1R - 103

REPORTS

DATE: 2006



March 24, 2006

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

Re:

Plains – Annual Monitoring Reports 16 Sites in Lea County, New Mexico

Dear Mr. Martin:

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:

TNM 97-17	Section 21, Township 20 South, Range 37 East, Lea County
TNM 97-18	Section 28, Township 20 South, Range 37 East, Lea County
TNM 98-05A	Section 26, Township 21 South, Range 37 East, Lea County
TNM 98-05B	Section 26, Township 21 South, Range 37 East, Lea County
TNM 97-04	Section 11, Township 16 South, Range 35 East, Lea County
Texaco Skelly "F"	Section 21, Township 20 South, Range 37 East, Lea County
Darr Angell #2	Sections 11 and 14, Township 15 South, Range 37 East, Lea County
LF-59	Section 32, Township 19 South, Range 37 East, Lea County
SPS-11	Section 18, Township 18 South, Range 36 East, Lea County
Monument #2	Sections 6 and 7, Township 20 South, Range 37 East, Lea County
Monument #10	Section 32, Township 19 South, Range 37 East, Lea County
Monument #17	Section 29, Township 19 South, Range 37 East, Lea County
Monument #18	Section 7, Township 20 South, Range 37 East, Lea County
Bob Durham	Sections 31 and 32, Township 19 South, Range 37 East, Lea County
Monument Barber 10" Sour	Section 32, Township 19 South, Range 37 East, Lea County
Lea Station to Monument 6"	Section 5, Township 20 South, Range 37 East, Lea County

Nova prepared these documents and has vouched for their accuracy an completeness, and on behalf of Plains All American, I have personally reviewed the documents and interviewed Nova in order to verify the accuracy and completeness of these documents. It is based upon these inquires 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 (505) 441-0965.

Sincerely,

Camille Reynolds

Remediation Coordinator Plains All American Pipeline

CC: Larry Johnson, NMOCD, Hobbs, New Mexico

Enclosure



Report to one the L-Drive

LF-59

LEA COUNTY, NEW MEXICO NW ¼ SW ¼ SECTION 32, TOWNSHIP 19 SOUTH, RANGE 37 EAST PLAINS EMS NUMBER: TNM-LF-59 NMOCD FILE NUMBER: 1R-0103

Prepared For:

PLAINS MARKETING, L.P. 333 CLAY STREET, SUITE 1600 HOUSTON, TEXAS 77002

Prepared By:

NOVA Safety and Environmental 2057 Commerce Street Midland, Texas 79703

March 2006

Curt Stanley

Project Manager

safety and environmental

Todd K. Choban, P.G.

Vice President Technical Services

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ENCLOSED ON DATA DISK

2005 Annual Monitoring Report
2005 Tables 1 and 2 – Groundwater Elevation and BTEX Concentration Data
2005 Figures 1, 2A-2D, and 3A-3D
Electronic Copies of Laboratory Reports
Historic Table 1 and 2 - Groundwater Elevation and BTEX Concentration Tables

INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. Beginning on May 29, 2004, project management responsibilities were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The LF-59 pipeline release site (the site), which was formerly the responsibility of Enron Oil Trading and Transportation (EOTT), is now the responsibility of Plains. The Release Notification and Corrective Action Form (C-141) is provided as Appendix A. This report is intended to be viewed as a complete document with text, figures, tables, and appendices. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2005 only. However, historic data tables as well as 2005 laboratory analytical reports are provided on the enclosed disk. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each of four (4) quarters during 2005 to assess the levels and extent of dissolved phase constituents and Phase Separated Hydrocarbon (PSH). Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH on the water column, and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The LF-59 site occurred as two separate releases of unknown volumes on unknown dates. The release occurred from an 8-inch pipeline and was attributed to structural failure associated with internal pipeline corrosion. Approximately 6,900 cubic yards of impacted soil was excavated, sorted, shredded and combined with fertilizer to enhance bioremediation rates. Approximately 550 cubic yards of caliche rock is also stockpiled on-site as a result of the previously referenced soil treatment activity. The soil was spread onto an on-site treatment cell for aeration in March 2003. Soil in the treatment cell was sampled for baseline concentrations of Total Petroleum Hydrocarbon (TPH) and Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations using EPA Methods 8015M and 8260b, respectively. The treatment cell was resampled on September 7, 2005, the analytical results of this sampling event indicate Total Petroleum Hydrocarbons (TPH) concentrations have decreased to levels ranging between <50 to 115 mg/Kg total TPH.

Eight groundwater monitor wells (MW-1 through MW-8) are currently on-site. NOVA directed the installation of monitor well MW-8 on October 4, 2005. Monitor well MW-8 was installed upgradient of monitor well MW-1 to verify the upgradient extent of impact to groundwater. The analytical results of soil samples collected during the installation of this monitor well indicate there appears to be no hydrocarbon impact to the soil in monitor well MW-8. Analytical groundwater samples collected after monitor well development and during the 4th quarter 2005 sampling event indicate there appears to be no hydrocarbon impact to groundwater in monitor

well MW-8. Site access was restricted by the surface lessee during 2003, who allowed site access to resume in 2004.

FIELD ACTIVITIES

During the 2005 reporting period, no measurable thickness of PSH was detected in any of the eight monitor wells. Approximately 56 gallons (approximately 1.3 barrels) of PSH have been recovered from this site since project inception. Measurable thicknesses of PSH exhibited during the 2004 reporting period, have diminished to a sheen in monitor wells MW-1 and MW-4 during the 2005 reporting period. See Table 1 and Figures 3A-3D.

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule, which was approved by the NMOCD in correspondence dated April 28, 2004

NMOCD Approved Sampling Schedule					
MW-1	Quarterly	MW-5	Annually		
MW-2	Quarterly	MW-6	Annually		
MW-3	Annually	MW-7	Semi-Annually		
MW-4	Quarterly	MW-8	Quarterly		

The site monitor wells were gauged and sampled on the following dates in 2005: March 8, June 7, September 7, and December 2. During each sampling event, sampled monitor wells were purged of approximately three well volumes of water or until the wells failed to produce water using a PVC bailer or electric Grundfos Pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Key Energy of Hobbs, New Mexico utilizing a licensed disposal facility (NMOCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed from measurements collected during the four (4) quarterly monitoring events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2005 is provided as Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.009 feet/foot to the southwest as measured between groundwater monitor wells MW-3 and MW-7. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevations ranged between 3,547.11 and 3,555.85 feet above mean sea level, in MW-7 on December 2, 2005 and MW-1 on January, 5 2005, respectively.

LABORATORY RESULTS

Groundwater samples collected during the monitoring events of 2005 were delivered to TraceAnalysis of Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8021b. A listing of BTEX

constituent concentrations for 2005 is summarized in Table 2 and an electronic copy of the laboratory reports is provided on the enclosed disk. The quarterly groundwater sampling results for benzene and total BTEX constituent concentrations are depicted on Figures 3A through 3D.

Laboratory analysis of groundwater samples obtained during the reporting period indicates benzene and total BTEX constituent concentrations were below NMOCD regulatory standards in monitor wells MW-2 through MW-8 with the exception of monitor well MW-4. Analytical results indicate monitor well MW-4 exhibited a benzene concentration above the NMOCD regulatory standard during the first quarter of 2005. Laboratory analysis of groundwater samples collected during the reporting period indicates benzene concentrations above the NMOCD regulatory standard in monitor well MW-1 during each quarterly event of 2005 and indicates total BTEX constituent concentrations were below the NMOCD regulatory standard.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

Eight groundwater monitor wells (MW-1 through MW-8) are currently on-site. During the 2005 reporting period, no monitor wells contained measurable quantities of PSH. The most recent Groundwater Gradient Map indicates a general gradient of approximately 0.009 feet/foot to the southwest.

A review of the laboratory analytical results for groundwater samples obtained during the reporting period indicates the benzene concentration was above the NMOCD regulatory standard and the total BTEX constituent concentrations were below NMOCD regulatory standards in monitor well MW-1 only. All other sample locations displayed BTEX constituent concentrations below the NMOCD regulatory standard during the reporting period, with the exception of monitor well MW-4, which exhibited a benzene concentration slightly above the NMOCD regulatory standard of 0.010 mg/L and a BTEX constituent concentration below the NMOCD regulatory standard.

Dissolved phase impact above the NMOCD regulatory limit appears to be limited to the area around MW-1 at this time. From 2000 to 2002, groundwater samples collected from monitor well MW-2 displayed concentrations of benzene and BTEX constituent concentrations above the NMOCD regulatory standard. However, since 2002 MW-2 has exhibited constituent concentrations below the NMOCD standard. This appears to indicate a diminishing dissolved phase impact in the area of monitor wells MW-1 and MW-2.

ANTICIPATED ACTIONS

Monitoring, gauging and sampling of the on site monitor wells will continue through 2006.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of NOVA and/or Plains.

DISTRIBUTION

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New Mexico Energy, Minerals and Natural Resources Department

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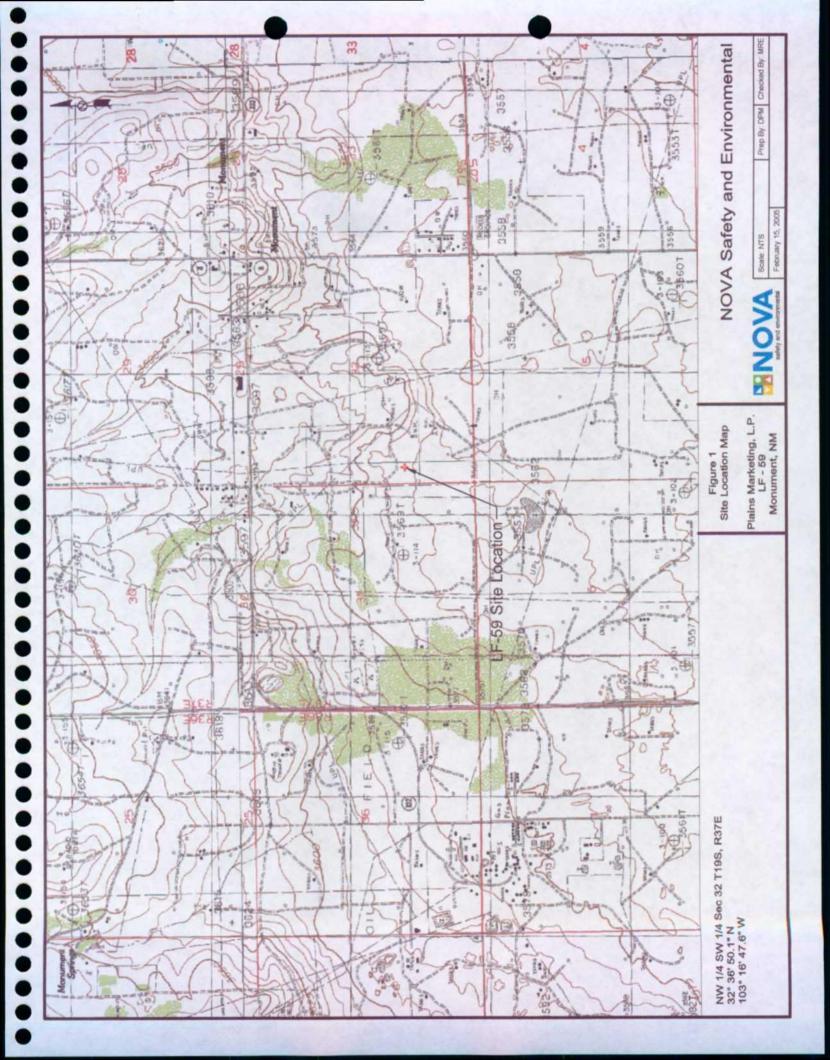
Houston, TX 77002 jpdann@paalp.com

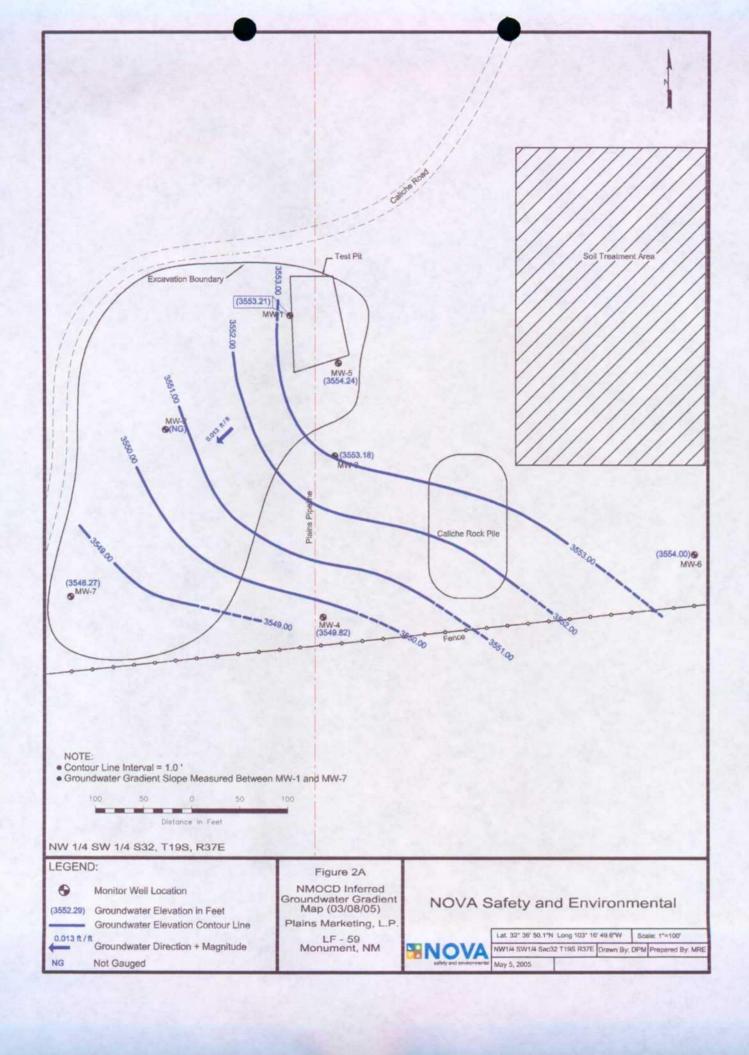
Copy 5: NOVA Safety and Environmental

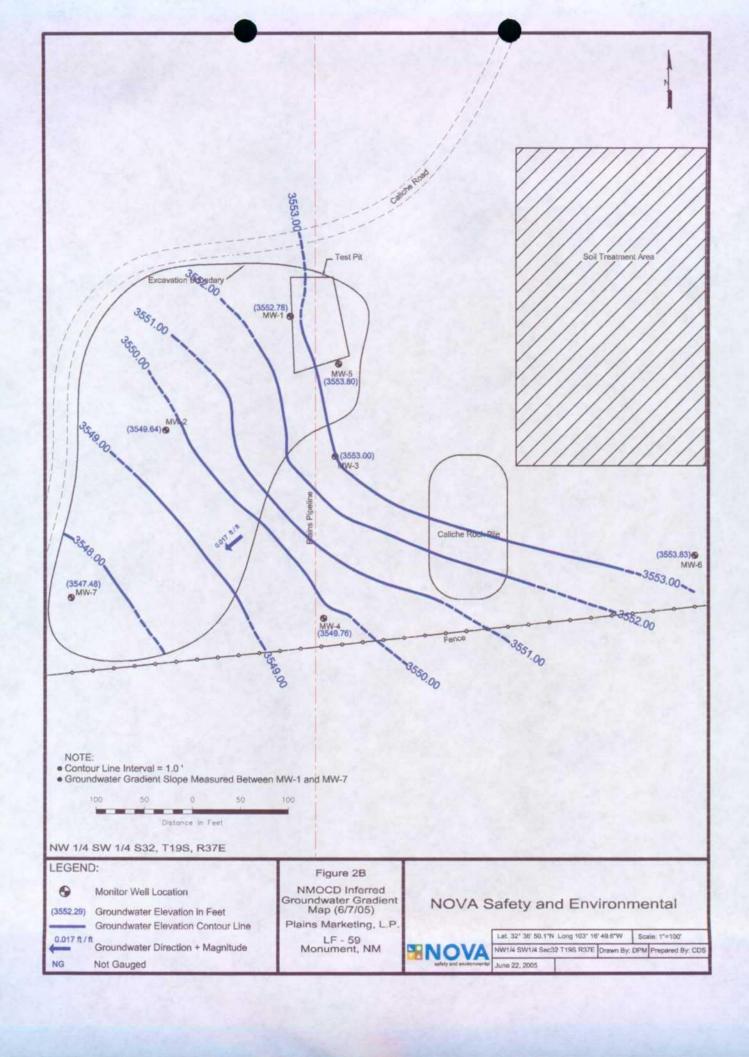
2057 Commerce Street Midland, TX 79703

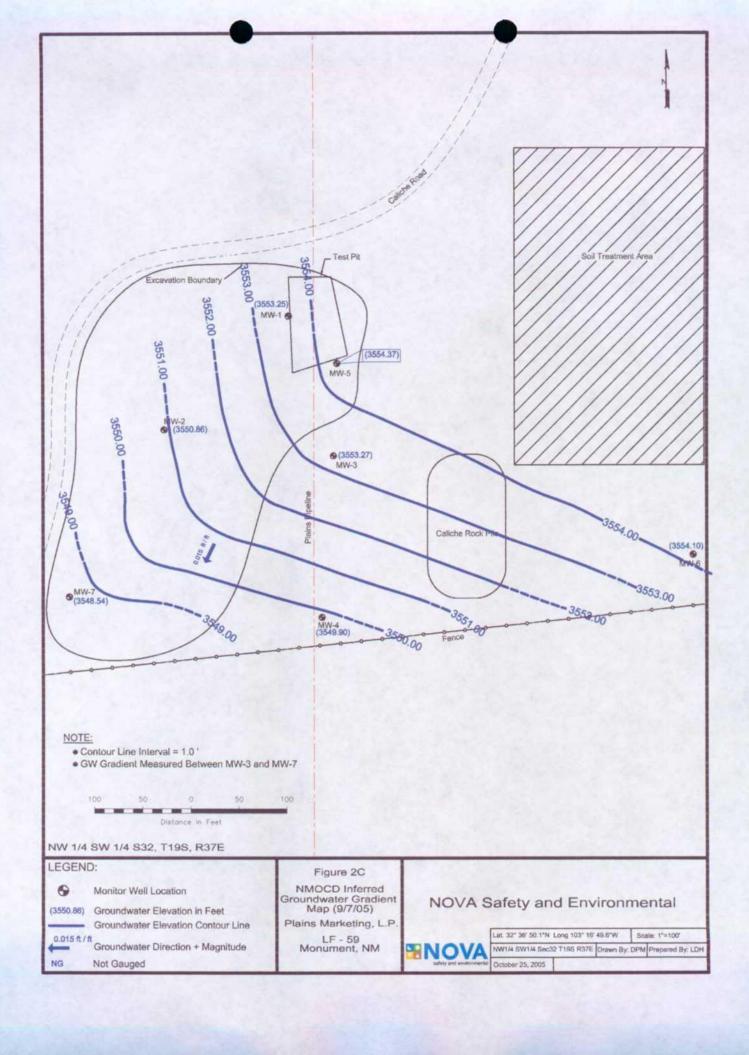
cstanley@novatraining.cc

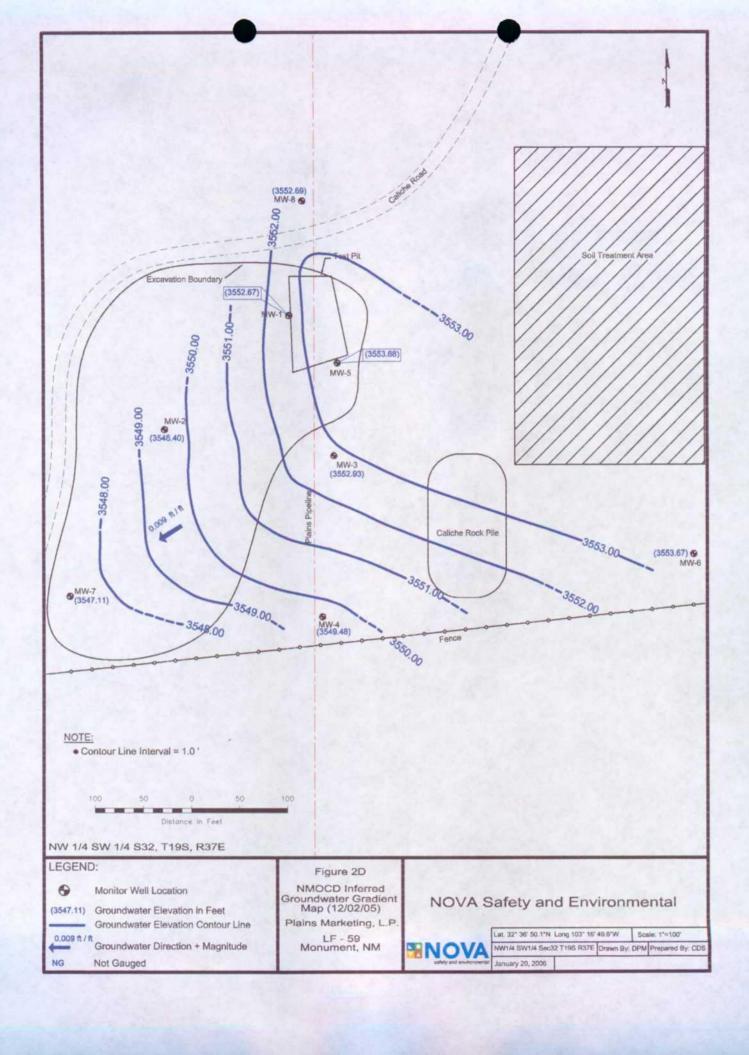
Figures

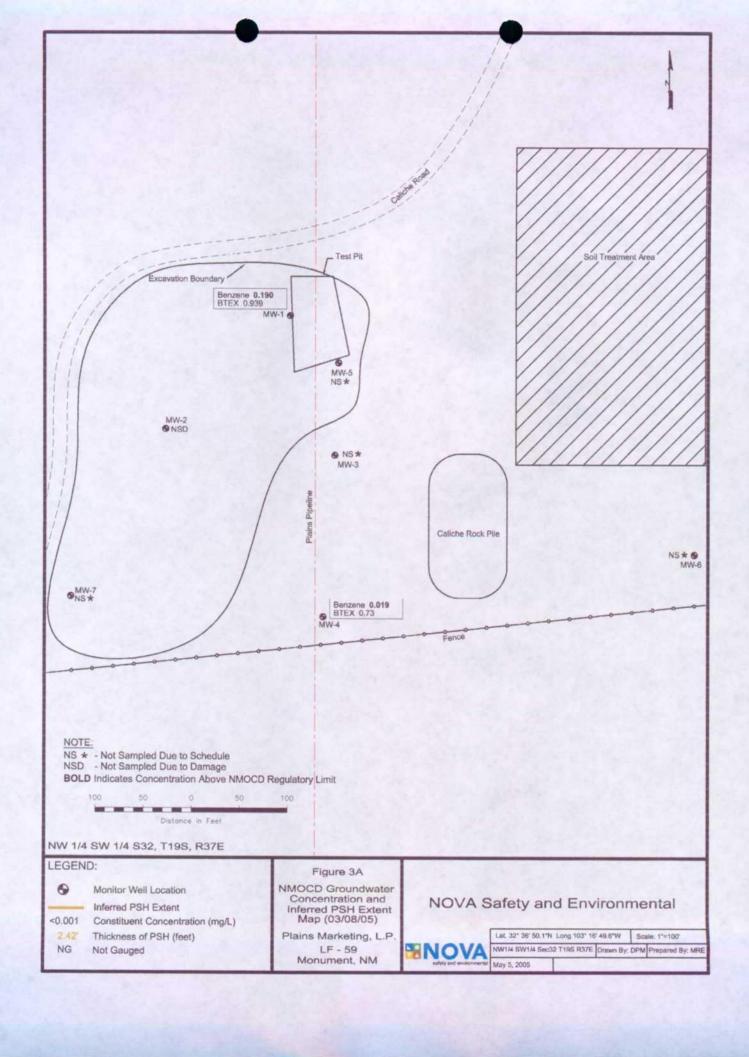


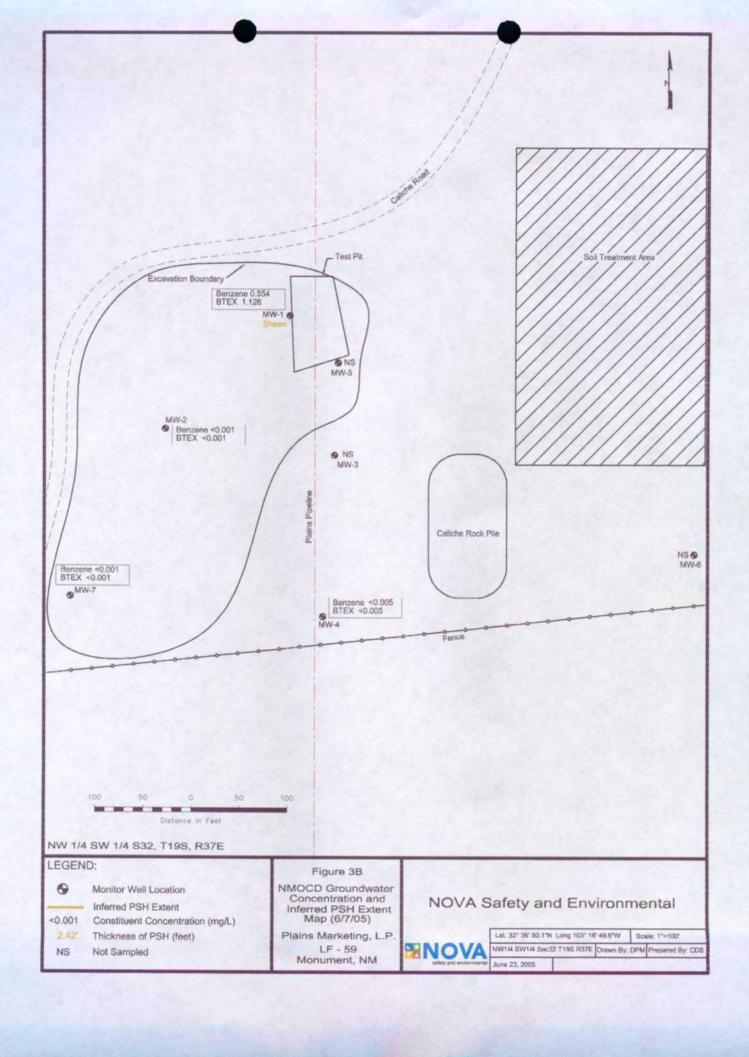


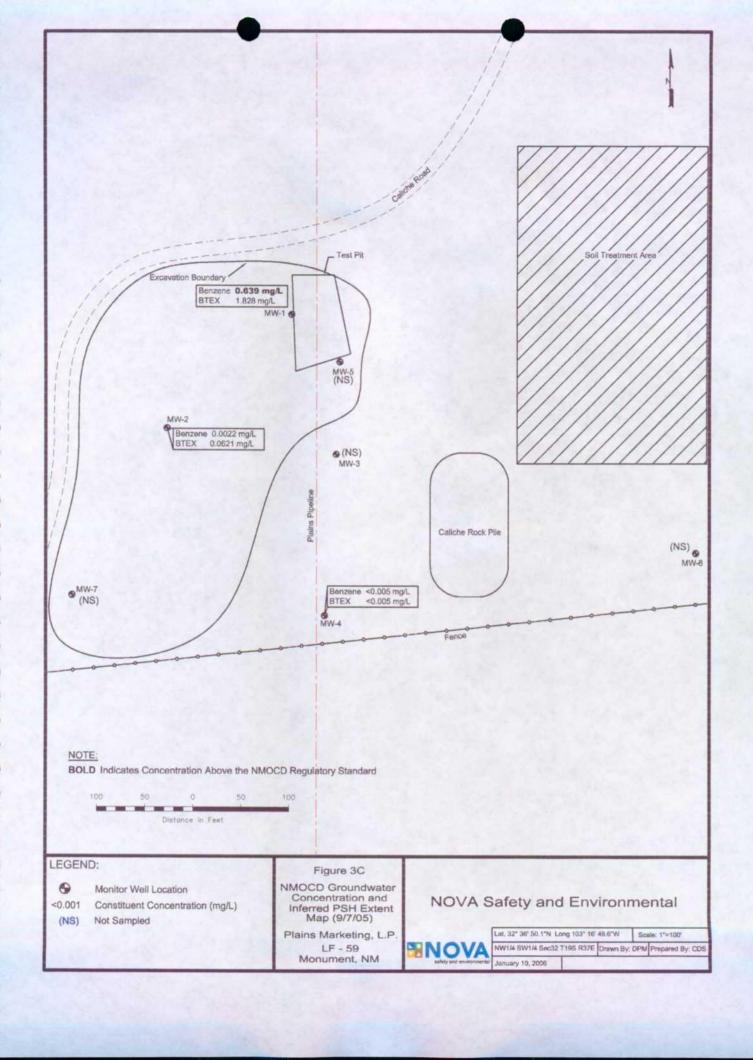


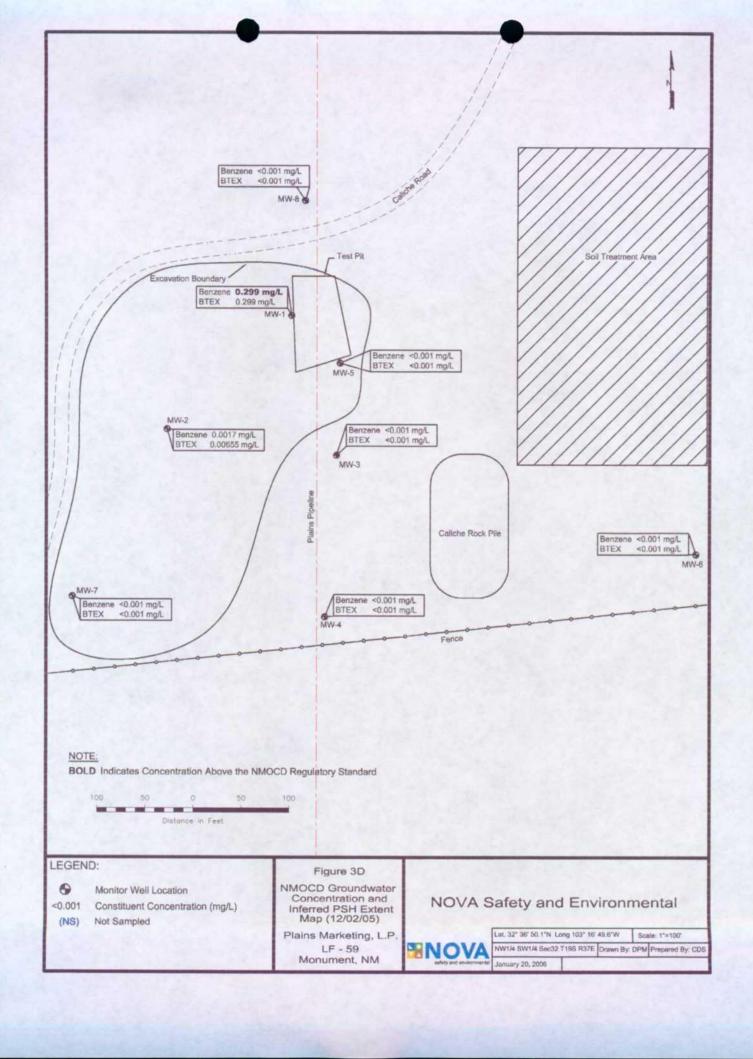












Tables

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TABLE 1

2005 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P. LF - 59 LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW-1	01/05/05	3,572.21	sheen	16.36	0.00	3,555.85
	01/13/05	3,572.21	sheen	16.72	0.00	3,555.49
	01/19/05	3,572.21	sheen	17.22	0.00	3,554.99
	01/27/05	3,572.21	sheen	17.66	0.00	3,554.55
	02/03/05	3,572.21	sheen	17.97	0.00	3,554.24
	02/10/05	3,572.21	sheen	18.34	0.00	3,553.87
	02/17/05	3,572.21	sheen	18.61	0.00	3,553.60
	02/24/05	3,572.21	sheen	18.80	0.00	3,553.41
	03/03/05	3,572.21	sheen	18.55	0.00	3,553.66
	03/08/05	3,572.21	sheen	19.00	0.00	3,553.21
	03/10/05	3,572.21	sheen	19.00	0.00	3,553.21
	03/17/05	3,572.21	sheen	18.98	0.00	3,553.23
	03/24/05	3,572.21	sheen	19.23	0.00	3,552.98
	03/31/05	3,572.21	sheen	19.36	0.00	3,552.85
	04/0705	3,572.21	sheen	19.29	0.00	3,552.92
	04/14/05	3,572.21	sheen	19.23	0.00	3,552.98
	05/24/05	3,572.21	sheen	20.09	0.00	3,552.12
	06/07/05	3,572.21	sheen	19.43	0.00	3,552.78
	06/23/05	3,572.21	sheen	19.51	0.00	3,552.70
	07/28/05	3,572.21	sheen	19.58	0.00	3,552.63
	08/24/05	3,572.21	sheen	18.19	0.00	3,554.02
	09/07/05	3,572.21	_	18.96	0.00	3,553.25
	09/30/05	3,572.21	-	19.29	0.00	3,552.92
	10/28/05	3,572.21	sheen	19.42	0.00	3,552.79
	11/16/05	3,572.21	sheen	19.50	0.00	3,552.71
	12/02/05	3,572.21	_	19.54	0.00	3,552.67
	12/30/05	3,572.21	sheen	19.59	0.00	3,552.62
MW-2	03/08/05	Unable to	Gauge			
	06/07/05	3,571.46	-	21.82	0.00	3,549.64
	09/07/05	3,571.46	-	20.60	0.00	3,550.86
	12/02/05	3,571.46	-	22.06	0.00	3,549.40
MW-3	03/08/05	3,573.46	-	20.28	0.00	3,553.18
	06/07/05	3,573.46	-	20.46	0.00	3,553.00
	09/07/05	3,573.46	-	20.19	0.00	3,553.27
	12/02/05	3,573.46	-	20.53	0.00	3,552.93
MW-4	01/05/05	3,570.15	sheen	20.00	0.00	3,550.15
	01/13/05	3,570.15	sheen	19.98	0.00	3,550.17
	01/19/05	3,570.15	sheen	20.01	0.00	3,550.14
	01/27/05	3,570.15	sheen	20.08	0.00	3,550.07
	02/03/05	3,570.15	sheen	20.11	0.00	3,550.04

TABLE 1

2005 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P. LF - 59 LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW-4	02/10/05	3,570.15	sheen	20.17	0.00	3,549.98
	02/17/05	3,570.15	sheen	20.23	0.00	3,549.92
	02/24/05	3,570.15	sheen	20.19	0.00	3,549.96
	03/03/05	3,570.15	sheen	20.14	0.00	3,550.01
	03/08/05	3,570.15	sheen	20.33	0.00	3,549.82
	03/10/05	3,570.15	sheen	20.33	0.00	3,549.82
	03/17/05	3,570.15	sheen	20.29	0.00	3,549.86
	03/24/05	3,570.15	sheen	20.33	0.00	3,549.82
	03/31/05	3,570.15	sheen	20.38	0.00	3,549.77
	04/07/05	3,570.15	sheen	20.37	0.00	3,549.78
	04/14/05	3,570.15	sheen	20.29	0.00	3,549.86
	05/24/05	3,570.15	sheen	18.99	0.00	3,551.16
	06/07/05	3,570.15	sheen	20.39	0.00	3,549.76
	06/23/05	3,570.15	sheen	20.50	0.00	3,549.65
	07/28/05	3,570.15	sheen	20.50	0.00	3,549.65
	08/24/05	3,570.15	sheen	20.49	0.00	3,549.66
	09/07/05	3,570.15	sheen	20.25	0.00	3,549.90
	09/30/05	3,570.15	-	20.30	0.00	3,549.85
	10/28/05	3,570.15	sheen	20.61	0.00	3,549.54
	11/16/05	3,570.15	sheen	20.62	0.00	3,549.53
	12/02/05	3,570.15	-	20.67	0.00	3,549.48
	12/30/05	3,570.15	sheen	20.82	0.00	3,549.33
	12,00,00	5,57,5115		20.02	0.00	2,0 13.00
MW-5	03/08/05	3,572.92	_	18.68	0.00	3,554.24
11111 5	06/07/05	3,572.92	_	19.12	0.00	3,553.80
	09/07/05	3,572.92	_	18.55	0.00	3,554.37
	12/02/05	3,572.92	_	19.24	0.00	3,553.68
	12/02/05	3,072.72	· .	15.21		3,333.00
MW-6	03/08/05	3,572.11		18.11	0.00	3,554.00
17777 0	06/07/05	3,572.11	_	18.28	0.00	3,553.83
	09/07/05	3,572.11	_	18.01	0.00	3,554.10
	12/02/05	3,572.11		18.44	0.00	3,553.67
	12/02/03	3,3,2.11	_	10.77	0.00	3,333.07
MW-7	03/08/05	3,569.75	-	21.48	0.00	3,548.27
	06/07/05	3,569.75	-	22.27	0.00	3,547.48
	09/07/05	3,569.75	-	21.21	0.00	3,548.54
	12/02/05	3,569.75	-	22.64	0.00	3,547.11
MWO	10/07/05	2 572 50		20.75		2.550.04
MW-8	10/07/05 12/02/05	3,573.59 3,573.59	-	20.75 20.90	0.00	3,552.84 3,552.69

Note: "-" denotes no PSH measured during gauging.

Elevations based on the North American Vertical Datum of 1929.

TABLE 2

2005 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P. LF - 59 LEA COUNTY, NEW MEXICO

All results are reported in mg/L.

		SW 846-8021B, 5030						
SAMPLE LOCATION	SAMPLE DATE	BENZENE	TOLUENE	ETHYL- BENZENE	m, p- XYLENES	o - XYLENE		
NMOCD Regulatory Limit		0.01 0.75 0.75		0.62				
MW-1	03/08/05	0.190	0.020	0.173		556		
	06/07/05	0.554	<0.2	< 0.2		572		
	09/07/05	0.639	< 0.01	0.204		985		
	12/02/05	0.299	<0.1	<0.1	.<(0.1		
MW-2	03/08/05	Not same	led due well	obstruction				
11111 2	06/07/05	<0.001	<0.001	< 0.001	<0	001		
	09/07/05	0.00220	< 0.001	0.0238		361		
	12/02/05	0.00170	<0.001	0.00240		0250		
					·			
MW-3	03/08/05	Not sample	ed due to sam					
	06/07/05	Not sample	ed due to sam					
	09/07/05	Not sample	ed due to sam	ple reduction				
	12/02/05	< 0.001	< 0.001	< 0.001	< 0.001			
					u.			
MW-4	03/08/05	0.019	0.017	< 0.01	0.038			
	06/07/05	< 0.005	< 0.005	< 0.005	<0.005			
	09/07/05	< 0.005	< 0.005	< 0.005	< 0.005			
	12/02/05	<0.001	<0.001	<0.001	<0.001			
MW-5	03/08/05	Not sample	d due to sam					
2,2,7,0	06/07/05		ed due to sam					
	09/07/05	Not sampled due to sample reduction						
	12/02/05	<0.001	<0.001	<0.001	<0.	001		
MW-6	03/08/05		ed due to sam					
	06/07/05		ed due to sam					
	09/07/05	Not sampled due to sample reduction						
	12/02/05	<0.001	<0.001	<0.001	<0.	001		
MW-7	03/08/05	Not sampled due to sample reduction						
	06/07/05	<0.001	<0.001	< 0.001	<0.001			
	09/07/05		Not sampled due to sample reduction		70.001			
	12/02/05	<0.001	<0.001	< 0.001	<0.001			
•								
MW-8	10/10/05	<0.001	< 0.001	< 0.001	<0.	001		
	12/02/05	< 0.001	< 0.001	< 0.001		001		

Note: m,p and o xylenes combined when analyzed by Trace Labaoratories, Inc. only.

Appendices

Appendix A:
Notification of Release and Corrective
Action (Form C-141)

Bill Seeth Flore 1 Artesta, NM 68210 | Discrict III - (505) 334-6178 | 1000 Rio Brazon Road Axton, NM 87410

ENV.

Phone 915

6843467

Conditions of Approval:

Ust Conservation Division 2040 South Pacheos Street Santa Fe, New Mexico 87505 (505) 827-7131

Expersion Desc.

Attached

Submit 2 empter to Appropriate District Office in accordance with Rule 1.66 on back side of form

STATE BURN 1 F. 1999-59 District IV - (985) 827-7(31 Release Notification and Corrective Action Iskul Report | Final Report **OPERATOR** ECTTENERGY Pipeline ennah FROST PO BOY 1660 Facility Type ipeline Mineral Owner Lesse Na tate of New Mexico LOCATION OF RELEASE North-South Line | Feet facts the Lunge East-Wirst Line Les Les Town then Perc thous the 32 37E Lea NATURE OF RELEASE Anisme Reamered Crudeoil 200 6615 260 bb/3 CRudeoil Pipeline IPM 199 Not Required Lennah trost If a Wincomuch was impacted, Describe Pully (Attach Additional Shorts If Necessary) Describe Carry of Publica and Repedial Action Takes. (Acuseh Additional Sheets If Necessary) Internal Corrosion - Leak Clamped off well replace pipe ASAP Describe Area Affected and Cleanup Action Taken (Assach Additional Sheets of Necessary) Spill occurred in a previously remediated site. Will Evaluate for cleaning this week I beneby certally that the information given above is true and complete to the best of my knowledge and understand that parasizes to NMOCD rules and regulations all operators are responsed to report and/or file cartain release artifications and perform constitute actions for release which they enderige public health or the environment. The acceptance of a C-141 report by the NMOCD marked at Third Report does not refer the operators of liability should their operators later filed to adequately invanignes and semediate contamination that post a cluster to ground water, resident water, human health or the environment. In addition, NMOCD receptance of a C-141 report does not release the operators of responsibility for compliance with any other federal, state, or local laws and/or regulations. OIL CONSERVATION DIVISION som struck Approved by District Supervisor: