

SITE ASSESSMENT WORK PLAN

**SOUTH MONUMENT GATHERING SOUR
NW ¼, NE ¼, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST
SOUTHWEST OF MONUMENT
LEA COUNTY, NEW MEXICO**

EMS #: 2001-11193

Prepared for:

Plains Marketing, L.P.
333 Clay Street, Suite 1600
Houston, Texas 77002



Prepared by:

Nova Safety and Environmental
2057 Commerce Drive
Midland, Texas 79703

November 17, 2004

Todd K. Choban

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Vice President, Technical Services

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President

*Plains - 231735
facility - PPAC 0603826677*

*incident - NPAC 0603826863
application - PPAC 0603827242*

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1.0 INTRODUCTION AND PURPOSE

On behalf of Plains Marketing, L.P. (Plains), Nova Safety and Environmental (Nova) has prepared this Site Assessment Work Plan for the site known as South Monument Gathering Sour (EMS # 2001-11193). On November 20, 2001 EOTT Energy, Corp. reported a 1200 barrel release of sour crude oil from a pipeline located approximately one half mile southwest of Monument, New Mexico. The initial response was conducted by Allstate Environmental Services in November of 2001. The site is now the responsibility of Plains, which acquired the assets of Link Energy in April of 2004. Plains has retained Nova Safety and Environmental to assess the site and determine if the site meets New Mexico Oil Conservation Division (OCD) closure standards or if further actions are necessary to achieve closure at the site.

2.0 SCOPE OF WORK

Based upon data collected during November and December of 2001, the following steps are proposed to assess the current conditions at the site known as South Monument Gathering:

- Prepare an accurate site map so that sample locations and site details can be plotted accurately.
- Collect soil samples from sidewalls and bottom holes of the excavation for Total Petroleum Hydrocarbons (TPH) and Benzene, Toluene, Ethyl benzene and total Xylenes (BTEX).
- Collect soil samples along the axis of the flow path south from the excavation to determine the adequacy of the previous remediation.
- Sample the stockpiles to determine the current concentrations of contaminants of concern.
- Upon obtaining analytical results from the above sampling events, develop a drilling/delineation plan to determine the vertical extent of contamination in any remaining areas of concern at the site. The goal will be to define the vertical and horizontal extent of contamination remaining at the site.

Composite samples will be utilized to characterize the soils from the walls and floor of the excavation. Composite samples will be obtained from the east, west, south, and north side walls, and the floor of the excavation. The axis of the flow path will be sampled by collecting a discrete grab sample from the surface every 25 linear feet and compositing four discrete grab samples into one composite sample for every 100 linear feet.

Data collected during December of 2001 indicate that the total recoverable petroleum hydrocarbon (TPH) content of all stockpiles associated with the site exceeds reuse standards set

100

by the OCD. The stockpiles will be divided into 250 yard units with each unit being sampled using a four-point composite sampling protocol. Disposition of the stockpiles is dependent on the analytical results, and will be proposed along with any required remediation plan for the site.

Upon receipt of the analytical results from the excavation and flow path samples, a drilling plan will be designed and proposed as an addendum to this work plan. The drilling plan will be designed to investigate areas remaining above OCD closure limits. The goal will be to define the vertical extent of contamination, and to investigate the potential of groundwater impact beneath the site. If the surface and excavation samples indicate that the work conducted by the previous contractor was successful in removing contamination above OCD closure requirements, no additional drilling will be proposed.

What procedure or protocol

Samples will be collected by field technicians and placed into glassware provided by Trace Analysis in Lubbock, Texas. The samples will then be placed on ice in coolers for transport to the laboratory. Strict chain-of-custody documentation will be maintained at all times. Flow path, excavation, and stockpile samples will be analyzed using SW 846-8015B for Gas and Diesel Range TPH and SW-846 8021 or SW-846 8260 for benzene, toluene, ethyl benzene and total xylenes (BTEX).

3.0 SCHEDULE OF ACTIVITIES

Task 1:

- Prepare an accurate site map

Estimated Time Period: One to one and one half weeks upon approval

Task 2:

- Site Sampling
 - o Sample excavation
 - o Flow path
 - o Stockpiles

Estimated Time Period: Concurrent with Task 1

Task 3:

- Receipt and review of analytical collected during Task 2
- Preparation of drilling plan addendum based on analytical results (if required)
- Preparation of Closure Request (if warranted)

Estimated Time Period: One month

4.0 REPORTING

Based upon the analytical results obtained from the excavation walls and floor and the flow path of the oil released at this site, a closure report will be recommended (if warranted), or an addendum will be prepared for further delineation of the site. Upon completion of site assessment activities, Nova will submit a Complete Site Assessment Report, summarizing the known excavation activities and remediation work conducted to date at the site, and transmitting the data associated with the site assessment. If warranted, the Complete Site Assessment Report will also include a Remedial Action Plan outlining the required actions to progress this site to closure.

5.0 DISTRIBUTION

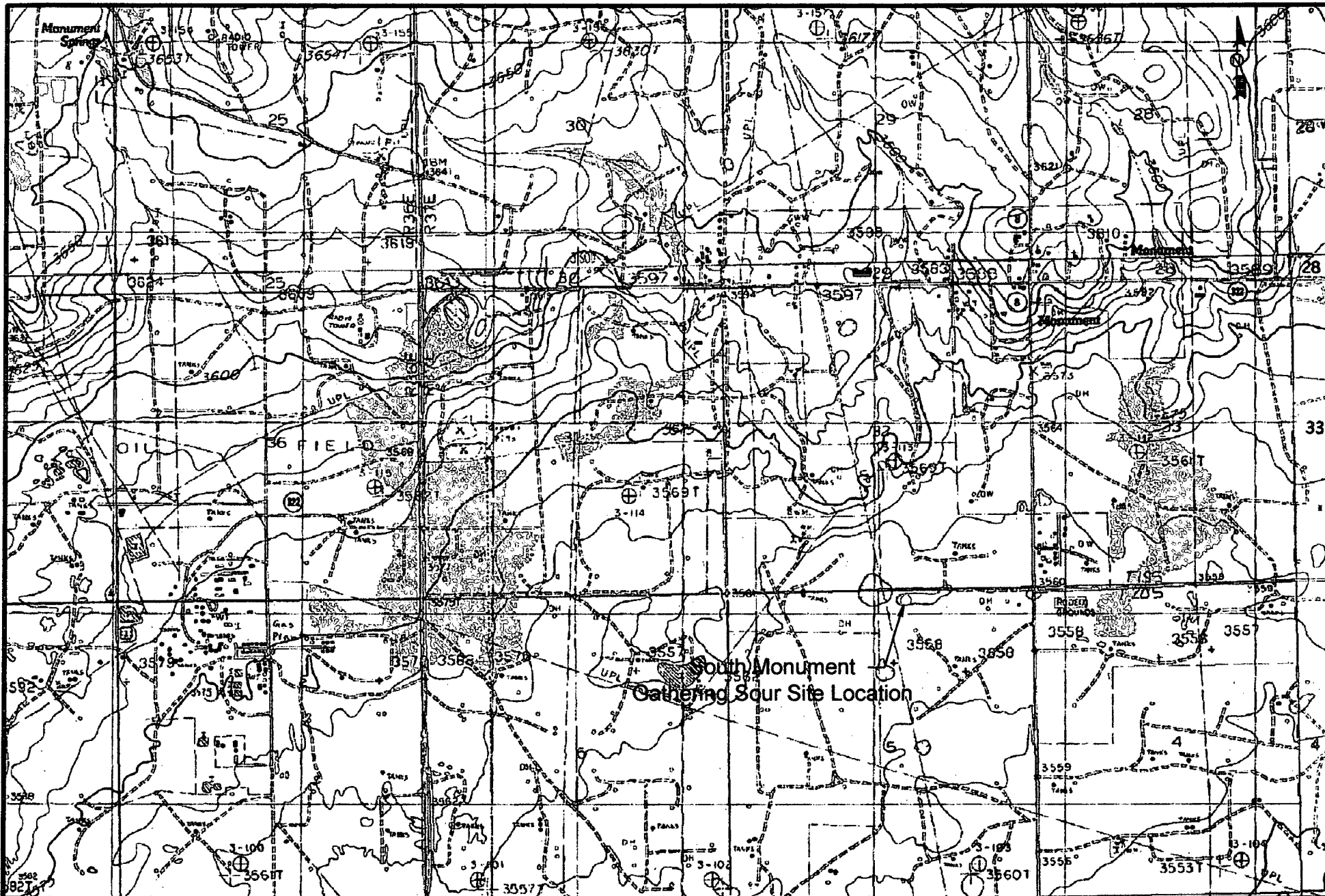
Copy 1: Chris Williams
New Mexico Oil Conservation Division (District 1)
1625 French Drive
Hobbs, NM 88240

Copy 2: Camille Reynolds
Plains Pipeline, L.P.
3112 Highway 82
Lovington, New Mexico
cjreynolds@paalp.com

Copy 3: Jeff Dann
Plains Pipeline, L.P.
333 Clay Street, Suite 1600
Houston, Texas 77002
jpdann@paalp.com

Copy 4: Nova Safety and Environmental.
2057 Commerce Drive
Midland, Texas 79703
tchoban@novatraining.cc

COPY # _____



NW 1/4 NE 1/4 Sec 5 T20S, R37E

Figure 1
Site Location Map
Plains Pipeline, L.P.

South Monument
Gathering Sour
Monument, NM

NOVA Safety and Environmental

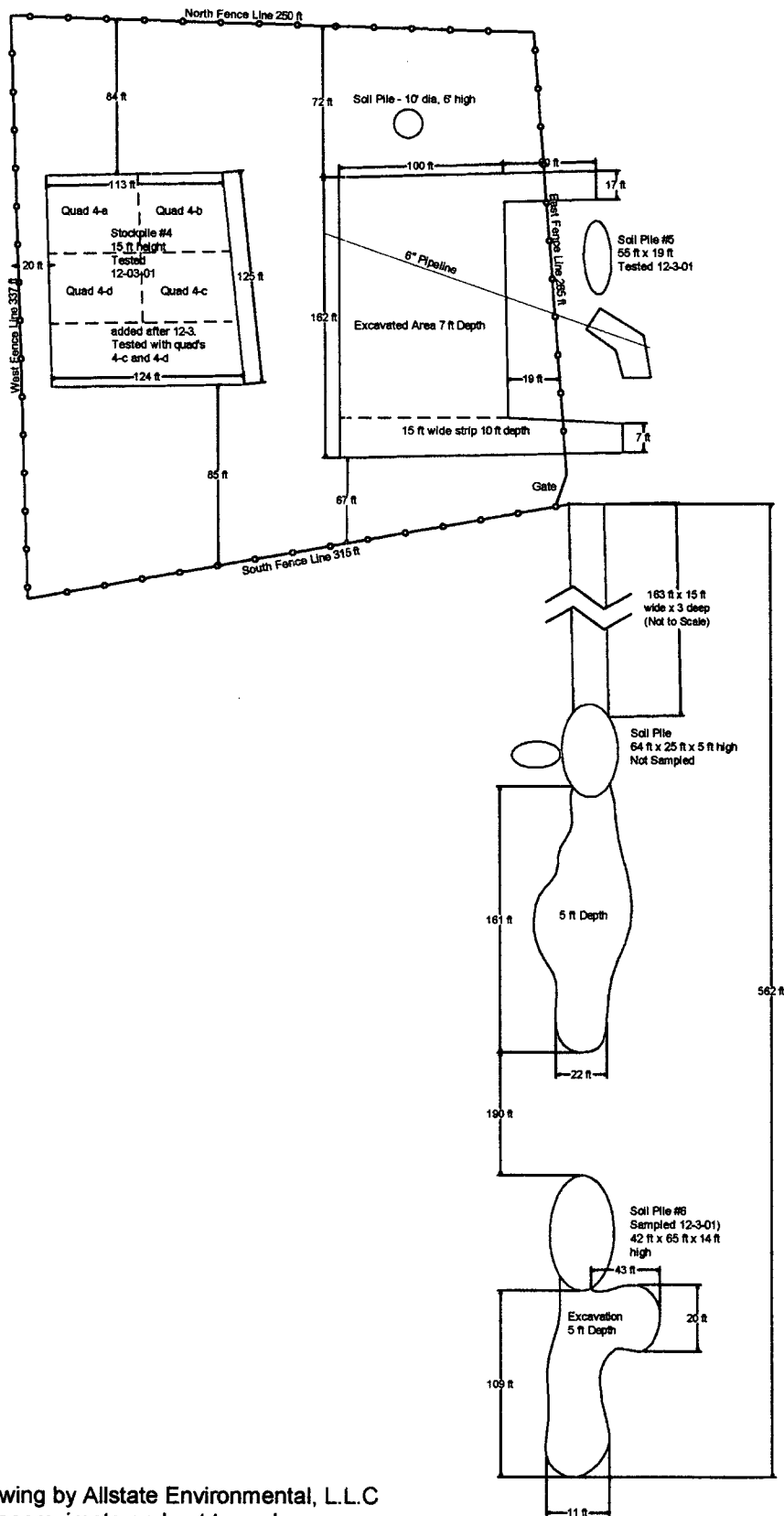


Scale: NTS

December 6, 2004

Prep By: CDS

Checked By: TKC



Adapted from drawing by Allstate Environmental, L.L.C
All distances are approximate and not to scale

LEGEND:

— Pipeline
— Fence
— Excavation

Figure 2
Site Map
Plains Pipeline, L.P.
2001-11193
South Monument
Gathering Sour
Midland, TX



NOVA Safety and Environmental

Not to Scale	Prep By: CS	Checked By: TKC
November 18, 2004		

Oct-21-04 09:53A
 Tuesday, December 11, 2004 4:55 PM

Randy Offield 915-682-4192

P.05
 p 03

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ALLSTATE SERVICES ENVIRONMENTAL
 ATTN: RANDY OFFIELD
 P.O. BOX 11322
 MIDLAND, TEXAS 79702
 FAX: 812-4192
 FAX: 864-3456 (clearing friend)


Sample Type: Soil
 Sample Condition: Intact/ Iced/ 4 deg C
 Project Name: Monument Gathering Sour
 Project #: 2001-11192
 Project Location: Las County, NM

Sampling Date: 12/02/01
 Receiving Date: 12/02/01
 Analysis Date: 12/04/01

ELT#	FIELD CODE	URO C6-C10 mg/kg	DRO C10-C20 mg/kg	Total TPH mg/kg
0102127-01	Stockpile 4 a	4430	10400	14830
0102127-02	Stockpile 4-b	5110	18600	20610
0102127-03	Stockpile 4 c	3820	11000	14820
0102127-04	Stockpile 4-d	2500	7350	9850
0102127-05	Stockpile 5	1840	5320	7160
0102127-06	Stockpile 6	4110	12000	16110

QUALITY CONTROL	477	600	1086
TRUE VALUE	505	500	1000
% INSTRUMENT ACCURACY	95	122	109
SPKSD AMOUNT	500	500	1000
ORIGINAL SAMPLE	<25	<25	<25
SPKSE	485	581	1066
SPKSE DUP	489	582	1071
% EXTRACTION ACCURACY	96	116	107
BLANK	<25	<25	<25
RPD	0.82	0.17	0.47

METHODS: TNRC 1005


 Caley D. Kline


 DATE

12500 West 120 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

Dec 11 '01 17:47

915 682 4192

PAGE.03

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company Plains Marketing, LP	Contact Camille Reynolds	
Address 5805 East Hwy. 80, Midland, TX 79706	Telephone No. 505-441-0965	
Facility Name South Monument Gathering Sour	Facility Type 6" Steel Pipeline	
Surface Owner Jimmie Cooper	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter B	Section 5	Township 20S	Range 37E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32° 36' 29.0" Longitude 103° 16' 26.8"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 1200 barrels	Volume Recovered 910 barrels
Source of Release 6" Steel Pipeline	Date and Hour of Occurrence 11-20-01	Date and Hour of Discovery 11-20-01
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Paul Sheeley	
By Whom? Frank Hernandez	Date and Hour 11-20-01@16:15	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of 6 inch steel pipeline resulted in crude oil release. Clamp was applied to the line to mitigate the release.

Describe Area Affected and Cleanup Action Taken.* The crude oil was vacuumed up and the impacted soil was excavated and stockpiled on plastic. Initial response activities included excavation and stockpiling of approximately 5,000 to 7,000 cubic yards of soil. Future response activities will include a soil and groundwater investigation and preparation of a remedial action plan.

NOTE: This information was obtained from historical EOTT files, Plains acquired EOTT/Link Energy on April 1, 2004 and Plains assumes this information to be correct.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

		OIL CONSERVATION DIVISION	
Signature:		Approved by District Supervisor:	
Printed Name: Camille Reynolds			
Title: Remediation Coordinator		Approval Date:	Expiration Date:
E-mail Address: cgreynolds@paalp.com		Conditions of Approval:	
Date: 12-29-04 Phone: 505-441-0965		Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary