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

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MAY 22 2008
HOBBS OCD

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-1501
OPERATOR

☐ Initial Report XX **Final Report**

Name of Company Plains Marketing, L. P.	Contact Camille Bryant
Address 3112 W. US Hwy 82, Lovington, NM 88260	Telephone No. (575) 441-0965
Facility Name **VACUUM SOUR 4 INCH TRAP** **SRS: 2007-233**	Facility Type 4" Steel Pipeline

Surface Owner SLO	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
J	33	17S	35E					Lea

Latitude 32° 47' 17.3" North **Longitude** 103° 27' 33.9" West.

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 30 barrels	Volume Recovered 0 barrels
Source of Release 4-inch Steel Pipeline	Date and Hour of Occurrence 20 Jul 07 @ 1300	Date and Hour of Discovery 20 Jul 07 @ 1330
Was Immediate Notice Given? XX Yes ☐ No ☐ Not Required	If YES, To Whom? Pat Richards	
By Whom? Camille Bryant	Date and Hour 20 Jul 07 @ 1545	
Was a Watercourse Reached? ☐ Yes XX☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Tie-in valve on the Phillips Central 8 inch line malfunctioned allowing oil to flow back into the idled 4 inch receiver trap. Internal corrosion of the 4-inch steel pipeline resulted in the release of crude oil. The line was cut and capped. Line idled; therefore, pressure and volume are not applicable.

Describe Area Affected and Cleanup Action Taken.* 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 of the excavation. Once the excavation confirmation soil samples were below NMOCD regulatory standards, mechanical screening of the stockpiled material was conducted. The mechanically screened material (<500 mg/kg TPH) was utilized as backfill and the site contoured to the original surrounding rangeland topography. Reseeding with approved NMSLO grass seed will be conducted as prescribed by NMSLO directives.

SEE ATTACHED BASIN ENVIRONMENTAL SERVICE TECHNOLOGIES CLOSURE REQUEST, DATED 19 MAY 08, 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: Camille Bryant	OIL CONSERVATION DIVISION
Printed Name: Camille Bryant	Approved by District Supervisor: ENVIRONMENTAL ENGINEER
Title: Remediation Coordinator	Approval Date: 5-22-08 Expiration Date: —
E-mail Address: cjbryant@paalp.com	Conditions of Approval: —
Date: 19 May 2008 Phone: (575) 441-0965	**1RP-1501**

District I
1625 N. French Dr., Hobbs, NM 88240
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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

x Initial Report ☐ Final Report

Name of Company Plains Pipeline	Contact Camille Reynolds
Address 3112 W. US Hwy 82, Lovington, NM 88260	Telephone No. 505-441-0965
Facility Name Vacuum Sour 4 Inch Trap	Facility Type 4"Steel Pipeline

Surface Owner SLO	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
J	33	17S	35E					Lea

Latitude 32° 47' 17.3" Longitude 103° 27' 33.9"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 30 barrels	Volume Recovered 0 barrels
Source of Release 4" Steel Pipeline	Date and Hour of Occurrence 07/20/2007 @ 13:00	Date and Hour of Discovery 07/20/2007 @ 13:30
Was Immediate Notice Given? X Yes ☐ No ☐ Not Required	If YES, To Whom? Pat Richards	
By Whom? Camille Reynolds	Date and Hour 07/20/2007 @ 15:45	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

JUL 2007
Received
Hobbs
OCD

Describe Cause of Problem and Remedial Action Taken: Tie in valve on the Phillips Central 8 inch line malfunctioned allowing oil to flow back into the idled 4 inch receiver trap. Internal corrosion on the idled 4 inch line resulted in the crude oil release. The line was cut and capped. Line idled, therefore, pressure and volume is not applicable.

Describe Area Affected and Cleanup Action Taken.* The initial visual impacted area was approximately 80 feet long by 20 feet wide. The impacted soil is being stockpiled on site on a 6-mil poly liner.

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: Camille Reynolds	OIL CONSERVATION DIVISION
Printed Name: Camille Reynolds	Approved by District Supervisor: ENVIRONMENTAL ENGR
Title: Remediation Coordinator	Approval Date: 7.26.07 Expiration Date: 9.28.07
E-mail Address: cjreynolds@paalp.com	Conditions of Approval: Submit Final C-141 w/ attachments by
Date: 07/26/2007 Phone:505-441-0965	Attached ☐

* Attach Additional Sheets If Necessary

RP#1501

Basin Environmental Service Technologies, LLC

2800 Plains Highway
P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com
Office: (575) 396-2378 Fax: (575) 396-1429

19 May 2008

Mr. Larry Johnson
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division, District 1
1625 N. French Drive
Hobbs, New Mexico 88240

Re: Closure Request, Vacuum Sour 4-Inch Trap (231735)
Plains Marketing, L. P. Preliminary Site Investigation Report and Remediation Plan, dated 03 October 2007
Unit J (NW ¼, SE ¼) Section 33, Township 17 South, Range 35 East
Lea County, New Mexico
Plains SRS Number: 2007-233
NMOCD File Number: 1RP-1501

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 idled Vacuum Sour 4-Inch Trap 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 Plan, dated 03 October 2007.

In July 2007, Basin mobilized to the idled Vacuum Sour 4-Inch Trap crude oil release site responding to a crude oil release for Plains. Plains operations personnel contained the crude oil release by cold cutting and capping the receiver trap line. A pipeline blind was installed at the tie-in valve to ensure there would be no further seepage into the idled Vacuum Sour 4-Inch Trap line. Upon arrival at the release site, Basin initiated excavation of the release point and flow path area with the impacted soil stockpiled on a 6-mil poly liner adjacent to the site. As reported on the initial C-141, dated 26 July 2007, approximately 30 barrels of crude oil were released and 0 barrels were recovered. The NMOCD ranking criteria for the Vacuum Sour 4-Inch Trap release site was >19, 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 10 mg/kg for benzene, 50 mg/kg for total BTEX and 100 mg/kg for TPH-GRO/DRO.

The following NMOCD approved remedial activities were accomplished at the idled Vacuum Sour 4-Inch Trap release site:

- In July, August and September 2007, Basin conducted excavation activities at the release point and flow path area. The final dimensions of the excavated area were approximately 140 feet long by 50 feet wide and approximately 15 feet below ground surface (bgs). The impacted soils were placed on a 6-ml poly-liner adjacent to the excavation for future remedial activities. Approximately 3800 cubic yards of caliche rock and impacted soils were excavated and stockpiled on-site. See attached Figure 2, Excavation Site Map.

- On 17 September 2007, five (5) confirmation soil samples were collected from the floor and walls of the excavation ranging in depth from approximately 5 to 15 feet bgs. Soil samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated that constituent concentrations of BTEX were not detected above laboratory method detection limits for four (4) soil samples and the remaining soil sample was reported below NMOCD regulatory standards. Laboratory results indicated that constituent concentrations of TPH-GRO/DRO were not detected above laboratory method detection limits for four (4) of the soil samples and the remaining soil sample reported TPH-GRO/DRO constituent concentrations above NMOCD regulatory standards at 4673 mg/kg.

- On 17 September 2007, Basin installed one (1) soil boring utilizing an air rotary drill rig operated by Straub Corporation, Stanton, Texas, to evaluate the vertical extent of crude oil impact at the release point on the floor of the excavation at approximately fifteen feet bgs. The soil boring was installed to a true subsurface depth of approximately 65 feet bgs with no visual observations of free phase hydrocarbons (PSH) or groundwater during the installation of the soil borings. The selected samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO

- Soil Boring 1, as depicted on the Excavation Site Map - Soil Sampling & Soil Boring Locations (Figure 3), was installed on the floor of the excavation at a depth of approximately fifteen feet bgs. The soil boring was installed to a true subsurface depth of approximately 65 feet bgs. Soil samples collected at depths of 10, 20, 30, 35, 40, 45 and 50 feet below the base of the excavation were submitted for analysis. Laboratory results indicated that constituent concentrations of BTEX were not detected above laboratory method detection limits for the four (4) soil samples and the remaining three (3) soil samples were reported below NMOCD regulatory standards. Laboratory results indicated that constituent concentrations of TPH-GRO/DRO were not detected above laboratory method detection limits for three (3) soil samples and the remaining four (4) soil

samples exceeded NMOCD regulatory standards at 4097 mg/kg, 7512 mg/kg, 4350 mg/kg and 267 mg/kg, respectively. Based on the results of the laboratory data, soil impacts appear to be limited to a subsurface depth of less than 50 feet bgs.

- A Preliminary Site Investigation Report and Remediation Plan, dated 03 October 2007, was submitted to NMOCD Hobbs District I and subsequently approved. The approved plan included no further excavation activities based on laboratory results from excavation, soil sampling and soil boring activities, mechanically screen the caliche rock and soil, utilize the screened caliche rock as partial backfill, analyze the screened soil at 500 cubic yard intervals to ensure TPH-GRO-DRO concentrations were 500 mg/kg or less and utilize the screened soil as backfill. If laboratory results report that a mechanically screened 500 cubic yard segment exceeds 500 mg/kg TPH-GRO/DRO concentrations, that 500 cubic yard segment will be transported to Lea Station Land Farm (LSLF) and clean backfill material will be transported to the site to be utilized as backfill material. Additionally, install an impermeable 20-ml poly liner at the base of the excavation to allow natural attenuation of the limited contaminates in the soil. Upon completion of backfilling the excavation, contour the excavation to the surrounding rangeland grade and reseed the site with approved SLO grass seed.

- In November and December 2007, mechanical screening of the on-site stockpiled material was conducted. In December 2007, the mechanically screened soils were sampled at approximately 500 cubic yard increments and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO to ensure TPH concentrations were at or below 500 mg/kg. Laboratory results reported that two (2) mechanically screened segments meet the cleanup standards and the remaining screened segment exceeded cleanup standards at 740 mg/kg, which was transported to LSLF with clean backfill transported to the site and utilized as backfill. In December 2007, installation of the 20-ml poly liner was completed and backfilling of the excavation was conducted with the mechanically screened soil that met the cleanup standards. Backfilling of the excavation was completed in January 2008 and the excavation was contoured to the surrounding rangeland grade. Reseeding activities with approved SLO grass seed will be accomplished as directed by SLO procedures.

The remediation activities were completed in accordance with the NMOCD approved Plains Marketing, L. P., Preliminary Site Investigation Report and Remediation Plan, dated 03 October 2007. Based on the results of the NMOCD approved remediation activities conducted at the idled Vacuum Sour 4-Inch Trap release site, Basin, on behalf of Plains, requests that the NMOCD consider the soil issue at 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 Results
Table 2, Soil Chemistry Results –Treated/Stockpiled Soil
Figure 2, Excavation Site Map
Figure 3, Excavation Site Map & Soil Sampling Locations
Digital Photos
NMOCD C-141 (Initial)
NMOCD C-141 (Final)

cc: Mr. Thaddeus Kostrubala, NM State Land Office (Santa Fe)

TABLE 1

SOIL CHEMISTRY RESULTS

PLAINS MARKETING, L.P.
VACUUM SOUR 4-INCH TRAP
LEA COUNTY, NEW MEXICO
PLAINS SRS: 2007-233
NMOCD REF NO: 1RP-1501

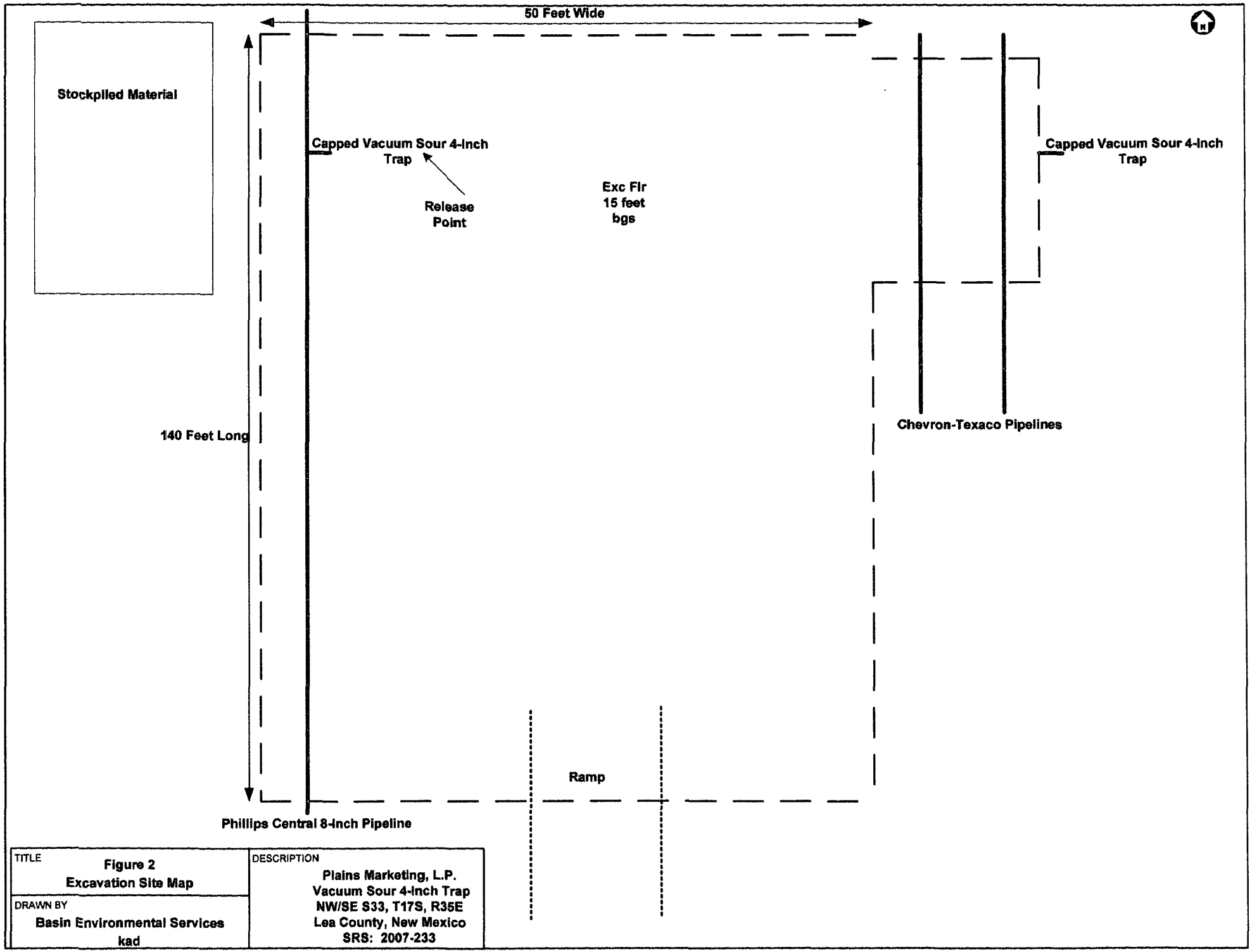
SAMPLE LOCATION	SAMPLE DEPTH (Below normal surface grade)	SAMPLE DATE	DATE ANALYZED	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030				METHOD: 8015M		TOTAL TPH
					BENZENE	TOLUENE	ETHYL-BENZENE	XYLENE	GRO	DRO	
					(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
SB-1 10'	15' bgs	09/17/07	09/19/07	In-Situ	<0.050	5.04	10.3	17.2	587	3510	4097
SB-1 20'	35' bgs	09/17/07	09/19/07	In-Situ	0.415	6.44	13.6	22.3	692	6820	7512
SB-1 30'	45' bgs	09/17/07	09/19/07	In-Situ	<0.050	2.20	6.21	11.1	510	3840	4350
SB-1 35'	50' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	16.2	251	267
SB-1 40'	55' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
SB-1 45'	60' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
SB-1 50'	65' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
N/W 9'	9' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
S/W 9'	9' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
W/W 9'	9' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
E/W 9'	9' bgs	09/17/07	09/19/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<1	<50	<50
Excv Flr 15'	15' bgs	09/17/07	09/19/07	In-Situ	0.484	4.79	5.66	21.7	603	4070	4,673
S/P	N/A	09/17/07	09/19/07	Stockpile	0.338	4.23	6.42	29.1	503	778	1281
S/P	N/A	01/09/08	01/15/08	Stockpile	<0.020	<0.020	<0.020	0.032	38	7910	7948
NMOCD Criteria					**10**	**TOTAL BTEX 50**					**100**

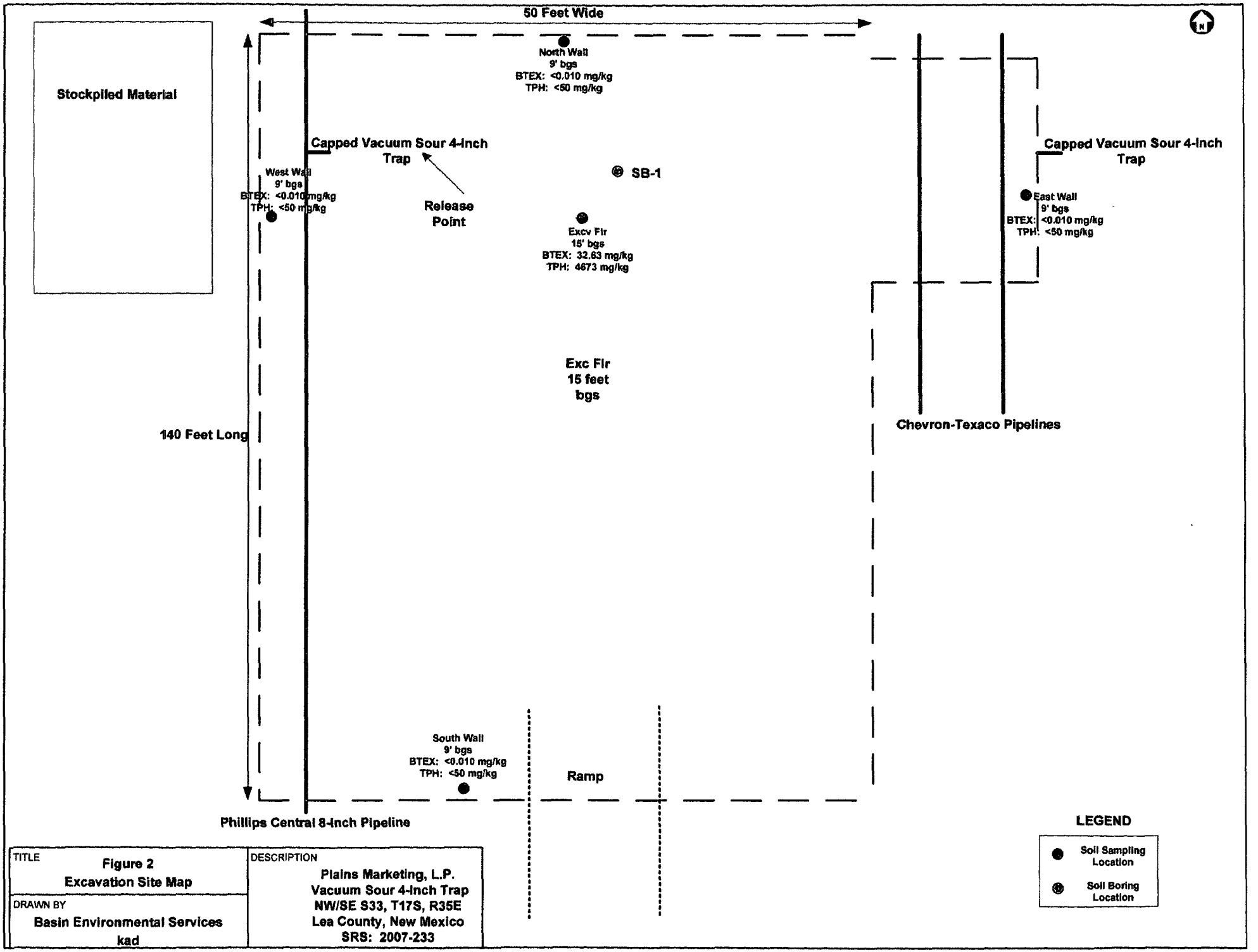
TABLE 2

SOIL CHEMISTRY RESULTS - MECHANICALLY SCREENED SOIL

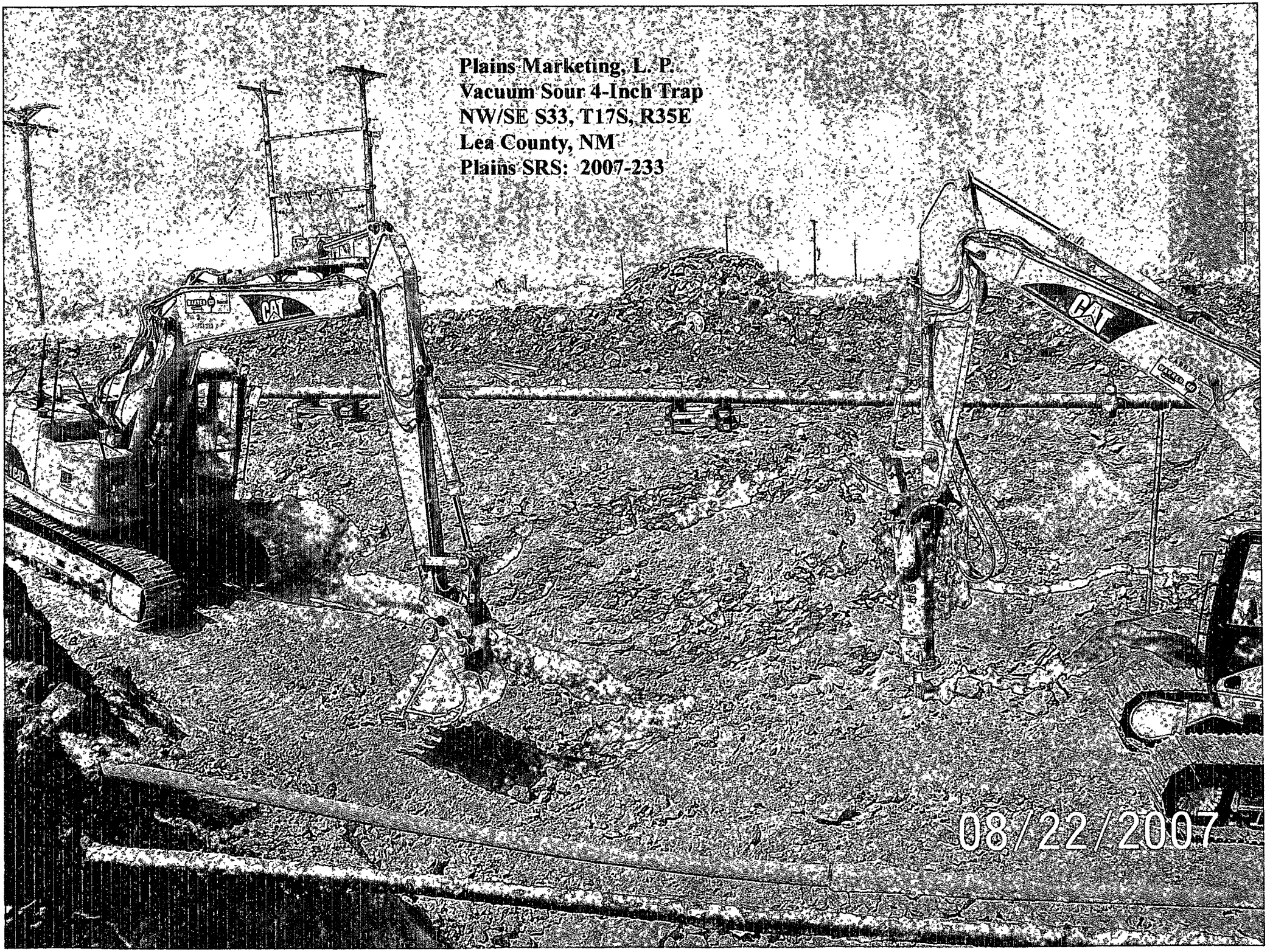
PLAINS MARKETING, L.P.
VACUUM SOUR 4-INCH TRAP
LEA COUNTY, NEW MEXICO
PLAINS SRS: 2007-233
NMOCD REF NO: 1RP-1501

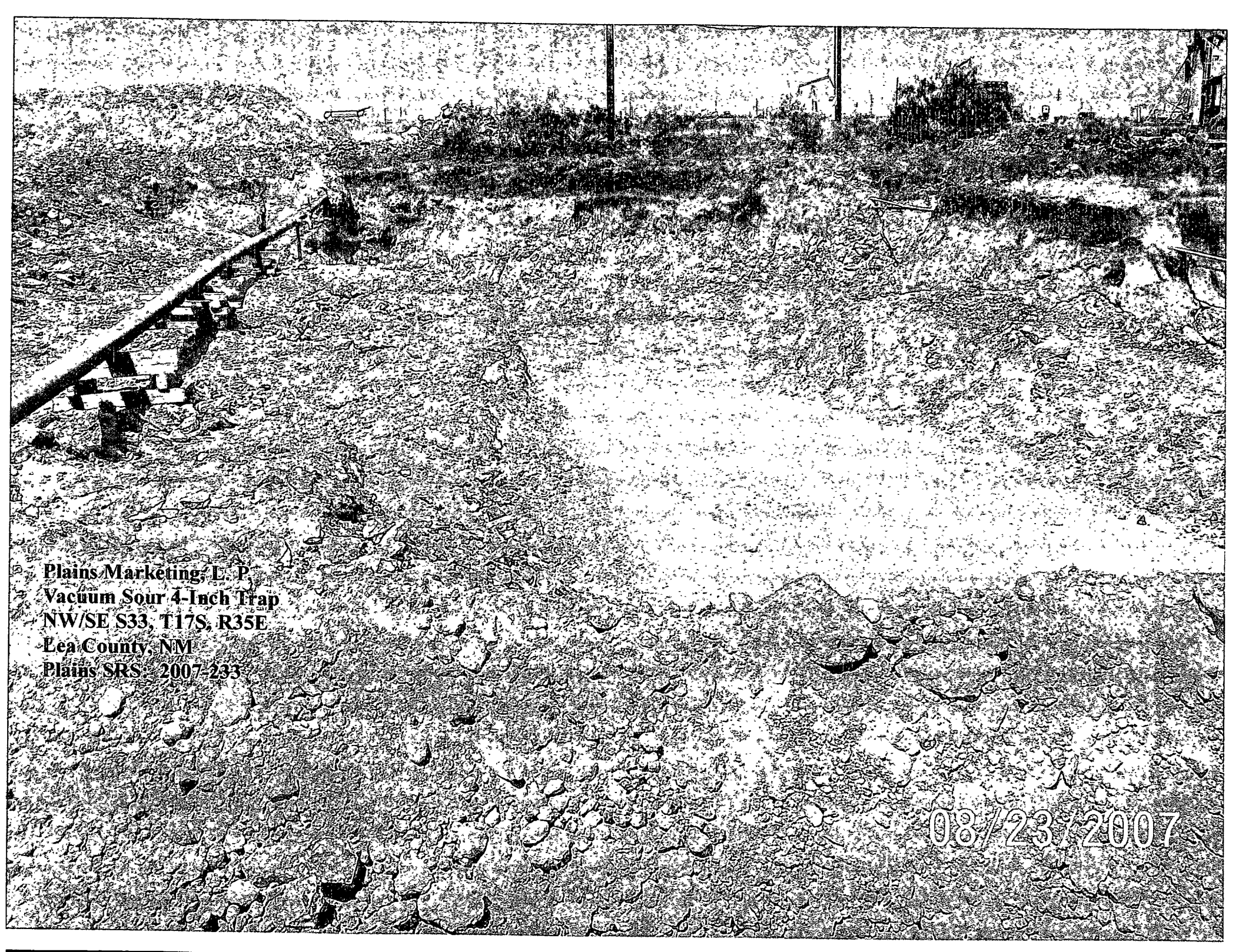
SAMPLE LOCATION	SAMPLE DEPTH (Below normal surface grade)	SAMPLE DATE	DATE ANALYZED	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030				METHOD: 8015M		TOTAL TPH
					BENZENE	TOLUENE	ETHYL-BENZENE	XYLENE	GRO	DRO	
					(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
S/P W # 1	N/A	12/13/07	12/19/07	Stockpile	<0.010	0.023	<0.010	0.402	95	335	430
S/P M # 2	N/A	12/13/07	12/19/07	Stockpile	<0.010	0.102	<0.010	0.631	121	619	740
S/P E # 3	N/A	12/13/07	12/19/07	Stockpile	<0.010	0.019	<0.010	0.254	74	205	279
NMOCD Criteria					10	TOTAL BTEX 50					500

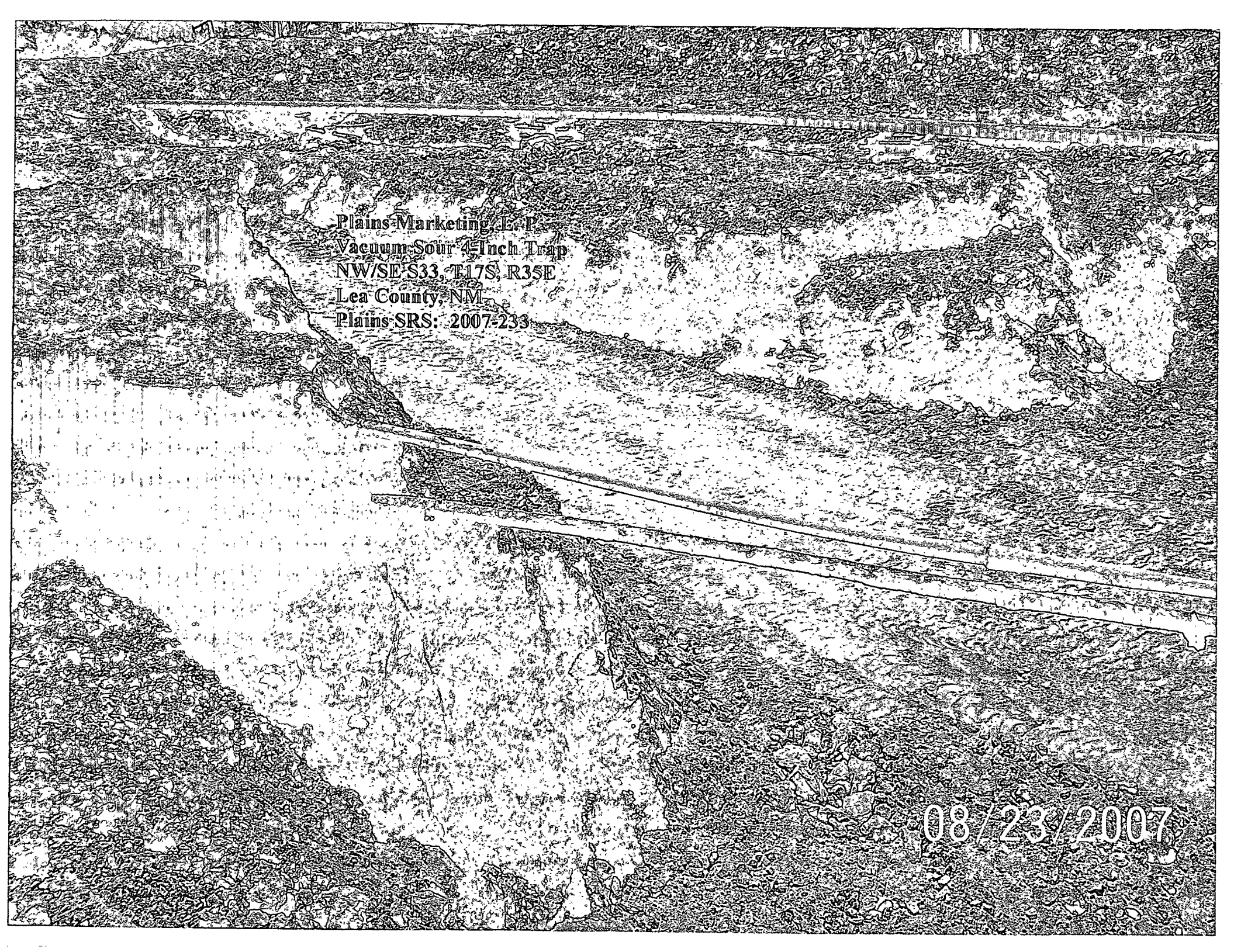

50 Feet Wide
Stockpiled Material
Capped Vacuum Sour 4-Inch Trap
Release Point
Exc Flr 15 feet bgs
Capped Vacuum Sour 4-Inch Trap
140 Feet Long
Chevron-Texaco Pipelines
Ramp
Phillips Central 8-Inch Pipeline
TITLE
Figure 2
Excavation Site Map
DRAWN BY
Basin Environmental Services
kad
DESCRIPTION
Plains Marketing, L.P.
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
Lea County, New Mexico
SRS: 2007-233



TITLE **Figure 2** **Excavation Site Map**	DESCRIPTION **Plains Marketing, L.P.** **Vacuum Sour 4-Inch Trap** **NW/SE S33, T17S, R35E** **Lea County, New Mexico** **SRS: 2007-233**
DRAWN BY **Basin Environmental Services** **kad**	


Plains Marketing, L. P.
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
Lea County, NM
Plains SRS: 2007-233
CAT
CAT
08/22/2007


Plains Marketing, L. P.
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
Lea County, NM
Plains SRS: 2007-233
08/23/2007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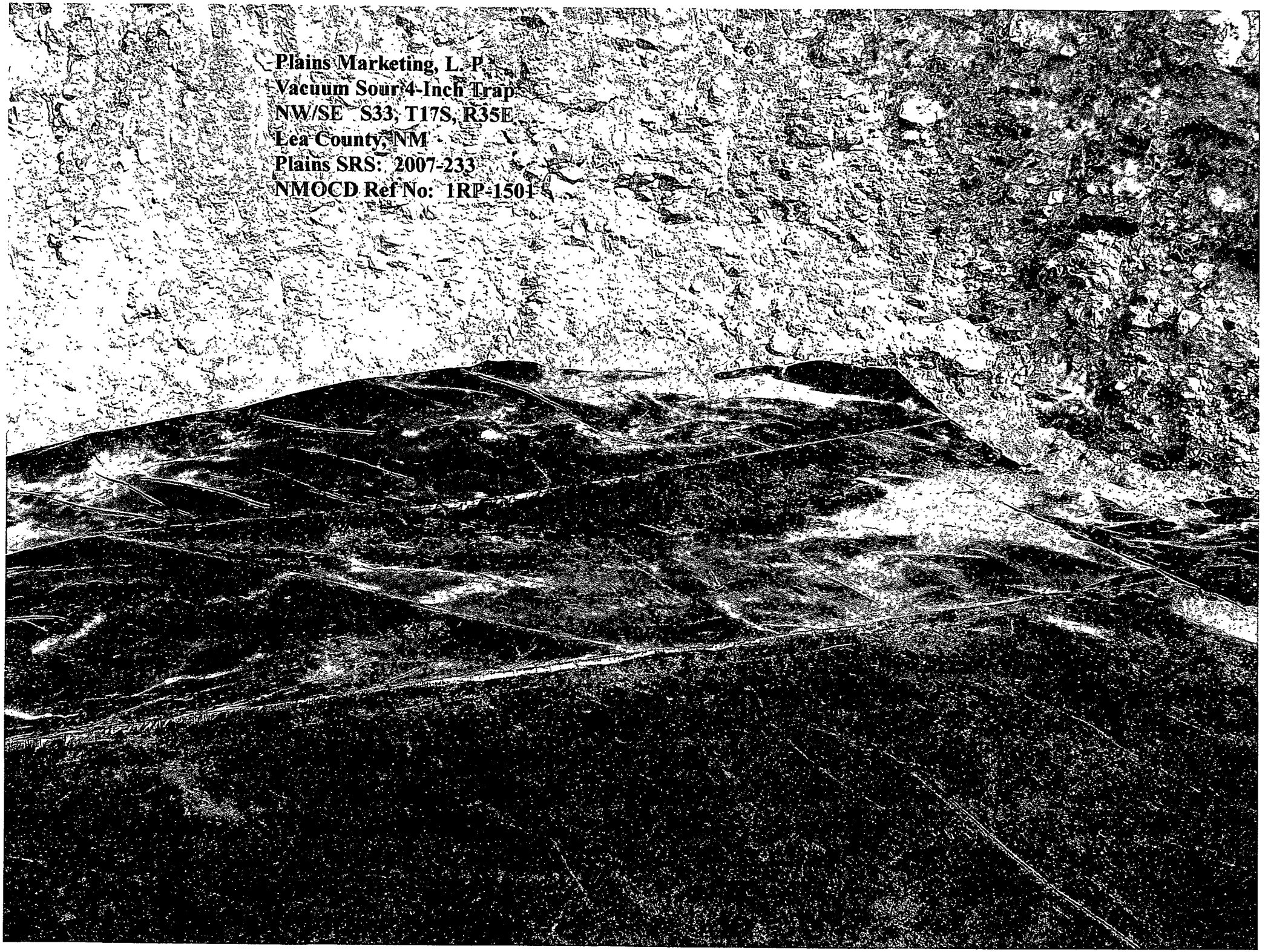
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
Lea County, NM
Plains SRS: 2007-233
08/23/2007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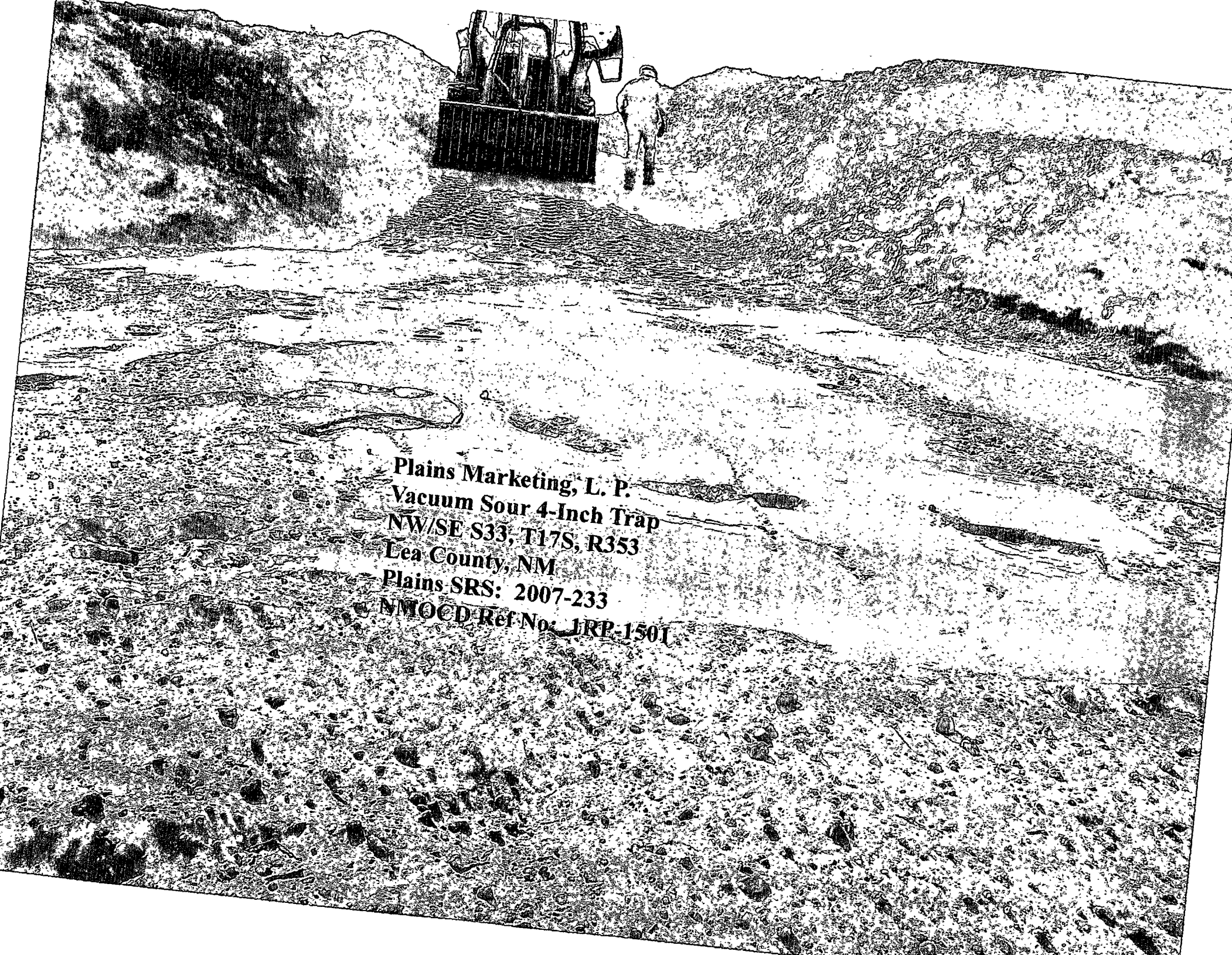
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
Lea County, NM
Plains SRS: 2007-233
NMOCD Ref No: 1RP-1501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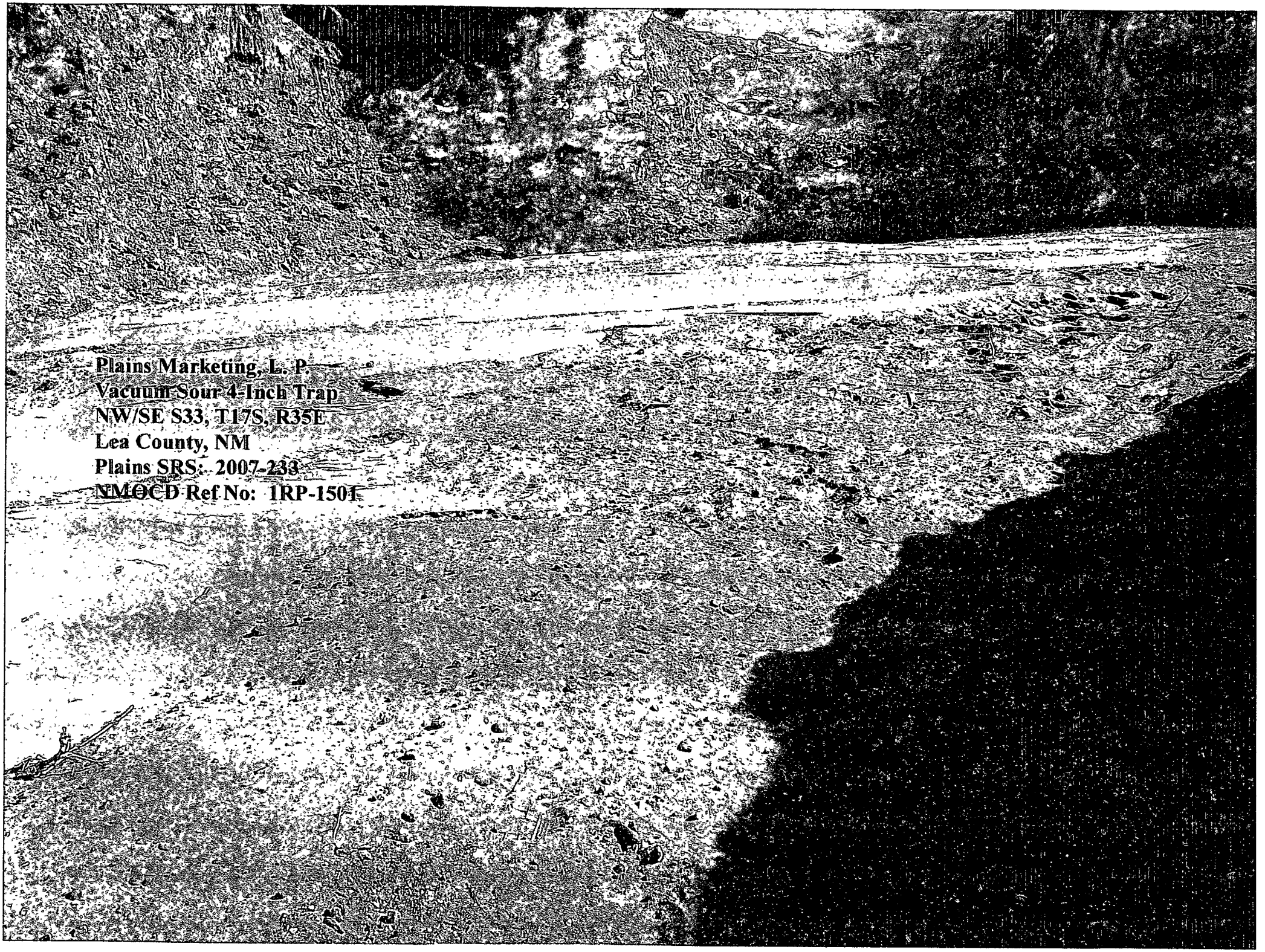
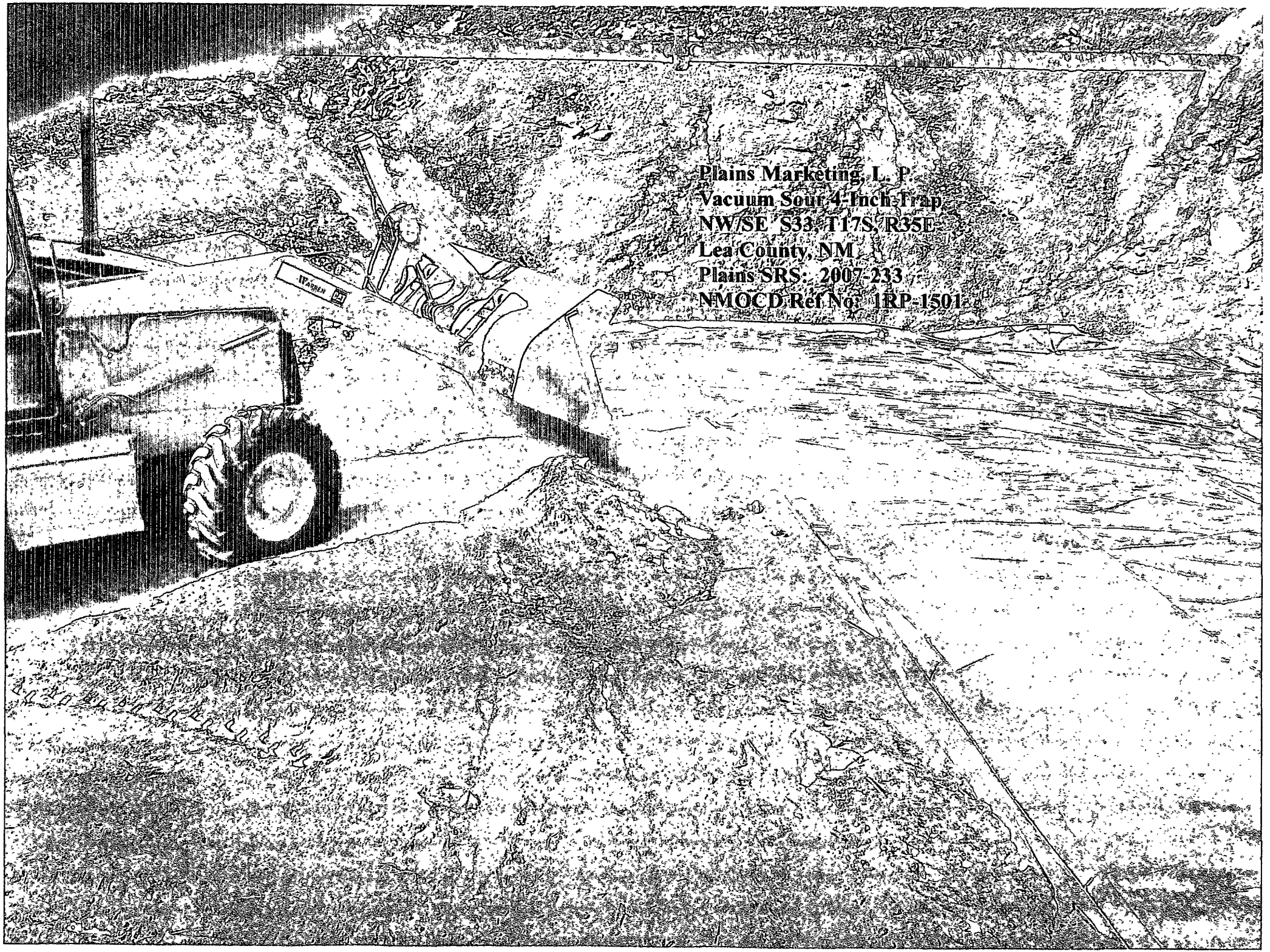
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R353
Lea County, NM
Plains SRS: 2007-233
NMOCD Ref No: JRP-1501


Plains Marketing, L. P.
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
Lea County, NM
Plains SRS: 2007-233
NMOCD Ref No: 1RP-1501


Plains Marketing, L. P.
Vacuum Sour 4-Inch Trap
NW/SE S33, T17S, R35E
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Plains SRS: 2007-233
NMOCD Ref No: 1RP-1501


Plains Marketing, L. P.
Vacuum Sour 4-Inch Trap
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Lea County, NM
Plains SRS: 2007-233
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