Plains submitted a Remediation Summary and Proposed Remediation Strategy for soil closure activities at the above referenced site. In a letter dated January 25, 2010, the New Mexico Oil Conservation Division (NMOCD) requested additional soil treatment options (high pressure injection of soil remediation amendment) be addressed at the North Trench #1 and the East Trench #1. The letter also requested the installation of a liner in the North Trench #1 and East Trench #1 areas.

Plains proposes to saturate the North Trench #1 and East Trench #1 with approximately 1,000 gallons of water soluble high nitrogen fertilizer. Following application of the fertilizer solution, a 20 mil polyurethane liner will be installed in the trenches at a depth of approximately fourteen (14) feet below ground surface (bgs). The liners will be cushioned by a six (6) inch layer of sand above and below the liner to protect the liner from damage during backfilling activities. Following installation of the liners, the trenches will be backfilled and compacted with the onsite remediated soil. Following backfilling activities, the surface will be contoured to fit the surrounding topography and the site will be reseeded with vegetation acceptable to the landowner.

On review and approval of this proposal by the NMOCD and New Mexico State Land Office (NMSLO), Plains is prepared to begin the field activities at this site. Upon completion of the field activities, Plains will submit a Remediation Summary and Soil Closure Request to the

NMOCD and NMSLO, documenting the results of confirmation soil samples, and final topography activities.

If you have any questions or require further information, please contact me at (575) 605-7210 or Mr. Jason Henry (Plains) at (575) 441-1099.

Respectfully,

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Camille Bryant Project Manager Basin Environmental Consulting, LLC

Enclosures

Figure 1 – Site Location Map Figure 2 – Site Map

cc: Jason Henry – Plains, Denver City, Texas Jeff Dann – Plains, Houston, Texas Larry Johnson – NMOCD, Hobbs District Office Brian Henington – NMSLO, Santa Fe file



