

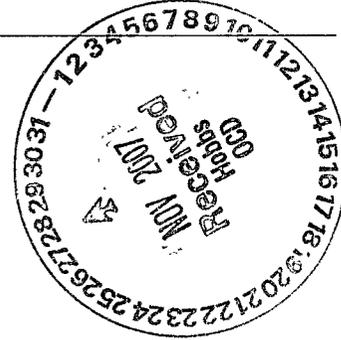
Basin Environmental Service Technologies, LLC

P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com
Office: (505) 396-2378 Fax: (505) 396-1429



19 November 2007

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



Re: Closure Request, Seaman Gathering Mainline (231735)
Plains Marketing, L. P. Preliminary Site Investigation Report &
Remediation/Closure Plan, dated 11 July 2007
Unit I (NE ¼, SE ¼) Section 01, Township 18 South, Range 32 East
Lea County, New Mexico
Plains SRS: 2006-011
NMOCD File Number: 1RP-1456

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 Seaman Gathering Mainline remediation site at the above referenced location. 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 11 July 2007.

Environmental Plus, Inc. (EPI), responded and clamped the crude oil release on 04 January 2006, located on the Seaman Gathering Mainline Pipeline, under the direction of Plains operations personnel. The impacted soils were excavated and stockpiled on a 6-mil poly-liner adjacent to the site. Basin Environmental Service Technologies, LLC (Basin), at the request of Plains, assumed oversight responsibilities for the remediation activities at the Seaman Gathering Mainline Pipeline release in June 2007. As reported on the C-141, dated 09 January 2006, approximately 07 barrels of crude oil were released and 02 barrels recovered. NMOCD ranking criteria for the Seaman Gathering Mainline release site was 0 - 9, which sets the remediation levels for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – gasoline range

organics/diesel range organics (TPH-GRO/DRO) at 10 mg/kg for benzene, 50 mg/kg for total BTEX and 5000 mg/kg for TPH-GRO/DRO.

The following NMOCD approved remedial activities were accomplished at the Seaman Gathering Mainline pipeline release site:

- In January and February 2006, excavation activities were conducted at the release point and flow path area by EPI. In February 2006, soil samples were collected from the walls and floor of the crude oil impacted excavation area and field screened with a Photoionization Detector (PID) to ascertain the levels of Volatile Organic Compounds (VOCs) present. Field screening results indicated that elevated VOCs concentrations existed on the excavation floor and vertical delineation was warranted.
- In March 2006, EPI installed a soil boring on the excavation floor to evaluate the vertical impact of the crude oil pipeline release. Subsurface soil samples were collected at 5 feet intervals, screened with a PID and selected soil samples analyzed for constituent concentrations of TPH-GRO/DRO. The soil boring was installed to a subsurface depth of approximately 43 feet below ground surface (bgs). Laboratory results indicated four (4) soil samples were reported to exceed NMOCD regulatory thresholds for TPH-GRO/DRO and the remaining two (2) soil samples were not detected above laboratory method detection limits. Laboratory results indicated crude oil impact to be limited to an area at the release point to a subsurface depth of approximately 33 feet bgs. (see Table 1, Soil Chemistry Results).
- In June 2007, five (5) confirmation soil samples were collected from the floor and walls of the excavation at approximately eight (8) feet and 18 feet bgs, respectively. Soil samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results for the five (5) soil samples indicated that constituent concentrations of BTEX and TPH-GRO/DRO were reported either below NMOCD thresholds or not detected above laboratory method detection limits.
- In July 2007, a proposed Preliminary Site Investigation Report and Remediation/Closure Plan, dated 11 July 2007, was submitted to NMOCD and subsequently approved. The plan included installation of a 20-mil poly-liner at the release point at approximately eighteen (18) feet bgs, blend the stockpiled material on-site and backfill the site with the blended soil (<5000 mg/kg TPH-GRO/DRO).
- In August 2007, five (5) confirmation soil samples were collected from the blended stockpile cell grids and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated that constituent concentrations of BTEX and TPH-GRO/DRO were reported below NMOCD thresholds with the exception of the north stockpile # 1 cell grid soil sample. Basin initiated re-

blending of the north stockpile # 1 cell grid and collected a confirmation soil sample on 23 August 2007. Laboratory results indicated constituent concentrations of BTEX and TPH-GRO/DRO were reported below NMOCD thresholds for the north stockpile # 1 soil sample and no further blending activity was warranted

- In August 2007, installation of the 20-mil poly-liner at the release point and excavation floor was completed with a 6-inch sand layer above and beneath the poly-liner. Backfilling the excavation with the blended soil was initiated once the poly-liner was installed. Backfilling of the site was completed in August 2007, with the site being contoured to the surrounding pastureland. Reseeding of the site with approved grass seed will be accomplished as prescribed by the landowner.

The remediation activities were completed in accordance with the NMOCD approved Plains Marketing, L. P., Preliminary Site Investigation and Remediation/Closure Plan, dated 11 July 2007. Based on the results of the NMOCD approved remediation activities conducted at the Seaman Gathering Mainline release site, Basin, on behalf of Plains, requests that the NMOCD consider this site as eligible for closure under the *New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills and Releases (1993)*.

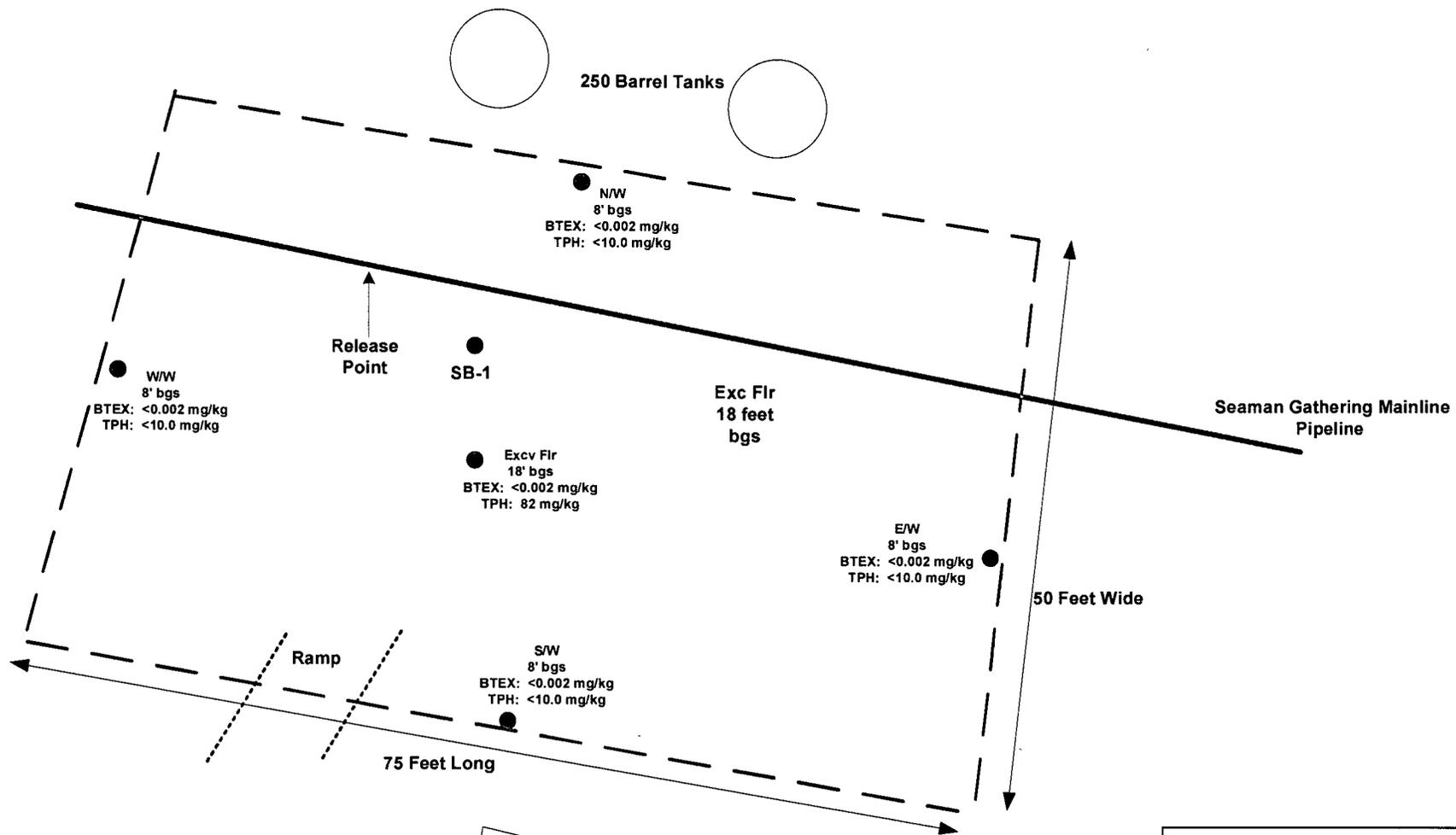
Should you have any questions or comments, please contact me at (505) 441-2124.

Sincerely,



Ken Dutton
Basin Environmental Services

- Attachments: Site Map
Table 1, Soil Chemistry Results
Digital Photos
NMOCD C-141 (Initial)
NMOCD C-141 (Final)



Legend

- Soil Boring Location
- Soil Sampling Locations

TITLE	Excavation Site Map & Soil Sampling Locations
DESCRIPTION	Plains Marketing, L.P. Seaman Gathering Mainline NE/SE S1, T18S, R32E Lea County, New Mexico SRS: 2006-011
DRAWN BY	Basin Environmental Services kad

**TABLE 1
SOIL CHEMISTRY RESULTS**

**PLAINS MARKETING, L.P.
SEAMAN GATHERING MAINLINE
LEA COUNTY, NEW MEXICO
SRS: 2006-011**

SAMPLE LOCATION	SAMPLE DEPTH (Below normal surface grade)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M		TOTAL TPH
				BENZENE	TOLUENE	ETHYL-BENZENE	M,P-XYLENES	O-XYLENE	GRO	DRO	
				(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	
SB1 - 18'	18' bgs	03/24/06	Soil Boring						7300	9491	16,800
SB1 - 23'	23' bgs	03/24/06	Soil Boring						8210	12,070	20,300
SB1 - 28'	28' bgs	03/24/06	Soil Boring						4250	5991	10,200
SB1 - 33'	33' bgs	03/24/06	Soil Boring						3400	4510	7910
SB1 - 38'	38' bgs	03/24/06	Soil Boring						<10.0	<10.0	<10.0
SB1 - 43'	43' bgs	03/24/06	Soil Boring						<10.0	<10.0	<10.0
N/W 8'	8' bgs	06/11/07	Excv	<0.002	<0.002	<0.002	<0.002	<0.002	<10.0	<10.0	<10.0
W/W 8'	8' bgs	06/11/07	Excv	<0.002	<0.002	<0.002	<0.002	<0.002	<10.0	<10.0	<10.0
S/W 8'	8' bgs	06/11/07	Excv	<0.002	<0.002	<0.002	<0.002	<0.002	<10.0	<10.0	<10.0
E/W 8'	8' bgs	06/11/07	Excv	<0.002	<0.002	<0.002	<0.002	<0.002	<10.0	<10.0	<10.0
EXCV FLR 18'	18' bgs	06/11/07	Excv	<0.002	<0.002	<0.002	<0.002	<0.002	<10.0	82	82
S/P-1	N/A	06/11/07	Stockpile	<0.025	0.157	0.391	1.70	0.940	931	22,480	23,400
S/P-2	N/A	06/11/07	Stockpile	<0.002	<0.002	<0.002	<0.002	<0.002	<50.0	590	590
North Stockpile #1	N/A	08/13/07	Stockpile	0.003	0.029	0.033	0.459	0.105	657	4938	5595
North West Stockpile #2	N/A	08/13/07	Stockpile	0.007	0.025	0.018	0.026	0.038	282	2962	3244
North East Stockpile #3	N/A	08/13/07	Stockpile	0.010	0.068	0.040	0.149	0.143	439	3159	3598
South East Stockpile #4	N/A	08/13/07	Stockpile	0.003	0.023	0.021	0.048	0.091	395	3263	3658
South West Stockpile #5	N/A	08/13/07	Stockpile	0.007	0.035	0.039	0.158	0.125	423	3602	4025
North Stockpile #1	N/A	08/23/07	Stockpile	<0.005	<0.005	0.007	0.038	0.046	194	2544	2738
NMOCD Criteria				10		TOTAL BTEX 50					5000

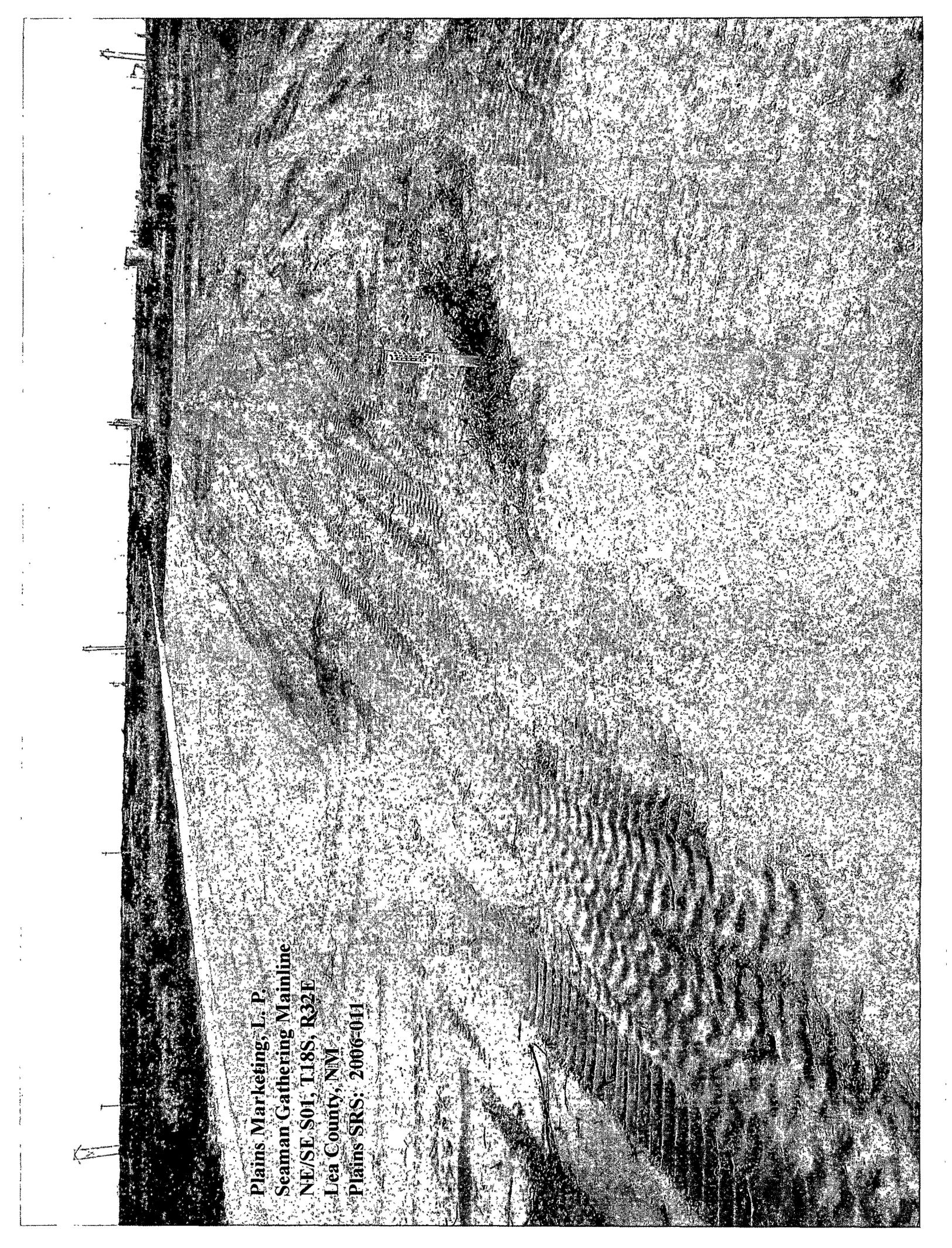
Plains Marketing, L.P.
Seaman-Gathering-Village
NE/SE S01 T18S R32E
Lea County, NM
Plains SRS-2006-011

Plains Marketing, L. P.
Seaman Gathering Mainline
NE/SE-S01, T18S, R32E
Lea County, NM
Plains SRS: 2006-011



Plains Marketing, L.P.
Seaman Gathering Mainline
NE/SE 50' T18S, R32E
Lea County, NM
Plains SRS, 2006-011





Plains Marketing, L. P.
Seaman Gathering Mainline
NE/SE S01, T18S, R32E
Lea County, NM
Plains SRS: 2006-011

Plains Marketing, L. P.

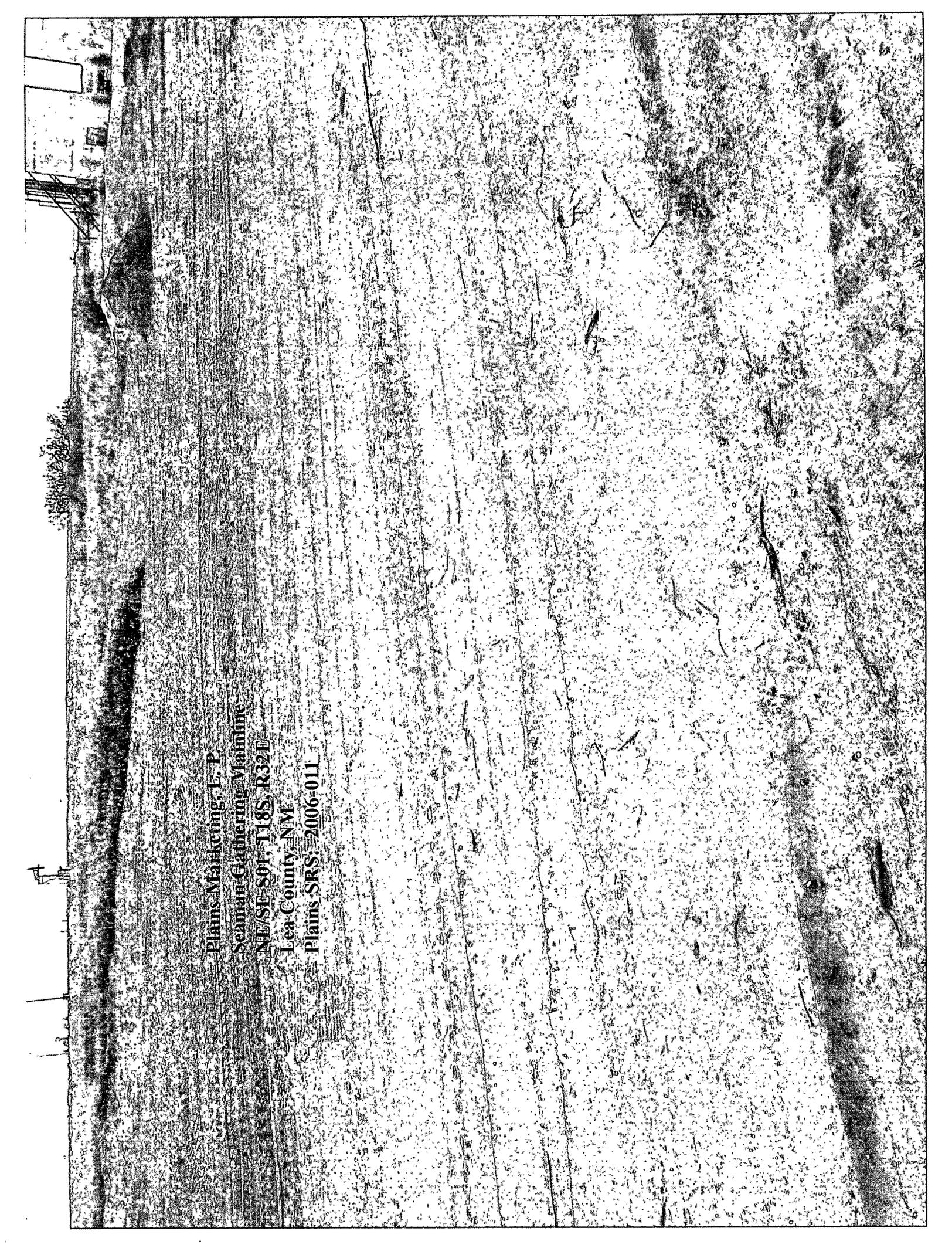
Seaman Gathering Mainline

NE/SE S01, T18S, R32E

Lea County, NM

Plains SRS: 2006-01H



An aerial photograph showing a rural landscape. In the upper left, there is a large, light-colored building with a dark roof and a small structure next to it. A line of utility poles runs vertically through the left side of the image. The terrain is mostly flat with some darker, possibly wooded or overgrown areas. The overall image has a high-contrast, grainy appearance.

Plains Marketing, L. P.
Seaman Gathering Mainline
NE/SF 801, T18S, R32E
Lea County, NM
Plains SRS: 2006-011

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 3112 W. US Hwy 82, Lovington, NM 88260	Telephone No. 505-441-0965	
Facility Name Seaman Gathering Mainline to EK Queen	Facility Type 4" Steel Pipeline	
Surface Owner Caviness Cattle Company	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
I	I	18S	32E					Lea
Latitude 32° 46' 24.4"				Longitude 103° 42' 52.4"				

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 7 barrels	Volume Recovered 2 barrels
Source of Release 4" Steel Pipeline	Date and Hour of Occurrence 1-04-06 @ 14:00	Date and Hour of Discovery 1-04-06 @ 14:10
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Pat Caperton	
By Whom? Camille Reynolds	Date and Hour 1-04-06 @ 16:00	
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.* External corrosion of a 4 inch steel pipeline resulted in a release of sweet crude oil. A clamp was installed on the line to mitigate the release. The line is an 4 inch steel transmission pipeline that produces approximately 1,400 barrels of crude oil per day. The pressure on the line is approximately 40 psi and the gravity of the sweet crude oil is 41.6. The sweet crude has an H₂S content of <10 ppm. The line was approximately 3 feet hgs at the release point.

Describe Area Affected and Cleanup Action Taken.* The impacted soil was excavated and stockpiled on plastic. Aerial extent of surface impact was approximately 120 ft².

*BLEND STOCKPILE TO 15000 PPM
TPH & BACKFILL AND
249 gal of*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOC D 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 NMOC D 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, NMOC D 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: <i>Camille Reynolds</i>	OIL CONSERVATION DIVISION	
Printed Name: Camille Reynolds	Approved by District-Supervisor: <i>[Signature]</i>	
Title: Remediation Coordinator	Approval Date: 7.24.07	Expiration Date: 10.24.07
E-mail Address: cjreynolds@paalp.com	Conditions of Approval: RBC PLAN APPROVED AS DISCUSSED.	Attached <input type="checkbox"/> <i>RP# 1456</i>

NMOCD

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 1RP-1456

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	SEAMAN GATHERING MAINLINE	Facility Type	4" Steel Pipeline
SRS:	2006-011		

Surface Owner	Caviness Cattle Company	Mineral Owner		Lease No.	
---------------	-------------------------	---------------	--	-----------	--

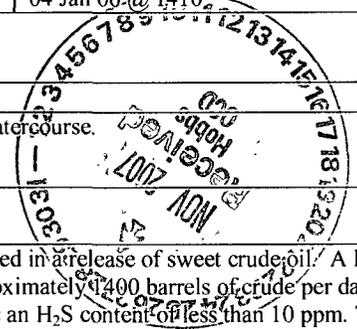
LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	01	18S	32E					Lea

Latitude 32° 46' 24.4" North Longitude 103° 42' 52.4"

NATURE OF RELEASE

Type of Release	Crude Oil	Volume of Release	07 barrels	Volume Recovered	02 barrels
Source of Release	4" Steel Pipeline	Date and Hour of Occurrence	04 Jan 06 @ 1400	Date and Hour of Discovery	04 Jan 06 @ 1410
Was Immediate Notice Given?	XX Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Pat Caperton		
By Whom?	Camille Reynolds	Date and Hour	04 Jan 06 @ 1600		
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.* External corrosion of the 4-inch steel pipeline resulted in a release of sweet crude oil. A line clamp was installed to mitigate the release. The line is a 4-inch steel transmission pipeline that produces approximately 1400 barrels of crude per day. The pressure on the line is approximately 40 psi and the gravity of the sweet crude oil is 41.6. The sweet crude has an H₂S content of less than 10 ppm. The pipeline is approximately 3 feet bgs at the release point.

Describe Area Affected and Cleanup Action Taken.* Per the approved NMOCD Plains Marketing, L. P., PSIR Remediation/Closure Plan, dated 11 July 2007, the crude oil release site was excavated, the impacted soil was blended on-site, confirmation soil samples collected. Once the confirmation soil samples were below NMOCD regulatory standards, a 20-ml poly-liner was installed; the site was backfilled with the blended material and contoured to the original rangeland topography.

SEE ATTACHED BASIN ENVIRONMENTAL SERVICE TECHNOLOGIES CLOSURE REQUEST, DATED 19 NOVEMBER 2007, 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:	OIL CONSERVATION DIVISION	
Printed Name: Camille Reynolds	 Approved by District Supervisor ENVIRONMENTAL ENGINEER	
Title: Remediation Coordinator	Approval Date: <u>11-28-07</u>	Expiration Date: _____
E-mail Address: cjreynolds@paaalp.com	Conditions of Approval:	
Date: 19 November 2007 Phone: (505) 441-0965	1RP-1456	

* Attach Additional Sheets If Necessary