1R - 951

Annual GW Mon. REPORTS

DATE:

2008

2008
ANNUAL MONITORING REPORT

SOUTH MONUMENT GATHERING SOUR

NW ¼, NE ¼, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS SRS # 2001-11193
RP #951

PREPARED FOR:

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February 2009

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ENCLOSED ON DATA DISK

2008 Annual Monitoring Report
2008 Tables 1, 2 and 3 – Groundwater Elevation, BTEX, TPH and PAH Concentration Data
2008 Figures 1, 2A-2D, and 3A-3D
Electronic Copies of Laboratory Reports
Historic Table 1 and 2 – Groundwater Elevation and BTEX, TPH, PAH Concentration Table

INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. The South Monument Gathering Sour Site, which was formally the responsibility of EOTT Energy, is now the responsibility of Plains. This report is intended to be viewed as a complete document with text, figures, tables and appendices. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2008 only. However, historic data tables as well as 2008 laboratory analytical reports are provided on the enclosed data disk. A Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each of four quarters in calendar year 2008 to assess the levels and extent of dissolved phase constituents and Phase Separated Hydrocarbon (PSH). The groundwater monitoring events consisted of measuring static water levels in the monitor wells, checking for the presence of PSH and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

On November 20, 2001, EOTT Energy, Corp.(EOTT) reported a 1,200 barrel release of sour crude oil from a pipeline located approximately one half mile southwest of Monument, New Mexico. The site is located in the NW ¼ NE ¼ , Section 5, Township 20 South, Range 37 East, Lea County, New Mexico. The initial response was conducted by Allstate Environmental Services (AES) in November 2001. According to AES's *Summary of Cleanup Activities and Site Delineation* (November 27 to December 12, 2001), on November 30, 2001, AES began excavating, stockpiling and transporting impacted soil to the C & C Landfarm. The Release Notification and Corrective Action (Form C-141) is provided as Appendix A. According to documentation prepared by AES, on November 30 and December 1, 2001, approximately 408 cubic yards (cy) of hydrocarbon impacted soil was transported to the landfarm. On December 5, 2001, excavation of the site ceased while EOTT and the landowner (Mr. Jimmy Cooper) entered into negotiations.

On March 3, 2005, NOVA, on behalf of Plains, collected excavation sidewall, floor, stockpile, and flow path soil samples. Stockpile and flow path soil samples were collected as five point composites collected at the surface as well as depths of three, six, twelve and eighteen inches below ground surface (bgs). Soil samples were collected at intervals of approximately 100 linear feet along the flow path and approximately one sample per three hundred square feet in the existing excavation bottom and existing stockpiles.

On July 25, 2006, four soil borings were advanced adjacent to or within the existing excavation to investigate the vertical and horizontal extent of hydrocarbon impact in these areas.

On September 13, 2006, a backhoe was utilized to excavate five investigation trenches along the reported crude oil flow path. The result of trenching activities in the flow path indicated hydrocarbon impact is present at depth, but limited to the lateral extent of the flow path.

On November 30 through December 4, 2006, nine additional soil borings were advanced and three groundwater monitoring wells were installed to further delineate the site. The results of drilling activities indicate hydrocarbon impacted soil is limited to areas immediately adjacent to the leak source and the subsequent flow path.

Currently, three monitor wells are located on site.

FIELD ACTIVITIES

Groundwater Monitoring

During the 2008 reporting period, measurable PSH or hydrocarbon sheen was not observed in any of the site monitor wells. The 2008 gauging data is provided in Table 1.

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule.

Sampling Schedule	
MW-1	Quarterly
MW-2	Quarterly
MW-3	Quarterly

The site monitor wells were gauged and sampled on February 7, June 5, August 8, and November 5, 2008. During each sampling event, sampled monitor wells were purged a minimum of three well volumes of water or until the wells were dry using a PVC bailer or electrical Grundfos pump. Groundwater was allowed to recharge and samples were collected using disposable Teflon samplers. Water samples were placed in clean glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of at a licensed disposal facility.

Locations of the monitor wells and the inferred groundwater gradient, which were constructed utilizing measurements collected during the four quarterly monitoring events, are depicted on Figures 2A through 2D. Groundwater elevation data for 2008 is provided as Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.003 feet/foot to the south-southwest as measured between monitor wells MW-2 and MW-1. During the 1st and 2nd quarters of the reporting period, the groundwater gradient progressed to the south. During the 3rd and 4th quarters, the inferred groundwater gradient progressed to the south-southwest. The corrected groundwater elevation has ranged between 3,530.87 and 3,531.81 feet above mean sea level, in monitor wells MW-1 on November 5, 2008 and MW-2 on February 7, 2008, respectively.

LABORATORY RESULTS

No measurable thicknesses of PSH were reported on any of the monitor wells during the reporting period.

Groundwater samples obtained during the quarterly sampling events of 2008 were delivered to TraceAnalysis, Inc. in Midland, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method 8021B, and Polynuclear Aromatic Hydrocarbons (PAH) concentrations by EPA Method 8270C. Monitoring wells containing measurable amounts of PSH were analyzed for Total Petroleum Hydrocarbons (TPH) concentrations by EPA Method 8015M. A listing of BTEX and TPH constituent concentrations for 2008 are summarized in Table 2 and the PAH constituent concentrations for 2008 are summarized in Table 3. Copies of the laboratory reports generated for 2008 are provided on the enclosed data disk. The quarterly groundwater sample results for BTEX constituent concentrations are depicted on Figures 3A through 3D.

Monitor well MW-1 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 2nd and 3rd quarters to 0.0067 mg/L during the 4th quarter of 2008. Benzene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Toluene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 3rd quarters to 0.0028 mg/L during the 4th quarter of 2008. Toluene concentrations were below the NMOCD regulatory standards during all four quarters of the reporting period. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 3rd quarters to 0.0019 mg/L during the 4th quarter of 2008. Ethylbenzene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 2nd and 3rd quarters to 0.0380 mg/L during the 1st quarter of 2008. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. PAH analysis during the 4th quarter sampling event indicated detectable concentrations above MDLs for naphthalene (0.00173 mg/L), fluorene (0.000922 mg/L), phenanthrene (0.000758 mg/L), 1-methylnaphthalene (0.00357 mg/L), and 2-methylnaphthalene (0.000875 mg/L), which are below the WQCC Drinking Water Standards.

Monitor well MW-2 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 4th quarter to 0.0027 mg/L during the 2nd quarter of 2008. Benzene concentrations were above NMOCD regulatory standards during all four quarters of the reporting period. Toluene, ethylbenzene and xylene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. PAH analysis during the 4th quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

Monitor well MW-3 is sampled on a quarterly schedule and analytical results indicate benzene, toluene, ethylbenzene and xylene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. PAH analysis during the 4th quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of monitoring activities for the annual monitoring period of 2008. Currently, there are three groundwater monitor wells (MW-1 through MW-3) on-site. The most recent Groundwater Gradient Map, Figure 2D indicates a general gradient of approximately 0.003 feet/foot to the south-southwest. During the 1st and 2nd quarters of the reporting period the groundwater gradient was to the south, a shift to the south-southwest appears to have occurred between the 2nd and 3rd quarters of 2008.

Review of laboratory analytical results generated from analysis of the groundwater samples obtained during the 2008 monitoring period indicates BTEX and PAH constituent concentrations were below NMOCD regulatory standard in all three monitor wells during the 2008 reporting period. BTEX concentrations have been below NMOCD regulatory standards for a minimum of five consecutive quarters in monitor well MW-2 and a minimum of ten consecutive quarters for MW-1 and MW-3.

ANTICIPATED ACTIONS

Groundwater monitoring and quarterly sampling will continue in 2009. An Annual Monitoring Report will be submitted to the NMOCD before April 1, 2010.

In the event the benzene concentrations in monitor well MW-2 exceed the NMOCD regulatory standard of 0.010 mg/L for an extended period of time, Plains will evaluate the need for an additional monitor well to the north and east of monitor well MW-2.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of NOVA and/or Plains.

DISTRIBUTION

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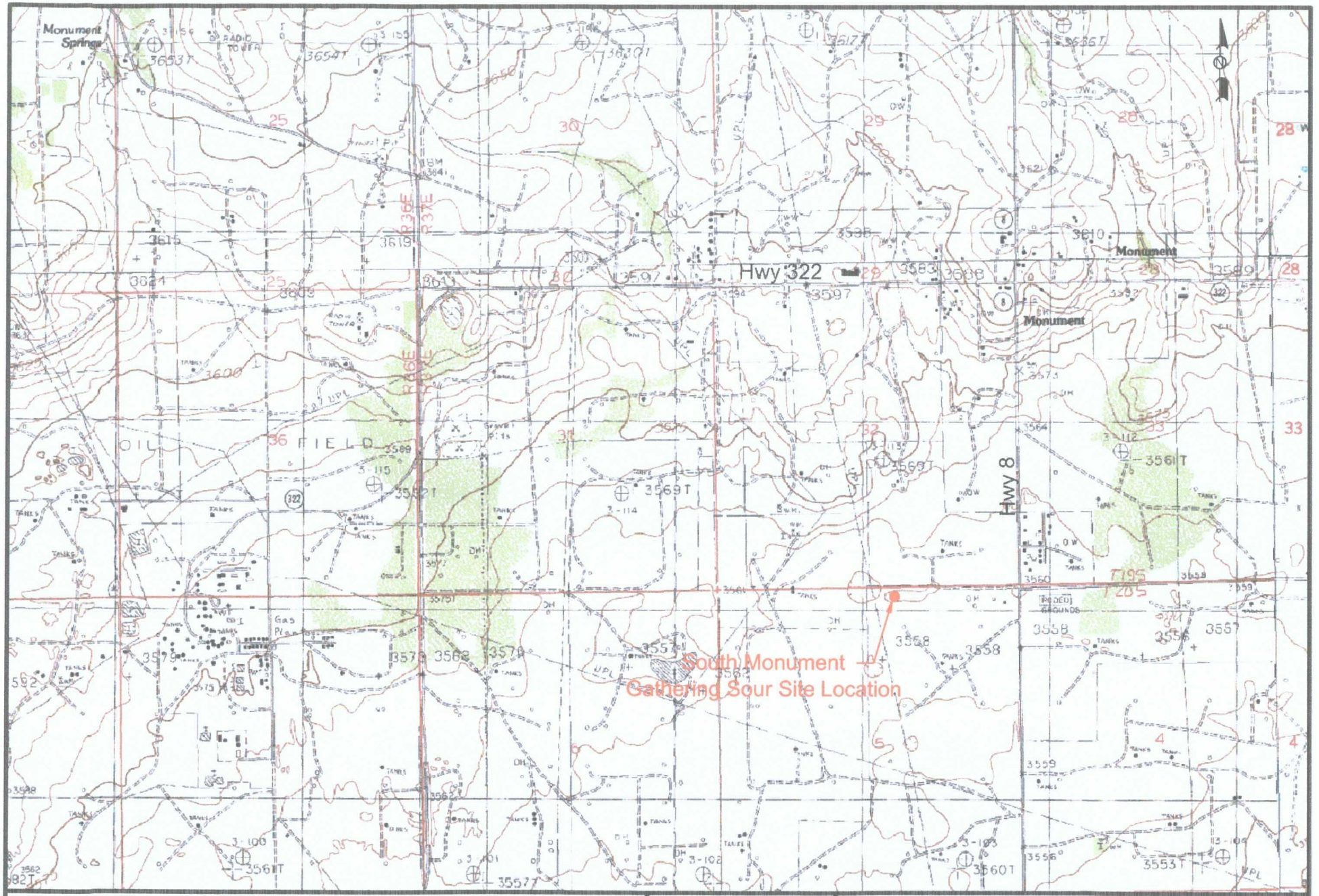
FIGURES



USGS Topographic Sheet Monument South (NM)
NW 1/4 NE 1/4 Sec 5 T20S, R37E

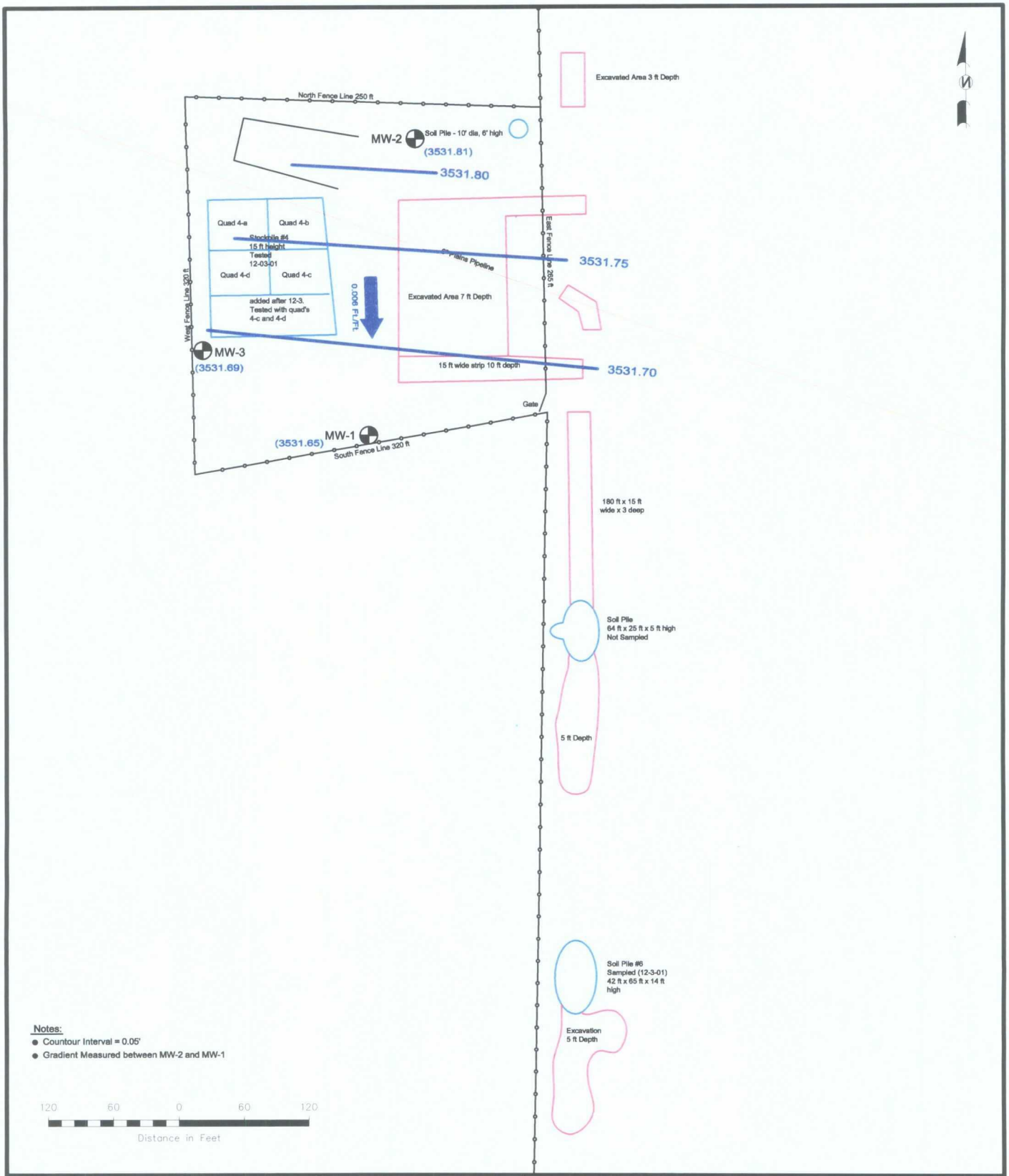
RP #951

Figure 1
Site Location Map
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument
Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale: NTS	Prep By: CDS	Checked By: TKC
December 6, 2004		



LEGEND:

- Monitor Well Location
- Pipeline
- Fence
- Excavation
- Stockpile
- (3791.69) Grounwater Elevation (Feet)
- Grounwater Elevation Contour Line
- 0.006 Feet/Foot *Groundwater Direction and Magnitude*

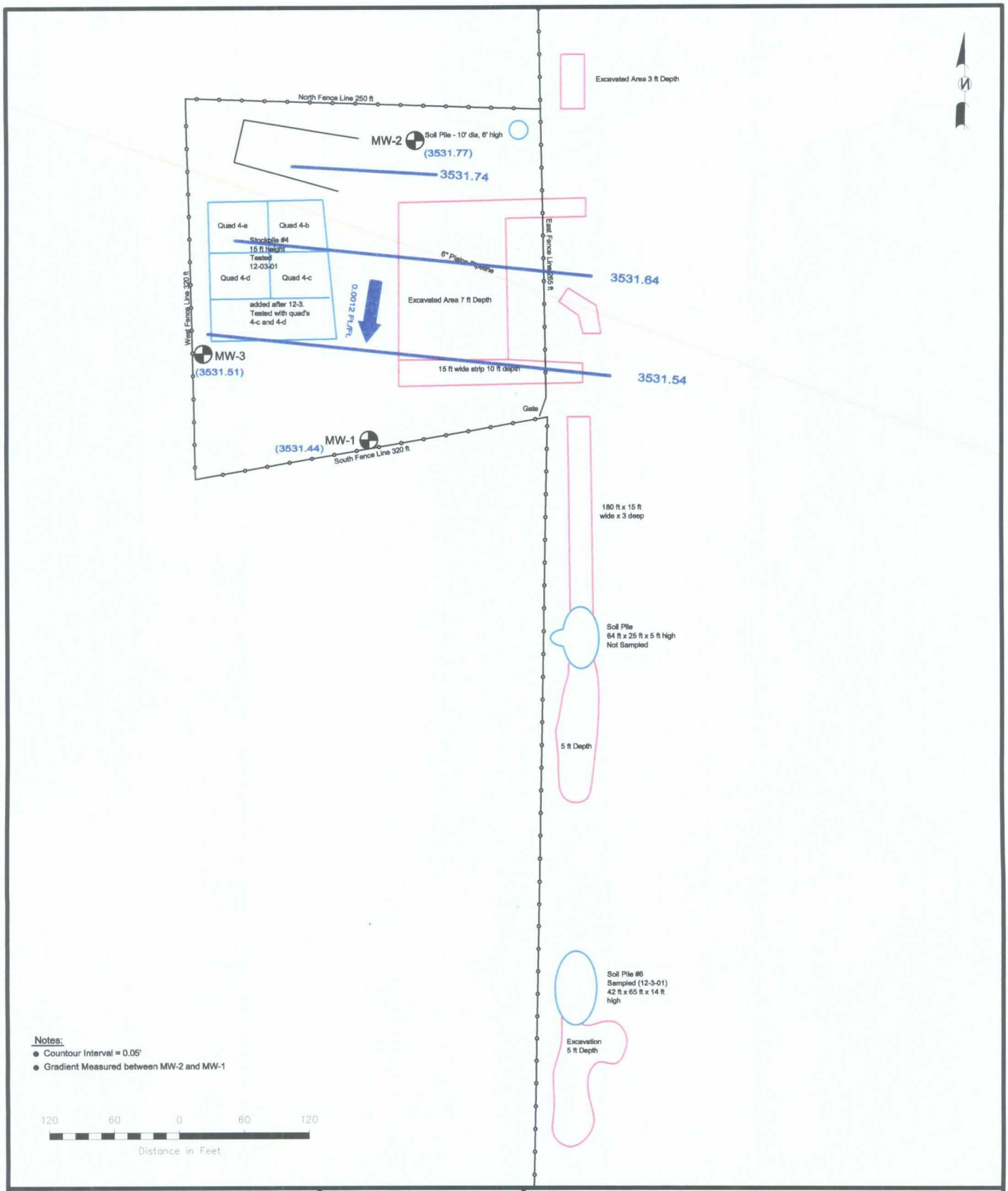
Figure 2A
Inferred Groundwater Gradient Map (02/07/08)

Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale 1" = 120'	CAD By: MWG	Checked By: CDS
January 22, 2009		



LEGEND:

- Monitor Well Location
- Pipeline
- Fence
- Excavation
- Stockpile
- (3791.69) Grounwater Elevation (Feet)
- Grounwater Elevation Contour Line
- 0.005 Feet/Foot — Groundwater Direction and Magnitude

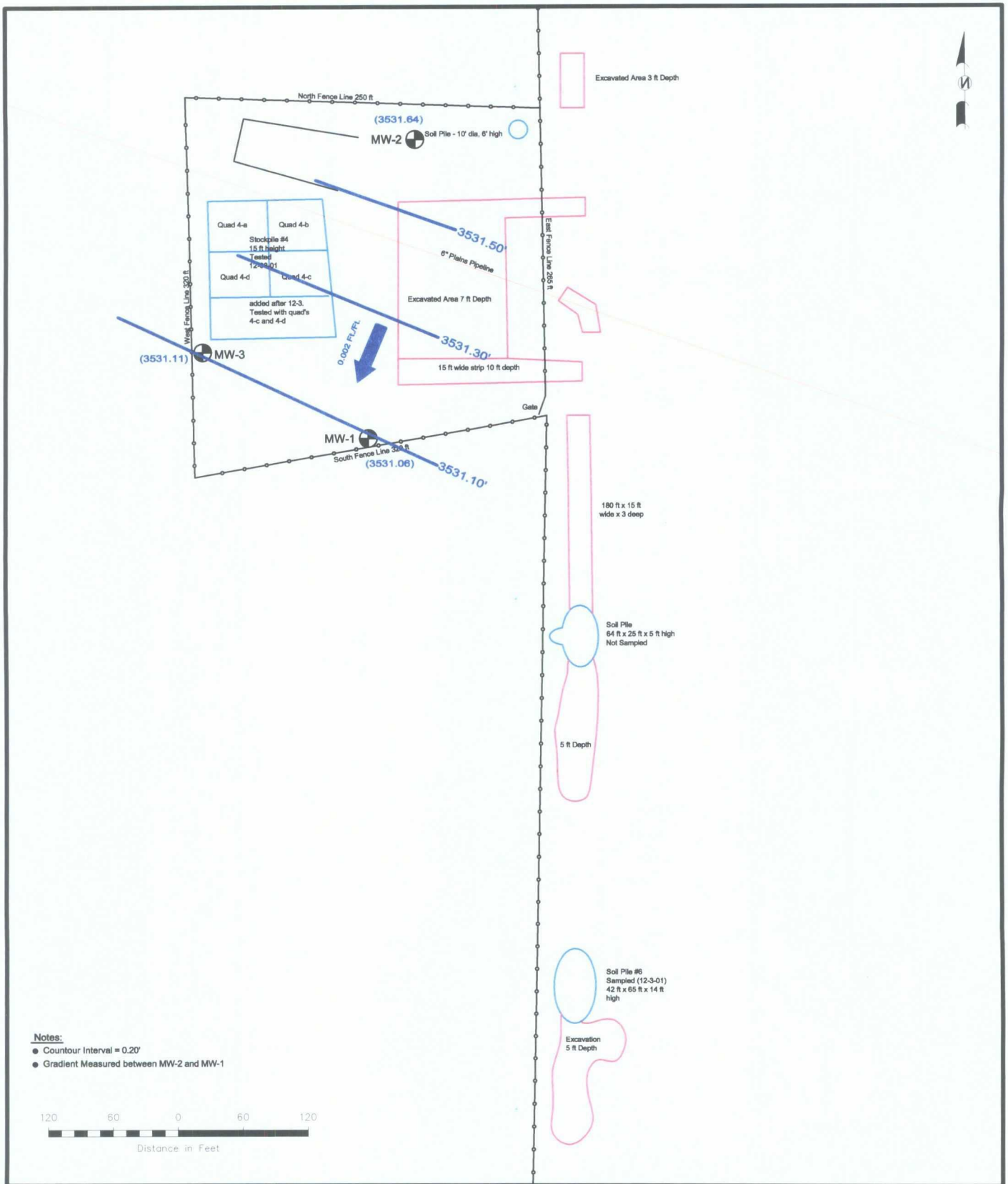
Figure 2B
Inferred Groundwater Gradient Map (06/05/08)

Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale 1" = 120'	CAD By: MWG	Checked By: CDS
January 22, 2009		



LEGEND:

- Monitor Well Location
- Pipeline
- Fence
- Excavation
- Stockpile
- (3791.69) Grounwater Elevation (Feet)
- Grounwater Elevation Contour Line
- 0.008 Feet/Foot Groundwater Direction and Magnitude

Figure 2C
Inferred Groundwater Gradient Map (08/08/08)

Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale 1" = 120'	CAD By: MWG	Checked By: CDS
January 22, 2009		

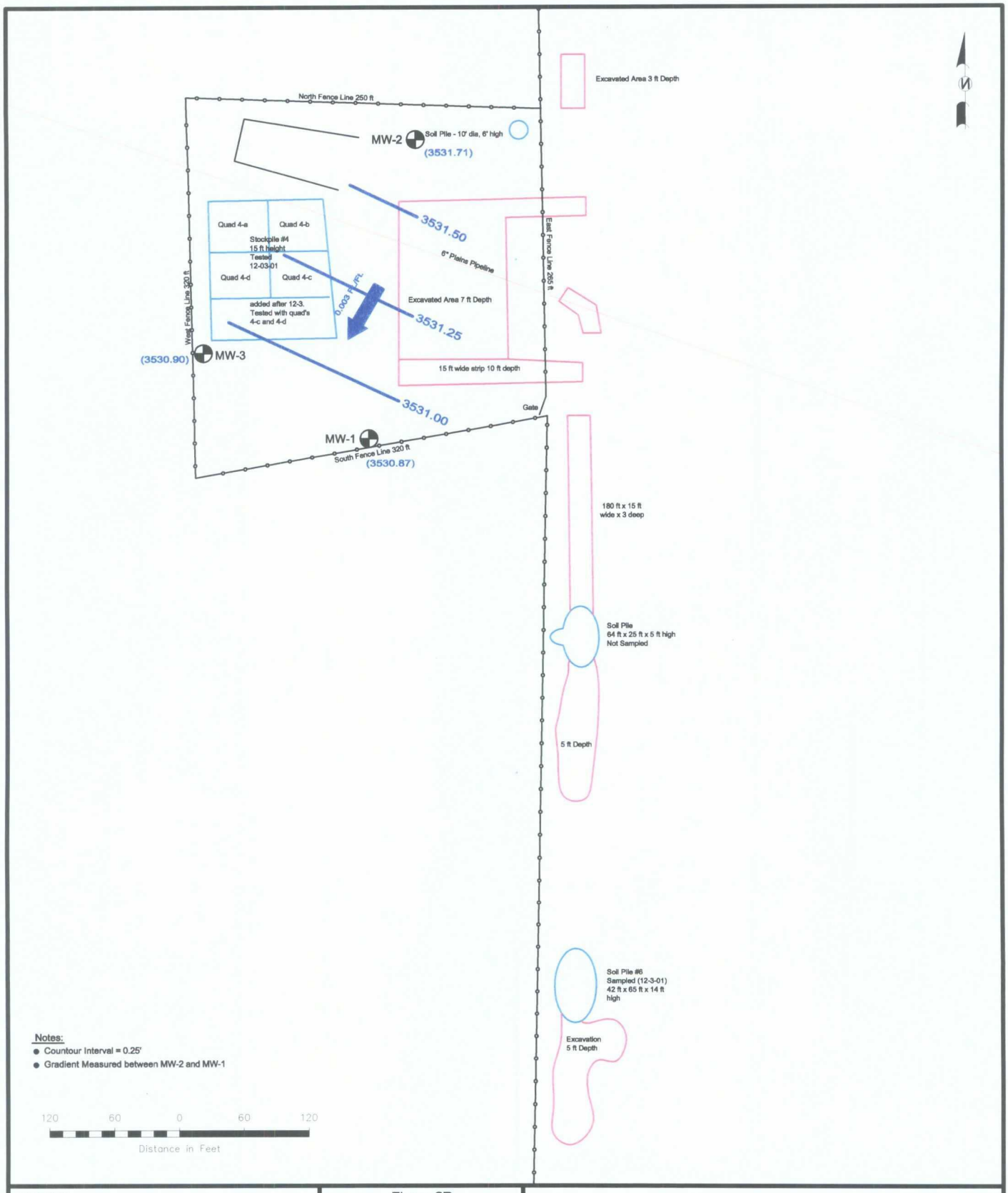


Figure 2D
Inferred Groundwater Gradient Map (11/05/08)

Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

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Scale 1" = 120'	CAD By: DGC	Checked By: RKR
December 3, 2008		

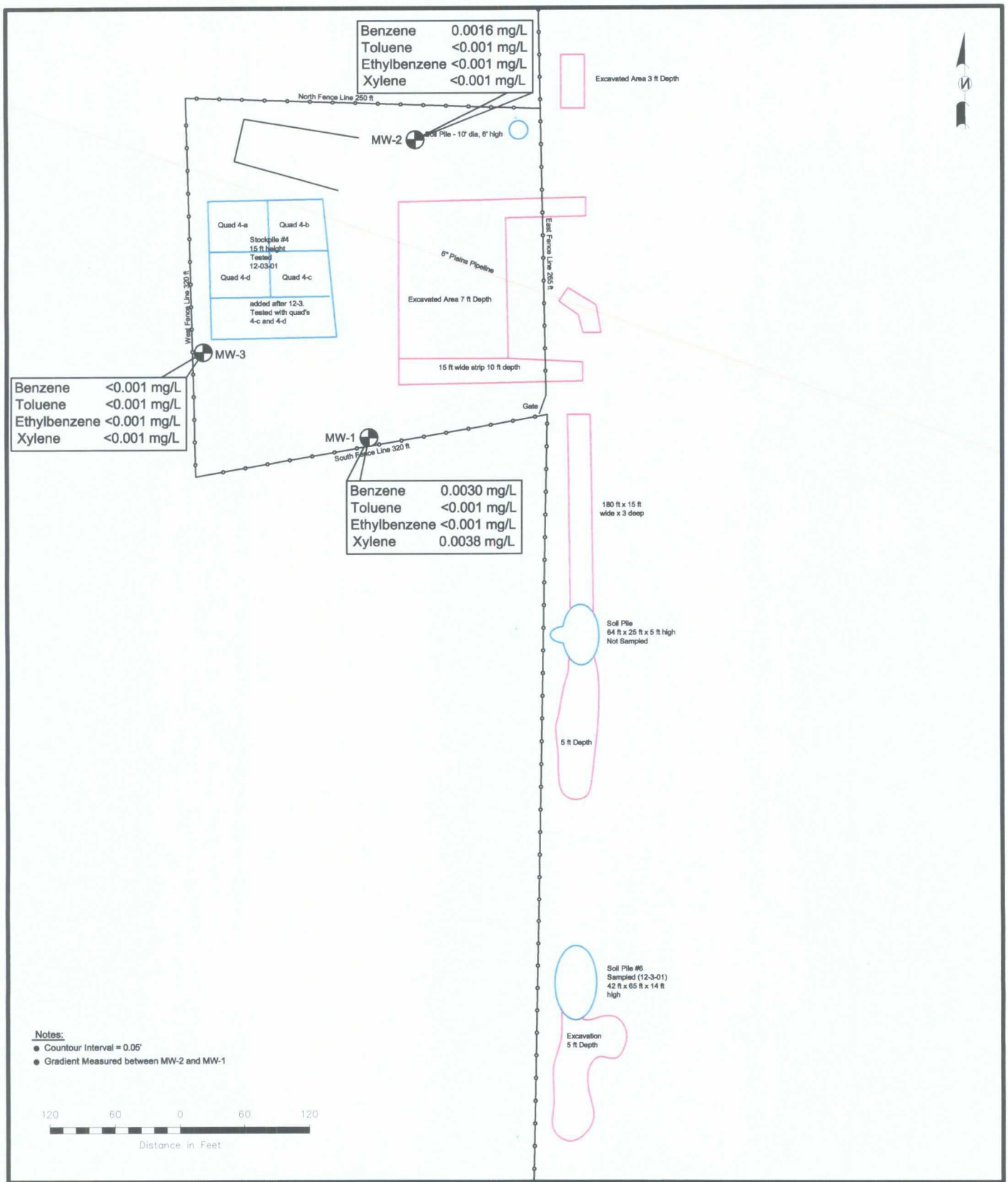

Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (02/07/08)
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

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Scale 1" = 120'	CAD By: DGC	Checked By: CDS
October 15, 2008		

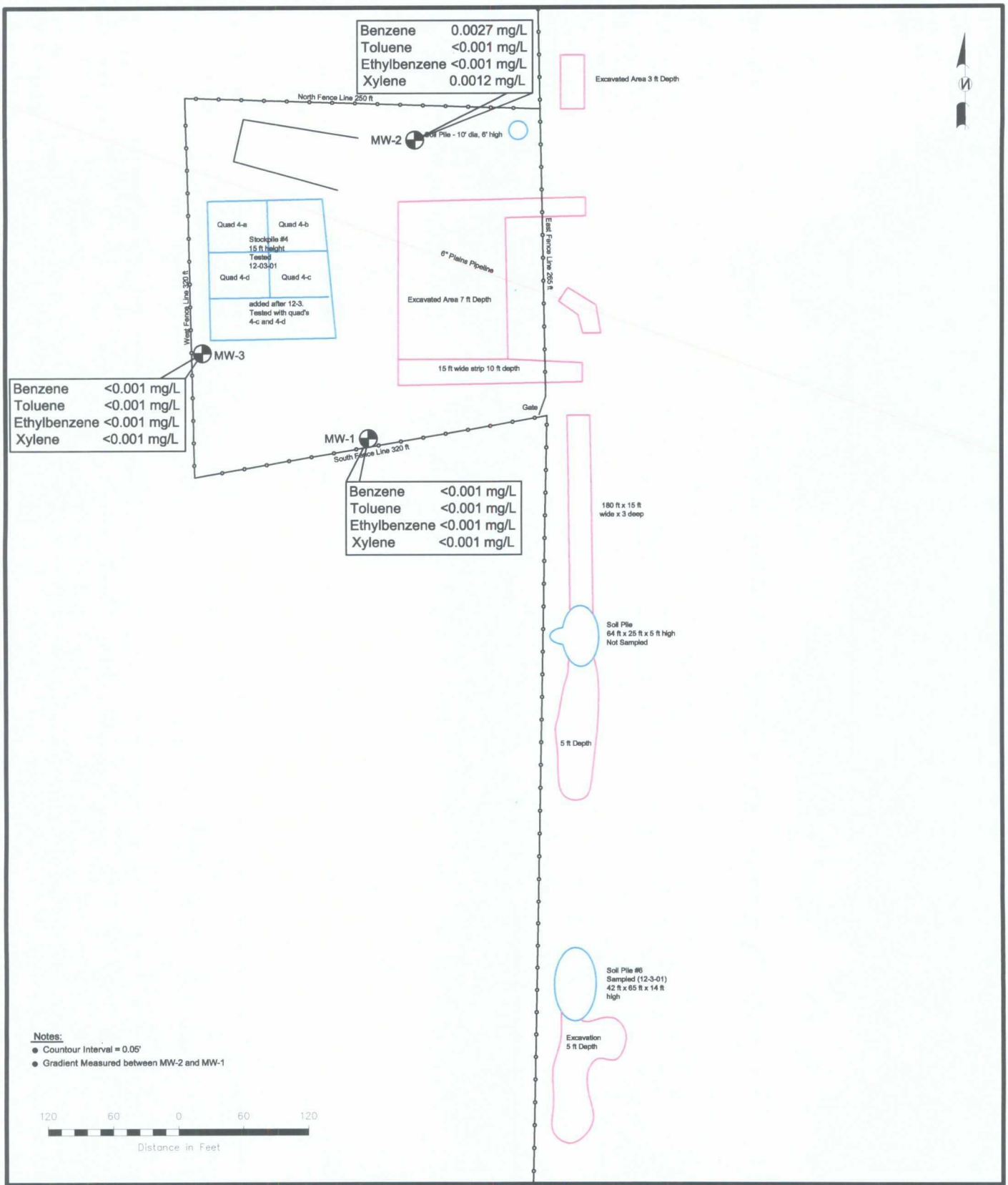

Figure 3B
Groundwater Concentration and Inferred PSH Extent Map (06/05/08)
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale 1" = 120'	CAD By: DGC	Checked By: CDS
October 15, 2008		

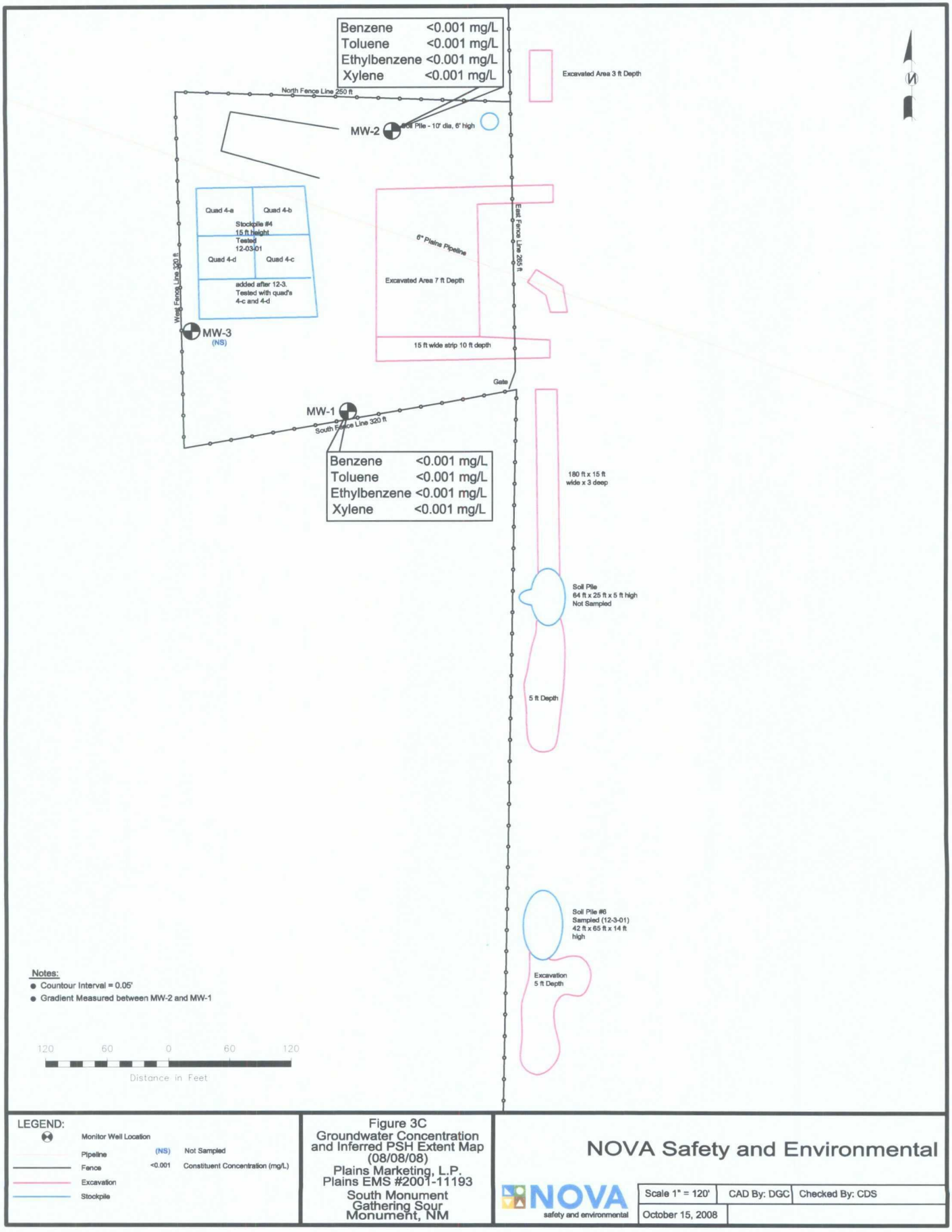

Figure 3C
Groundwater Concentration and Inferred PSH Extent Map (08/08/08)
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

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October 15, 2008		

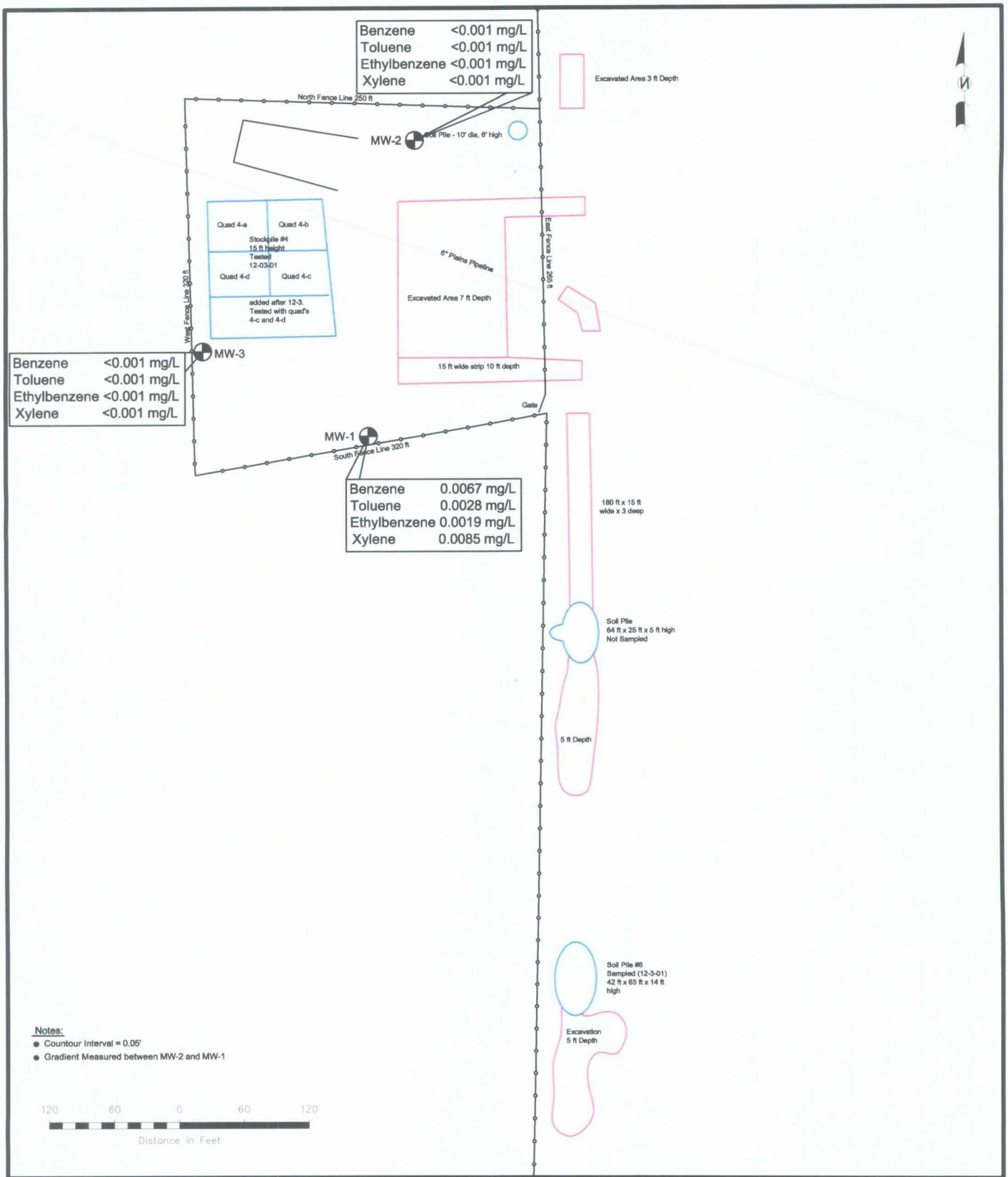

Figure 3D
Groundwater Concentration and Inferred PSH Extent Map
(11/05/08)
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

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NOVA safety and environmental

Scale 1" = 120'	CAD By: DGC	Checked By: RKR
December 3, 2008		

TABLES

TABLE 1

2008 - GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
SOUTH MONUMENT GATHERING SOUR
LEA COUNTY, NEW MEXICO
PLAINS SRS# 2001-11193

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	*02/07/08*	3,564.20	-	32.55	0.00	3,531.65
MW-1	*06/05/08*	3,564.20	-	32.76	0.00	3,531.44
MW-1	*08/08/08*	3,564.20	-	33.14	0.00	3,531.06
MW-1	*11/05/08*	3,564.20	-	33.33	0.00	3,530.87
MW-2	*02/07/08*	3,563.83	-	32.02	0.00	3,531.81
MW-2	*06/05/08*	3,563.83		32.12	0.00	3,531.71
MW-2	*08/08/08*	3,563.83		32.19	0.00	3,531.64
MW-2	*11/05/08*	3,563.83		32.12	0.00	3,531.71
MW-3	*02/07/08*	3,564.42	-	32.73	0.00	3,531.69
MW-3	*06/05/08*	3,564.42	-	32.91	0.00	3,531.51
MW-3	*08/08/08*	3,564.42	-	33.31	0.00	3,531.11
MW-3	*11/05/08*	3,564.42	-	33.52	0.00	3,530.90

** Complete Historical Tables provided on the attached CD.*

TABLE 2

2008 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
SOUTH MONUMENT GATHERING SOUR
Lea County, New Mexico
Plains SRS# 2001-11193

All concentrations are in mg/kg

Sample Date	Sample Location	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
NMOCD REGULARY LIMIT		**0.010**	**0.750**	**0.750**	**0.620**	
02/07/08	MW-1	0.003	<0.001	<0.001	0.038	0.041
06/05/08	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
08/08/08	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
11/05/08	MW-1	0.0067	0.0028	0.0019	0.0085	0.0199
02/07/08	MW-2	0.0016	<0.001	<0.001	<0.001	0.0016
06/05/08	MW-2	0.0027	<0.001	<0.001	<0.001	0.0027
08/08/08	MW-2	0.0019	<0.001	<0.001	<0.001	0.0019
11/05/08	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
02/07/08	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001
06/05/08	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001
08/08/08	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001
11/05/08	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001

** Complete Historical Tables provided on the attached CD.*

TABLE 3

POLYNUCLEAR AROMATIC HYDROCARBON CONCENTRATIONS IN GROUNDWATER - 2008

PLAINS MARKETING, L.P.
SOUTH MONUMENT GATHERING SOUR
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE NUMBER RP #951

All water concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	EPA SW846-8270C, 3510																		
		Acenaphthene	Acenaphthylene	Anthracene	Benzo[a]anthracene	Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[g,h,i]perylene	Benzo[k]fluoranthene	Chrysene	Dibenz[a,h]anthracene	Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	Naphthalene	Phenanthrene	Pyrene	1-Methylnaphthalene	2-Methylnaphthalene	Dibenzofuran
Maximum Contaminant Levels from NM WQCC Drinking water standards Sections 1-101.UU and 3-103.A.		–	–	–	0.0001 mg/L	0.0007 mg/L	0.0002 mg/L	–	0.0002 mg/L	0.0002 mg/L	0.0003 mg/L	–	–	0.0004 mg/L	0.03 mg/L	–	–	0.03 mg/L		–
MW-1	11/05/08	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	0.000922	<0.000185	0.00173	0.000758	<0.000185	0.00357	0.000875	<0.000185
MW-2	11/05/08	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185	<0.000185
MW-3	11/05/08	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184	<0.000184

APPENDICES

APPENDIX A:
Form C-141

District
1625 5 55r55c5 Dr55 555s55 5 55255
District 55
1301 5 55 r555 5 5555555 rt5si555 5 55210
District 555
1000 5 i5 5 r555s 5 55555 5t5c55 5 55510
District 55
1220 555t55r55cis Dr55555t5 5555 5 55505

State 555 e5 5 e5ic5
Energy 5 inera5s an5 5 at5ra55 es55rces

Oil 5 5nser5ati5n Di5isi5n
1220 S55t5 St55rancis Dr5
Santa 5e55 5 55505

Form 5 5151
Revised Octo5er 1052003

Submit 2 5 o5ies to a55ro5riate District O55ice in accordance with Rule 116 on bac5 side o5 5orm

Release a a e e

OPERATOR

5 5nitial Re5ort ☐ Final Re5ort

Name o55 om5any 5lains 5 ar5eting555	5 ontact 5 amille Reynolds
Address 5505 East 5 wy55055 idland555 55506	5 ele5hone No55055551505 65
Facility Name South 5 onument 5 athering Sour	Facility 5y5e 65Steel 5i5eline

Surface Owner 5immie 5 oo5er	5 ineral Owner	5 ease No5

LOCATION O RELEA E

Unit 5etter	Section	Township	Range	Feet from the	North5South 5 ine	Feet from the	East55 est 5 ine	5 ounty
5	5	20S	35E					5 ea

Latitude 32° 36'29.0" **Longitude** 103° 16' 26.5"

NATURE O RELEA E

Type of Release 5 rude Oil	5 olume of Release 1200 barrels	5 olume Recovered 910 barrels
Source of Release 6" Steel 5ipeline	Date and 5 our of Occurrence 11-20-01	Date and 5 our of Discovery 11-20-01
Was 5mmediate Notice 5 iven5 5 5 es ☐ No ☐ Not Re5uired	If 5 ES5To Whom5 Paul Sheeley	
By Whom5 Fran5 5 ernande5	Date and 5 our 11-20-015 1655	
Was a Watercourse Reached5 ☐ 5 es ☒ No	If 5 ES55 olume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.5

Describe 5 ause of Problem and Remedial Action Ta5en.5 Internal corrosion of 6 inch steel pipeline resulted in crude oil release. 5 lamp was applied to the line to mitigate the release.

Describe Area Affected and 5 leanup Action Taken.* The crude oil was vacuumed up and the impacted soil was e5cavated and stockpiled on plastic. Initial response activities included e5cavation and stockpiling of appro5imately 5,000 to 5,000 cubic yards of soil. Future response activities will include a soil and groundwater investigation and preparation of a remedial action plan.

NOTE: T is in o ation as o tained o historical EOTT iles Plains ac uired EOTT Link Energ on A ril and Plains assumes this information to e correct

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to N5 O5 D rules and regulations all operators are re5uired to report and5or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a 5-151 report by the N5 O5 D marked as 5Final Report5 does not relieve the operator of liability should their operations have failed to ade5uately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, N5 O5 D acceptance of a 5-151 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and5or regulations.

Signature:	OIL 5 ONSER5 ATION DI5 ISION	
Printed Name: 5 amille Reynolds	Approved by District Supervisor:	
Title: Remediation 5 oordinator	Approval Date:	Expiration Date:
E-mail Address: c5reynolds5 paalp.com	Conditions of Approval:	Attached ☐
Date: 12-29-05 Phone:505-551-0965		

* Attach Additional Sheets If Necessary