

Leking, Geoffrey R, EMNRD

From: Leking, Geoffrey R, EMNRD
Sent: Wednesday, June 08, 2011 11:24 AM
To: VonGonten, Glenn, EMNRD
Subject: FW: SALINE No. 001 Inspection 04/13/2011: M-36-18S-37E 30-025-12803
Attachments: Monitor Wells History_Disposition_Saline 1.pdf

From: Whitaker, Mark A, EMNRD
Sent: Wednesday, June 08, 2011 6:37 AM
To: Leking, Geoffrey R, EMNRD
Subject: FW: SALINE No. 001 Inspection 04/13/2011: M-36-18S-37E 30-025-12803

From: Gonzales, Elidio L, EMNRD
Sent: Wednesday, June 08, 2011 5:25 AM
To: Whitaker, Mark A, EMNRD
Subject: FW: SALINE No. 001 Inspection 04/13/2011: M-36-18S-37E 30-025-12803

FYI !!

E. L. GONZALES
STAFF SUPERVISOR
EMNRD - OCD DISTRICT 1
HOBBS, NM 88240
OFFICE: 575-393-6161 X-114
CELL: 575-370-3182 FAX: 575-393-0720
ELIDIOL.GONZALES@STATE.NM.US

From: Wayne E Roberts [<mailto:weroberts@paalp.com>]
Sent: Tuesday, June 07, 2011 2:42 PM
To: Gonzales, Elidio L, EMNRD
Cc: Pierce Broach; Dennis L Shearer; Douglas S Kennedy; Shawn M Harris; Jeffrey P Dann
Subject: SALINE No. 001 Inspection 04/13/2011: M-36-18S-37E 30-025-12803

Mr. Gonzales:

Mr. Mark Whitaker called today and we discussed several more areas of concern that need to be addressed in our agreeable and continuing effort to re-establish this property and secure the release of bond. Among the items we discussed were the two monitor wells on the property and our mutual desire to properly plug and abandon these wells that are no longer useful to assure that groundwater supply is protected and preserved for further use and to eliminate the potential physical hazard. I found the records and reports for the two wells which include a description of the scenario which led to their installation. The attachment shows that once Guardian, the Country Club and others were shown that we were not the source of high chlorides in their wells, the monitor wells have remained idle and unused since.

Will you please review the report with Mark and let us know if we can obtain permission to P&A these wells? We both agree that it is the best solution for the ultimate clean up of this property along with the other sanitation and refuse/debris concerns. We await your decision on this and will get busy on the remainder of the cleanup as soon as possible.

Thank you and best regards,
Wayne E. Roberts
Plains All American
Director, Environmental & Regulatory Compliance
6 Desta Drive, Suite 6600
Midland, TX 79705
432.687.8915 Office
432.413.2574 Cellular
713.289.7498 Fax

QUEST CONSULTING, INC.

6700 W. LOOP SOUTH, SUITE 310 • BELLAIRE, TEXAS 77401 • TEL (713) 667-6323 • FAX (713) 667-6213

October 1, 2001

Mr. Ky Nichols
Plains Marketing L.P.
Route 1, Box 595
Cushing, Oklahoma 74023

Re: Monitor Well Installation and Sampling — Hobbs Brine Production Well Facility
Lea County, New Mexico
Quest Project No. 02420

Dear Ky:

This letter documents the installation and sampling of a monitor well at the Plains Marketing (PM) brine production well location in Hobbs, New Mexico. County, Texas. Quest Consulting, Inc. (Quest) was retained by PM to assist in addressing concerns raised by the New Mexico Oil Conservation Division (NMOCD) regarding elevated chloride levels in water supply wells located to the east of the PM facility. The objective of the well installation was to allow collection of a groundwater sample from a location directly between the PM brine production well and an offsite water well that exhibited elevated chloride levels in a recent sampling event. This report describes the construction and sampling of the monitor well, and the laboratory analytical results for the groundwater sample collected.

Background and Work Scope

The Hobbs brine production well is located approximately 2 miles west of the town of Hobbs, on the north side of US Highway 62/180. The site presently consists of a brine production well and associated pumping and piping equipment, three brine storage tanks, and some surplus tankage and other equipment. A monitor well is located approximately 90 feet to the east-southeast of the brine production well. The site is bounded by an undeveloped tract to the east, and further to the east by a property owned and operated by Guardian, an oilfield supply company. A water supply well is located on the northern part of the Guardian property. Another commercial property is located directly to the west, where a water supply well identified as the McNabb well is located. Figure 1 shows the general layout of the subject site and vicinity.

According to a letter dated May 31, 2001, from Environmental Strategies Corporation (ESC) to Mr. Wayne Price of the NMOCD, several samples collected from the Guardian water well in 2000 and 2001 had chloride concentrations in excess of 1,000 mg/l. The New Mexico State Water Quality Control Commission (WQCC) has set a standard of 250 mg/l of chloride for water-bearing

zones. The monitor well on the PM property showed a chloride concentration of 134 mg/l when sampled in August 1998 (at the time of installation). The ESC report states that preliminary data shows groundwater flow in the upper water-bearing unit (the Ogallala, found from the surface to a depth of about 200 ft below ground surface, or bgs) to be to the north and east. The ESC report provides a scope of work for installing a single monitor well to the east of the brine production well, on PM property.

Quest discussed the proposed well construction details with Mr. Price of the NMOCD prior to commencing any work at the site. Mr. Price indicated that the agency wanted the well to be completed to the bottom of the Ogallala water-bearing unit (approximately 175 ft bgs), and that only the bottom 10 ft of the well was to be screened, in order to determine if high-density brine had been released from the brine production well. The construction details were agreed upon by Quest and the NMOCD prior to the start of construction.

Well Installation

The well installation was performed on September 6 and 7, 2001. The drilling and well construction was performed by Eades Drilling and Pump Service of Hobbs, with a Quest geologist logging cuttings and overseeing the well construction. Mr. Paul Sheeley and Mr. Larry Johnson of the NMOCD Hobbs district office were present during much of the drilling, well construction, and well development activities. The well location, which was determined by Mr. Price, was approximately 250 ft east-northeast of the brine production well, approximately 20 ft west of the western boundary fence of the PM property. The monitor well was placed on the direct line from the brine production well to the Guardian water well.

The boring was emplaced using a truck mounted drilling rig, using air rotary (top 50 ft) and wet rotary (remainder to total boring depth) methods. The drillers utilized a very small amount (less than one quart) of synthetic water-based polymer to aid in keeping the boring from collapsing during drilling and well construction activities. The boring diameter was approximately eight inches. Cuttings were circulated to the surface, where they were inspected and logged by the Quest geologist, and then into several settling tanks. The water used in the drilling operations was provided by Eades from a fresh water well at the company's yard in Hobbs. The subsurface geology was generally a progression of poorly sorted, unconsolidated sand layers, with some gravel, with intercalated hard caliche and sandstone layers. Saturated sands were encountered at approximately 50 ft bgs. The boring was completed to 171 ft, when cuttings indicated that the "red bed" clay layer had been encountered. This stratum is considered to be the base of the Ogallala water-bearing zone, and was the agreed-upon base for the well installation. The boring log for the monitor well, providing a description of the subsurface geology, is presented in Attachment A.

The monitor well (identified as MW-2) was constructed using four-inch diameter PVC screen and riser. The well had 10 ft of .020-inch machine-slotted screen (set at 170 ft bgs), and approximately 165 ft of solid riser. A sand pack, using 12/20 size quartz sand, was set to approximately 2 ft above the top of the screen (tagged using a weighted tape measure). A 2 ft thick layer of bentonite chips was placed atop the sand pack; this layer was also tagged using

the tape measure. The remaining annulus space was filled with a cement/bentonite slurry, which was placed using a tremie pipe. The tremie pipe was originally placed to a depth of 150 ft, and was successively elevated as the annulus was filled with the slurry. The well was completed with a concrete pad and locking steel protective cover over the PVC stickup. The well construction details are presented in Attachment A.

The water used in drilling operations, and the cuttings from the well boring, were discharged into a former caliche pit directly south of the monitor well on the PM site.

Well Sampling and Analytical Results

Prior to development of the well, the static water level was measured using a water level indicator. Groundwater was encountered at a depth of 54.02 ft below the top of the well casing. The groundwater level in the nearby MW-1 was also measured at this time, with a result of 51.11 ft below top of casing.

The monitor well was developed using an electric submersible pump, which was lowered to the bottom of the well on one-inch PVC pipe. After several attempts to pump at a higher rate, which pumped the well dry, the well was pumped at a steady rate of approximately 8 gal/min for 90 minutes. It is estimated that 800 gal in total was removed from the well. For the final 25 minutes of the pumping, Quest measured pH, total dissolved solids (TDS), conductivity, and temperature on a regular basis to determine if the well had stabilized. These parameters varied less than 5% during the measurement period, and it was determined that the well had been adequately developed and purged.

A sample of the groundwater was collected into laboratory-supplied containers, and was subsequently transported to e-Lab, Inc. in Houston, Texas by overnight courier for analysis. Standard chain-of-custody procedures were followed for handling of the sample. The sample was analyzed for total dissolved solids (TDS; EPA Method 160.1), and for chlorides (EPA Method 325.3), as proposed in the ESC letter and in discussions with the NMOCD. The laboratory data sheets and chain-of-custody documentation are found in Attachment B.

The analytical results are as follows:

TDS	300 mg/l
chloride	30 mg/l

The chloride results are substantially lower than the WQCC standard of 250 mg/l. The laboratory TDS result is similar to the field results noted during the well development and purging (average of about 360 mg/l).

Conclusions

A monitor well was installed in the location recommended by the NMOCD to determine if a possible release of brine from the PM brine production well had impacted other water wells to the

east of the PM site. The well construction details were agreed upon between PM and NMOCD prior to the drilling and installation activities, and the well was constructed using these guidelines. The results of the monitor well sampling indicate no chloride impact in the Ogallala water-bearing zone in the area to the east of the brine production well. Therefore, the brine production well is not the source of elevated chlorides in the Guardian water well, or other water wells located to the east of the PM site.

We appreciate the opportunity to assist you with your environmental needs. If you have any questions regarding this project, please contact me at 713-667-6323.

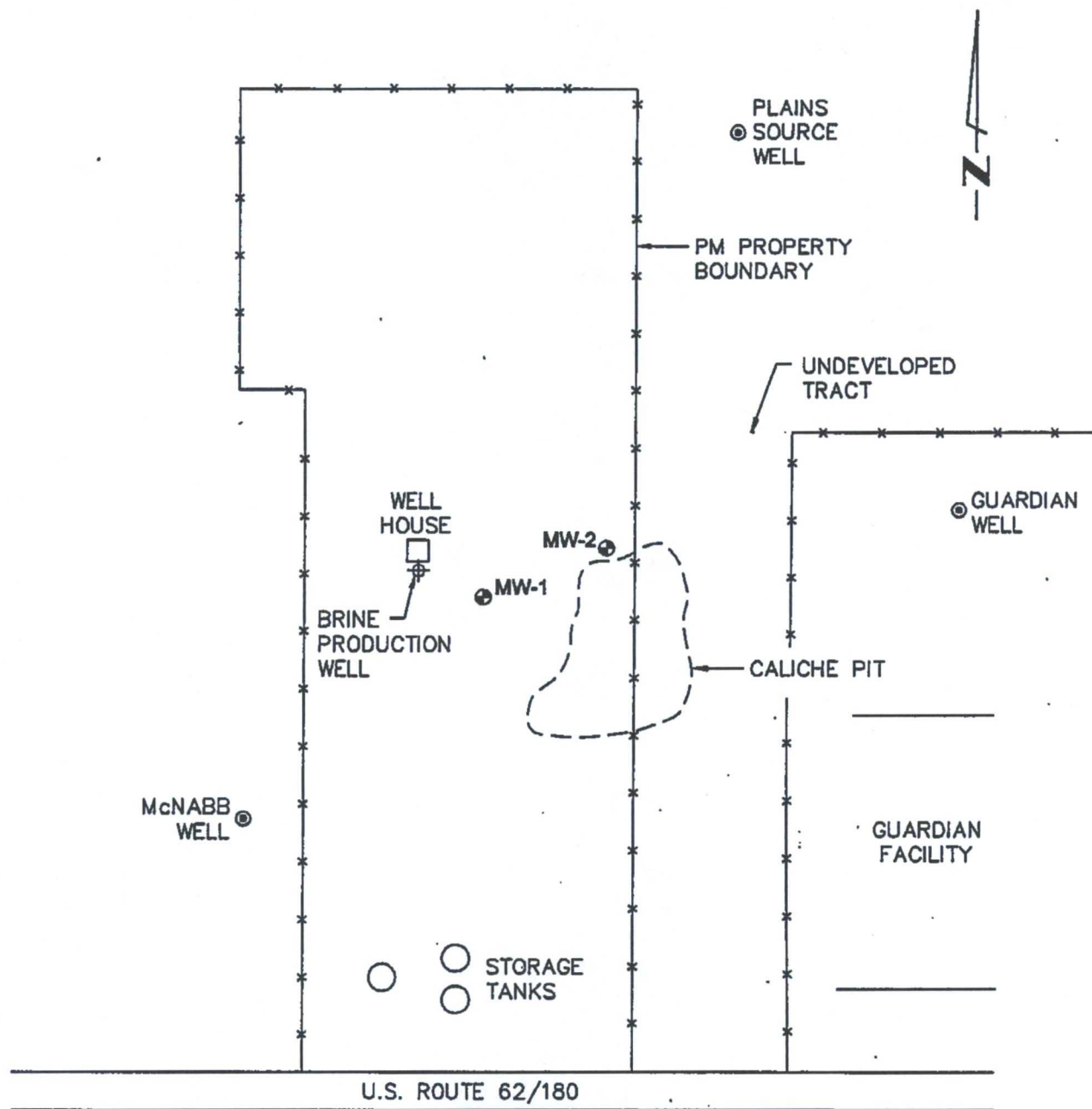
Sincerely,

A handwritten signature in black ink, appearing to read 'Douglas S Kennedy', written in a cursive style.

Douglas S Kennedy
Project Manager

Attachments

09/27/01 22:18 TDR F:\ACAD\QUEST\02420\02420-01.dwg



LEGEND:

- - MONITOR WELL
- - FRESH WATER WELL
- ⊕ - BRINE PRODUCTION WELL

0 200
FEET
APPROX.SCALE

QUEST CONSULTING, INC.

Figure 1
Site Map
PM Hobbs Brine Production Well
Hobbs, New Mexico

PROJ. NO: 02420

CK:

DATE: 9/01

Attachment A

Boring Log and Monitor Well Construction Detail

QUEST CONSULTING, INC.

Sh. 1 of 2

SKETCH MAP

WELL NUMBER MW-2
 PROJECT Plains - Hobbs Brine OWNER Plains Marketing
 LOCATION Hobbs, New Mexico PROJECT NO. 02420
 TOTAL DEPTH 170 ft. SURFACE ELEV. N/A BOREHOLE DIA. .
 WATER FIRST ENCOUNTERED Approx. 50 ft. 24-HRS. .
 SCREEN DIA. 4 inches LENGTH 10 ft. SLOT SIZE 0.010 inches
 CASING DIA. 4 inches LENGTH 160 ft. TYPE Sch. 40 PVC
 SCREENED INTERVAL 170-160 ft. bgs OTHER .
 DRILLING COMPANY Eades Drilling DRILLING METHOD Air/Water Rotary
 DRILLER . GEOLOGIST D. Kennedy DATE DRILLED 9/6/2001

DEPTH (feet)	GRAPHIC LOG	DESCRIPTION/SOIL CLASSIFICATION	WELL CONSTRUCTION	CONSTRUCTION NOTES
0		0-45		Steel Protective Well Cover
10		Buff/pink silty SAND, very fine-grained - thin caliche layers 0-5 ft		
20		- hard caliche layer at 15 ft.		
30		- hard caliche layer at 26-30 ft.		
40		- hard caliche layers at 40-45 ft. - grades to below		Cement / Bentonite Grout
50		45-104		
60		Tan silty SAND, poorly sorted, moist - saturated at 50 ft.		
70				
80				
90		- thin sandstone layers at 85-98 ft.		
100				

QUEST CONSULTING, INC.

Sh. 2 of 2

SKETCH MAP

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 PROJECT Plains - Hobbs Brine OWNER Plains Marketing
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 SCREENED INTERVAL 170-160 ft. bgs OTHER .
 DRILLING COMPANY Eades Drilling DRILLING METHOD Air/Water Rotary
 DRILLER . GEOLOGIST D. Kennedy DATE DRILLED 9/6/2001

DEPTH (feet)	GRAPHIC LOG	DESCRIPTION/SOIL CLASSIFICATION	WELL CONSTRUCTION	CONSTRUCTION NOTES
100		- very hard sandstone layer at 102 ft.		
104-110		White/buff sandy CLAY - soft.		
110-114		Very hard precipitated carbonate layer.		
114-135		Tan silty SAND		
135-168		Unconsolidated gravelly SAND - with chert and quartzite pebbles - poorly sorted, soft.		
168-171		Red silty CLAY.		
TOTAL DEPTH = 171 FT.				

09/22/01 22:36 TDR F:\ACAD\QUEST\02420\mw-2b.dwg

Attachment B

**Laboratory Analytical Data Sheets and
Chain of Custody Documentation**



e-Lab, Inc.

10450 Stancliff Road, Suite 210 • Houston, Texas 77099 • Ph: 281.530.5656 • Fax: 281.530.5887

September 19, 2001

Doug Kennedy
Quest Consulting
6700 West Loop South
Suite 310
Houston, TX 77401
TEL: (713) 667-6323
FAX (713) 667-6213

RE: Hobbs Brine 02420

Work Order No.: 0109031

Dear Doug Kennedy,

e-Lab, Inc. received 1 sample on 9/8/01 9:42:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by e-Lab, Inc. and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by e-Lab Inc. The total number of pages in this report is 7.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Shannon L. Tyrell
Project Manager

e-Lab, Inc.

Date: *September 19, 2001*

CLIENT: Quest Consulting
Project: Hobbs Brine 02420
Work Order: 0109031
Date Received: 9/8/01

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Tag Number	Collection Date
0109031-01	MW-2		9/7/01 10:32:00 AM

e-Lab, Inc.

Date: September 19, 2001

CLIENT: Quest Consulting
Project: Hobbs Brine 02420

Work Order: 0109031

Lab ID: 0109031-01A

Collection Date: 9/7/01 10:32:00 AM

Client Sample ID: MW-2

Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TOTAL DISSOLVED SOLIDS				E160.1		Analyst: SAM
Total Dissolved Solids (Residue, Filterable)	300	10		mg/L	1	9/13/01

Lab ID: 0109031-01B

Collection Date: 9/7/01 10:32:00 AM

Client Sample ID: MW-2

Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
CHLORIDE				E325.3		Analyst: SAM
Chloride	30	1.0		mg/L	1	9/19/01

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

AR Page 1 of 1

e-Lab, Inc.

Date: Sep 19 2001

CLIENT: Quest Consulting

Work Order: 0109031

Project: Hobbs Brine 02420

QC BATCH REPORT

Batch ID: R6015 InstrumentID: Wet Chemistry

MBLK Sample ID: WMBLKW1-0913 Test Code: E160.1 Units: mg/L Analysis Date 9/13/01 Prep Date:

Client ID: Run ID: WET CHEMISTRY_0109 SeqNo: 109020

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
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Total Dissolved Solids (Residue, Filtera	ND	10									
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LCS Sample ID: WLCSW1-0913 Test Code: E160.1 Units: mg/L Analysis Date 9/13/01 Prep Date:

Client ID: Run ID: WET CHEMISTRY_0109 SeqNo: 109021

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
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Total Dissolved Solids (Residue, Filtera	994	10	1000	0	99.4	75	125	0			
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LCSD Sample ID: WLCSW2-0913 Test Code: E160.1 Units: mg/L Analysis Date 9/13/01 Prep Date:

Client ID: Run ID: WET CHEMISTRY_0109 SeqNo: 109277

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
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Total Dissolved Solids (Residue, Filtera	922	10	1000	0	92.2	75	125	0			
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LCSD Sample ID: WLCSW3-0913 Test Code: E160.1 Units: mg/L Analysis Date 9/13/01 Prep Date:

Client ID: Run ID: WET CHEMISTRY_0109 SeqNo: 109278

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
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Total Dissolved Solids (Residue, Filtera	902	10	1000	0	90.2	75	125	0			
--	-----	----	------	---	------	----	-----	---	--	--	--

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

U - Analyzed for but not detected

QC Page 1 of 2

CLIENT: Quest Consulting
Work Order: 0109031
Project: Hobbs Brine 02420

QC BATCH REPORT

Batch ID: R6050 InstrumentID: Wet Chemistry

MBLK Sample ID: WBLKW1-0919 Test Code: E325.3 Units: mg/L Analysis Date 9/19/01 Prep Date:
 Client ID: Run ID: WET CHEMISTRY_0109 SeqNo: 109734

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chloride	ND	1.0									

LCS Sample ID: WLCSW1-0919 Test Code: E325.3 Units: mg/L Analysis Date 9/19/01 Prep Date:
 Client ID: Run ID: WET CHEMISTRY_0109 SeqNo: 109735

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chloride	999.8	1.0	1000	0	100	80	120	0			

MS Sample ID: 0109031-01BMS Test Code: E325.3 Units: mg/L Analysis Date 9/19/01 Prep Date:
 Client ID: MW-2 Run ID: WET CHEMISTRY_0109 SeqNo: 109738

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chloride	47.13	1.0	20	29.52	88.1	80	120	0			

DUP Sample ID: 0109031-01BDUP Test Code: E325.3 Units: mg/L Analysis Date 9/19/01 Prep Date:
 Client ID: MW-2 Run ID: WET CHEMISTRY_0109 SeqNo: 109737

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chloride	28.57	1.0	0	0	0	0	0	29.52	3.28	20	

Qualifiers: ND - Not Detected at the Reporting Limit
 J - Analyte detected below quantitation limits

 S - Spike Recovery outside accepted recovery limits
 R - RPD outside accepted recovery limits

 B - Analyte detected in the associated Method Blank
 U - Analyzed for but not detected

Leking, Geoffrey R, EMNRD

From: Leking, Geoffrey R, EMNRD
Sent: Tuesday, July 26, 2011 8:40 AM
To: Hansen, Edward J., EMNRD
Cc: Gonzales, Elidio L, EMNRD; VonGonten, Glenn, EMNRD
Subject: FW: SALINE No. 001 Inspection 04/13/2011: M-36-18S-37E 30-025-12803
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Ed

I think that Glenn passed this on to you...maybe a couple weeks or so ago...Plains has a Saltwater facility that they are abandoning...they have two monitoring wells that were used to display that they were not the source of chloride contamination in some residential wells...they did that but never got the okay to plug the wells...can they plug the wells?...I think there is enough information attached so that you can track this one down...let me know...thanks a lot...

Geoff

From: Leking, Geoffrey R, EMNRD
Sent: Wednesday, June 08, 2011 11:24 AM
To: VonGonten, Glenn, EMNRD
Subject: FW: SALINE No. 001 Inspection 04/13/2011: M-36-18S-37E 30-025-12803

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FYI !!

E. L. GONZALES
STAFF SUPERVISOR
EMNRD - OCD DISTRICT 1
HOBBS, NM 88240
OFFICE: 575-393-6161 X-114
CELL: 575-370-3182 FAX: 575-393-0720
ELIDIOL.GONZALES@STATE.NM.US

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Thank you and best regards,
Wayne E. Roberts
Plains All American
Director, Environmental & Regulatory Compliance
6 Desta Drive, Suite 6600
Midland, TX 79705
432.687.8915 Office
432.413.2574 Cellular
713.289.7498 Fax