

Basin Environmental Service Technologies, LLC

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27 October 2006

LRP-1108

Mr. Larry Johnson
New Mexico Oil Conservation Division, District 1
1625 N. French Drive
Hobbs, New Mexico 88240



Re: Closure Request, Young Deep to Lynch 8" Sweet (231735)
Plains Marketing, L. P. Preliminary Site Investigation Report and
Remediation/Closure Plan, dated 02 December 2005
Unit E (SW ¼, NW ¼) Section 18, Township 20 South, Range 34 East
Lea County, New Mexico
Plains EMS Number: 2005-00120

Dear Mr. Johnson:

Basin Environmental Service Technologies, LLC (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for closure of the Young Deep to Lynch 8" Sweet remediation site at the above referenced location. Soil remediation activities were successfully accomplished as proposed in the New Mexico Oil Conservation Division (NMOCD) approved Preliminary Site Investigation Report and Remediation/Closure Plan, dated 02 December 2005.

Basin responded and clamped the pipeline release on 20 May 2005, located on the Young Deep to Lynch 8" Pipeline. The Young Deep to Lynch 8" Sweet pipeline was subsequently de-oiled by Plains operations personnel. The impacted soils were excavated and stockpiled on a 6-mil poly-liner adjacent to the site. As reported on the C-141, dated 23 May 2005, approximately 165 barrels of crude oil were released and 105 barrels recovered. The NMOCD ranking criteria for the Young Deep to Lynch 8" Sweet release site was 0-9 which sets the soil remediation levels for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – gasoline range organics/diesel range organics (TPH-GRO/DRO) at 50 mg/kg for total BTEX and 5000 mg/kg for TPH-GRO/DRO.

The following NMOCD approved remedial activities were accomplished at the Young Deep to Lynch 8" pipeline release site:

facility - pPACO630455066
incident - nPACO630455172
application - pPACO630455286

- In May 2005, Basin conducted excavation activities at the release point and flow path. The excavation was approximately 145 feet long by 70 feet wide and ranged from approximately 12 to 19 feet below ground surface (bgs). The impacted soils were placed on a 6-mil poly-liner adjacent to the excavation for future remedial activities. Approximately 4500 cubic yards of impacted soil and segregated clean overburden were excavated and stockpiled on-site. See attached Figure 2, Excavation Site Map.
- On 14 July 2005, ten (10) confirmation soil samples were collected from the excavation floor and walls ranging in depth from approximately 6 to 19 feet bgs and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated that constituent concentrations of BTEX were either below NMOCD regulatory standards or not detected above laboratory method detection limits. Laboratory results indicated constituent concentrations of TPH-GRO/DRO were detected for the ten (10) confirmation soils samples; however, the ten (10) soil samples were below NMOCD regulatory standards. See Figure 3, Soil Sampling Locations. Based on the laboratory results, continued excavation of the Young Deep to Lynch 8" Sweet release site was not warranted.
- A Preliminary Site Investigation Report and Remediation/Closure Plan, dated 02 December 2005, was submitted to NMOCD and subsequently approved. The approved plan proposed to blend impacted soils with the segregated clean overburden and if necessary, the surrounding sand dunes adjacent to the site. The blended soil was to be divided into equal cells of approximately 350 cubic yards and confirmation soil samples were to be analyzed for constituent concentrations of BTEX and TPH-GRO/DRO to ensure compliance with NMOCD regulatory standards.
- In March and April 2006, the impacted soil and segregated clean overburden were mechanically blended by introducing the impacted soil to the segregated clean overburden and wind rowing the eighteen (18) inch lift to achieve the required results. As approved by NMOCD, cells were divided into approximately 350 cubic yards and confirmation soil samples were collected 12 May 2006 and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated detectable constituent concentrations of BTEX and TPH-GRO/DRO for the twelve (12) soil samples; however, the twelve (12) soil samples were below NMOCD regulatory standards. The Laboratory results are attached as Table 1, Soil Chemistry.
- In June and July 2006, backfilling of the Young Deep to Lynch 8" Sweet excavation site was completed and the site was contoured to the surrounding dunal pastureland. As proposed and approved by NMOCD, reseeded of the release site was conducted in September 2006.

The remediation activities were completed in accordance with the NMOCD approved Plains Marketing, L. P., Preliminary Site Investigation Report and Remediation/Closure Plan, dated 02 December 2005. Based on the results of the NMOCD approved remediation activities conducted at the Young Deep to Lynch 8" Sweet release site, Basin, on behalf of Plains, requests that the NMOCD consider this site eligible for closure under the *New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills and Releases (1993)*.

Should you have any questions or comments, please contact me at (505) 441-2124.

Sincerely,



Ken Dutton

Basin Environmental Services

Attachments: Table 1, Soil Chemistry
Figure 2, Excavation Site Map
Figure 3, Excavation Soil Sampling Locations
Digital Photos
NMOCD C-141 (Initial)
NMOCD C-141 (Final)

TABLE 1
SOIL CHEMISTRY

PLAINS MARKETING, L.P.
YOUNG DEEP TO LYNCH 8" SWEET
LEA COUNTY, NEW MEXICO
EMS: 2005-00120

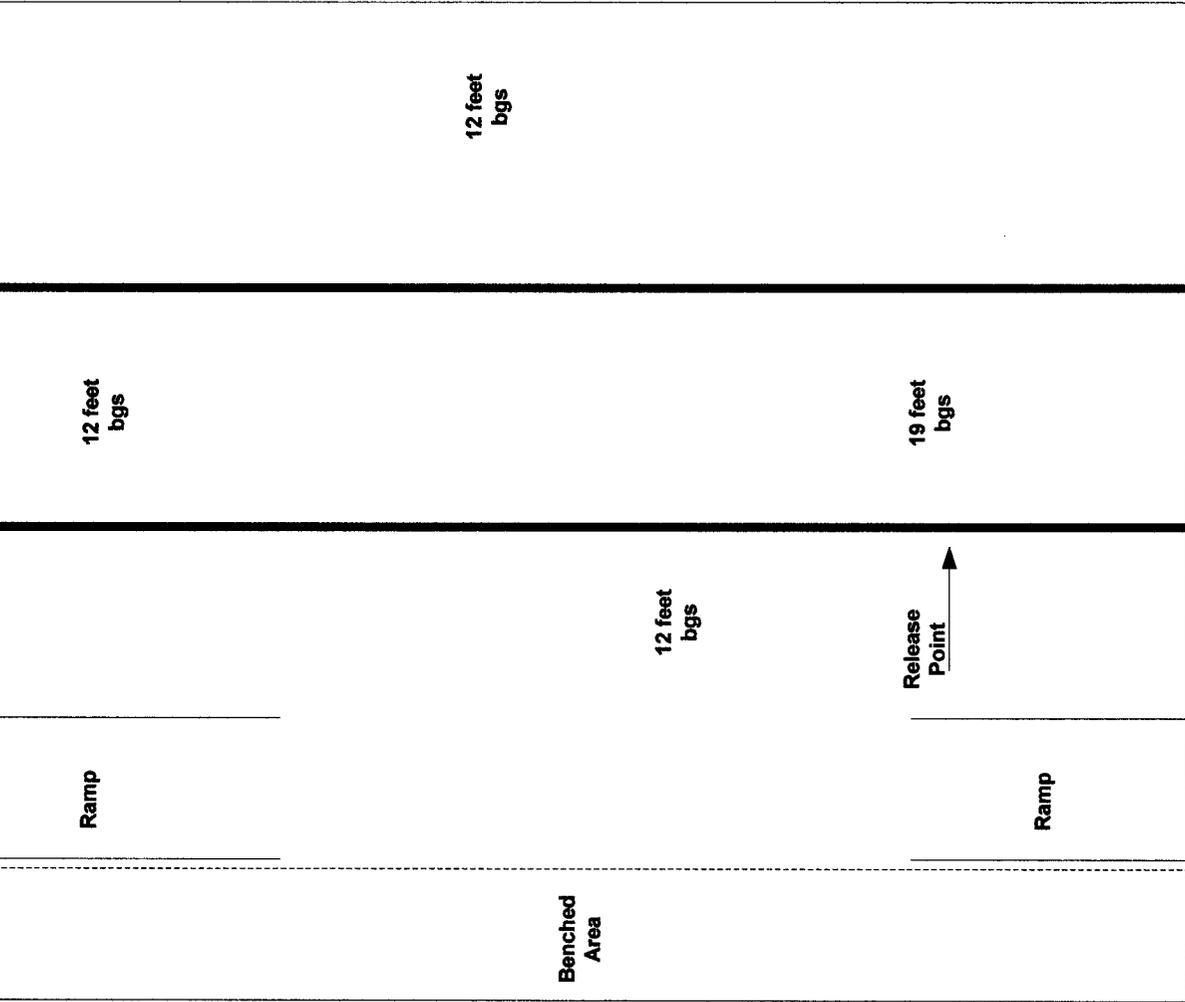
SAMPLE LOCATION	SAMPLE DEPTH	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030				METHOD: 8015M			TOTAL CHLORIDES		
			BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	M,P-XYLENES (mg/kg)	O-XYLENE (mg/kg)	GRO (mg/kg)	DRO (mg/kg)		TPH (mg/kg)	
North SW	8' bgs	07/14/05	<0.025	<0.025	<0.025	0.037	<0.025	<10	36	36		
South SW	8' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	31.3	31.3		
R/P FLR	19' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	49.6	49.6	24.7	
East SW (S)	8' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	236	236		
East SW (N)	8' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	95.4	95.4		
EXCV FLR (N)	12' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	32.4	1470	1500		
West SW (S)	8' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	410	410		
West SW (N)	8' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	35.1	35.1		
BNCH FLR (S)	6' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	96	1370	1470		
BNCH FLR (N)	6' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	54.4	54.4		
Stockpile	N/A	07/14/05	0.069	1.16	2.25	3.00	1.63	1030	9570	10,600		
Blend # 3	N/A	05/04/06						307	1890	2200		
# 1	N/A	05/12/06	<0.025	<0.025	0.059	0.168	0.190	285	3082	3370		
# 2	N/A	05/12/06	<0.025	<0.025	0.055	0.123	0.133	259	3344	3600		
# 3	N/A	05/12/06	<0.025	<0.025	0.028	0.039	0.031	156	2273	2430		
# 4	N/A	05/12/06	<0.025	<0.025	0.057	0.129	0.147	273	3244	3520		
# 5	N/A	05/12/06	<0.025	<0.025	0.038	0.057	0.044	164	2229	2390		
# 6	N/A	05/12/06	<0.025	<0.025	<0.025	<0.025	<0.025	68.8	1427	1500		
# 7	N/A	05/12/06	<0.025	0.041	0.095	0.496	0.602	405	3247	3650		
# 8	N/A	05/12/06	<0.025	<0.025	0.059	0.241	0.279	307	2891	3200		
# 9	N/A	05/12/06	<0.025	<0.025	0.047	0.144	0.174	222	2323	2540		
# 10	N/A	05/12/06	<0.025	<0.025	0.073	0.306	0.321	331	2914	3240		
# 11	N/A	05/12/06	<0.025	0.033	0.088	0.235	0.262	259	2201	2460		
# 12	N/A	05/12/06	<0.025	0.032	0.080	0.348	0.362	262	2286	2550		
NMOC D CRITERIA			10	TOTAL BTEX 50						5000		



Young Deep to Lynch Idle 10"

70 feet wide

Young Deep to Lynch 8"



Stockpiled Clean Overburden Soil

145 feet long

12 feet bgs

12 feet bgs

19 feet bgs

12 feet bgs

Release Point

Ramp

Ramp

Bench Area

Stockpiled Impacted Soil on 6-mil poly liner

Stockpiled Clean Overburden

DESCRIPTION
 Plains Marketing, L.P.
 Young Deep to Lynch 8" Sweet
 SW/NW S18, T20S, R34E
 Lea County, New Mexico

TITLE
 Figure 2
 Excavation Site Map

DRAWN BY
 Basin Environmental
 Services
 kad

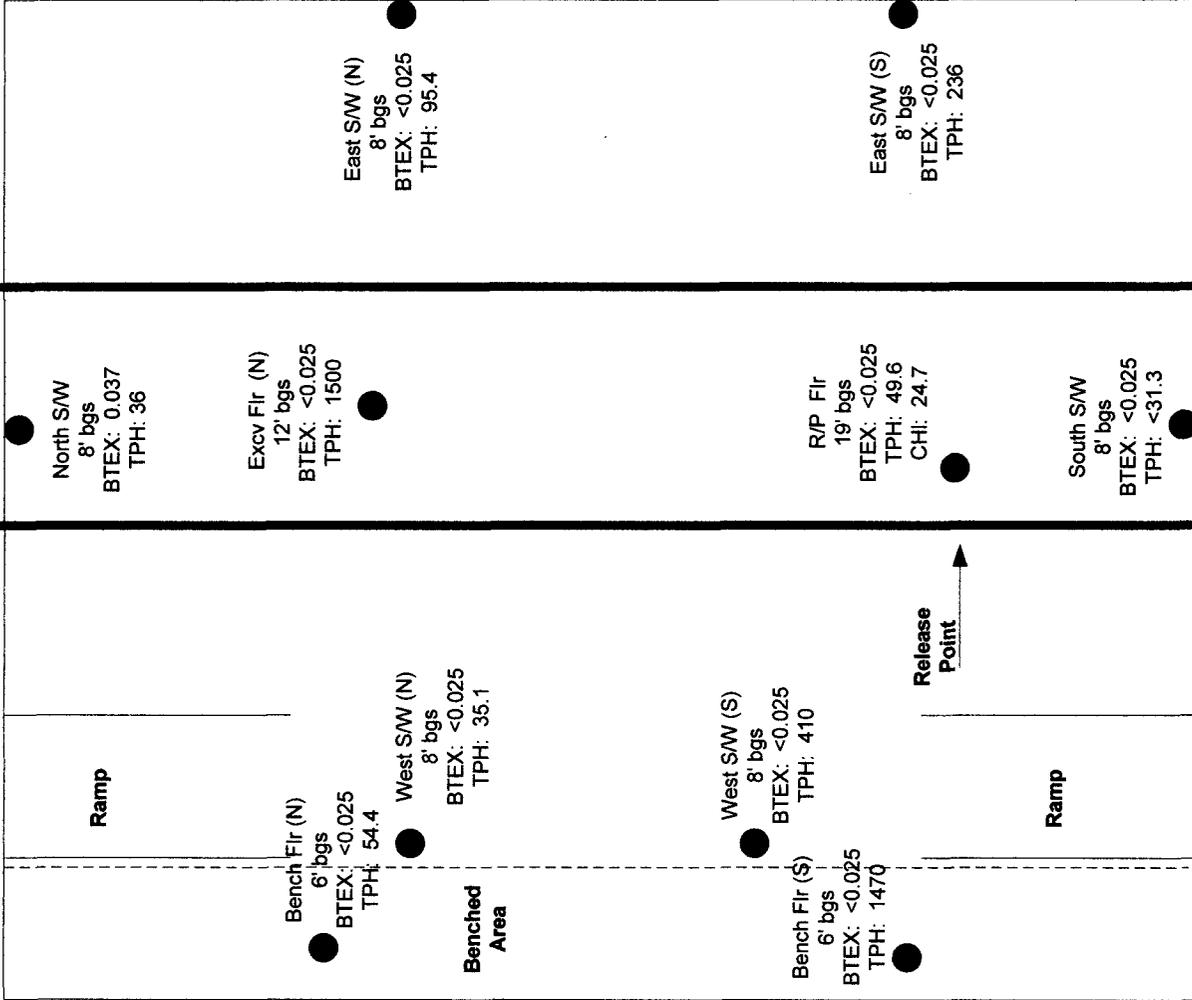


Young Deep to Lynch Idle 10"

70 feet wide

145 feet long

Young Deep to Lynch 8"



DESCRIPTION Plains Marketing, L.P. Young Deep to Lynch 8" Sweet SW/NW S18, T20S, R34E Lea County, New Mexico	TITLE Figure 3 Soil Sampling Location Map	DRAWN BY Basin Environmental Services kad
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Stockpiled Clean Overburden

Stockpiled Impacted Soil on 6-mil poly liner

Sampling Points

Plains Marketing, L. P.
Young Deep to Lynch 8" Sweet
SW/NW, S18, T20S, R34E
Lea County, NM
Plains EMS: 2005-00120



Plains Marketing, L. P.

Young Deep to Lynch 8" Sweet

SW/NW S18, T20S, R34E

Lea County, NM

Plains EMS: 2005-00120

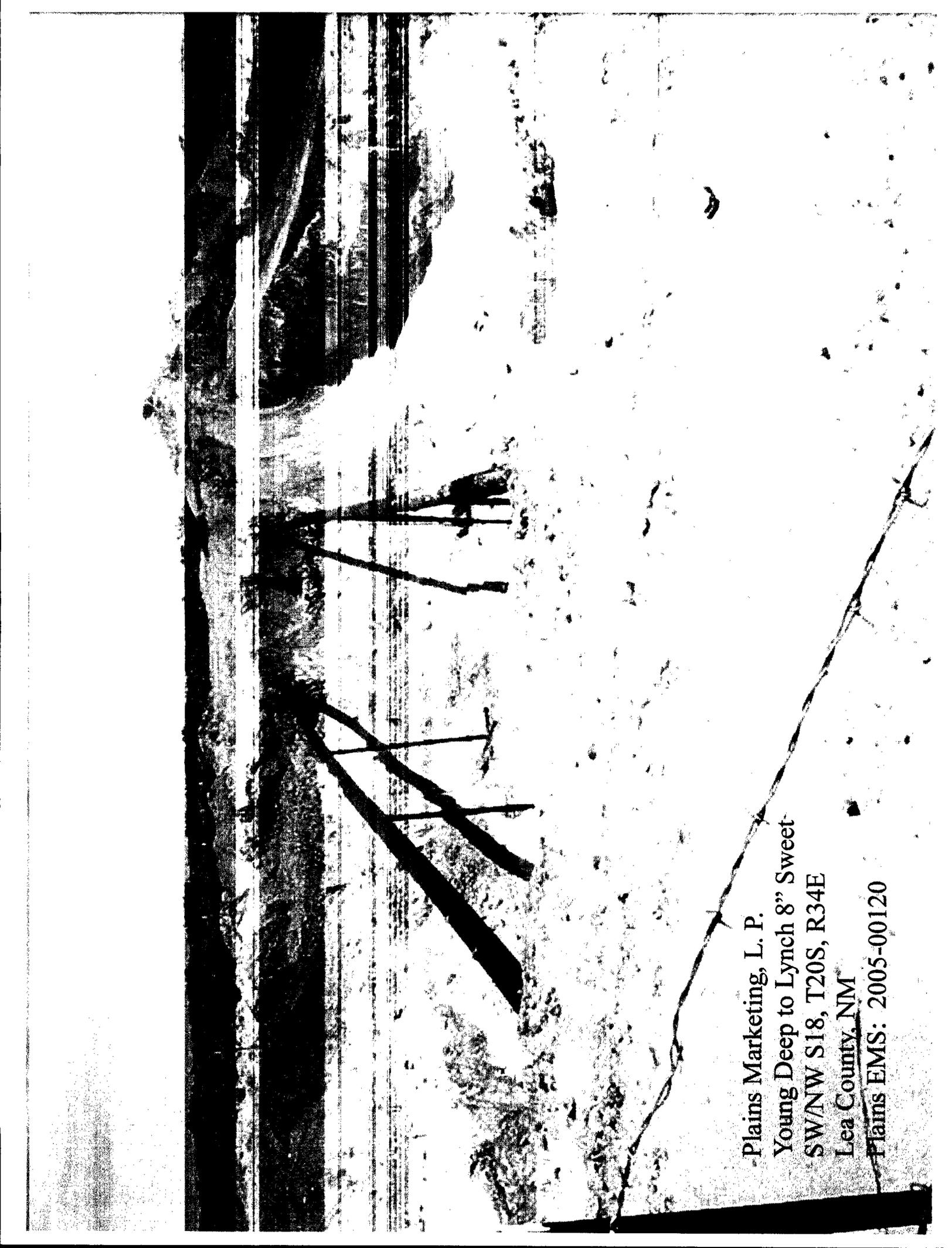


Plains Marketing, L. P.
Young Deep to Lynch 8" Sweet
SW/NW S18, T20S, R34E
Lea County, NM
Plains EMS: 2005-00120



Plains Marketing, L. P.
Young Deep to Lynch 8" Sweet
SW/NW S18, T20S, R34E
Lea County, NM
Plains EMS 2005-00120





Plains Marketing, L. P.
Young Deep to Lynch 8" Sweet
SW/NW S18, T20S, R34E
Lea County, NM
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Young Deep to Lynch 8" Sweet
SW/NW S18, T20S, R34E
Lea County, NM
Plains EMS: 2005-00120



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 8" Young Deep to Lynch Sweet	Facility Type 8" Steel Pipeline
Surface Owner Kenny Smith	Mineral Owner
Lease No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	18	20S	34E					Lea

Latitude 32° 34' 34.4" Longitude 103° 36' 27.1"

NATURE OF RELEASE

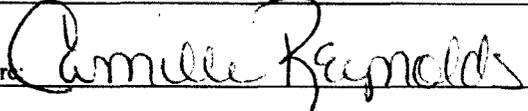
Type of Release Crude Oil	Volume of Release 165 barrels	Volume Recovered 105 barrels
Source of Release 8" Steel Pipeline	Date and Hour of Occurrence 5-20-05 @ 07:30	Date and Hour of Discovery 5-20-05 @ 08:00
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Larry Johnson	
By Whom? Camille Reynolds	Date and Hour 5-20-05 @ 14:00	
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 the 8" steel pipeline. A line clamp was installed to mitigate the release. The line is a 8 inch steel transmission pipeline that produces approximately 1,800 barrels of crude oil per day. The pressure on the line is 100 psi and the gravity of the sweet crude oil is 42.5. The sweet crude has an H₂S content of <10 ppm

Describe Area Affected and Cleanup Action Taken.* The impacted soil was excavated and stockpiled on plastic. Aerial extent of surface impact was 2,415 ft².

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:	Attached <input type="checkbox"/>
Date: 5-23-05	Phone: 505-441-0965	

* Attach Additional Sheets If Necessary

1 RP - 1108

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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, L. P.	Contact	Camille Reynolds
Address	3112 W. US Hwy 82, Lovington, NM 88260	Telephone No.	(505) 441-0965
Facility Name	Young Deep to Lynch 8" Sweet	Facility Type	8" Steel Pipeline

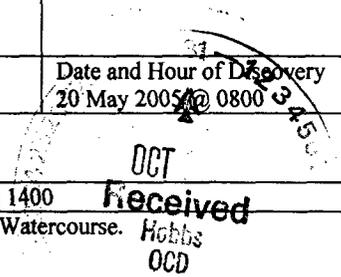
Surface Owner	Kenny Smith	Mineral Owner		Lease No.	
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	18	20S	34E					Lea

Latitude 32° 34' 34.4" North Longitude 103° 36' 27.1" West

NATURE OF RELEASE

Type of Release	Crude Oil	Volume of Release	165 barrels	Volume Recovered	105 barrels
Source of Release	8-inch Steel Pipeline	Date and Hour of Occurrence	20 May 2005 @ 0730	Date and Hour of Discovery	20 May 2005 @ 0800
Was Immediate Notice Given?	XX Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Larry Johnson		
By Whom?	Camille Reynolds	Date and Hour	20 May 2005 @ 1400		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

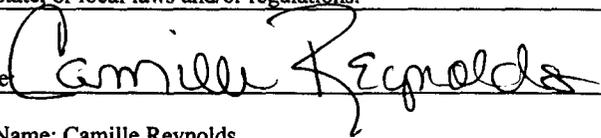
If a Watercourse was Impacted, Describe Fully.*

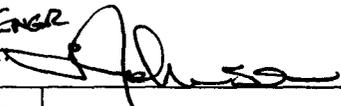
Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of a 8 inch steel pipeline. A line clamp was installed to mitigate the release. The line is an 8-inch steel transmission line that produces approximately 1,800 barrels of crude per day. The pressure on the line is approximately 100 psi and the gravity of the sweet crude oil is 42.5. The sweet crude has an H2S content of <10 ppm. The line was approximately 2 feet bgs at the release point.

Describe Area Affected and Cleanup Action Taken.* Per the approved NMOCD Plains Marketing, L. P., Remediation /Closure Plan, dated 02 December 2005, the crude oil release site was excavated; the impacted soil placed on a poly-liner adjacent to the excavation, confirmation soil samples were collected from the floor & walls of the excavation. Once the excavation confirmation soil samples were below NMOCD regulatory standards; the stockpiled soils were blended, confirmation soil samples collected, and the site was backfilled with the blended material and contoured to the original rangeland topography.

SEE ATTACHED BASIN ENVIRONMENTAL SERVICE TECHNOLOGIES LETTER DATED 26 OCTOBER 2006, CLOSURE REQUEST, WITH ATTACHMENTS FOR DETAILS OF REMEDIAL ACTIVITIES CONDUCTED.

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: 
Printed Name: Camille Reynolds

OIL CONSERVATION DIVISION
Approved by District Supervisor: 

Title: Remediation Coordinator
E-mail Address: cgreynolds@paalp.com
Date: 26 October 2006 Phone: (505) 441-0965

Approval Date: 10-31-06 Expiration Date: —
Conditions of Approval: —
Attached