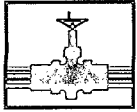


AP - 41

GENERAL CORRESPONDENCE

YEAR(S):
2006-1997



PLAINS
ALL AMERICAN

March 20, 2006

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

Re: Plains All American – Annual Monitoring Report
One Site 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 the Annual Monitoring report for the following site:

Hugh Gathering

Section 11, Township 21 South, Range 37 East, Lea County

EPI prepared this document and has vouched for the accuracy and completeness. On behalf of Plains All American, I have personally reviewed the document and interviewed EPI in order to verify the accuracy and completeness of the document. It is based upon this inquiry and review that Plains All American submits the enclosed Annual Monitoring Report for the above-referenced facility.

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

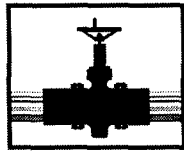
Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosure

2006 MAR 27 PM 12:33



PLAINS
ALL AMERICAN

October 18, 2005

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

RECEIVED
OCT 24 2005
OIL CONSERVATION
DIVISION

1R-78

Re: Notifications for Stage 1 and 2 Abatement Plan
Hugh Gathering 909402 (ref. #2002-10235), dated May 2005
Unit Letter M, S12 and Unit Letter P S11, T 21S, R37E
Lea County, New Mexico

Dear Mr. Martin:

Enclosed please find copies of the required notification letters and newspaper advertisements for the Stage 1 and Stage 2 Abatement Plan for Plains Pipeline's Hugh Gathering release site in Lea County, NM. If you have any questions or comments about this information, please do not hesitate to call me at 713-646-4625.

Sincerely,

Rebecca E. Esparza
Environmental and Regulatory Compliance Specialist

Cc: Camille Reynolds
Jeff Dann

Enclosures



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary**Mark E. Fesmire, P.E.**

Director

Oil Conservation Division

June 16, 2005

Ms. Camille Reynolds
Plains All American Pipeline, L.P.
3112 West Hwy 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

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Plains All American Pipeline's (Plains) report as shown above.

The OCD has determined that the above referenced Stage 1 and Stage 2 Abatement Plan is **administratively complete**. Before the OCD can complete a technical review of the Stage 1 and Stage 2 proposals, the OCD requires that:

1. Plains issue, by July 18, 2005, a notice of publication in the Albuquerque Journal and Hobbs News-Sun pursuant to OCD Rule 19.G.(2), using the format attached.
2. Prior to issuing public notice, Plains shall issue written notice of the plan pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1)(d) can be found at www.emnrd.state.nm.us/oed/Bureaus/enviro.htm.
3. Plains shall notify, in writing, the individuals and organizations listed in part 4.6 of the plan.
4. Plains provide the OCD with proof of publication and proof of written notice by July 22, 2005. Proof of notice shall include a map of the surface owners of record within one (1) mile of the perimeter of the site and shall identify compliance with each of the provisions of OCD Rule 19.G.

If you have any questions, please contact Ed Martin at (505) 476-3492.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

cc: Larry Johnson, Hobbs OCD District Office

Plains All American Pipeline, L.P.
Stage 1 and Stage 2 Abatement Plan
Hugh Gathering Site
July 16, 2005
Page 2 of 2

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 and Stage 2 Abatement Plan Proposals have been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico 87260, has submitted a Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit M of Section 12, and Unit P of Section 11 of Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of New Mexico Water Quality Control Commission standards has been observed in ground water at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designates a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigations, characterizes the site as to geology and hydrogeology, determined vertical and horizontal extent and magnitude of vadose-zone and groundwater contamination, determined rate and direction of contaminant migration, provided inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

Any interested person may obtain further information from the Oil Conservation Division and may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that include reasons why a hearing should be held. The Stage 1 and Stage 2 Abatement Plan Proposals may be viewed at the above address or at the Oil Conservation Division Hobbs District Office, 1925 N. French Dr., Hobbs, New Mexico 88240, Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 and Stage 2 Abatement Plan Proposals, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments or a written request for a hearing may be submitted.

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a
newspaper published at
Hobbs, New Mexico, do solemnly
swear that the clipping attached
hereto was published once a
week in the regular and entire
issue of said paper, and not a
supplement thereof for a period.

of 1
_____ weeks.

Beginning with the issue dated

September 11

2005

and ending with the issue dated

September 11

2005

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 12th day of

September

2005

Notary Public.

My Commission expires
February 07, 2009
(Seal)



OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO

My Commission Expires: _____

LEGAL NOTICE

September 11, 2005

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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#21794

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

02106111000 67533222
PLAINS ALL AMERICAN
PO BOX 4648
HOUSTON, TX 77210

Advertising Receipt

Hobbs Daily News-Sun

201 N Thorp
P O Box 850
Hobbs, NM 88241-0850
Phone: (505) 393-2123
Fax: (505) 397-0610

PLAINS ALL AMERICAN
PO BOX 4648
HOUSTON, TX 77210

Cust#: 02106111-000
Ad#: 67533222
Phone: (713)646-4625
Date: 09/09/05

Ad taker: C2**Salesperson:** 06**Classification:** 673

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	09/11/05	09/11/05	1	91.13		91.13
Bold						1.00
Affidavit for legals						3.00

Payment Reference:

LEGAL NOTICE
September 11, 2005

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico, 87260, has

Total: 95.13**Tax:** 6.36**Net:** 101.49**Prepaid:** 0.00**Total Due** 101.49

APC

STATE OF NEW MEXICO
County of Bernalillo SS

Bill Tafoya, being duly sworn, declares and says that he is Classified Advertising Manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 14 day of Sept. 2004, and the subsequent consecutive publications on _____, 20____.

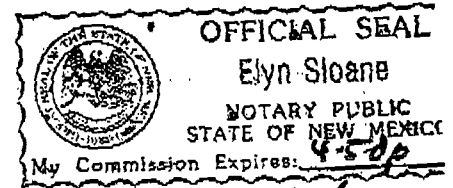
[Signature]
Sworn and subscribed to before me, a Notary Public, in and for the County of Bernalillo and State of New Mexico this 18 day of Oct. of 2005

PRICE \$46.03

Statement to come at end of month.

ACCOUNT NUMBER C 81371

CLA-22-A (R-1/93)



*** Proof ***

Albuquerque Publishing Company
7777 Jefferson NE
Albuquerque, NM 87109
(505)823-7777

Account Information

Phone: (713) 646-4625
Name: PLAINS ALL AMER
Account #: C81371
Address: PO BOX 4648

HOUSTON, TX 77210
Client:
Placed by: REBECCA E ESPARZA
Fax #:

Ad Information

Classification: 0001-Legals - Non - Government
Size: 1 x 98.000
Start date: 09-14-05 Billed size: 98.00 lines-6.5pt
Stop date: 09-14-05 Ad #: 2237367
Insertions: 1 Ad type: Liner Ad
Rate code: Non-Government
Le-
gals
Publications: Journal Daily (AM)

Ad Cost: \$ 43.12

Tax @ 6.7500 %: \$

Tax @ 7.3125 %: \$

Tax @ 7.0625 %: \$

Total: \$ 46.03

Ad Copy:

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS,
AND NATURAL
RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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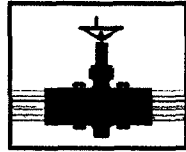
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Albuquerque Publishing Company
7777 Jefferson NE
Albuquerque, NM 87109
(505)823-7777

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Journal: September 14, 2005



PLAINS
PIPELINE, L.P.

September 9, 2005

Wayne Stephens and William Stephens
Po Box 115
Eunice, NM 88231

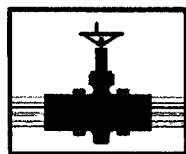
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Sincerely,

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

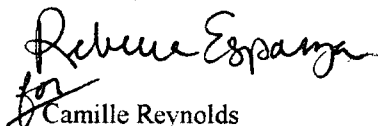
Charles A Bettis
612 Cedar Drive
Buchanan, TX 78609

Dear Sir or Madam:

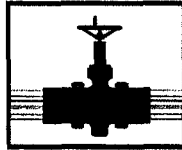
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Sincerely,


for

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

N.B. Bunin Trust
PO Box 65
Lincoln City, OR 97367

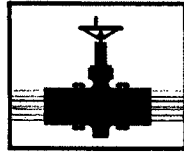
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Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005


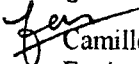
Evan May Toussaint et al
PO Box 115
Eunice, NM 88231

Dear Sir or Madam:

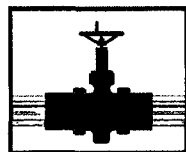
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3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

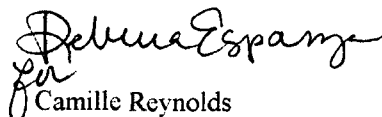
State of New Mexico Land Office
PO Box 1148
Santa Fe, NM 87504

Dear Sir or Madam:

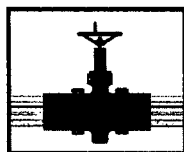
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for

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3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

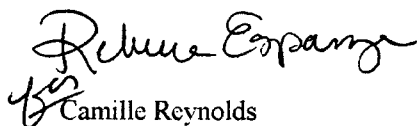
William McNeill et al
PO Box 339
Bridger, MT 59014

Dear Sir or Madam:

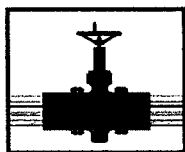
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Sincerely,



Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

James A. Bryant
8204 Indigo Court NE
Albuquerque, NM 87122

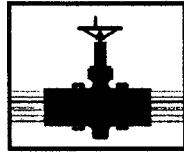
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Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005


Darrold Stephenson
Lea County Commissioner, District 5
PO Box NN
Jal, NM 88252

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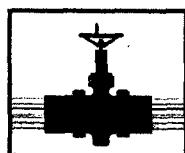

for
Camille Reynolds

Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



PLAINS
PIPELINE, L.P.


Lynn Brandvold
NM Bureau of Mines & Mineral Resources
NM Institute of Mining & Tech.
Socorro, NM 87801

Dear Sir or Madam:

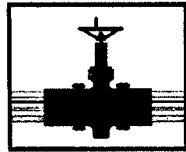
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Telephone (505) 396-3441
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Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

Ned Kendrick
Attorney at Law
325 Paseo de Peralta
Santa Fe, NM 87501

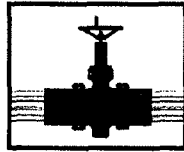
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PLAINS
PIPELINE, L.P.

September 9, 2005

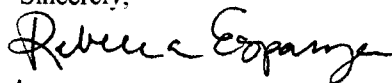
NM Oil & Gas Association
P. O. Box 1864
Santa Fe, NM 87504

Dear Sir or Madam:

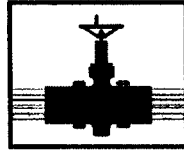
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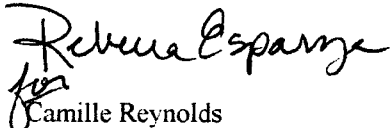
Attorney General's Office
P. O. Box 1508
Santa Fe, NM 87504

Dear Sir or Madam:

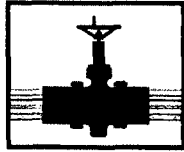
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Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

Elmo Baca
State Historic Preservation Officer
228 E Palace Ave, Villa Rivera Room 101
Santa Fe, NM 87503

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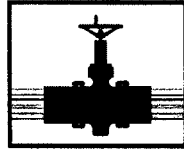
Rebecca Espargna
for

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



PLAINS
PIPELINE, L.P.

Chief
Hazardous Waste Bureau
Runnels Building
Santa Fe, NM 87504

Dear Sir or Madam:

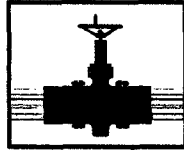
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September 9, 2005

Chief
Groundwater Bureau
Runnels Building
Santa Fe, NM 87504

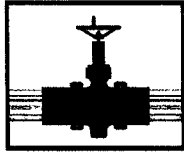
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PLAINS
PIPELINE, L.P.

September 9, 2005

Bruce S. Garber
Attorney at Law
P. O. Box 0850
Santa Fe, NM 87504

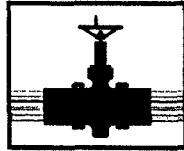
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September 9, 2005

Jay Lazarus
P. O. Box 5727
Santa Fe, NM 87502

Dear Sir or Madam:

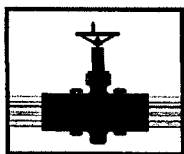
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Sincerely,

Rebecca Espinoza
for

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

State Director
Bureau of Land Management
P. O. Box 27115
Santa Fe, NM 87502

Dear Sir or Madam:

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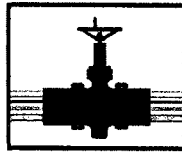
Rebecca Espinoza
for
Camille Reynolds

Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



PLAINS
PIPELINE, L.P.

State Engineer
Water Resources Division
Bataan Building
Santa Fe, NM 87503

Dear Sir or Madam:

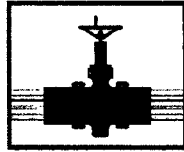
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Sincerely,

Rebena Espanza
for

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

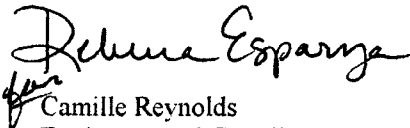
Director
NM Department of Game & Fish
Villagra Building
Santa Fe, NM 87503

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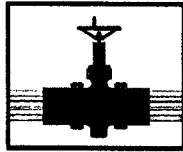
Sincerely,



Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



PLAINS

PIPELINE, L.P.

September 9, 2005

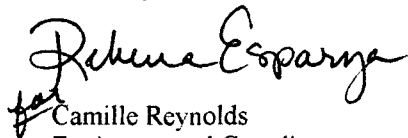
Secretary
New Mexico Environment Department
P. O. Box 26110
Santa Fe, NM 87504

Dear Sir or Madam:

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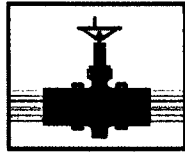
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for
Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

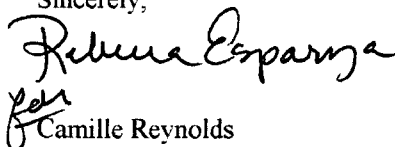
Lee Wilson & Associates
P. O. Box 931
Santa Fe, NM 87501

Dear Sir or Madam:

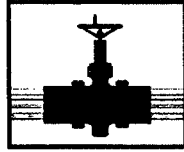
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Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

Director
State Parks & Recreation
1220 S. St. Francis
Santa Fe, NM 87505

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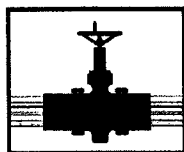
Sincerely,

for
Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



PLAINS
PIPELINE, L.P.

Soil and Water Conservation Bureau
New Mexico Agriculture Department
Ag Programs and Resources Division
Box 30005/APR
Las Cruces, NM 88003

Dear Sir or Madam:

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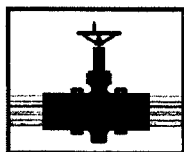
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Debbie Espinoza
for

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

Gerald R. Zimmerman
Colorado River Board of California
770 Fairmont Ave., Ste. 100
Glendale, CA 91203-1035

Dear Sir or Madam:

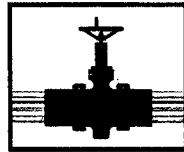
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Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

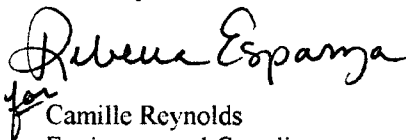
Dr. Harry Bishara
P. O. Box 748
Cuba, NM 87013

Dear Sir or Madam:

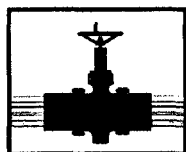
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Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



PLAINS
PIPELINE, L.P.

September 9, 2005

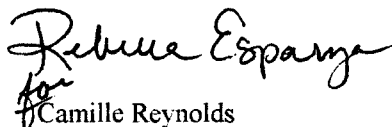
Jack A. Barnett
Colorado River Basin Ctrl. Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

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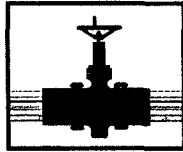
Sincerely,



for
Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



PLAINS
PIPELINE, L.P.

September 9, 2005

Ron Dutton
Southwestern Public Service
P. O. Box 1261
Amarillo, TX 79170

Dear Sir or Madam:

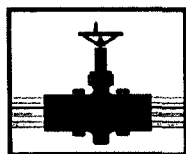
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Sincerely,

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

William Turner
New Mexico Trustee for Natural Resources
c/o American Ground Water Consultants
610 Gold St. SW, Suite 111
Albuquerque, NM 87102

Dear Sir or Madam:

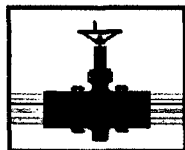
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Sincerely,

for Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.


Mike Schulz
International Technology Corp.
5301 Central Avenue, N.E., Ste 700
Albuquerque, NM 87108

Dear Sir or Madam:

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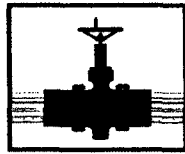
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Sincerely,


for

Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

Colin Adams
Environmental Counsel
Public Service Co. of New Mexico
414 Silver, Southwest
Albuquerque, NM 87158

Dear Sir or Madam:

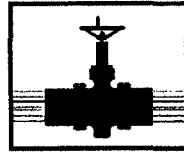
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Sincerely,

for
Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

Regional Forester
USFS Regional Office
517 Gold Avenue SW
Albuquerque, NM 87102

Dear Sir or Madam:

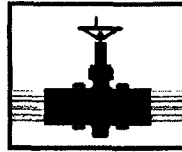
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Sincerely,

for
Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

Field Supervisor
US Fish & Wildlife Service
2105 Osuna Road, Northeast
Albuquerque, NM 87113

Dear Sir or Madam:

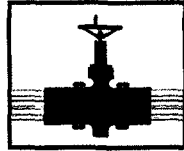
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Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260

September 9, 2005



PLAINS
PIPELINE, L.P.

Chris Shuey
Southwest Research & Information Center
P. O. Box 4524
Albuquerque, NM 87106

Dear Sir or Madam:

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for
Camille Reynolds
Environmental Coordinator
Plains All American Pipeline
Telephone (505) 396-3441
3112 West Hwy 82
Lovington, NM 87260



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

June 16, 2005

Ms. Camille Reynolds
Plains All American Pipeline, L.P.
3112 West Hwy 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

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Plains All American Pipeline's (Plains) report as shown above.

The OCD has determined that the above referenced Stage 1 and Stage 2 Abatement Plan is **administratively complete**. Before the OCD can complete a technical review of the Stage 1 and Stage 2 proposals, the OCD requires that:

1. Plains issue, by July 18, 2005, a notice of publication in the Albuquerque Journal and Hobbs News-Sun pursuant to OCD Rule 19.G.(2), using the format attached.
2. Prior to issuing public notice, Plains shall issue written notice of the plan pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1)(d) can be found at www.emnrd.state.nm.us/oed/Bureaus/environm.htm.
3. Plains shall notify, in writing, the individuals and organizations listed in part 4.6 of the plan.
4. Plains provide the OCD with proof of publication and proof of written notice by July 22, 2005. Proof of notice shall include a map of the surface owners of record within one (1) mile of the perimeter of the site and shall identify compliance with each of the provisions of OCD Rule 19.G.

If you have any questions, please contact Ed Martin at (505) 476-3492.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

cc: Larry Johnson, Hobbs OCD District Office

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 and Stage 2 Abatement Plan Proposals have been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico 87260, has submitted a Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit M of Section 12, and Unit P of Section 11 of Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of New Mexico Water Quality Control Commission standards has been observed in ground water at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designates a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigations, characterizes the site as to geology and hydrogeology, determined vertical and horizontal extent and magnitude of vadose-zone and groundwater contamination, determined rate and direction of contaminant migration, provided inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

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**PLAINS
PIPELINE**

May 16, 2005

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

1R-078

Re: Plains All American Pipeline Revised Stage 1 and 2
Abatement Plan
Hugh Gathering Site
Sections 11 and 12, T21S, R37E
Lea County, New Mexico

Dear Mr. Martin:

Please find attached for your approval the Revised Stage 1 and 2 Abatement Plan, dated May 2005, for the Hugh Gathering site located in Sections 11 and 12 of Township 21 South, and Range 37 East of Lea County, New Mexico. The Revised Stage 1 and 2 Abatement Plan details site activities conducted to date and future activities for remediation and closure of the site.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American Pipeline

Cc: Larry Johnson, NMOCD, Hobbs Office
Mr. James Bryant, 8204 Indigo Ct., Albuquerque, NM

Enclosure

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 687-2040

June 10, 1997

State of New Mexico
Oil Conservation Division - Hobbs District Office
P.O. Box 1980
Hobbs, NM 88241-1980
Attn: Wayne Price

RE: Closure Report - Hugh Gathering System
Sec. 26, T-21-S, R-37-E
Lea County, NM

Dear Wayne:

EOTT Energy Pipeline has completed remediation of crude oil contaminated soil at the above captioned leak site. Nickell Environmental Corporation conducted the remediation activities using their Deep Remediation Injection System.

Attached is a copy of the lab analysis of remediated soil from the site. Note that the TPH level is well below the 1,000 ppm level proposed in our January 30, 1997 letter to the OCD outlining the cleanup of the leak site.

EOTT Energy Pipeline, by issue of this letter and attachments requests closure on the project. If you have any questions or need additional information, please don't hesitate to call.

Sincerely,



Lennah Frost
Environmental Engineer

/lf

Attachments

cc: A. Hugh - Environmental File
Neil Stidham - Shell Pipe Line
B. Garduno

ENVIRONMENTAL LAB. OF , INC.

"Don't Treat Your Soil Like Dirt!"

NICKELL ENVIRONMENTAL
ATTN: MR. RONNIE W. NICKELL
19 BARRY ROAD
MIDLAND, TEXAS 79708
FAX: 915-520-3844

RECEIVING DATE: 04/03/97
SAMPLE TYPE: SOIL
PROJECT #: EOT 502-1
PROJECT NAME: EOTT HUGHES GATHERING
PROJECT LOCATION: EUNICE, NM

ANALYSIS DATE: 04/04/97
SAMPLING DATE: 04/03/97
SAMPLE CONDITION: INTACT

ELT#	FIELD CODE	TPH O10-C25 (mg/kg)
10645	EOT 502-1	73

QUALITY CONTROL	1040
TRUE VALUE	1118
% PRECISION	93
RPD	1

Methods: EPA SW 846-8015M Diesel Range Organics (DRO)


Michael R. Fowler

4-7-97
Date

