

AP - 41

APPROVALS

YEAR(S):

2006-2005



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 18, 2006

Ms. Camille Reynolds
Plains All American Pipeline, L.P.
3112 West Highway 82
Lovington, NM 88260

RE: 2005 annual Monitoring Report
Plains Hugh Gathering 090402
Ref. # 2002-10235
U/L-P, Section 11, Township 21 South, Range 37 East
NMOCD File Number: AP-0041

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division has received and reviewed the above report submitted on behalf of Plains All American Pipeline, L.P. (Plains) by Environmental Plus, Inc. This report is hereby accepted and approved with the following understandings:

Plains will:

1. Continue to sample groundwater quarterly from the monitor wells that do not exhibit phase-separated hydrocarbons (PSH).
2. Analyze samples quarterly for BTEX and annually for PAH.
3. Measure groundwater and PSH levels semi-monthly.
4. Continue manual PSH recovery.
5. Implement the previously approved abatement plan for this site.
6. Report the activities during 2006 in the 2006 Annual Monitoring Report, due in this office by April 1, 2007.

NMOCD approval does not relieve Plains of liability should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other governmental agency.

If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Copy: NMOCD, Hobbs
Pat McCasland, EPI



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Oil Conservation Division

November 4, 2005

Ms. Camille Reynolds
Plains All American Pipeline, L.P.
3112 West Highway 82
Lovington, NM 88260

RE: Stage 1 and Stage 2 Abatement Plan (Revised)
Hugh Gathering 909402 (ref. # 2002-10235) Dated May 2005
Unit Letters M of Section 12 and P of Section 11, Township 21 South, Range 37 East
Lea County, New Mexico
NMOCD Ref. AP-0041

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the proposal shown above submitted on behalf of Plains All American Pipeline, L.P. (Plains) by Environmental Plus, Inc. (EPI). This abatement plan (AP) is hereby approved, pursuant to 19.15.1.19 NMAC, with the following conditions and understandings:

1. AP ref. 4.2 "Remediation Strategy": installation of a 2-foot thick clay barrier to isolate remaining contaminants is approved. This clay barrier will be compacted to 95% percent of the material's Standard Proctor Density per ASTM D-698 and extend a minimum of 5 feet beyond the contaminated soil in the floor of the excavation. Also, Plains will install a passive soil vapor ventilation system below the clay barrier to evacuate volatile organic vapors.
2. AP ref. 4.5 "Abatement and Monitoring Schedule": the portion of this paragraph that proposes cessation of abatement of the groundwater after 4 consecutive quarters of monitoring well data below regulatory limits is not approved. Eight (8) consecutive quarters shall be required pursuant to 19.15.1.19.B (4) NMAC.
3. Installation of a covering cap is required in addition to AP proposals. This cap shall be constructed using PVC (Polyvinyl chloride), or other equivalent material that meets or exceeds the various ASTM standards for PVC, shall be at least 12 mils thick, shall extend at least 3 feet beyond the areas of contamination, and shall be covered with at least 3 feet of clean soil prior to "backfilling, contouring and reseeding" activities described in parts 4.2.1.5 and 4.2.2.5 of the abatement plan.

AP-0041 Plains Pipeline, L.P.

November 4, 2005

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NMOCD approval of this abatement plan does not relieve Plains of liability should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other local, state or federal governmental agency.

If you have any questions, contact Ed Martin at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION



Roger C. Anderson
Environmental Bureau Chief

Copy: NMOCD, Hobbs
Environmental Plus, Inc.

Martin, Ed, EMNRD

From: Martin, Ed, EMNRD
Sent: Tuesday, November 22, 2005 3:09 PM
To: 'Camille J Reynolds'
Subject: RE: Hugh Gathering

The request outlined below for the "Hugh Gathering" site is approved.

New Mexico Oil Conservation Division approval does not relieve Plains of liability should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other local, state, or federal governmental agency.

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Phone: 505-476-3492
Fax: 505-476-3462
email: ed.martin@state.nm.us

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

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]
Sent: Monday, November 21, 2005 7:04 AM
To: Martin, Ed, EMNRD
Subject: Hugh Gathering

Mr. Martin:

This e-mail is a follow up to our phone conversation on Friday, November 18 regarding the OCD approval letter for the Stage 1 and 2 Abatement Plan for the Hugh Gathering release site. This report was submitted by EPI on behalf of Plains. In the OCD approval letter dated November 4, 2005, the third item states that Plains will install a covering cap in addition to AP proposals. Plains is requesting an exception for part three due to the soil that will be utilized during backfilling activities. The soil will be clean soil purchased from the landowner.

Please call me with any question regarding this matter. As always thank you for your time and consideration.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

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

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Attention:

The information contained in this message and/or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you received this in error, please contact the Plains Service Desk at 713-646-4444 and delete the material from any system and destroy any copies.

This footnote also confirms that this email message has been scanned for Viruses and Content and cleared.

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November 4, 2005

Page 2 of 2

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If you have any questions, contact Ed Martin at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with the first name "Roger" being more prominent than the last name "Anderson".

Roger C. Anderson
Environmental Bureau Chief

Copy: NMOCD, Hobbs
Environmental Plus, Inc.