



**2020
GROUNDWATER STATUS UPDATE**

MONUMENT 18

NW ¼ NW ¼ SECTION 7, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS SRS NUMBER: TNM MONUMENT 18-KNOWN
NMOCD Reference 1R-0124
Incident # nAPP2109537667

APPROVED
By Nelson Velez at 2:38 pm, Jan 11, 2022

Prepared For:

PLAINS MARKETING, L.P.
333 CLAY STREET, SUITE 1600
HOUSTON, TEXAS 77002

Prepared By:

TRC Environmental Corporation
10 Desta Drive, Suite 150E
Midland, Texas 79705

Review of 2020 GROUNDWATER STATUS UPDATE: **Content satisfactory**
Contractor anticipated actions approved by OCD and are as follows;
1. Resume quarterly gauging and groundwater sampling when excavation activities are completed
2. Submit a Remediation Summary and Soil Closure Request to the NMOCD on completion of the approved excavation activities
Submit the Annual Monitoring Report to the OCD no later than March 31, 2022.

March 2021


Curt D. Stanley
Senior Project Manager

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INTRODUCTION

On behalf of Plains Marketing, L.P., (Plains), TRC Environmental Corporation (TRC) is pleased to submit this 2020 Groundwater Status Update in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. Beginning on May 29, 2004, project management responsibilities were assumed by TRC, previously NOVA Safety and Environmental (NOVA). The Monument 18 Site (the Site), formally the responsibility of Enron Oil Trading and Transportation (EOTT), is now the responsibility of Plains. This report is intended to be viewed as a complete document with figures, attachments, and text. The report presents the results of the groundwater monitoring events conducted in calendar year 2020. For reference, the Site Location Map is provided as Figure 1.

On March 10, 2017, the NMOCD Santa Fe Office approved the temporary cessation of groundwater sampling at the Monument 18 Release Site due to continuing excavation activities.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site location is NW ¼ NW ¼, Section 7, Township 20 South, Range 37 East, Lea County, New Mexico. No information with respect to the release date or volume of crude oil released and recovered is available as the release occurred while the pipeline was operated by Texas New Mexico Pipe Line Company (TNMPL). The Release Notification and Corrective Action Form (C-141) is provided as Appendix A.

A Remediation Summary and Proposed Soil Closure Strategy (Work Plan) was submitted to the NMOCD in March 2013. The Work Plan proposed soil remediation activities intended to progress the site toward an NMOCD approved soil closure.

On April 22, 2013, Plains received approval from the NMOCD to commence the activities outlined in the Work Plan. Excavation activities began during the 3rd quarter of 2013 and continued throughout 2014.

In the 2nd quarter of 2015, Plains submitted and received NMOCD approval for the *Interim Remediation Summary and Revised Proposed Soil Closure Strategy*.

On October 31, 2016, Plains submitted an *Addendum to the Interim Remediation Summary and Revised Proposed Soil Closure Strategy* (Addendum) to the NMOCD. On January 27, 2017, Plains verbally requested an amendment to the Addendum and February 7, 2017, Plains received an email approval from the NMOCD.

Additional details of NMOCD approved soil remediation activities will not be addressed in this 2020 Groundwater Status Update. A *Remediation Summary and Soil Closure Request* will be prepared and submitted to the NMOCD at the completion of the NMOCD approved activities.

Currently, there are eight (8) monitor wells (MW-3 through MW-10) on-site. Monitor wells MW-4, MW-7, and MW-8 were temporarily excavated and were re-established during backfilling activities inside PVC conduits, the conduits will be filled with bentonite to complete

the re-installation of the monitor wells. Monitor well MW-1 was permanently excavated and will not be re-established at this time.

On March 10, 2017, the NMOCD Santa Fe Office approved the temporary cessation of groundwater sampling at the Monument 18 Release Site due to continuing excavation activities.

ANTICIPATED ACTIONS

Quarterly gauging and groundwater sampling will resume when excavation activities are completed.

A Remediation Summary and Soil Closure Request will be submitted to the NMOCD on completion of the NMOCD approved excavation activities.

An Annual Monitoring Report or Groundwater Status Update will be submitted to the NMOCD before April 1, 2022.

LIMITATIONS

TRC has prepared this Groundwater Status Update to the best of its ability. No other warranty, expressed or implied, is made or intended.

TRC has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. TRC has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. TRC has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. TRC also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of TRC and/or Plains.

DISTRIBUTION

- Copy 1 Bradford Billings
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505
- Copy 2: New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240
- Copy 3: Camille Bryant
Plains Marketing, L.P.
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Midland, TX 79706
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jpdann@paalp.com
- Copy 5: TRC Environmental Corporation
10 Desta Drive, Suite 150E
Midland, TX 79705
cdstanley@trccompanies.com

Figures

Appendix A
Release Notification and Corrective Action
(NMOCD Form C-141)

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 x Initial Report Final Report

Name of Company	Plains Pipeline, LP	Contact:	Camille Reynolds
Address:	3705 E. Hwy 158, Midland, TX 79706	Telephone No.	505-441-0965
Facility Name	Monument # 18	Facility Type:	Pipeline
Surface Owner:	Mineral Owner	Lease No.	
Jim B Cooper			

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	7	20S	37E					Lea

Latitude 32 degrees 35' 30.0" **Longitude** 103 degrees 17' 55.9"

NATURE OF RELEASE

Type of Release:	Volume of Release:	Volume Recovered
Source of Release:	Date and Hour of Occurrence	Date and Hour of Discovery
	Unknown	
Was Immediate Notice Given?	If YES, To Whom?	
Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required <input type="checkbox"/>		
By Whom?	Date and Hour	
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
Describe Area Affected and Cleanup Action Taken.*		
NOTE: Texas-New Mexico Pipeline was the owner/operator of the pipeline system at the time of the release, initial response information is unavailable.		
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.		

Signature:		OIL CONSERVATION DIVISION	
Printed Name:	Camille Reynolds	Approved by District Supervisor:	
Title:	Remediation Coordinator	Approval Date:	Expiration Date:
E-mail Address:	cjreynolds@paalp.com	Conditions of Approval:	
Date: 3/21/2005	Phone: (505)441-0965	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720
District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS
 Action 22905

CONDITIONS

Operator: PLAINS MARKETING L.P. 333 Clay St, Ste 1600 Houston, TX 77002	OGRID: 34053
	Action Number: 22905
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Review of 2020 GROUNDWATER STATUS UPDATE: Content satisfactory Contractor anticipated actions approved by OCD and are as follows; 1. Resume quarterly gauging and groundwater sampling when excavation activities are completed 2. Submit a Remediation Summary and Soil Closure Request to the NMOCD on completion of the approved excavation activities 3. Submit the Annual Monitoring Report to the OCD no later than March 31, 2022.	1/11/2022