

AP - 52

APPROVALS

YEAR(S):

2006



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 18, 2006

Ms. Camille Reynolds
Plains Pipeline
3112 West Highway 82
Lovington, NM 88260

RE: Plains All American Pipeline Stage 1 and 2
Abatement Plan, Dated October 2005 for the
C.S. Cayler Release Site (Plains Ref. 2002-10250) Located in
Unit Letter B of Section 6, township 17 South, Range 37 East
NMPM, Lea County, New Mexico
NMOCD Reference AP-052 (Old 1R-0382)

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the abatement plan proposal shown above. This proposal for remediation activities at the site is hereby approved with the following conditions and understandings:

1. Groundwater impact at the site will be further delineated as described in section 3.7 of the proposal entitled "Proposed Monitoring Wells" and further detailed in Figure 30. A report shall be submitted to the NMOCD Santa Fe office after installation of these additional monitor wells containing well completion data and groundwater sample analyses of water collected from these wells.
2. Per section 2.12 of the proposal, Plains All American Pipeline (Plains) shall submit soil sampling results obtained during the installation of the proposed monitor wells MW11 through MW16. Upon receiving this report, the NMOCD will make a determination as to the necessity for additional boreholes inside the perimeter of the existing excavation.
3. Plains will continue the annual reporting to the NMOCD as described in section 2.13 of the proposal.
4. Per proposal section 2.11.8.1, Plains is proposing to remediate soil at the site to levels that "may be in excess of the NMOCD remedial goals prescribed according to the site rank." Such acceptable levels have yet to be determined. Plains will propose alternative soil remediation levels and obtain NMOCD approval before any backfilling of the excavation takes place. Additionally, no backfilling activities shall take place before NMOCD personnel have inspected the site.

5. Section 3.2 of the proposal is agreed to, in principle, contingent upon NMOCD inspection of the site before installation of the "oversized engineered barrier" and the NMOCD approval of Plains' report showing the soil sample analyses.
6. Plains shall not receive soil closure approval until the NMOCD is satisfied that soil contamination at the site will not pose a threat to fresh water, public health or the environment.
7. Vapor extraction and product recovery, will not deviate from the description of such activities shown in sections 3.2.6 and 3.3 of the proposal.
8. Groundwater remediation and a monitoring schedule will be accomplished according to sections 3.8 and 3.9 of the proposal respectively.

NMOCD approval of this Stage 1 and Stage 2 Abatement Plan does not relieve Plains of liability should its operations at this site, under said plan, prove to have been harmful to fresh water, public health and the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other governmental entity.

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read "Roger C. Anderson", written in a cursive style.

Roger C. Anderson
Environmental Bureau Chief

Copy: NMOCD, Hobbs
Environmental Plus, Inc.

Martin, Ed, EMNRD

To: Camille J Reynolds
Subject: RE: Plains Proposal for additional drilling

All of the proposed monitor well sites are approved.

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

Handwritten: 7R 382
AP-52

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

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]
Sent: Thursday, February 02, 2006 11:51 AM
To: Martin, Ed, EMNRD
Subject: Plains Proposal for additional drilling

Ed;

Please find attached the proposal for additional drilling to be conducted at various Plains remediation sites. Please contact me with any questions or comments.

Sincerely,

Camille

<<Additional MW installation.pdf>>

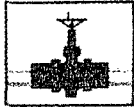
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PLAINS PIPELINE

January 31, 2006

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

Re: Plains Pipeline Remediation Sites
Various Locations in Lea County

Dear Mr. Martin:

Based on the results of our ongoing groundwater monitoring and sampling program at several of our remediation and groundwater monitoring sites in Lea County, we have identified the need for additional groundwater monitor and/or recovery wells at the following sites.

Site Name	Plains EMS No.	Site Location	Number of Wells
SPS-11	TNM SPS-11	Section 18, T18S, R36E	2
Texaco Skelly F	2002-11229	Section 21, T20S, R37E	2 and/or 3
Red Byrd #1	TNM Red Byrd #1	Section 1, T19S, R36E	6
Junction 34 to Lea	2002-10286	Section 21, T20S, R37E	3
CS Caylor	2002-10250	Section 6, T17S, R37E	6
Abandoned Vacuum 10" Sour	2004-00208	Section 8, T20S, R37E	3
34 Junction South	2005-00138	Section 2, T17S, R36E	3
WSDDU Texaco	2001-11152	Section 31, T24S, R38E	3
D. S. Hugh Gathering	2000-10807	Section 3, T21S, R37E	2

The proposed well locations are illustrated on the attached site maps. Plains requests your approval of the proposed monitor well locations at the above referenced sites. We anticipate commencement of drilling activities the week of February 13, 2006. Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American Pipeline

