AP - 63

# STAGE 1 & 2 WORKPLANS

DATE: 5-9-08

PLAINS PIPELINE

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May 9, 2008

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
34 Junction South Station Release Site
Unit Letter L of Section 2, Township 17 South, Range 36 East
Lea County, New Mexico
NMOCD Reference # AP-63

Dear Mr. Hansen,

Plains Pipeline, L. P. is pleased to submit the attached Addendum to the Stage 1 and 2 Abatement Plan, dated May 6, 2008, for the 34 Junction South release site located in Section 2 of Township 17 South, and Range 36 East of Lea County, New Mexico. This document addresses recommendations set forth in the NMOCD e-mail dated February 19, 2008.

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

Sincerely,

Camille Bryant

Camille Bryant
Remediation Coordinator
Plains Pipeline

CC: Larry Johnson, NMOCD, Hobbs, NM
Thaddeus Kostrubala, SLO, Santa Fe, NM

Enclosure

NOVA
safety and environmental

May 6, 2008

Mr. Ed Hansen
New Mexico Energy, Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Addendum to the 34 Junction South Station Stage 1 and 2 Abatement Plan
Section 2, T-17-S, R-36-E
Plains SRS # 2005-00138
Lea County, NM
NMOCD Reference AP-63 (was 1R-1456)

Dear Mr. Hansen,

NOVA Safety and Environmental (NOVA), on behalf of Plains Marketing, L.P. (Plains) respectfully submits the following Addendum to the 34 Junction South Station *Stage 1 and 2 Abatement Plan* report dated October 2006. The site is located in Section 2, Township 17 South, Range 36 East in Lea County, NM.

On February 19, 2008, Plains received notification from the NMOCD that the Stage 1 and 2 Abatement Plan submitted in October 2006 was accepted as administratively complete and recommended additional amendments to the plan. As requested, Plains proposes the following amendments:

Plains proposes to install two soil borings in the vicinity of recovery well RW-1 and monitor well MW-3, each drilled to a depth of approximately 60 feet below ground surface (bgs). Soil samples will be collected at the same intervals as the original RW-1 and MW-3 soil borings utilizing standard sampling protocol and submitted for laboratory analysis for TPH by EPA method 8015M GRO/DRO and BTEX by EPA method 8021B.

In addition, Plains proposes to install two additional groundwater monitor wells located downgradient of monitor wells MW-4 and MW-5. The proposed monitor wells would be utilized to delineate the dissolved phase plume to the east due to the presence of PSH observed in monitor well MW-4 and increased dissolved phase hydrocarbon concentrations detected in monitor well MW-5. The proposed monitor wells will be completed to a depth of approximately 70 feet bgs. A site map depicting the proposed soil boring and monitor well locations is presented as Figure 1.

Samples of subsurface soils collected during installation of the soil borings and monitor wells will be collected utilizing a split-spoon sampling tool. Representative soil samples will be divided into two separate portions using clean, disposable gloves and clean sampling tools. One portion of the soil sample will be placed in a sterile glass container equipped with a Teflon-lined lid furnished by the laboratory. The container will be filled to capacity to limit the amount of headspace present, labeled and placed on ice in an insulated cooler. Proper chain-of-custody documentation will be maintained throughout the sampling and shipping process.

The other portion of the soil sample will be placed in a disposable zip-lock baggie. The baggie will be labeled and sealed for headspace analysis using a photoionization detector (PID) calibrated to a 100-ppm isobutylene standard. Each bagged sample will be allowed to volatilize for approximately thirty minutes in the sunlight at ambient temperature prior to field screening activities.

Soil samples will be delivered to Trace Analysis, in Midland, Texas and analyzed for BTEX and TPH analyses using the methods described below:

- BTEX concentrations in accordance with EPA SW-846 Method 8021B, 5030; and
- TPH concentrations in accordance with EPA SW-846 Method 8015M GRO/DRO.

Following completion of well installation activities, the new monitor wells (MW-13 and MW-14) will be purged of a minimum of three well volumes of water or until the wells failed to produce water. Purging will be performed using a disposable polyethylene bailer for each well or electrical Grundfos pump and dedicated tubing. Groundwater will be allowed to recharge and samples will be obtained using disposable Teflon samplers. Water samples will be collected in clean glass containers provided by the laboratory and placed on ice in the field. Purge water will be collected in a polystyrene tank and disposed of at a licensed disposal facility.

Groundwater samples will be delivered to Trace Analysis, in Midland, Texas and analyzed for BTEX and TPH analyses using the methods described below:

- BTEX concentrations in accordance with EPA SW-846 Method 8021B, 5030; and
- TPH concentrations in accordance with EPA SW-846 Method 8015M GRO/DRO.

The newly installed monitor wells will be added to the quarterly groundwater monitoring schedule.

Upon receipt and evaluation of the soil boring analytical data, Plains will further address soil abatement options prior to implementing the proposed abatement plan.

Contingent on NMOCD approval, Plains is prepared to begin field activities and perform the corrective actions as summarized in the *Stage 1 and 2 Abatement Plan* Report dated October 2006. Upon completion of the field activities and review of the laboratory analytical reports, Plains will submit a Site Investigation Report to the NMOCD, documenting the installation of the soil borings, monitor wells, soil sample results and review of soil abatement options.

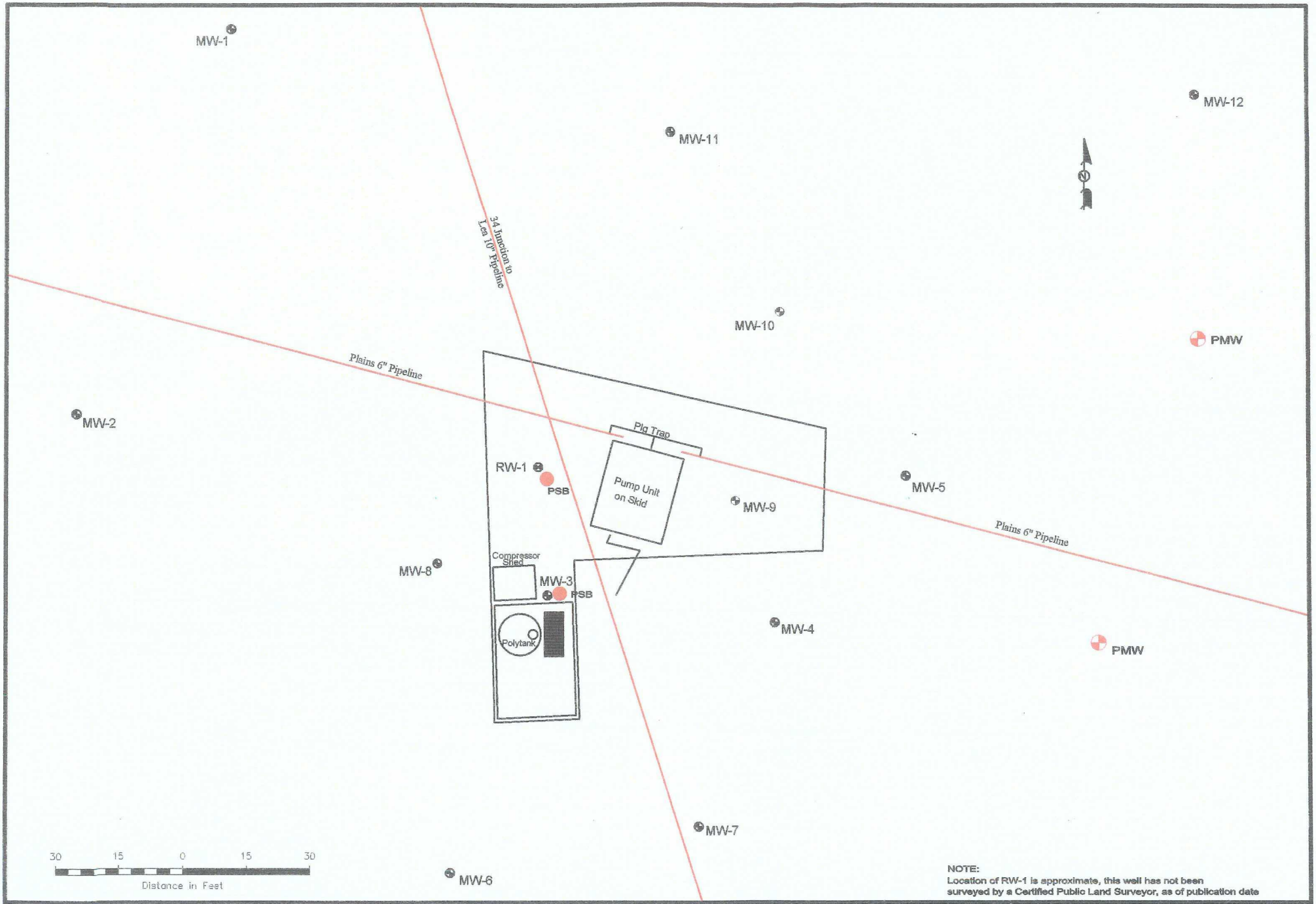
If there are any questions regarding this Addendum to the 34 Junction South Station Stage 1 and 2 Abatement Plan, please contact Ms. Camille Bryant at 505-441-0965 or myself at 432-520-7720.

Sincerely,

Ronald K. Rounsaville
Project Manager
NOVA Safety and Environmental

cc: Mr. Larry Johnson – NMOCD Hobbs District Office
Mrs. Camille Bryant – Plains Marketing, L.P., Lovington, NM
Mr. Jeff Dann – Plains Marketing, L.P., Houston, TX
NOVA Central Files

Attachment A: Figure 1 – Proposed Soil Boring and Monitor Well Location Map


MW-1
MW-12
MW-11
N
34 Junction to Lea 10" Pipeline
MW-10
PMW
Plains 6" Pipeline
MW-2
Pig Trap
RW-1
PSB
Pump Unit on Skid
MW-9
MW-5
Plains 6" Pipeline
Compressor Shed
MW-8
MW-3
PSB
MW-4
Polytank
PMW
MW-7
30 15 0 15 30
Distance in Feet
MW-6
NOTE:
Location of RW-1 is approximate, this well has not been surveyed by a Certified Public Land Surveyor, as of publication date
Legend:
Monitor Well Location
Recovery Well Location
Pipeline
PMW Proposed Monitor Well
PSB Proposed Soil Boring Location
NMOCD Reference No. 1R-0456
Figure 1
Proposed Soil Boring and Monitor Well Location Map
Plains Marketing, L.P.
34 Junction South Station
Lea County, NM
NOVA Safety and Environmental
Scale: 1" = 30'
CAD By: DGC
Checked By: CDS
January 25, 2008