

CORRESPONDENCE

MISC.

Martin, Ed

From: James1Luke@aol.com
Sent: Friday, March 18, 2005 3:31 PM
To: EMARTIN@state.nm.us
Subject: Re: Hugh Gathering

1R-0078

Thank you. We received our copy yesterday afternoon and are in the process of reviewing. Hopefully, the plan is *technically correct since our backgrounds are not in this field. We appreciate your communications with us.*
L & J Bryant

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3/18/2005

Martin, Ed

To: james1luke@aol.com
Cc: Anderson, Roger; Fesmire, Mark
Subject: Plains All American Hugh Gathering Site

The Oil Conservation Division has not yet received an abatement plan for this site. I have talked to Plains about this, and they have promised to have the abatement plan in to this office by the end of next week (March 18, 2005). When I receive it, I will send you a copy.

Attached are the groundwater standards that we use for these types of sites.



Cleanup
Standards1.doc

Soil cleanup standards depend upon the location and its proximity to groundwater. Generally speaking here are the standards we use:



Cleanup
Standards.doc

I will keep you updated as to the progress of the submission of the abatement plan and work on the plan as it progresses.

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

Martin, Ed

From: Anderson, Roger
Sent: Friday, March 04, 2005 2:08 PM
To: Martin, Ed
Subject: FW: Abatement plan: Plains All American Hugh Gathering #2002-10235

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

From: Fesmire, Mark
Sent: Friday, March 04, 2005 12:44 PM
To: Anderson, Roger
Subject: FW: Abatement plan: Plains All American Hugh Gathering #2002-10235

Roger,

More of the last message.

Mark

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

From: James1Luke@aol.com [mailto:James1Luke@aol.com]
Sent: Tuesday, March 01, 2005 7:32 AM
To: MFesmire@state.nm.us
Subject: Fwd: Abatement plan: Plains All American Hugh Gathering #2002-10235

Mr. Fesmire:

UL-P SE1/4 of the SE1/4 of Section 11 T21S R37E, Lea County, New Mexico

In our original email we neglected to ask about the standards for clean up of oil spills within New Mexico. What are the standards? How much of the contaminated soil must be removed, how deep, down to the water table where the contamination has reached? Please inform us of any requirements the State of New Mexico places upon the companies responsible.

Please reply by return email or telephone 505-797-7788.

Thank you.
Lucille Bryant
James A. Bryant

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3/8/2005

Martin, Ed

From: Anderson, Roger
Sent: Friday, March 04, 2005 2:08 PM
To: Martin, Ed
Subject: FW: Abatement plan: Plains All American Hugh Gathering #2002-10235

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

From: Fesmire, Mark
Sent: Friday, March 04, 2005 12:42 PM
To: 'James1Luke@aol.com'
Cc: Anderson, Roger
Subject: RE: Abatement plan: Plains All American Hugh Gathering #2002-10235

Mr. and Mrs Bryant:

I have forwarded your request to Mr. Roger Anderson, Environmental Bureau Chief for the Oil Conservation Division. He should be able to answer your questions and get back to you in the near future. If you need to reach him by telephone, his number is 505-476-3490. If you need to reach me, my number is 505-476-3460.

Mark Fesmire
OCD Director

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

From: James1Luke@aol.com [mailto:James1Luke@aol.com]
Sent: Monday, February 28, 2005 7:31 PM
To: MFesmire@state.nm.us
Subject: Abatement plan: Plains All American Hugh Gathering #2002-10235

Dear Mr. Fesmire:

As owners of UL-P SE1/4 of the SE1/4 of Section 11 T21S R37E, Lea County, New Mexico, we are requesting information regarding the filing of an Abatement Plan regarding the cleaning of contaminated soil at this site which resulted from an oil pipeline leak. Has the Plan been filed? If it has been, how do we obtain a copy? If not, do you know why it has not been filed?

We became aware inadvertently of this oil pipeline leak. On February 1, 2005, we initiated a telephone call to Environmental Plus, Inc. resulting in a telephone call from a Plains All American representative. We were advised that the Abatement Plan would take about two weeks to complete.

Please advise us of the situation and of any information that should be forthcoming to us as property owners.

You may reach us by return email or telephone us at 505-797-7788 in Albuquerque.

Thank you.
James A. Bryant
Lucille Bryant

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3/8/2005



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

October 14, 2004

Mr. Jeffrey P. Dann
Plains All American L.P.
P.O. Box 4648
Houston, TX 77210-4648

IR-78

Dear Mr. Dann:

The New Mexico Oil Conservation Division (NMOCD) has received your letter, dated September 20, 2004, identifying the need for additional groundwater monitor and/or recovery wells at various sites. This request is hereby approved.

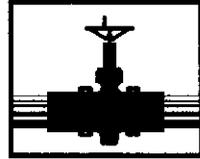
This approval does not relieve Plains Marketing, L.P. of any future liability at these sites should it prove that Plains' operations have caused harm to public health or the environment. Nor does it relieve Plains of its obligation to comply with the rules and regulations of any other governmental agency.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Cc: Larry Johnson, NMOCD, Hobbs
Camille Reynolds, Plains, Midland



PLAINS

MARKETING, L.P.

September 20, 2004

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

Re: Plains Marketing, L.P. (formerly Link Energy) Remediation Sites
Various Locations in Lea County

Dear Mr. Martin:

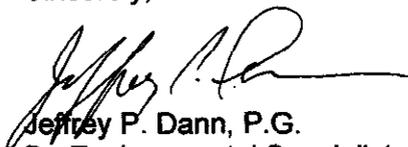
Based on the results of our ongoing groundwater monitoring and sampling program at several of our remediation and groundwater monitoring sites in Lea County, we have identified the need for additional groundwater monitor and/or recovery wells at the flowing sites.

Site Name	Plains EMS No.	Site Location	Number of Wells
Jct 34 to Lea	2002-10286	Section 21, T20S, R37E	3
Livingston Line-Bob McCasland	2001-11043	Section 3, T21S, R37E	2
Hugh Gathering	2002-10235	Section 11, T21S, R37E	1
C. S. Caylor	2002-10250	Section 6, T17S, R37E	5
Lovington Deep 6-Inch	2002-1-312	Section 6, T21S, R36E	6
Kimbrough Sweet	2000-10757	Section 3, T18S, R37E	2
8" Moore to Jal #1	2002-10270	Section 16, T17S, R37E	3
8" Moore to Jal #2	2002-10273	Section 16, T17S, R37E	3
Darr Angell #1	Darr Angell #1	Section 11, T15S, R37E	1
Darr Angell #4	2001-10876	Section 2/11, T15S, R37E	2
Red Byrd #1	Red Byrd #1	Section 1, T19S, R36E	5
HDO 90-23	HDO 90-23	Section 6, T20S, R37E	2
Monument 6" Pipeline	2001-11056	Section 5, T20S, R37E	3
Texaco Skelly F	2002-11229	Section 21, T20S, R37E	1
SPS-11	SPS-11	Section 18, T18S, R36E	2
Monument #11	TNM Mon #11	Section 30, T19S, R37E	2
Monument #2	TNM Mon #2	Section 6, T20S, R37E	1
Monument #17	TNM Mon #17	Section 29, T19S, R37E	1
Monument #18	TNM Mon #18	Section 7, T20S, R37E	2
98-05A	TNM 98-05A	Section 26, T21S, R37E	1
LF-59	LF-59	Section 32, T19S, 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 October 4, 2004.

Should you have any questions or comments concerning this information, please contact me at (713) 646-4657.

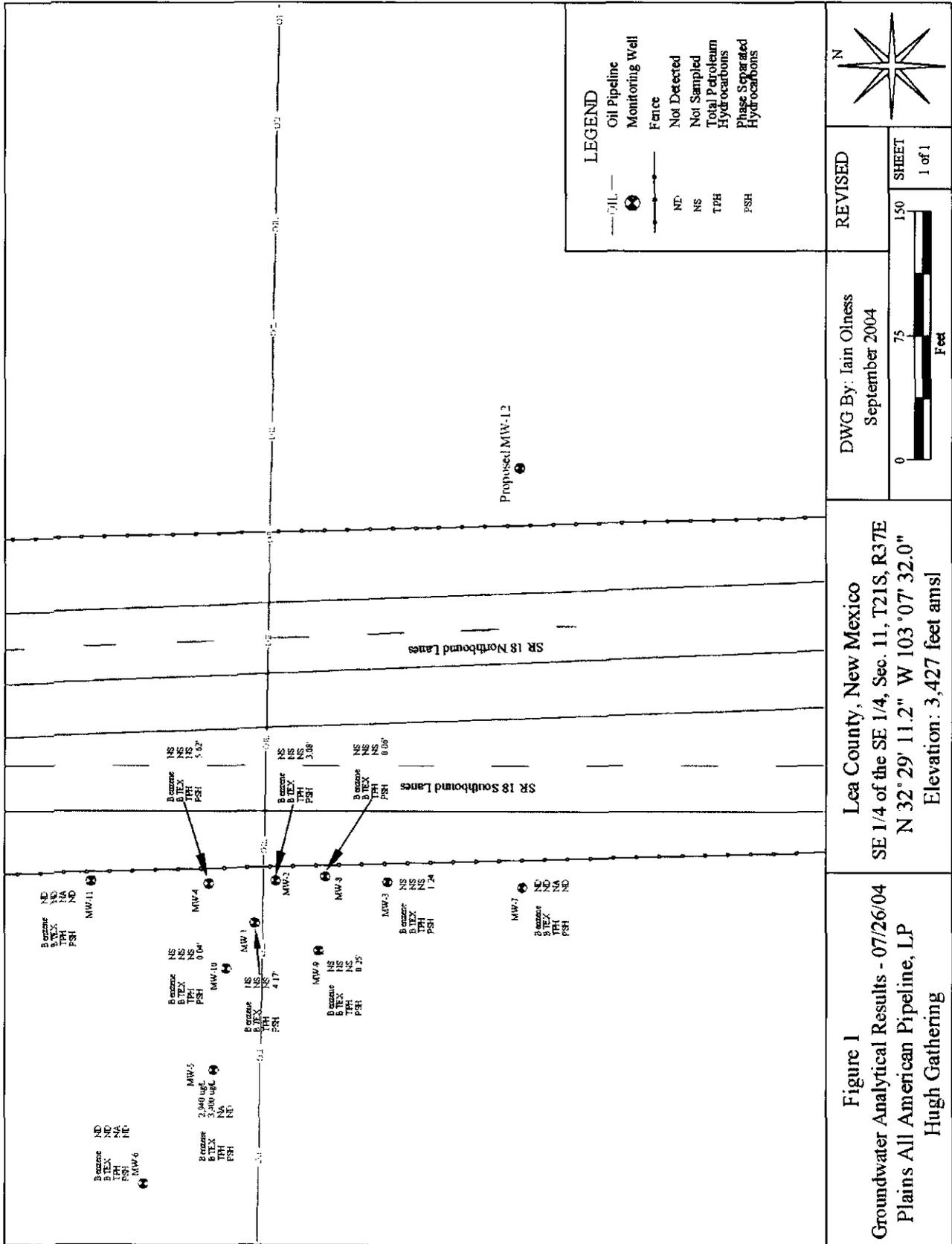
Sincerely,

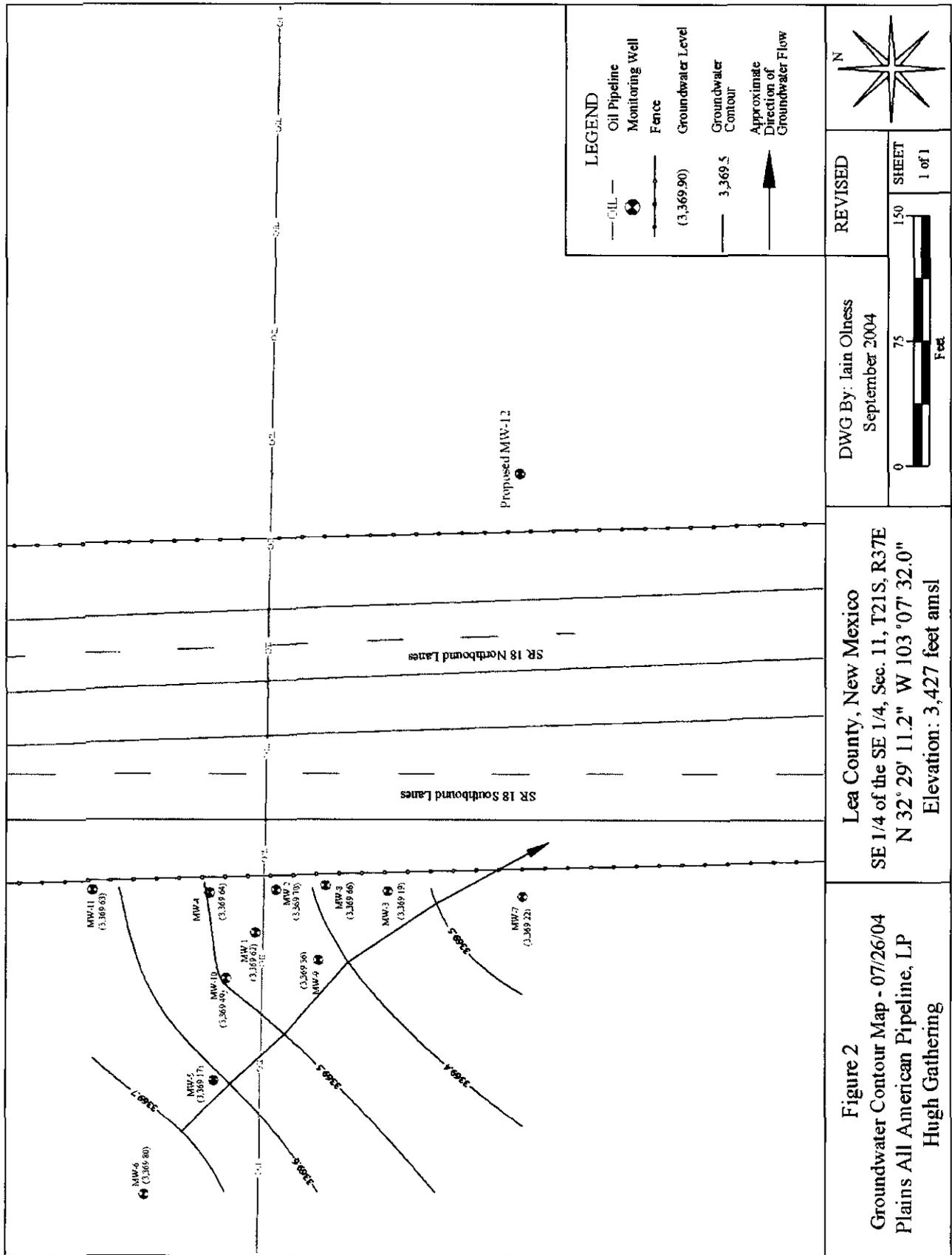


Jeffrey P. Dann, P.G.
Sr. Environmental Specialist
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM
Camille Reynolds, Plains
Todd Choban, Nova
Pat McCasland, EPI

File: c:\jeff-files/OCD-DrillingSchOct2004







April 5, 2004

Mr. Ed Martin
NM Energy, Minerals, and Natural Resources Department
New Mexico Oil Conservation Division – Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Preliminary 2003 Ground water monitoring summary

Re: Link Energy Hugh Gathering #2002-10235
UL-P Section 11 T21S R37E
Lea County New Mexico

1R-78

Dear Mr. Martin,

Environmental Plus, Inc. (EPI), on behalf of Mr. Frank Hernandez, Link Energy, submits for your consideration this *Preliminary 2003 Ground Water Monitoring Report* for the Link Energy Hugh Gathering #2002-10235. The information included in this submittal provides water levels, an analytical results summary, and an annotated map of the site.

If there are any questions or comments please call Mr. Ben Miller or myself at EPI's offices, or at 505-390-2088 or 505-390-9804 respectively. Mr. Hernandez may be contacted through Link's Midland office at 915-638-3799 or 505-631-3095.

All official correspondence should be addressed to:

Mr. Frank Hernandez
Link Energy
P.O. Box 1660
5805 East Highway 80
Midland, Texas 79703

Sincerely,

Pat McCasland
EPI Technical Manager

cc: Larry W. Johnson, NMOCD – Hobbs District Office
Frank Hernandez, Link Energy
Jeff Dann, Link Energy (Houston)
Sherry Miller, EPI President
Ben Miller, EPI Vice President and General Manager

ENVIRONMENTAL PLUS, INC.

LINK ENERGY
 HUGH
 GATHERING
 #2002-10235
 UL-P SEC II
 T2IS R37E



NMSR #18

MW4 (7-23-03)
 PSH

MW1 (7-23-03)
 PSH

Leak Origin

MW2 (7-23-03)
 PSH

Fence

MW3 (7-23-03)
 Benzene - 112 µg/L
 Ethylbenzene - 138 µg/L
 Xylenes - 249.9 µg/L
 Toluene - 361 µg/L

MW5 (7-23-03)
 Benzene - 35.9 µg/L
 Ethylbenzene - 20.9 µg/L
 Xylenes - 44.4 µg/L
 Toluene - 87.9 µg/L

**PSH - Phase Separated Hydrocarbon
 Wells with PSH were not sampled.**



SCALE 1:350



FEET

UNIVERSAL TRANSVERSE MERCATOR
 IS NORTH
 MAD 1983 HPGN (New Mexico)

LITMAN MW MAP.SSF
 4/8/2004



Link Energy
Hugh Gathering #2002-10235
Water Level and Analytical Information

Well #	Date	PSH Level	Water Level	Product Thickness	Benzene	Ethylbenzene	m,p-Xylenes	o-Xylene	Toluene	TPH	
		'btoc	'btoc	feet	µg/L	µg/L	µg/L	µg/L	µg/L	GRO	DRO
										mg/L	mg/L
MW1	12/13/2002	59.33	67.10	7.77							
	2/27/2003	59.42	66.63	7.21							
	3/24/2003	59.51	66.15	6.64							
	6/4/2003	59.70	65.48	5.78							
	6/10/2003	60.16	60.62	0.46							
	8/14/2003	60.53	61.86	1.33							
	11/4/2003	60.17	64.64	4.47							
MW2	6/10/2003	60.57	61.27	0.70							
	11/4/2003	60.71	64.28	3.57							
MW3	6/10/2003	ND	66.67								
	7/23/2003	ND	60.85	oil sheen	112	138	158	91.9	361	2.29	3.95
	8/14/2003	ND	60.86								
MW4	6/10/2003	61.03	61.26	0.23							
	7/23/2003	60.65	63.80	3.15							
	8/14/2003	49.82	50.24	0.42							
MW5	7/23/2003	ND	61.17		35.9	20.9	24.1	20.3	87.9	<0.5	1.97
	8/14/2003	ND	59.75								
<i>WQCC Standard</i>					<i>10</i>	<i>750</i>	<i>Total Xylene 620.0</i>		<i>750</i>		

'btoc - feet below top of casing
µg/L - micrograms per Liter
GRO - Gasoline Range Organics
DRO - Diesel Range Organics
PSH - Phase Separated Hydrocarbon
WQCC - New Mexico Water Quality Control Commission



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 24, 2004

Mr. Jimmy Bryant
Link Energy
P.O. Box 1660
Midland, TX 79703

Dear Mr. Bryant:

The New Mexico Oil Conservation Division acknowledges receipt of:

"2003 Annual Monitoring Report" for the Link Energy Hugh Gathering #2002-10235; NMOCD
ref. 1R0078

The report referenced above is hereby approved. Status of the site and the recommendations included in Section 7.0 on page 2 of the report are acceptable. The Stage I and Stage II Abatement Plan referred to in this section should be prepared and submitted to NMOCD as soon as possible.

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

cc: Larry W. Johnson, NMOCD, Hobbs
Jeff Dann, Link Energy, Houston
Pat McCasland, EPI



May 10, 2004

RECEIVED

Mr. Ed Martin
NM Energy, Minerals, and Natural Resources Department
New Mexico Oil Conservation Division – Environmental Bureau MAY 13 2004
1220 South St. Francis Drive
Santa Fe, NM 87505

OIL CONSERVATION
DIVISION

Subject: Proposed Link Energy monitor well installations in Lea County, New Mexico

Re: C.S. Cayler #2002-10250, UL-B Section 6 T17S R37E
Hugh Gathering #2002-10235, UL-P Section 11 T21S R37E
Hobbs Junction Mainline #2003-00017, UL-M Sections 26 and 35 T18S R37E
Junction 34 to Lea #2002-10286, UL-L Section 21 T20S R37E
Kimbrough Sweet #2002-10757, UL-E Section 3 T18S R37E
Livingston Line Bob McCasland #2001-11043, UL-K Section 3 T21S R37E

Dear Mr. Martin,

Environmental Plus, Inc. (EPI), on behalf of Mr. Jimmy Bryant, Link Energy, submits for your consensus, the attached maps illustrating the proposed monitor well installation locations at the above referenced sites. Installation of these wells will provide further delineation information regarding the extents of phase separated and dissolved phase hydrocarbon, as well as, additional soil delineation information. It is anticipated that the work will begin the week of May 17, 2004.

If there are any questions or comments please call Mr. Ben Miller or myself at office, or at 505-390-2088 or 505-390-7864, respectively. Mr. Bryant may be contacted at 432-684-3479.

All official correspondence should be addressed to:

Mr. Jimmy Bryant
Link Energy
P.O. Box 1660
5805 East Highway 80
Midland, Texas 79703

Sincerely,

Pat McCasland
EPI Technical Manager

cc: Larry W. Johnson, NMOCD – Hobbs District Office
Jimmy Bryant, Link Energy (Midland)
Jeff Dann, Link Energy (Houston)
Sherry Miller, EPI President
Ben Miller, EPI Vice President and General Manager

LINK ENERGY
 HUGH
 GATHERING
 #2002-10235
 UL-P SEC II
 T2IS R37E
 EXISTING AND
 PROPOSED
 MONITOR WELLS

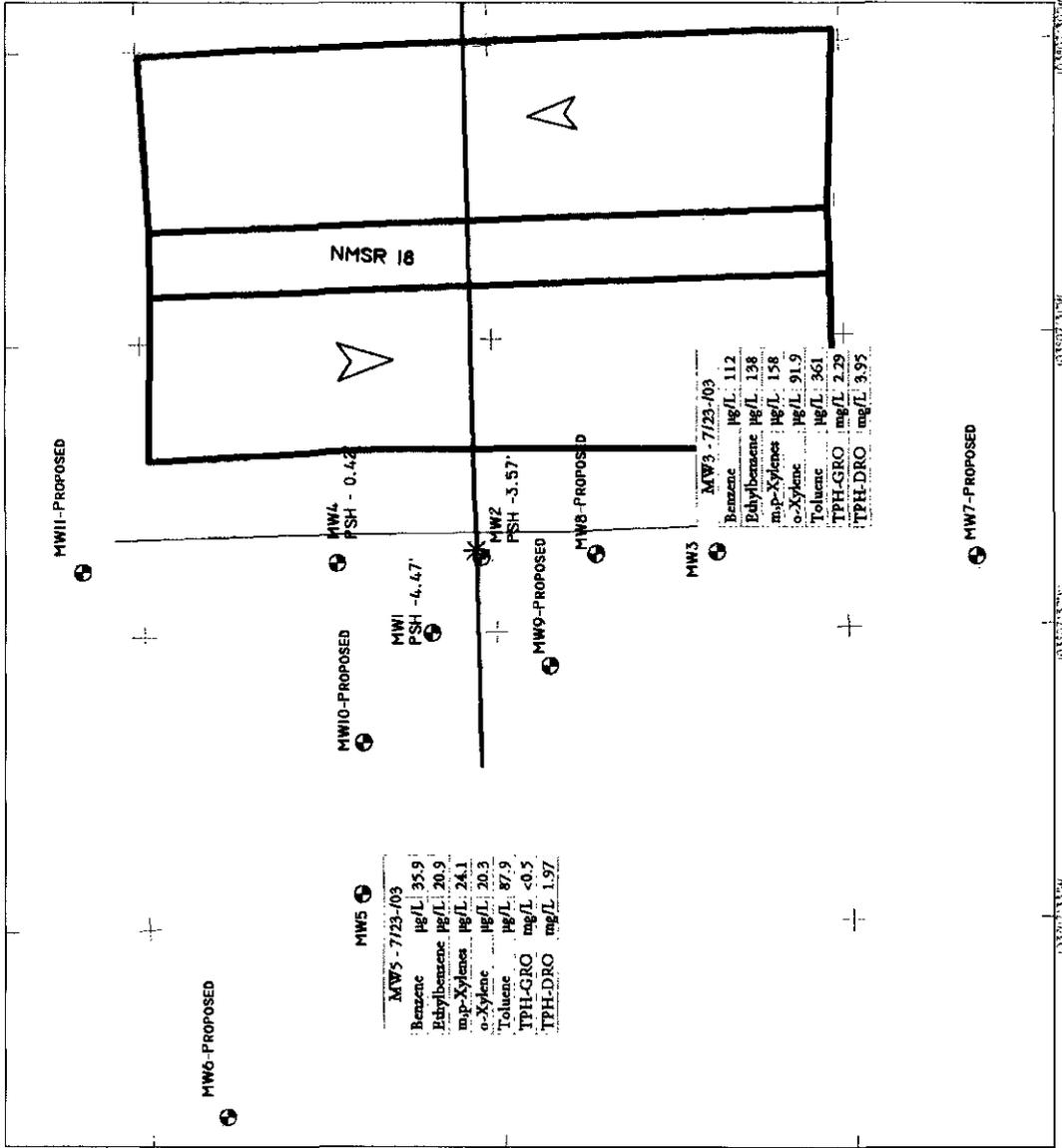


SCALE 1:600



UNIVERSAL TRANSVERSE MERCATOR
 NAD 1983 HF6N (NEW HEARD)

HUGH GATHERING MWS AND PROPOSED 5-6-04.SSF
 5/6/2004





ENVIRONMENTAL PLUS, INC. *Micro-Blaze Micro-Blaze Oct™*

STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

April 30, 2004

Mr. Ed Martin
NM Energy, Minerals, and Natural Resources Department
New Mexico Oil Conservation Division – Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: 2003 Annual Monitoring Report

Re: Link Energy Hugh Gathering #2002-10235
UL-P Section 11 T21S R37E
Lea County New Mexico

Dear Mr. Martin,

Environmental Plus, Inc. (EPI), on behalf of Mr. Frank Hernandez, Link Energy, submits the enclosed *2003 Annual Monitoring Report* for the Link Energy Hugh Gathering #2002-10235. The information included in this submittal provides water levels, analytical results, and PSH thicknesses, levels, and recovery volumes.

If there are any questions or comments please call Mr. Ben Miller or myself at EPI's offices, or at 505-390-2088 or 505-390-9804 respectively. Mr. Hernandez may be contacted through Link's Midland office at 915-638-3799 or 505-631-3095.

All official correspondence should be addressed to:

Mr. Frank Hernandez
Link Energy
P.O. Box 1660
5805 East Highway 80
Midland, Texas 79703

Sincerely,

Pat McCasland
EPI Technical Manager

cc: Larry W. Johnson, NMOCD – Hobbs District Office
Frank Hernandez, Link Energy
Jeff Dann, Link Energy (Houston)
Sherry Miller, EPI President
Ben Miller, EPI Vice President and General Manager

ENVIRONMENTAL PLUS, INC.



2003 ANNUAL MONITORING REPORT

Hugh Gathering 090402
Ref. # 2002-10235

UL-P, SE¼ of the SE¼ of Section 11, R37E, T21S
Latitude 32°29'11.007"N and Longitude 103°07'33.864"W
Elevation ~3,425'amsl

3 miles northeast of Eunice, Lea, New Mexico

Date

April 2004

Prepared by

Environmental Plus, Inc.
2100 West Avenue O
P.O. Box 1558
Eunice, New Mexico 88231
Tele 505•394•3481 FAX 505•394•2601

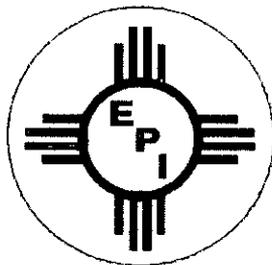


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1.0 BACKGROUND

This site is located in UL-P, the SE¼ of the SE¼ of Section 11, Range-37E, Township- 21S at Latitude 32°29'11.007"N and Longitude 103°07'33.864"W approximately 3 miles northeast of Eunice, Lea County, New Mexico on property owned by Jimmy Bryant. Area and site maps are included as Figures 1-3. The estimated 50 barrel crude oil leak was attributed to internal/external corrosion and occurred on September 4, 2002 in the 6" steel pipeline with no oil recovered. The line was subsequently replaced and tested. Near surface impacted soil was disposed of in an NMOCD approved landfarm and the site delineated. Approximately 100 sqft (10' X 10') of surface area was affected. There are no surface water bodies or domestic or agricultural water wells within 1,000 horizontal feet of the site. During site soil delineation in September 2002, crude oil, (i.e., phase separated hydrocarbons (PSH)) were found to have impacted the ground water measured at approximately 60 feet below ground surface ('bgs).

2.0 FIELD ACTIVITIES

A single 2" PVC cased monitor well (MW1), was installed during soil delineation activities in September 2002 to evaluate PSH thickness and to initiate PSH recovery. In June 2003, monitor wells MW2, MW3, and MW4 were installed and in July 2003 MW5 was installed. In June 2003, weekly manual recovery of PSH began at monitor wells MW1, MW2, and MW4. In August 2003 Link Energy began deploying a gasoline powered PSH recovery system on a daily basis. Site surveillance is conducted daily to monitor water and PSH levels, deploy the trailer mounted product recovery system, and manage produced fluids.

3.0 GROUNDWATER GRADIENT AND PSH THICKNESS

The area groundwater gradient, as illustrated in Figure 4, is to the southeast and was determined using measurements from the site monitoring wells. Stabilized PSH thickness declined from 7.77 feet in January 2002 to 4.47 feet in October 2003. Water and PSH levels along with PSH thickness are illustrated in Figures 5-9.

4.0 PSH RECOVERY

Product recovery activities began in September of 2002, initially by manual bailing followed in August of 2003 with the daily deployment of a gasoline powered PSH recovery system. The recovery system is shutdown for at least 48 hours prior to collecting water and PSH levels to ensure stabilized measurements. As of December 31, 2003, approximately 400 gallons of crude oil have been recovered and reintroduced into the Link Energy pipeline system.

5.0 GROUNDWATER SAMPLING

Monitor wells MW1, MW2, and MW4 were not sampled due to the presence of PSH. Monitor wells MW3 and MW5 were sampled in July 2003. The data is summarized in Table 2 and the analytical reports are included in Appendix A.

6.0 ANALYTICAL RESULTS

Groundwater samples collected from monitor wells MW3 and MW5 both exceeded the New Mexico Water Quality Control Commission (WQCC) 10 mg/L standard for benzene (112 mg/L and 35.9 mg/L, respectively) and, although detected, toluene, ethyl benzene, and total xylene did not exceed the WQCC standards (Ethylbenzene-750 mg/L, total xylene-620 mg/L, and toluene-750 mg/L).

7.0 STATUS AND RECOMMENDATIONS

Currently, Environmental Plus, Inc. on behalf of Link Energy is preparing a Stage I and Stage II Abatement Plan in accordance with 19.15.1.19 NMAC (Rule 19) that will propose further delineation of the groundwater to bound the areal extents of the PSH and the dissolved phase hydrocarbons, as well as, provide for additional recovery and monitor wells. A conservative risk assessment will be provided to address the impacted soil remaining in the subsurface. The Abatement Plan will propose the following;

- At least 3 additional wells to bound the areal extents of dissolved phase hydrocarbon plume,
- Additional interior recovery wells,
- Include, at least annually, Polyaromatic Hydrocarbon (PAH) and general chemistry in the analytical suite,
- A soil remediation plan that will propose a conservative risk assessment to address the impacted soil remaining in the subsurface.

FIGURES

**LINK ENERGY
HUGH GATHERING
#2002-10235
UL-P SEC11
AND
UL-M SEC12
T21S R37E
LEA CO. NM**



SCALE 1:40,000



FEET

UNIVERSAL TRANSVERSE MERCATOR
13 NORTH
NAD 1983 HPGN (NEW MEXICO)

MULTIPLE FILES
9/13/2002

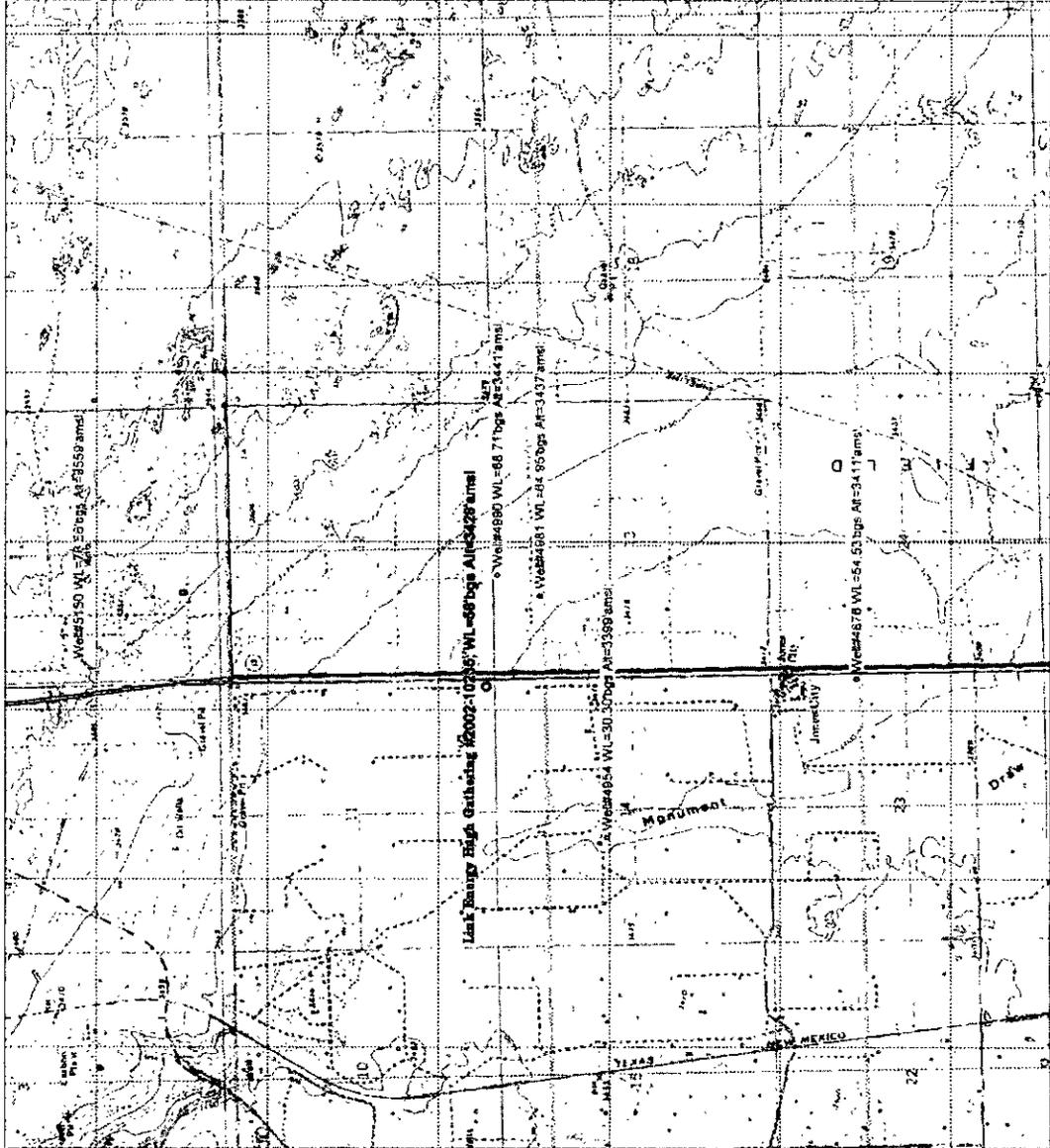


Figure 1 - Hugh Gathering 090402 Area Map

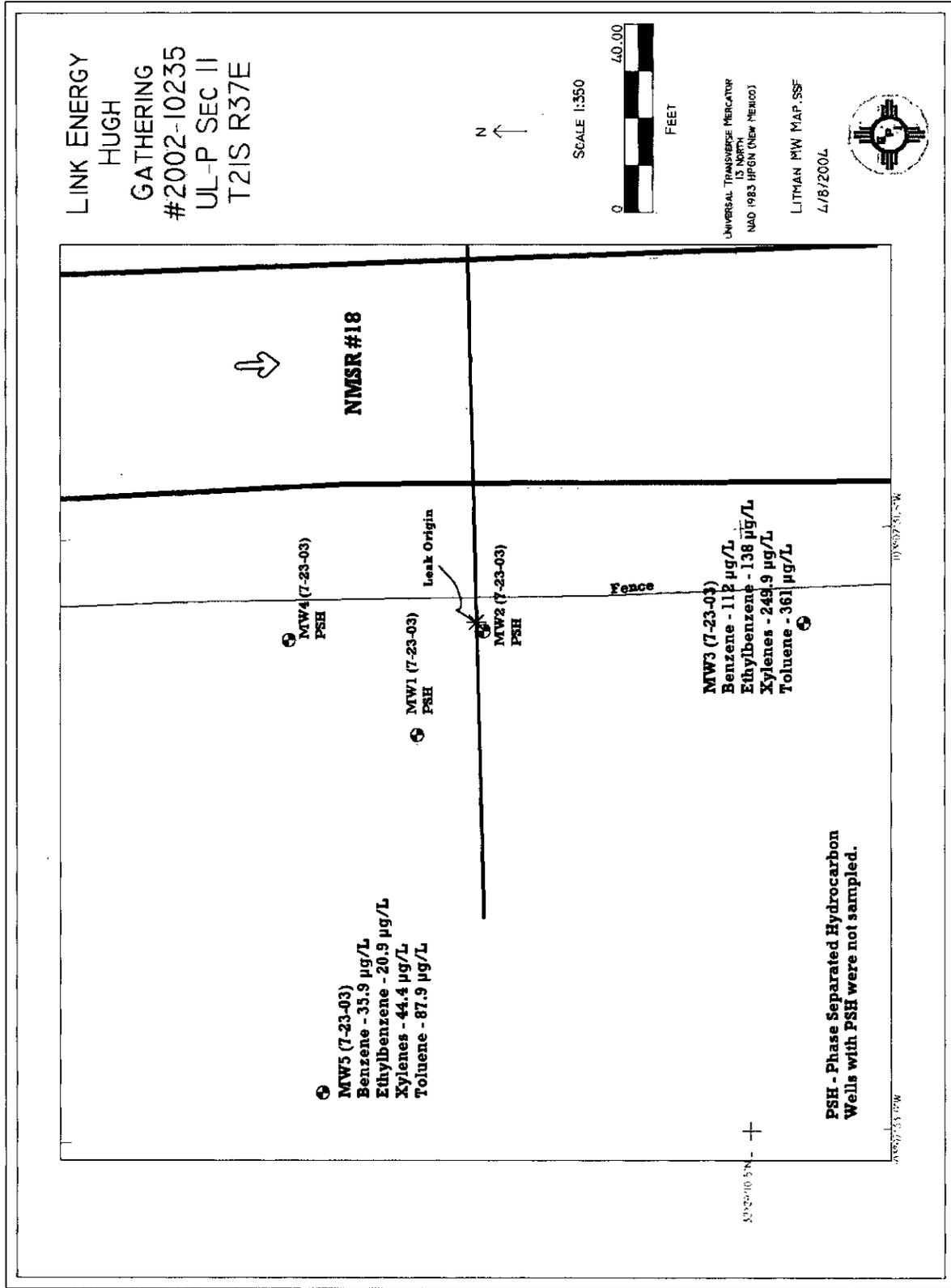


Figure 2 - Hugh Gathering 090402 Monitor Well Location Map

LINK ENERGY
HUGH GATHERING
#2002-10235

NMSR 18
CONDUIT
EASTSIDE
UL-M SEC12
WESTSIDE
UL-P SEC II
T2IS R37E

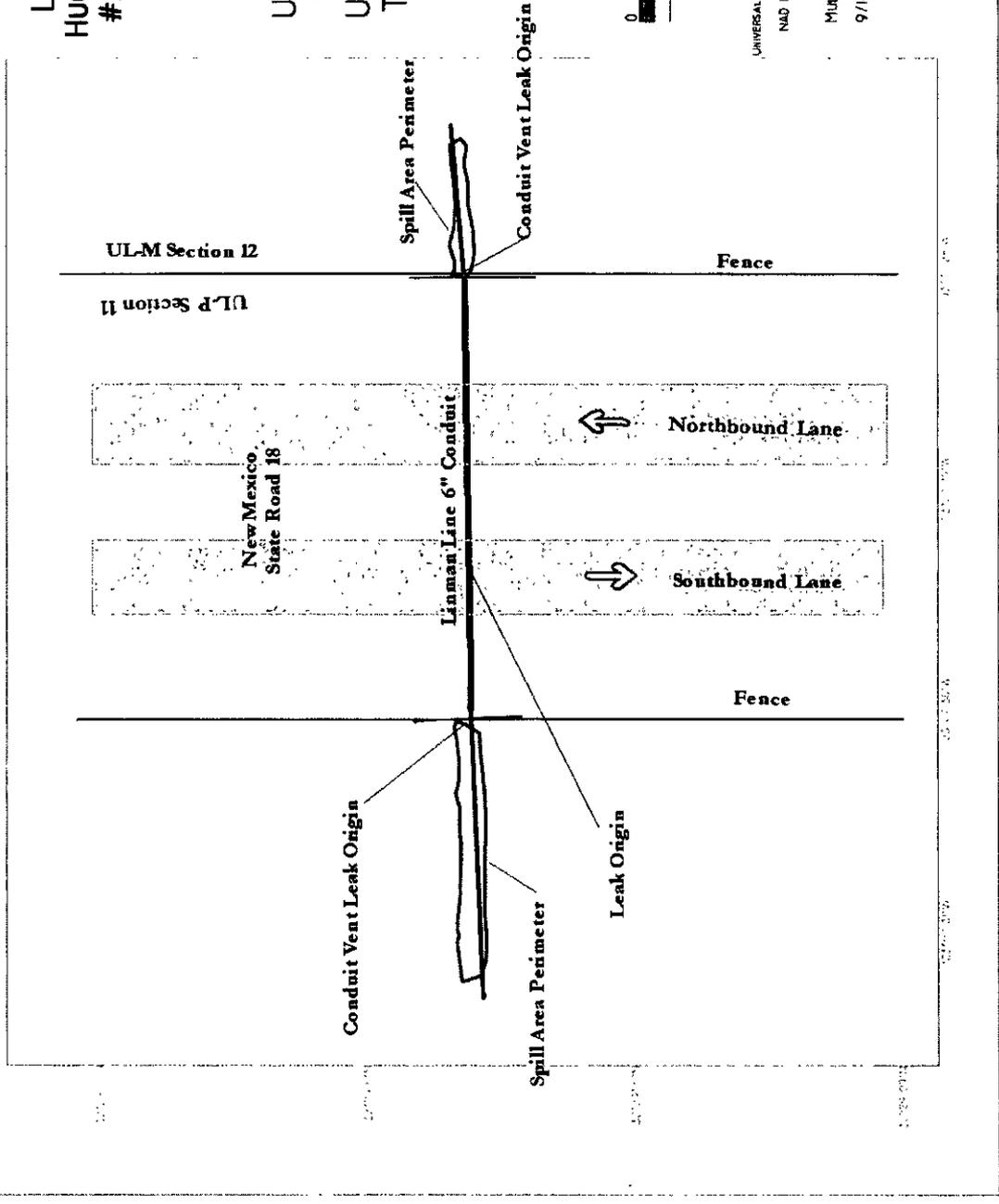


Figure 3 - Hugh Gathering 090402 Site Map

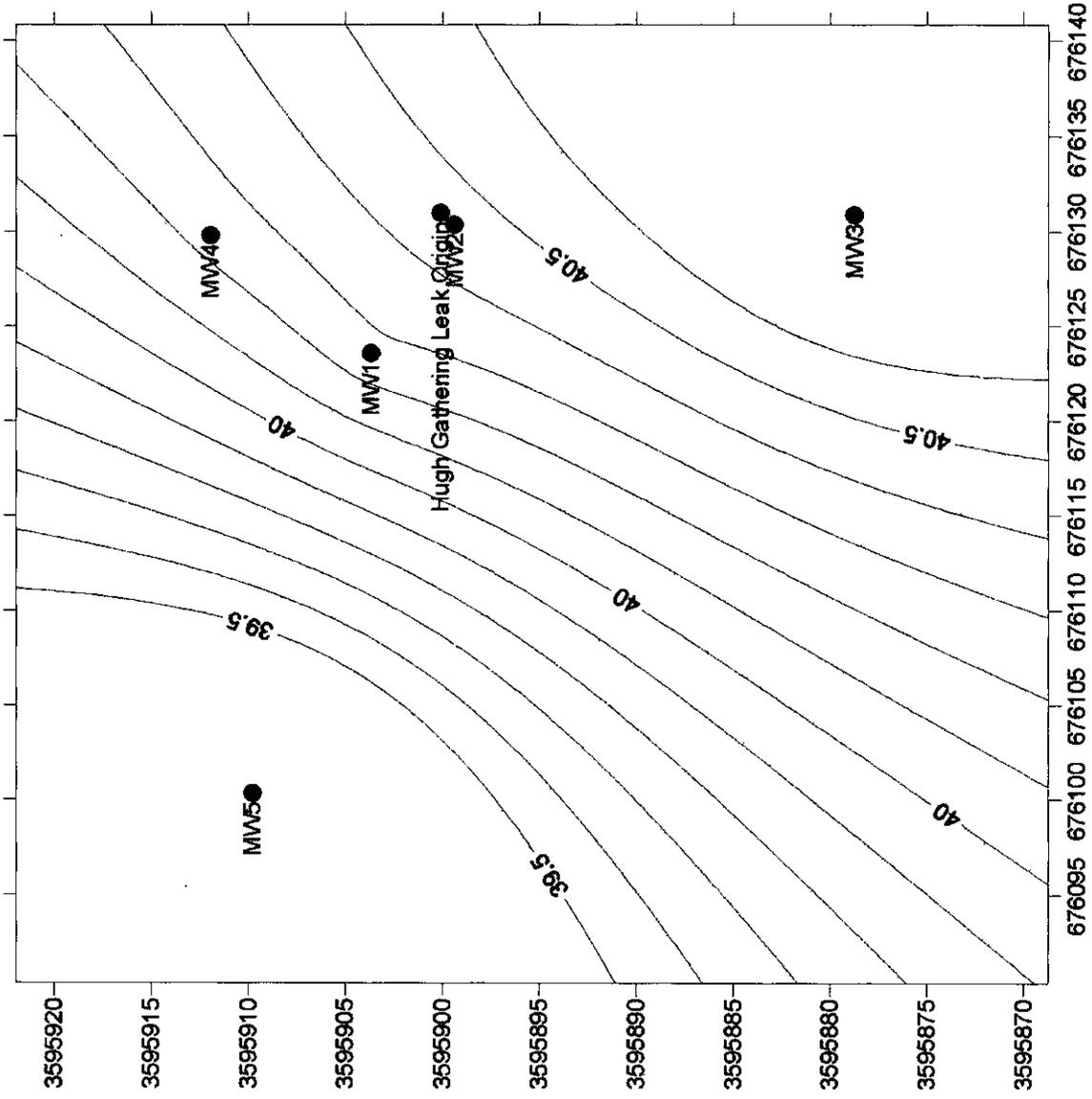


Figure 4 - Hugh Gathering 090402 Groundwater Gradient Map

Link Energy
 Hugh Gathering #2002-10235
 MW1 Water and PSH Levels and PSH Thickness

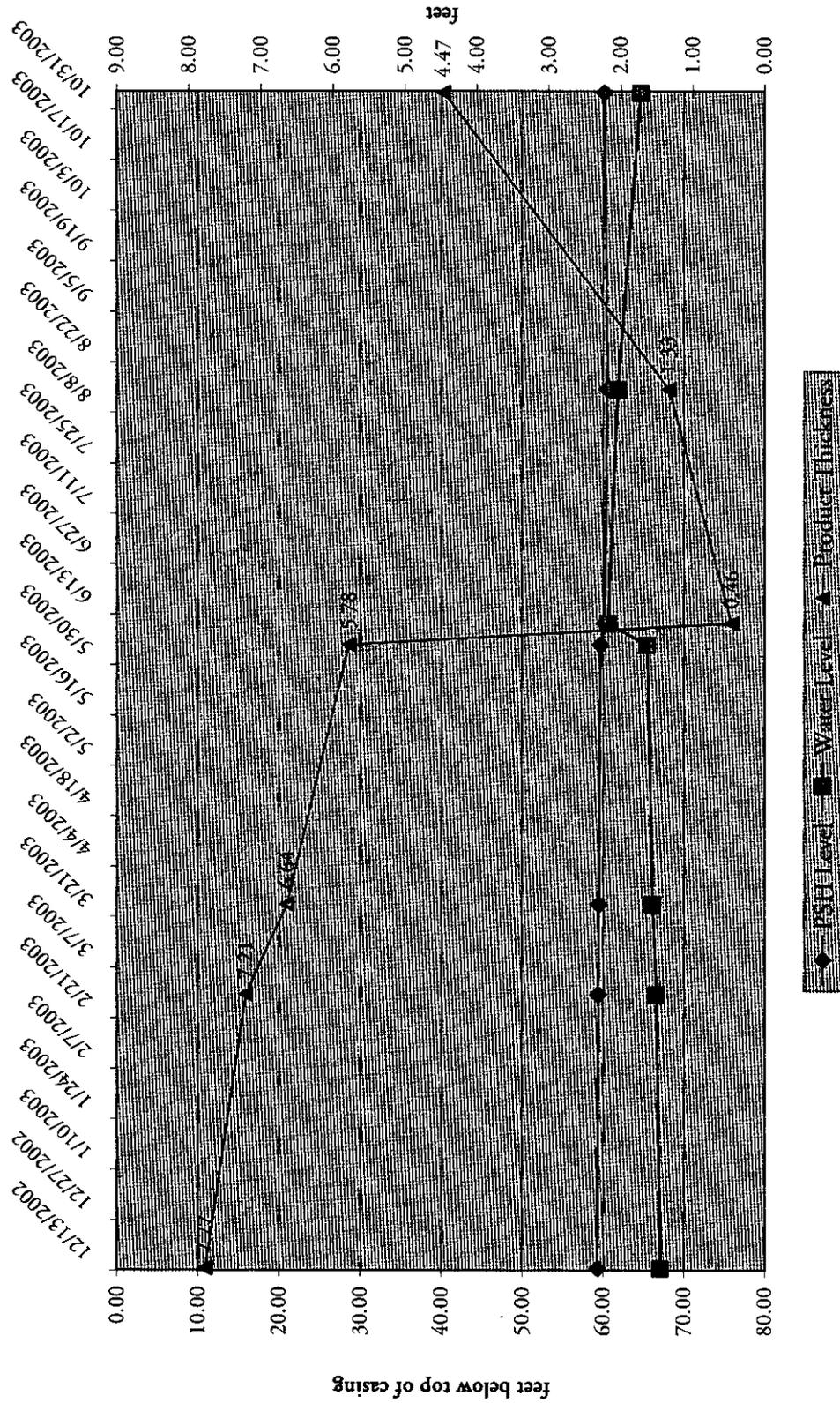


Figure 5 - Hugh Gathering 090402 MW1 Water and PSH Levels and PSH Thickness

Link Energy
 Hugh Gathering #2002-10235
 MW2 Water and PSH Levels and PSH Thickness

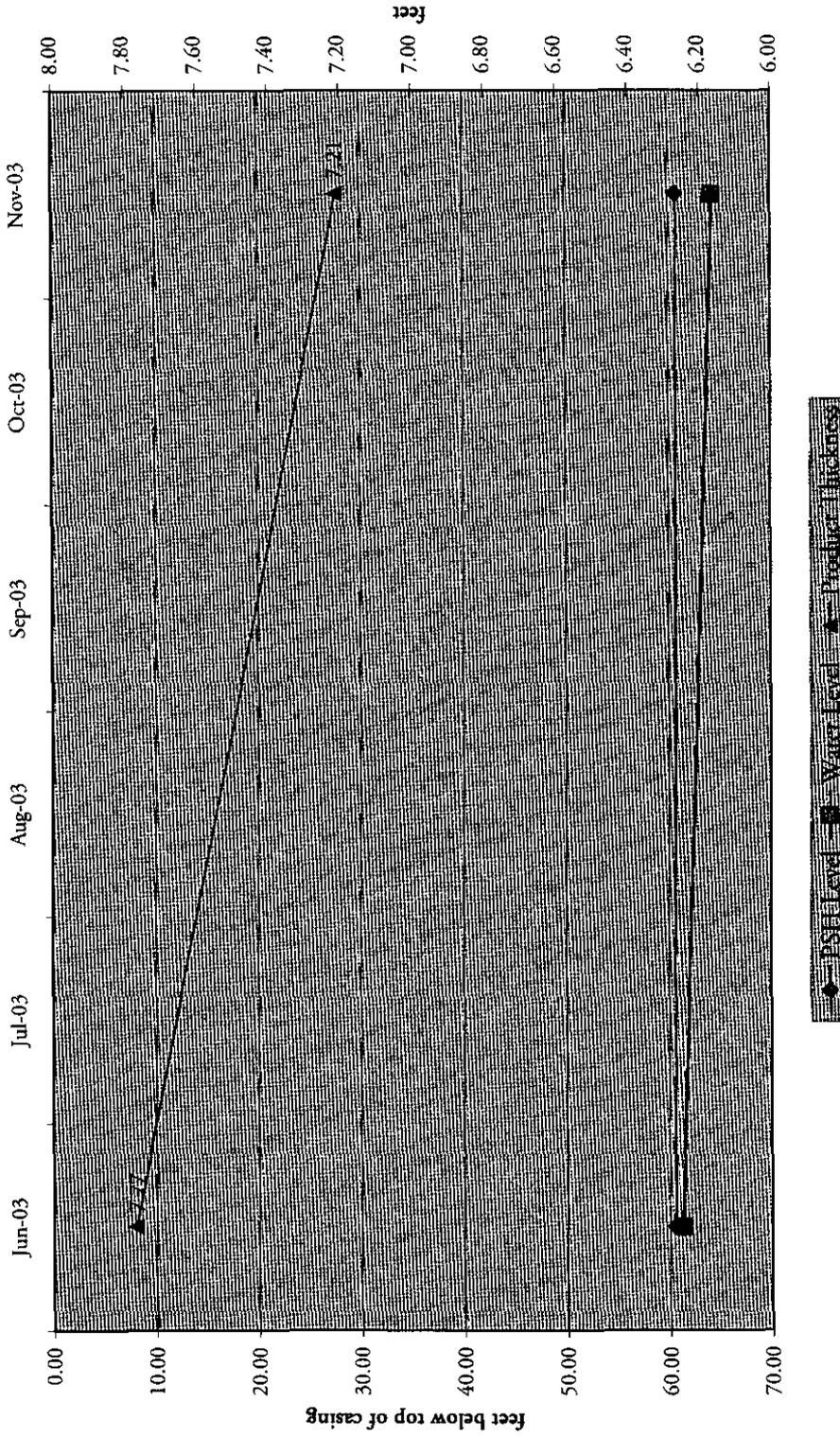
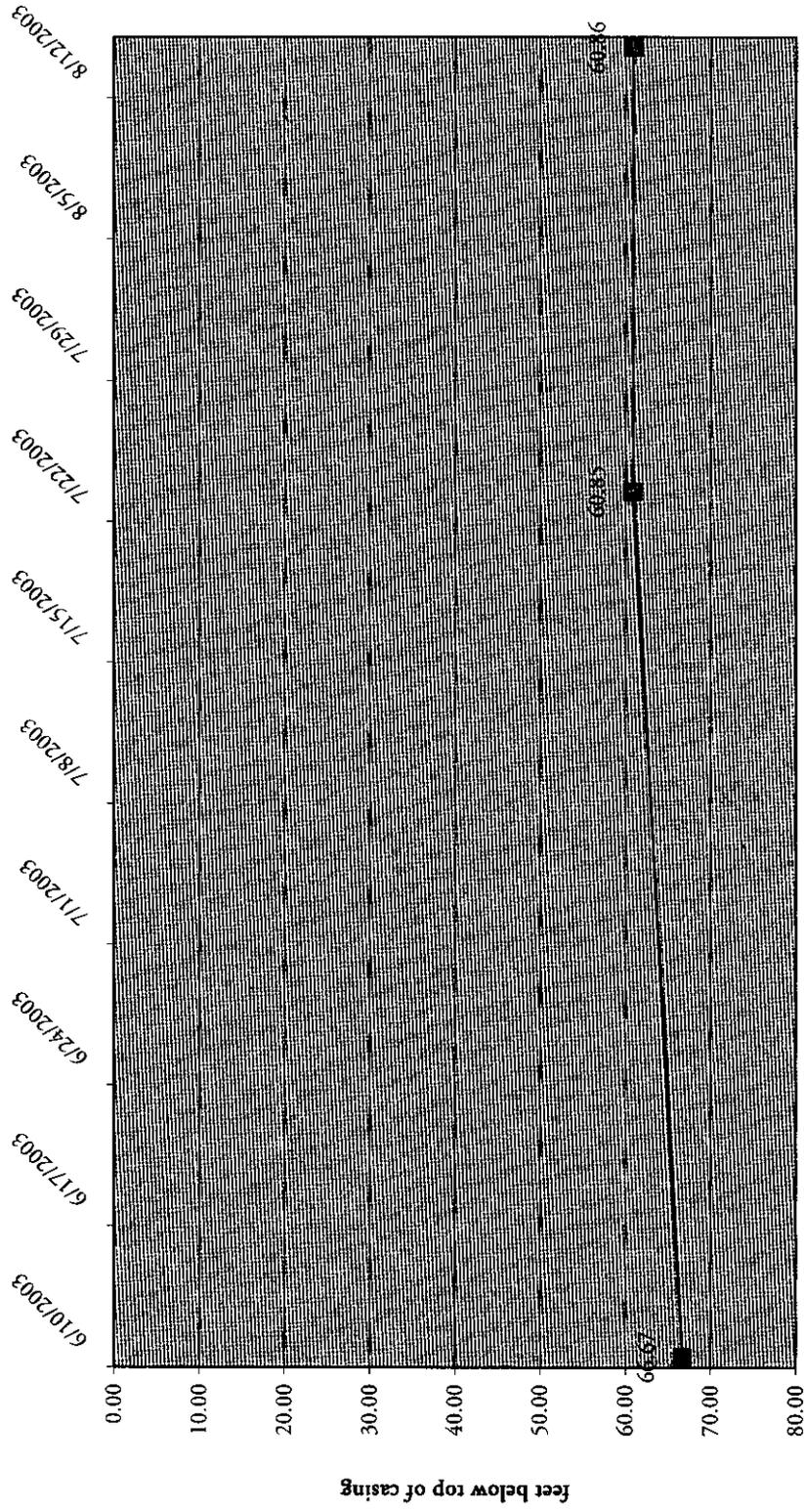


Figure 6 - Hugh Gathering 090402 MW2 Water and PSH Levels and PSH Thickness

Link Energy
Hugh Gathering #2002-10235
MW3 Water Levels



Water Level

Figure 7 - Hugh Gathering 090402 MW3 Water Levels

Link Energy
 Hugh Gathering #2002-10235
 MW4 Water and PSH Levels and PSH Thickness

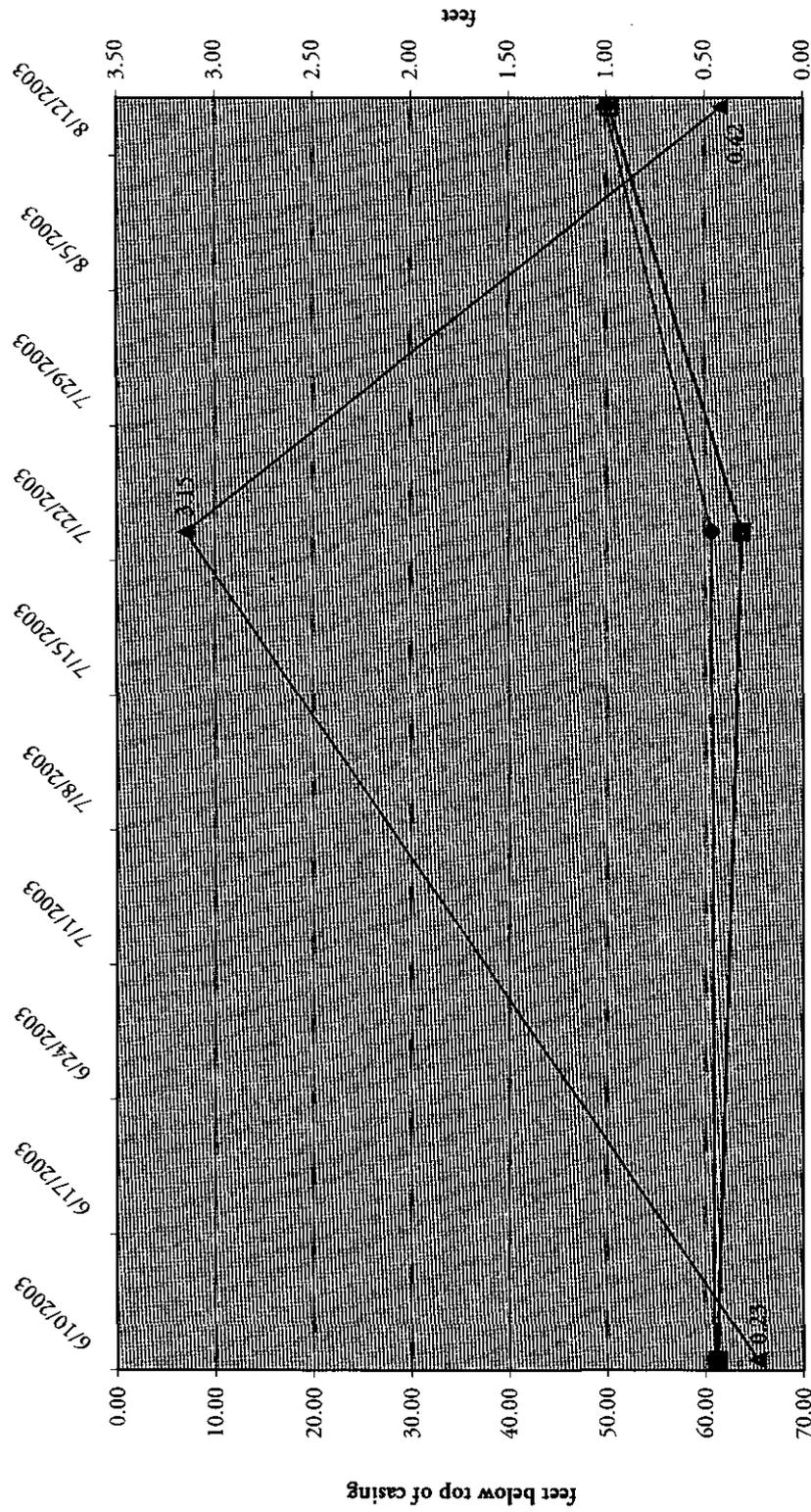


Figure 8 - Hugh Gathering 090402 MW4 Water and PSH Levels and PSH Thickness

Link Energy
Hugh Gathering #2002-10235
MW5 Water Levels

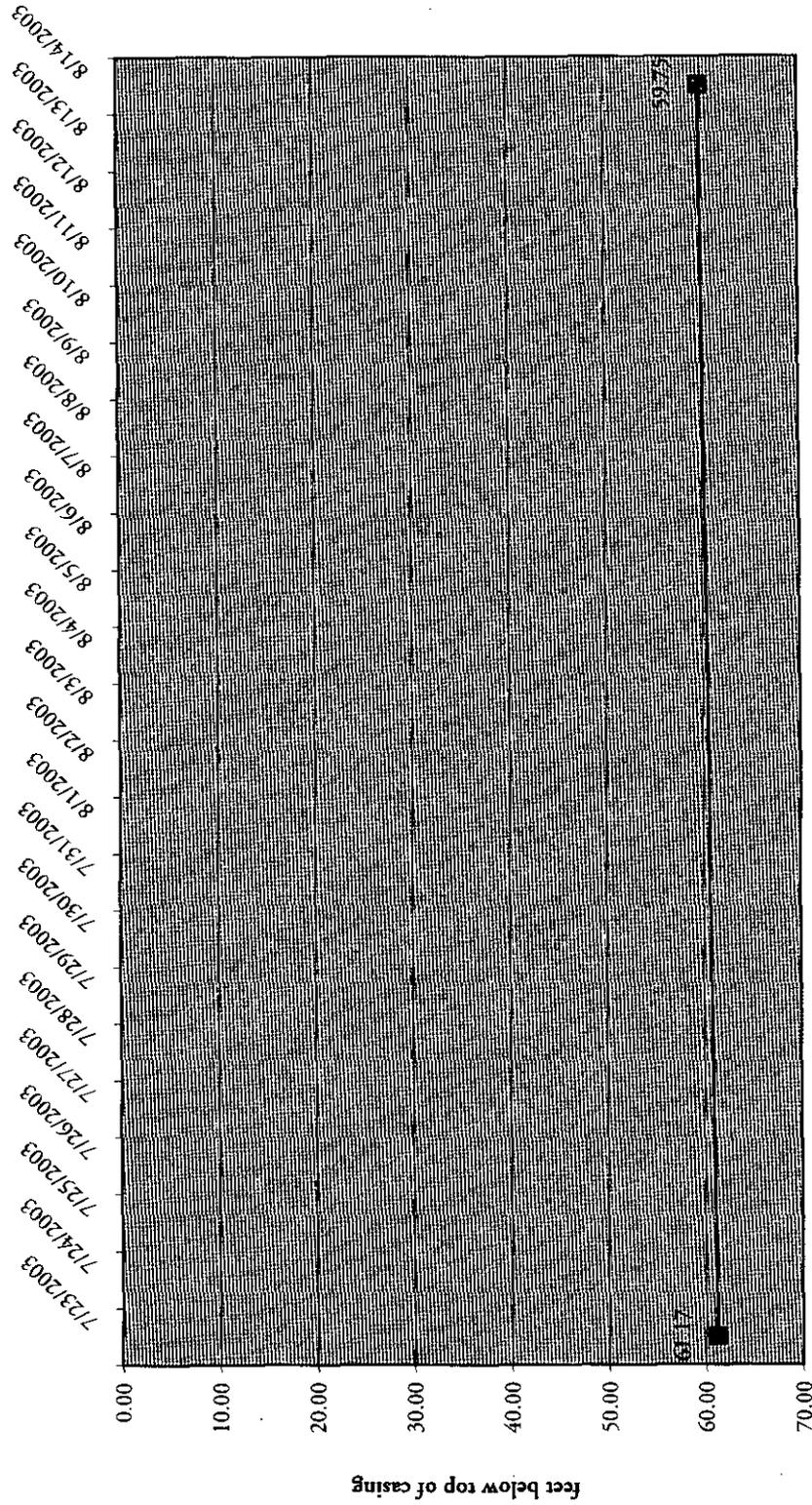


Figure 9 - Hugh Gathering 090402 MW5 Water Levels

TABLE

Link Energy
Hugh Gathering #2002-10235

Water and PSH Level, PSH Thickness, Analytical Information, and PSH Recovery Summary

Well #	Date	PSH Level		Water Level	Product Thickness	Benzene	Ethylbenzene	m,p-Xylenes	o-Xylene	Toluene	TPH		PSH Recovered (volumes are from MWs 1, 2, & 3)
		'btoc									GRO	DRO	
		'btoc	feet	'btoc	feet	µg/L	µg/L	µg/L	µg/L	µg/L	mg/L	mg/L	gallons
MW1	12/13/2002	59.33	7.77	67.10	7.77								110
	2/27/2003	59.42	7.21	66.63	7.21								15
	3/24/2003	59.51	6.64	66.15	6.64								20
	6/4/2003	59.70	5.78	65.48	5.78								65
	6/10/2003	60.16	0.46	60.62	0.46								
MW2	8/14/2003	60.53	1.33	61.86	1.33								80
	11/4/2003	60.17	4.47	64.64	4.47								110
	6/10/2003	60.57	0.70	61.27	0.70								
MW3	11/4/2003	60.71	3.57	64.28	3.57								
	6/10/2003	ND		66.67									
	7/23/2003	ND	oil sheen	60.85		112	138	158	91.9	361	2.29	3.95	
MW4	8/14/2003	ND		60.86									
	6/10/2003	61.03	0.23	61.26	0.23								
	7/23/2003	60.65	3.15	63.80	3.15								
MW5	8/14/2003	49.82	0.42	50.24	0.42								
	7/23/2003	ND		61.17		35.9	20.9	24.1	20.3	87.9	<0.5	1.97	
	8/14/2003	ND		59.75									
WQCC Standard						10	750	Total Xylene 620.0	750	TOTAL			400

'btoc - feet below top of casing
 µg/L - micrograms per Liter
 GRO - Gasoline Range Organics
 DRO - Diesel Range Organics
 PSH - Phase Separated Hydrocarbon
 WQCC - New Mexico Water Quality Control Commission

Table 1 - Hugh Gathering 090402 Water and PSH Levels, PSH Thicknesses, Analytical Results Summary and PSH Recovery Log

APPENDIX

APPENDIX A - HUGH GATHERING 090402 ANALYTICAL RESULTS AND
FORMS



3512 Montpellet Drive, Austin, TX 78744
 2209 N. Padre Island Dr., Corpus Christi, TX 78409
 (512) 395-5886 FAX (512) 395-7411

Client: Environmental Plus, Inc.
 Attn: Pat McCusker
 Address: 2100 Ave. O
 Elgin NM 88231
 Phone: (505) 394-3481 FAX: (505) 394-2601

Report#/Lab ID#: 145464 Report Date: 08/06/03
 Project ID: 2000-10437
 Sample Name: WEHG72303WAW (MW5)
 Sample Matrix: water
 Date Received: 07/23/2003 Time: 10:50
 Date Sampled: 07/23/2003 Time: 09:15

REPORT OF ANALYSIS

QUALITY ASSURANCE DATA

Parameter	Result	Units	RQL ⁵	Blank	Date	Method ⁶	Data Qual ⁷	Prec. ¹	Recov. ³	CCV ⁴	LCS ⁴
TPH by GC (as diesel)	1.97	mg/L	0.5	<0.5	08/04/03	8015 mod.	---	8.9	72.2	75.2	76
TPH by GC (as diesel-ext)	---	---	---	---	08/04/03	3540	---	---	---	---	---
TPH by GC (as gasoline)	<0.5	mg/L	0.5	<0.5	08/04/03	8015 mod.	---	2.4	99.5	99.8	96.3
Volatile organics-8260b/8TEX											
Benzene	35.9	ug/L	1	<1	07/31/03	8260b	---	---	---	---	---
Ethylbenzene	20.9	ug/L	1	<1	07/31/03	8260b	---	5.5	107.1	107.6	109
m,p-Xylenes	24.1	ug/L	1	<1	07/31/03	8260b	---	3.5	107.4	106.3	109.8
o-Xylene	20.3	ug/L	1	<1	07/31/03	8260b	---	3.5	109.4	106.8	110.1
Toluene	87.9	ug/L	1	<1	07/31/03	8260b	---	0.9	90.3	100.3	97.3

This analytical report is prepared by ANALYSYS, Inc. The enclosed results have been carefully reviewed and, to the best of my knowledge, the analytical results are consistent with ANALYSYS, Inc.'s Quality Assurance/Quality Control Program. © Copyright 2000, ANALYSYS, Inc., Austin, TX. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without the express written consent of ANALYSYS, Inc.
 Respectfully Submitted,
Richard Lester
 Richard Lester

1. Quality assurance data is for the sample batch which included this sample. 2. Precision (PREC) is the absolute value of the relative percent (%) difference between duplicate measurements. 3. Recovery (Recov.) is the percent (%) of analyte recovered from a spiked sample. 4. Calibration Verification (CCV) and Laboratory Control Sample (LCS) results are expressed as the percent (%) recovery of analyte from a known standard or matrix. 5. Reporting Quantitation Limits (RQL), typically at or above the Practical Quantitation Limit (PQL) of the analytical method. 6. Method numbers typically denote USEPA procedures. Less than (<) values reflect minimal quantitation limits adjusted for any required dilutions. 7. Data Qualifiers are J = analyte potentially present between the PQL and the MDL, B = Analyte detected in associated method blank(s), S1 =MS and/or MSD recovery exceeded advisory limits, S2 =Post digestion spike (PDS) recovery exceeds advisory limits, S3 =MS and/or MSD and PDS recoveries exceed advisory limits, P =Precision higher than advisory limits, M =Matrix interference.



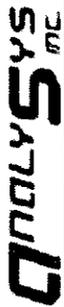
3512 Montopolis Drive, Austin, TX 78744 ☎
 2209 N. Padre Island Dr., Corpus Christi, TX 78409
 (512) 385-5884 • FAX (512) 385-7411

Client: Environmental Plus, Inc. Project ID: 2000-10437 Report#/Lab ID#: 145464
 Attn: Pat McCasland Sample Name: VEHG72303VMTW (MWS) Sample Matrix: water

REPORT OF SURROGATE RECOVERY

Surrogate Compound	Method	Recovery	Recovery Limit	Data Qualifiers
I-Chloroocane	8015 mod.	68.4	50-150	---
p-Terphenyl	8015 mod.	64.2	50-150	---
1,2-Dichloroethane-d4	8260b	84	80-120	---
Toluene-d8	8260b	103	88-110	---

Data Qualifiers: D= Surrogates diluted and X= Surrogates outside satisfactory recovery limits.



Client: Environmental Plus, Inc.
 Attn: Paul McCasland
 Address: 2100 Ave. O
 Eunice

NM 88231

Phone: (505) 394-3481 FAX: (505) 394-2601

3912 Montepolis Drive, Austin, TX 78744 &
 2289 N. Padre Island Dr., Corpus Christi, TX 78408
 (512) 385-5886 FAX (512) 385-7411

Report/Lab ID#: 145465 Report Date: 08/06/03
 Project ID: 2000-10437
 Sample Name: WEHGT2303SMW2 (MW3)
 Sample Matrix: water
 Date Received: 07/25/2003 Time: 10:50
 Date Sampled: 07/23/2003 Time: 10:30

REPORT OF ANALYSIS

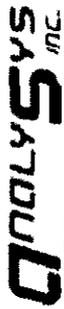
Parameter	Result	Units	RQL ⁵	Blank	Date	Method ⁴	Data Qual ⁷	Prec. ³	Recov. ³	CCV ⁴	LCS ⁴
TPH by GC (as diesel)	3.95	mg/L	0.5	<0.5	08/05/03	8015 mod.	---	8.9	72.2	75.2	76
TPH by GC (as diesel-ext)	---	---	---	---	08/04/03	3540	---	---	---	---	---
TPH by GC (as gasoline)	2.29	mg/L	0.5	<0.5	08/05/03	8015 mod.	---	2.4	99.5	99.8	96.3
Volatile organics-8260b/BTEX											
Benzene	112	µg/L	10	<10	07/31/03	8260b	---	---	---	---	---
Ethylbenzene	138	µg/L	10	<10	07/31/03	8260b	---	1	87.9	96.7	93.6
m,p-Xylenes	158	µg/L	10	<10	07/31/03	8260b	---	5.5	107.1	107.6	109
o-Xylene	91.9	µg/L	10	<10	07/31/03	8260b	---	3.5	107.4	106.3	109.8
Toluene	361	µg/L	10	<10	07/31/03	8260b	---	3.5	109.4	106.8	110.1
								0.9	90.3	100.3	97.3

QUALITY ASSURANCE DATA¹

This analytical report is respectfully submitted by AnalySys, Inc. The enclosed results have been carefully reviewed and, to the best of my knowledge, the analytical results are consistent with AnalySys, Inc.'s Quality Assurance/Quality Control Program. © Copyright 2000, AnalySys, Inc., Austin, TX. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without the express written consent of AnalySys, Inc.

Respectfully Submitted,
Richard Lamer
 Richard Lamer

1. Quality assurance data is for the sample batch which included this sample. 2. Precision (PREC) is the absolute value of the relative percent (%) difference between duplicate measurements. 3. Recovery (Recov.) is the percent (%) of analyte recovered from a spiked sample. 4. Calibration Verification (CCV) and Laboratory Control Sample (LCS) results are expressed as the percent (%) recovery of analyte from a known standard or matrix. 5. Reporting Quantitation Limits (RQL), typically as or above the Practical Quantitation Limit (PQL) of the analytical method. 6. Method numbers (typically denoted by SBEA procedures). Less than (<) values reflect nominal quantitation limits adjusted for any required dilutions. 7. Data Qualifiers are 1 = analyte potentially present between the PQL and the MDL. B = Analyte detected in associated method blank(s). S1 = MS or/MSD recovery exceed advisory limits. S2 = Post digestion spike (PDS) recovery exceed advisory limit. S3 = MS or/MSD and PDS recoveries exceed advisory limits. P = Precision higher than advisory limits. M = Matrix interference.



3512 Montopolis Drive, Austin, TX 78744 ☎
 2209 N. Pedra Island Dr., Corpus Christi, TX 78408
 (512) 395-5886 • FAX (512) 385-7411

Client: Environmental Plus, Inc. Project ID: 2000-10437 Report/Lab ID#: 145465
 Attn: Pat McCasland Sample Name: WEHG72303SMW2 (MW3) Sample Matrix: water

REPORT OF SURROGATE RECOVERY

Surrogate Compound	Method	Recovery	Recovery Limit	Data Qualifiers
1-Chlorooctane	8015 mod.	70.5	50-150	--
p-Terphenyl	8015 mod.	76.5	50-150	--
1,2-Dichloroethane-d4	8260b	101	80-120	--
Toluene-d8	8260b	106	88-110	--

Data Qualifiers: D= Surrogates diluted and X= Surrogates outside advisory recovery limits.

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 C10-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