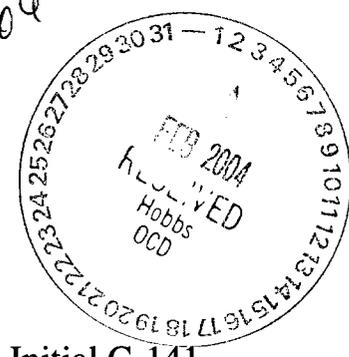




*PC  
1/26/04*



January 30, 2004

Mr. Larry Johnson  
New Mexico Oil Conservation Division  
1625 North French  
Hobbs, New Mexico 88240

Subject: LINK Energy Atkins 4" Gathering (2004-00027) Initial C-141

Dear Mr. Johnson:

Environmental Plus, Inc. (EPI), on behalf of Mr. Frank Hernandez, LINK Energy LLC, submits the attached New Mexico Oil Conservation Division Form C-141 for the above referenced leak site located on lands owned by the State of NM. The release volume is estimated to be 50-bbl of crude petroleum with 0-bbl recovered. The release site is located in the NW<sup>1</sup>/<sub>4</sub> of the SW<sup>1</sup>/<sub>4</sub> (Unit Letter L), Section 28, Township 20 South, and Range 37 East. The geographic location is N32°32'29.264"; W103°15'41.465". The site is ~5.7 miles south (bearing 177.9°) from Monument, Lea County, New Mexico. According to information obtained from the New Mexico Office of the State Engineer (NMOSE) database, ground water level beneath this site is ~40-ft bgs. The site matrix ranking for this site is 20 due to the depth to ground water from the lower contaminant level being <50-ft.

The remedial action plan for this site is to delineate and characterize the soil contamination within the surface extents of the release, excavate, dispose of and/or blend and attenuate on-site the RCRA non-exempt contaminated soils, and backfill the excavation with clean soil obtained on-site and/or off-site from private or public sources. Any contaminated soils removed from the site will be disposed of in an NMOCD approved surface waste treatment facility.

The Constituents of Concern (CoC's) and associated NMOCD acceptable remedial levels are as follows:

- BTEX<sup>8620</sup> (Benzene, Toluene, Ethyl Benzene, and Xylenes): 50 mg/kg
- TPH<sup>8015m</sup> (Total Petroleum Hydrocarbon): 100 mg/kg
- Benzene<sup>8620</sup>: 10 mg/kg

It is EPI's policy to evaluate crude oil release sites for the presence of elevated levels of SO<sub>4</sub><sup>-</sup> and Cl<sup>-</sup> ions. These inorganic constituents are often present in subsurface soils associated with sour crude releases and/or releases containing a

*Plains - 34053  
facility  
incident - NPAC 0602625472  
application - NPAC 060253643*

ENVIRONMENTAL PLUS, INC.



ENVIRONMENTAL PLUS, INC. *Micro-Blaze Micro-Blaze Out*

STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

brine component. Chloride and sulfate contamination of the soil will be evaluated relative to NMWQCC Ground Water Standards, 250 mg/ml and 600 mg/ml respectively.

If there are any questions please call Mr. Ben Miller, or myself, at our office or at (505) 390-0288 and (505) 390-9804, respectively or Mr. Frank Hernandez at (505) 631-3095. All official written communications should be addressed to:

Mr. Frank Hernandez  
EOTT Energy Pipeline, L.P.  
PO Box 1660  
Midland, TX 79701

Sincerely,

John Good  
EPI Environmental Consultant

cc: Frank Hernandez, LINK Energy – Dist Environmental Supv., w/enclosure  
Jeff Dann – LINK Energy - Environmental Specialist, w/enclosure  
Ben Miller, EPI Vice President and General Manager  
Pat McCasland, EPI Technical Manager  
Sherry Miller, EPI President  
file

ENVIRONMENTAL PLUS, INC.

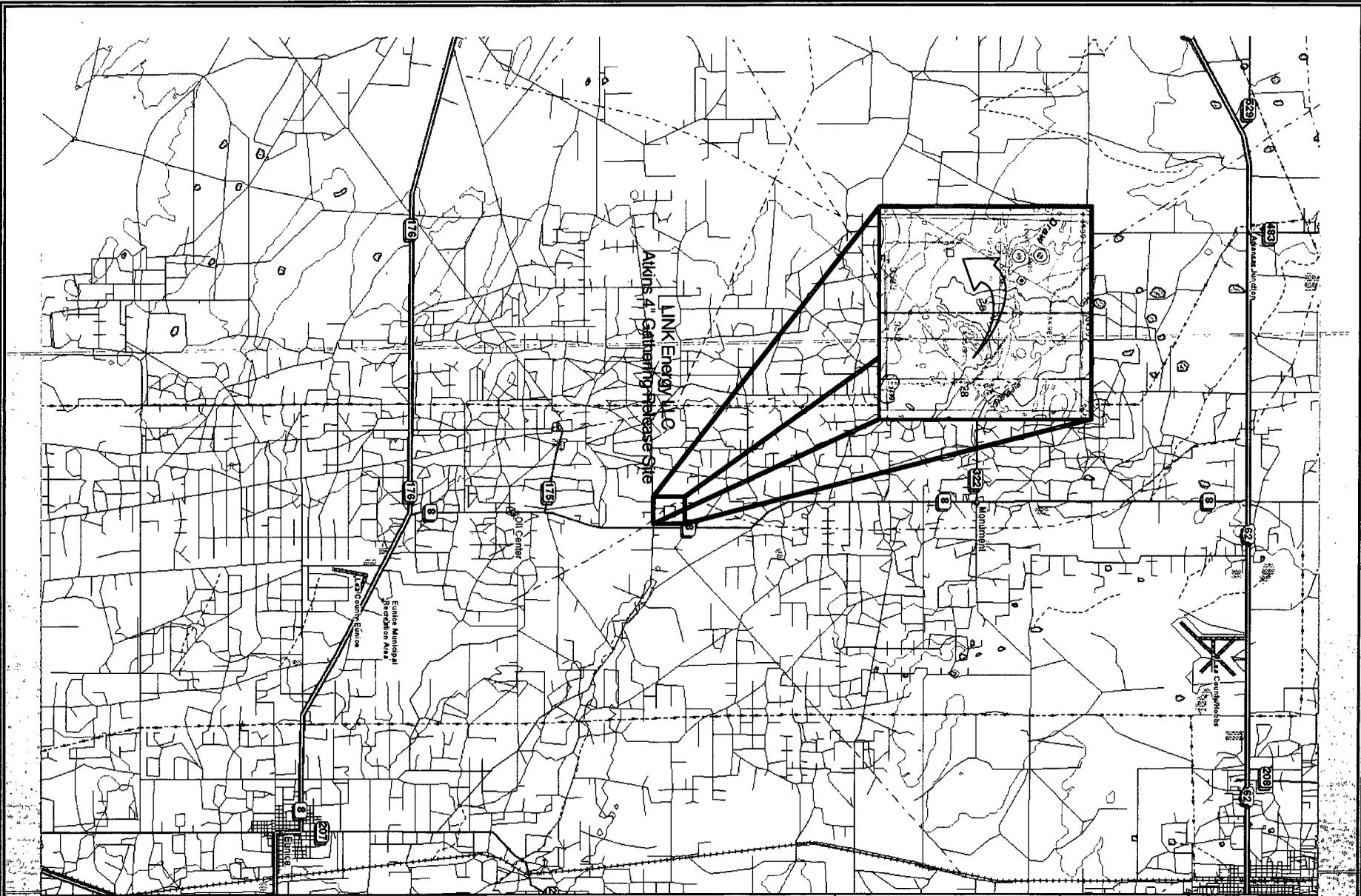
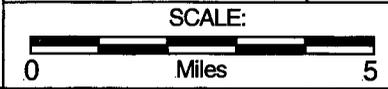


Plate 1: Site Location  
 LINK Energy LLC - Atkins 4" Gathering  
 2004-00027

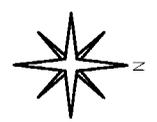
Lea County, New Mexico  
 UL-L Section 28 T20S R37E  
 N32° 32' 29.26" W103° 15' 41.47"  
 Elevation: 3510-ft amsl

DWG BY: John Good  
 Jan - 2004

REVISED:



SHEET  
 1 of 1



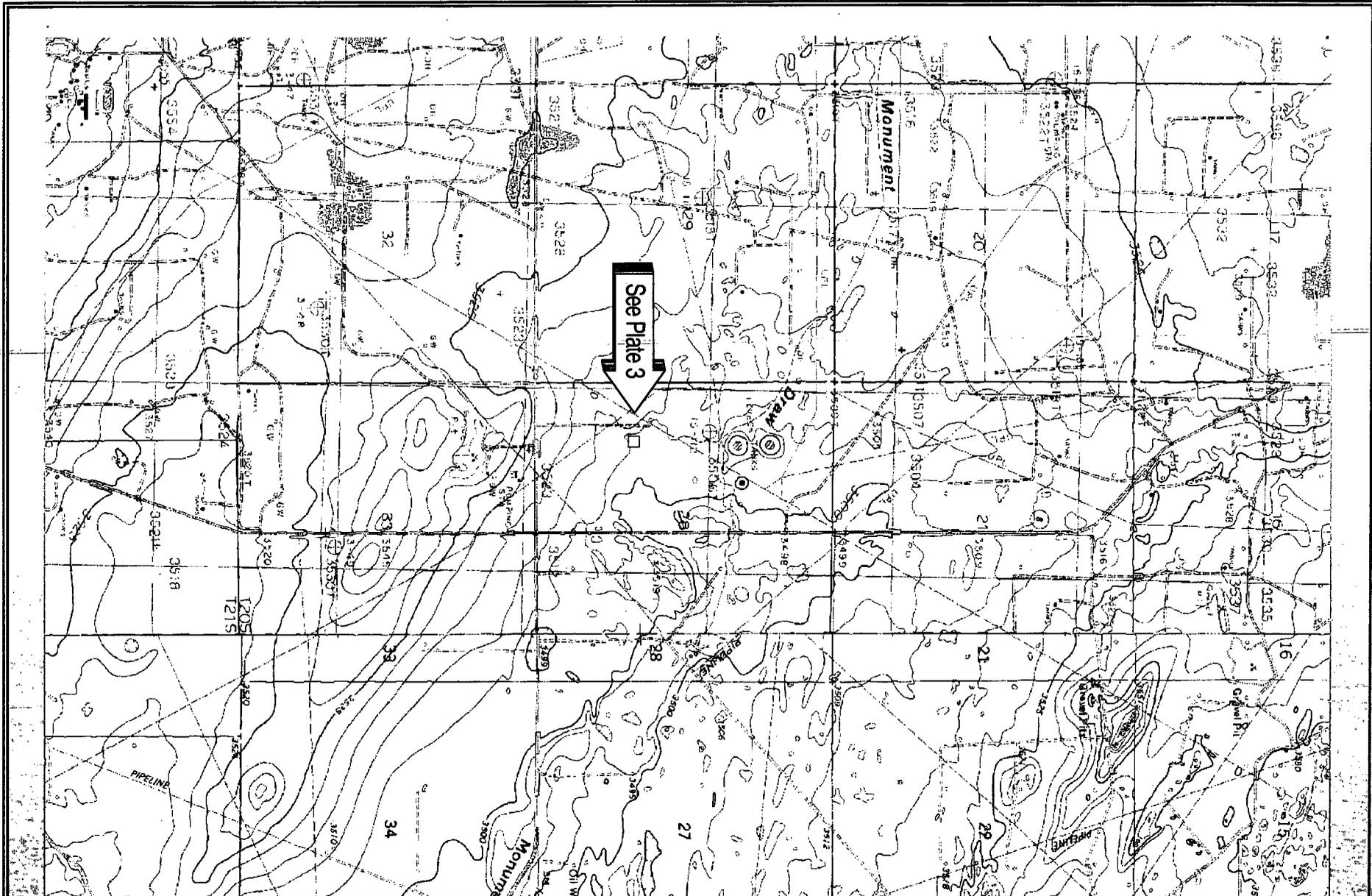
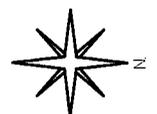


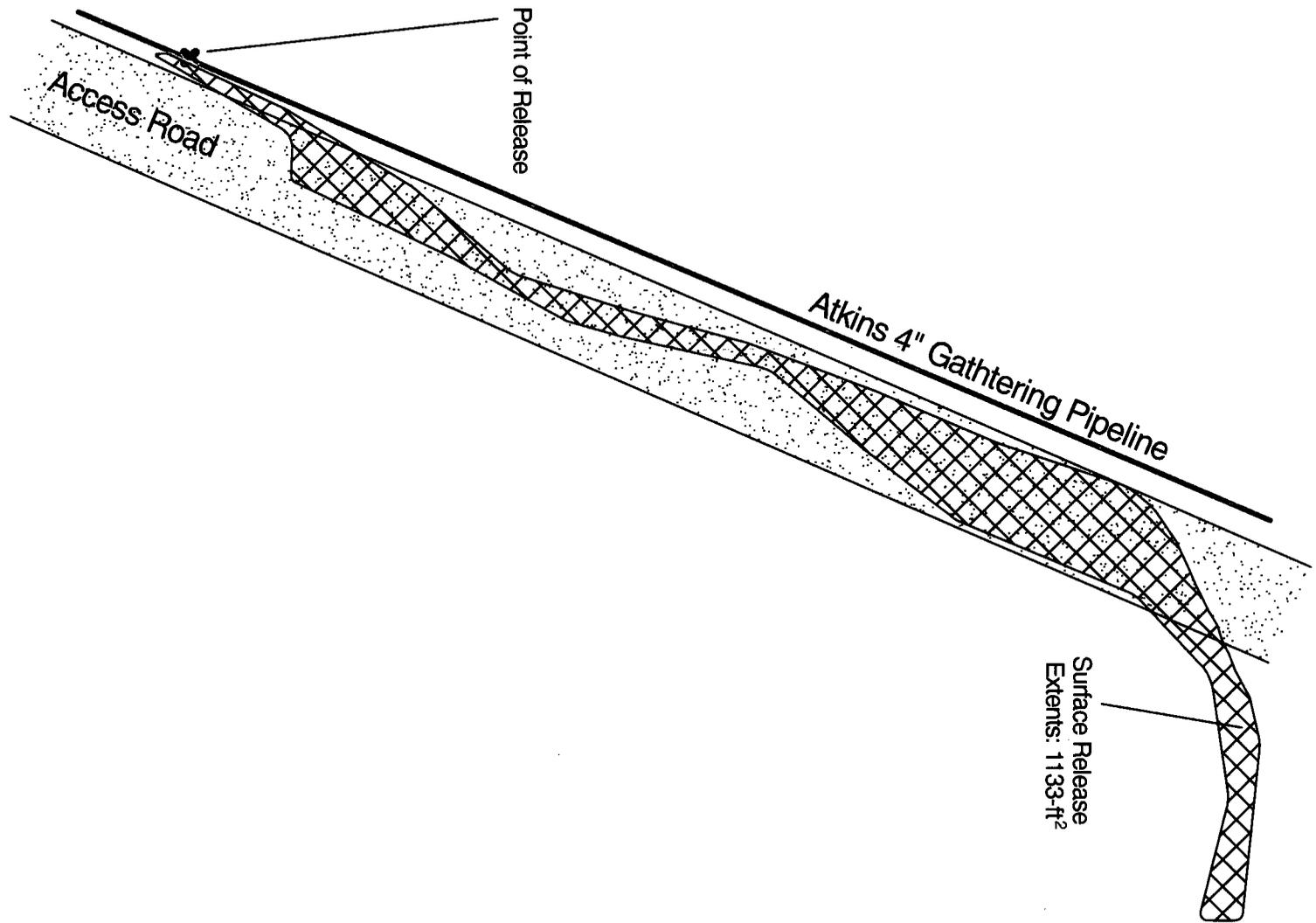
Plate 2: Site Topography  
 LINK Energy LLC - Atkins 4" Gathering  
 2004-00027

Lea County, New Mexico  
 UL-L Section 28 T20S R37E  
 N32° 32' 29.26" W103° 15' 41.47"  
 Elevation: 3510-ft amsl

DWG BY: John Good  
 Jan - 2004

REVISED:





5

<p>Plate 3 - Initial GPS Demarcation LINK Energy LLC - Atkins 4" Gathering 2004-00027</p>	<p>Lea County, New Mexico UL-L Section 28 T20S R37E N32° 32' 29.26" W103° 15' 41.47" Elevation: 3510-ft amsl</p>	<p>DWG BY: John Good Jan - 2004</p>	<p>REVISED:</p>	
		<p>SCALE: 0  50 Feet</p>		

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 March 17, 1999

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: Link Energy LLC; Contact: Frank Hernandez; Address: P.O. Box 1660, Midland, TX 79702; Telephone No.: (505) 631-3095; Facility Name: Atkins 4" Gathering Pipeline; Facility Type: Crude Oil Gathering Pipeline

Surface Owner: State of New Mexico; Mineral Owner: NA; Lease No.: NA

LOCATION OF RELEASE

Table with 9 columns: Unit Letter, Section, Township, Range, Feet from South Line, Feet from West Line, Longitude, Latitude, County. Values: L, 28, 20S, 37E, 1700, 1057, W103° 15' 41.465", N32° 32' 29.264", Lea

NATURE OF RELEASE

Type of Release: Crude Oil Release and associated components; Volume of Release: 50 bbl; Volume Recovered: 0 bbl; Source of Release: 4" Steel Pipeline; Date and Hour of Occurrence: 1/28/04 PM; Date and Hour of Discovery: 1/28/2004 PM; Was Immediate Notice Given? Yes; If YES, To Whom? Larry Johnson, NMOCD-Hobbs; By Whom? John Good - EPI; Date and Hour: 1/29/04 8:10 AM; Was a Watercourse Reached? No; If a Watercourse was Impacted, Describe Fully.\* NA; Describe Cause of Problem and Remedial Action Taken.\* Internal pipeline corrosion; Describe Area Affected and Cleanup Action Taken.\* 1,133-ft2 surface area affected; 50-bbl of product released, 0 recovered; RCRA Non-Exempt Non-hazardous grossly contaminated soil was excavated and transported to LINK's Lea Station land farm by EPI.

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.

Signature: Frank Hernandez; Printed Name: Frank Hernandez; Title: District Environmental Supv.; E-Mail: frank.hernandez@eott.com; Date: 1/30/04; Phone: (505) 631-3095; OIL CONSERVATION DIVISION; Approved by District Supervisor; Approval Date; Expiration Date; Conditions of Approval: Attached



**Incident Date and NMOCD Notified?**

1/28/2004 PM

1/29/04 8:10 AM

SITE: Atkins 4" Gathering Pipeline		Assigned Site Reference 2004-00027	
Company: Link Energy LLC			
Street Address: 5805 East Highway 80			
Mailing Address: P.O. Box 1660			
City, State, Zip: Midland, TX 79702			
Representative: Frank Hernandez			
Representative Telephone: (505) 631-3095			
Telephone:			
Fluid volume released (bbls):	50	Recovered (bbls):	0
>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days.			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
Leak, Spill, or Pit (LSP) Name:		2004-00027	
Source of contamination:		4" Steel Pipeline	
Land Owner, i.e., BLM, ST, Fee, Other:		State of New Mexico State Land Office - Santa Fe, NM	
LSP Dimensions:		140 x 10 (see Plate 3, Attachments)	
LSP Area:		1,133 -ft <sup>2</sup>	
Location of Reference Point (RP):			
Location distance and direction from RP:			
Latitude:		N32° 32' 29.264"	
Longitude:		W103° 15' 41.465"	
Elevation above mean sea level:		3510 -ft amsl	
Feet from South Section Line:		1700	
Feet from West Section Line:		1057	
Location - Unit and 1/4 1/4:		UL- L NW 1/4 of SW 1/4	
Location - Section:		28	
Location - Township:		20S	
Location - Range:		37E	
Surface water body within 1000' radius of Site:		0	
Surface water body within 1000' radius of Site:		0	
Domestic water wells within 1000' radius of Site:		0	
Domestic water wells within 1000' radius of Site:		0	
Agricultural water wells within 1000' radius of Site:		0	
Agricultural water wells within 1000' radius of Site:		0	
Public water supply wells within 1000' radius of Site:		0	
Public water supply wells within 1000' radius of Site:		0	
Depth (ft) from land surface to ground water (DG):		40	
Depth (ft) of contamination (DC):		8	
Depth (ft) to ground water (DG - DC = DtGW):		32	
<b>1. Ground Water</b>		<b>2. Wellhead Protection Area</b>	
If Depth to GW <50 feet: 20 points		If <1000' from water source, or, <200' from private domestic water source: 20 points	
If Depth to GW 50 to 99 feet: 10 points			
If Depth to GW >100 feet: 0 points		If >1000' from water source, or, >200' from private domestic water source: 0 points	
Ground water Score: 20		Wellhead Protection Area Score: 0	
Site Rank (1+2+3) = 20		Surface Water Score: 0	
<b>Total Site Ranking Score and Acceptable Concentrations</b>			
Parameter	20 or >	10	0
Benzene <sup>1</sup>	10 ppm	10 ppm	10 ppm
BTEX <sup>1</sup>	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

<sup>1</sup>100 ppm field VOC headspace measurement may be substituted for lab analysis

