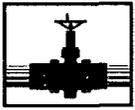


AP - 52

**STAGE 1 & 2  
WORKPLANS**

**DATE:**

4-22-08



**PLAINS  
PIPELINE**

April 25, 2008

RECEIVED

APR 28 2008  
Environmental Bureau  
Oil Conservation Division

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

Re: Plains Pipeline, L.P. Addendum to the Stage 1 and 2 Abatement Plan  
C. S. Caylor Release Site  
NMOCD Reference # AP-0052  
Unit Letter B, Section 6, Township 17 South, Range 37 East  
Lea County, New Mexico

Dear Mr. Hansen:

Please find attached for your approval the Addendum to the Stage 1 and 2 Abatement Plan, dated April 22, 2008, for the C. S. Caylor release site located in Section 6 of Township 17 South, and Range 37 East of Lea County, New Mexico. The Addendum details site activities to be conducted for groundwater and soil remediation at the site.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Bryant  
Remediation Coordinator  
Plains Pipeline

Cc: Larry Johnson, NMOCD, Hobbs Office

Enclosure



# PLAINS PIPELINE

April 22, 2008

Mr. Edward Hansen  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

RECEIVED

APR 28 2008  
Environmental Bureau  
Oil Conservation Division

Re: Plains Pipeline, L.P. C.S. Cayler (Plains SRS#2002-10250)  
NMOCD Reference # AP-052 (OLD 1R-0382)  
UL-B (NW¼ of the NE¼) of Section 6, T17S, R37E  
Latitude: 32° 52' 2.45"N and Longitude: 103° 17' 17.73"W  
Landowner: Robert C. Rice  
Lea County, New Mexico

Dear Mr. Hansen:

Plains Pipeline, L.P. (Plains) submits this response to the email sent by New Mexico Oil Conservation Division (OCD) dated February 20, 2008. This Addendum corresponds to the Stage 1 and Stage 2 Abatement Plan dated September 5, 2006. The recommendations are reiterated below followed by the Plains response.

1. "The soil remediation programs must specify that the soils intended for use as backfill will have a TPH concentration of no more than 100 mg/kg."

Response: On April 2, 2008, a letter was submitted to the NMOCD describing backfill activities that will be performed onsite. Plains is anticipating the approval of the backfill activity letter.

2. "The groundwater remediation program must specify that a more aggressive non-aqueous phase liquid (NAPL) removal program (which may include recovery wells). This must also include the method(s) for treatment and/or disposal of the oil and groundwater removed."

Response: Plains installed monitor well MW-18 on March 18, 2008, as requested by the OCD. The BTEX and TPH concentrations, from soil samples collected from 5', 40', and 75', were below laboratory reporting limits. Analytical results from the groundwater sampling event on March 25, 2008, indicated BTEX and polycyclic aromatic hydrocarbons (PAH) constituents below laboratory reporting limits except for isopropylbenzene (0.0021 mg/L). There is not a maximum contaminant level (MCL) for isopropylbenzene.



## PLAINS PIPELINE

Subsequent to the results of a pump test, a more aggressive removal program will be instated. Depending on the pump test results, three pneumatic total fluid pumps will be installed at the site. These pumps will be placed in the source area (monitor wells MW-2, MW-3, and MW-4) to accommodate a more aggressive phase separated hydrocarbon (PSH) removal program. The PSH recovered from the site will be transported and reintroduced into the Plains Pipeline System. The amount of PSH recovered from the site will be documented and recorded in the Annual Report. Two existing skimmer pumps will be utilized to optimize remediation activities in monitor wells MW-7 and MW-8.

Downstream from the pumps, a frac tank will be connected and utilized for fluid collection and PSH separation. Currently, Plains is attempting to acquire access to a nearby injection well to facilitate disposal of purged groundwater. If access is not obtained, other long term options will be further evaluated. In the interim, fluids will be removed via vacuum truck and disposed off-site at a regulatory certified disposal facility.

Discontinuation of PSH removal activities will be evaluated when gauging results indicate no free product remains on the groundwater, and as approved by the OCD.

3. "The abatement schedule must be revised to include the more aggressive NAPL removal program."

Response: Plains will continue PSH recovery and groundwater monitoring accordingly and submit the Annual Report documenting status and progress.

If you have any questions or require further information, please contact me at (505) 441-0965.

Sincerely,

Camille Bryant  
Remediation Coordinator  
Plains Pipeline

Enclosure



Date: 04/23/2008

Scale: 1" = 100'

Drawn By: SJA

C.S. Cayler (PLAINSO44SPL)

SRS # 2002-10250, NMOCD REF. # AP-052 (OLD 1R-0382)

Lea County, New Mexico

Site Plan

(MW-18) Approximate Location

