1R - 951

Annual GW Mon. REPORTS

DATE:

2009

2009
ANNUAL MONITORING REPORT

RECEIVED
FEB 16 2010
Environmental Bureau
Oil Conservation Division

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:

PLAINS MARKETING, L.P.
333 Clay Street, Suite 1600
Houston, Texas 77002

NOVA
safety and environmental

PREPARED BY:

NOVA Safety and Environmental
2057 Commerce Street
Midland, Texas 79703

February 2010

Ronald K. Rounsaville
Senior Project Manager

Brittan K. Byerly, P.G.
President

TABLE OF CONTENTS

FIGURES

Figure 1 – Site Location Map

Figure 2A – Inferred Groundwater Gradient Map February 5, 2009
2B – Inferred Groundwater Gradient Map May 30, 2009
2C – Inferred Groundwater Gradient Map August 15, 2009
2D – Inferred Groundwater Gradient Map November 19, 2009

3A – Groundwater Concentration and Inferred PSH Extent Map February 5, 2009
3B – Groundwater Concentration and Inferred PSH Extent Map May 30, 2009
3C – Groundwater Concentration and Inferred PSH Extent Map August 15, 2009
3D – Groundwater Concentration and Inferred PSH Extent Map November 19, 2009

TABLES

Table 1 – 2009 Groundwater Elevation Data
Table 2 – 2009 Concentrations of BTEX and TPH in Groundwater
Table 2 – 2009 Concentrations of PAH in Groundwater

APPENDICES

Appendix A – Release Notification and Corrective Action (Form C-141)

ENCLOSED ON DATA DISK

2009 Annual Monitoring Report
2009 Tables 1, 2 and 3 – Groundwater Elevation, BTEX, TPH and PAH Concentration Data
2009 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 2009 only. However, historic data tables as well as 2009 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 2009 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 2009 reporting period, measurable PSH or hydrocarbon sheen was not observed in any of the site monitor wells. The 2009 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 5, May 30, August 15, and November 19, 2009. 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 2009 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 0.004 feet/foot to the south-southwest as measured between monitor wells MW-2 and MW-1. The corrected groundwater elevation has ranged between 3,530.51 and 3,531.62 feet above mean sea level, in monitor wells MW-1 on November 19, 2009 and MW-2 on February 5, 2009, 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 2009 were delivered to TraceAnalysis, Inc. in Midland, Texas for determination of Benzene, Toluene, Ethyl-benzene and Xylene (BTEX) constituent concentrations by EPA Method 8021B, and Polynuclear Aromatic Hydrocarbons (PAH) concentrations by EPA Method 8270C. A listing of BTEX constituent concentrations for 2009 are summarized in Table 2 and the PAH constituent concentrations for 2009 are summarized in Table 3. Copies of the laboratory reports generated for 2009 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, toluene, ethyl-benzene and xylene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last fourteen consecutive quarters. PAH analysis during the 4th quarter sampling event indicated detectable concentrations above MDLs for naphthalene (0.00043 mg/L), phenanthrene (0.000627 mg/L) and dibenzofuran (0.000584 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, toluene, ethyl-benzene and xylene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last nine consecutive quarters. 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 and ethyl-benzene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 2nd, 3rd and 4th quarters to 0.0036 mg/L during the 1st quarter of the reporting period. Xylene concentrations were below NMOCD during all four quarters of 2009. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last fourteen consecutive quarters. 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 2009. 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 0.004 feet/foot to the south-southwest.

Review of laboratory analytical results generated from analysis of the groundwater samples obtained during the 2009 monitoring period indicates BTEX and PAH constituent concentrations

were below NMOCD regulatory standard in all three monitor wells during the 2009 reporting period. BTEX concentrations have been below NMOCD regulatory standards for a minimum of nine consecutive quarters in monitor well MW-2 and a minimum of fourteen consecutive quarters for MW-1 and MW-3. Review of PAH analysis indicates a decreasing trend in constituent concentrations in monitor well MW-1 as compared to the 2008 PAH analytical data.

ANTICIPATED ACTIONS

Review of the laboratory analysis for the groundwater samples collected and analyzed over the past several years indicates that BTEX constituent concentrations have been below the NMOCD criteria for at least eight consecutive quarters and as such, NOVA recommends sampling and analysis be discontinued and the monitor wells properly plugged and abandoned.

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

Copy 1
Ed Hansen
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

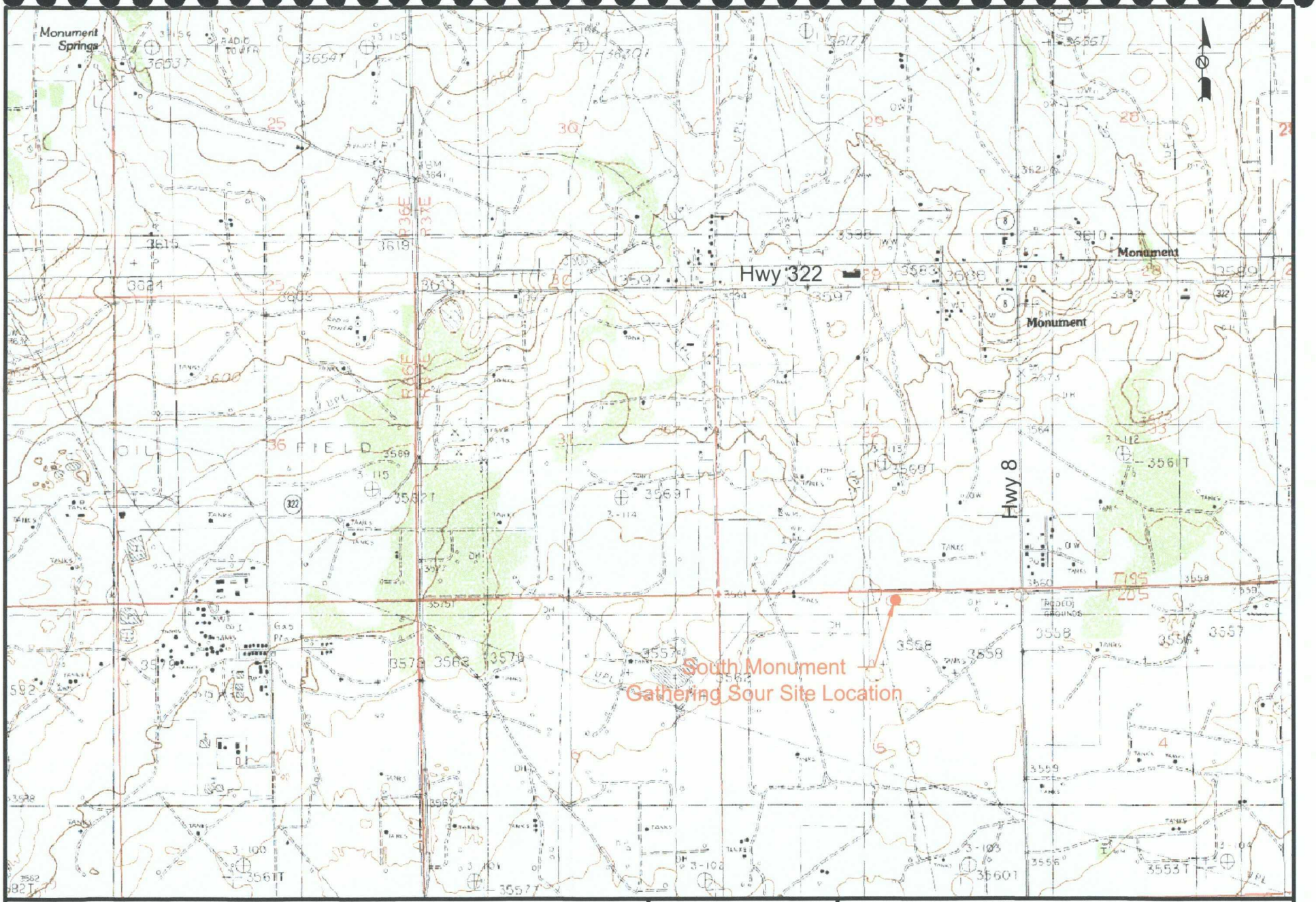
Copy 2:
Larry Johnson
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240

Copy 3:
Jason Henry
Plains Marketing, L.P.
2530 State Highway 214
Denver City, TX 79323
jhenry@paalp.com

Copy 4:
Jeff Dann
Plains Marketing, L.P.
333 Clay Street
Suite 1600
Houston, TX 77002
jpdann@paalp.com

Copy 5:
NOVA Safety and Environmental
2057 Commerce Street
Midland, TX 79703
rrounsaville@novatraining.cc

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		

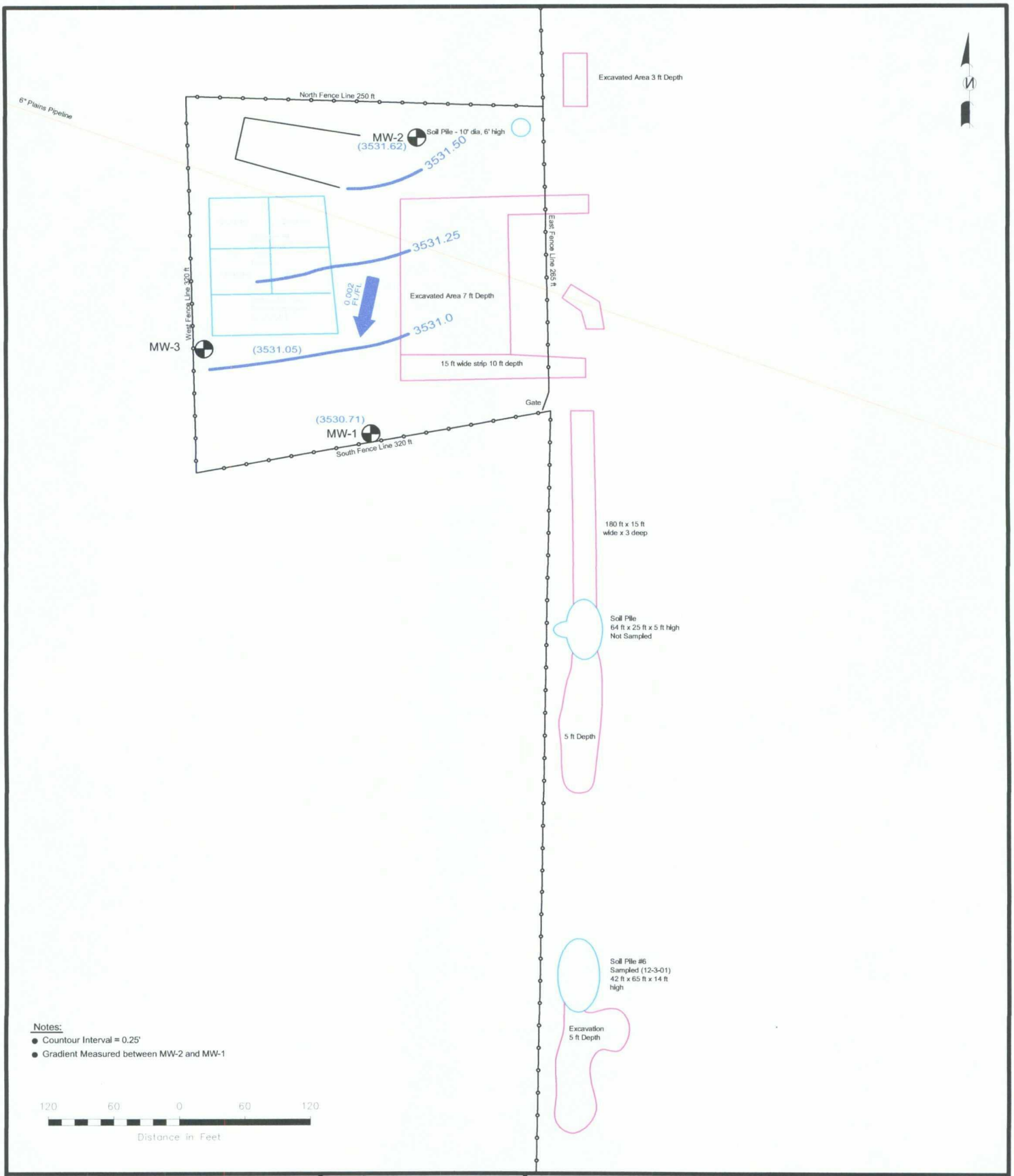
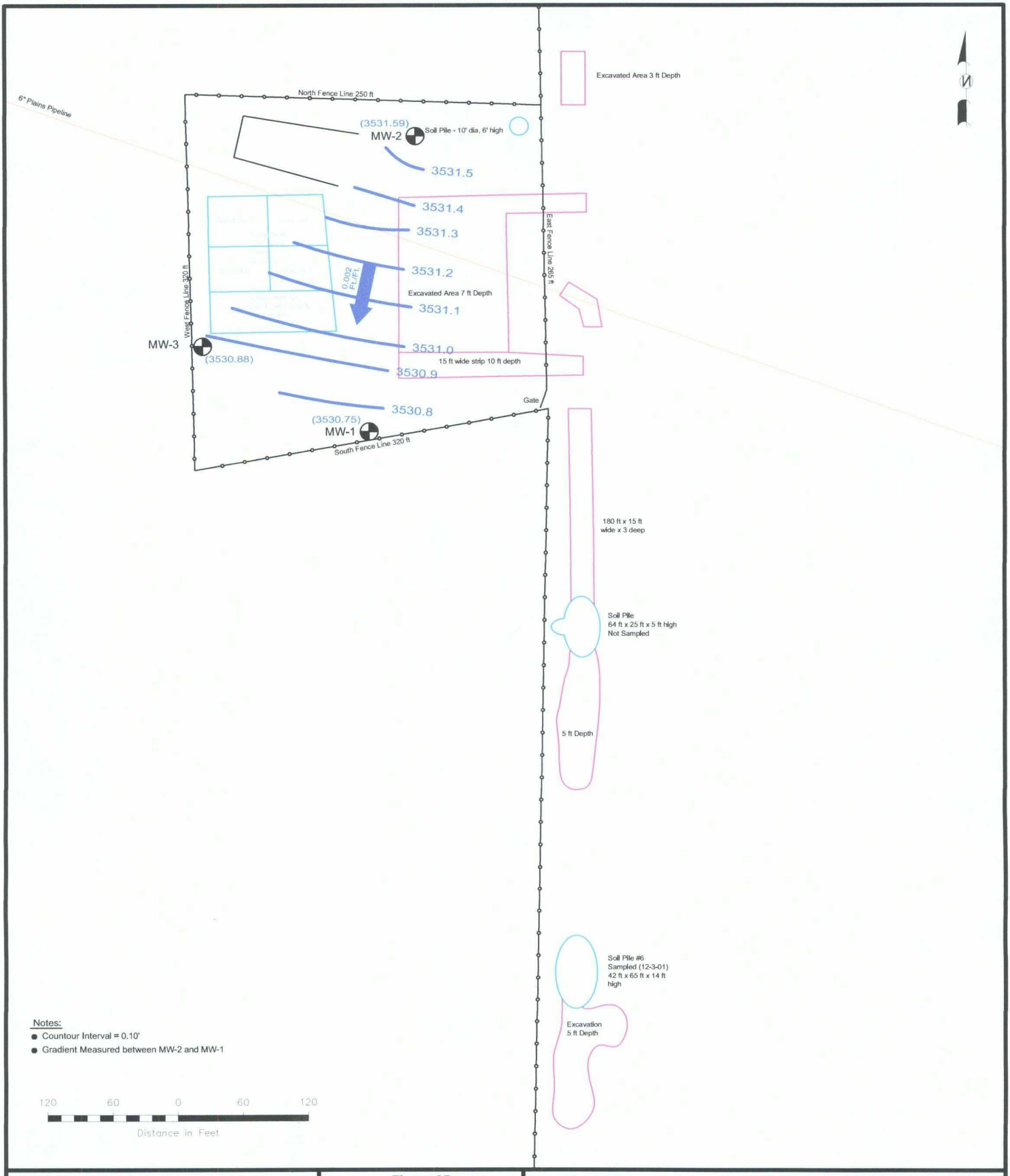


Figure 2A
Inferred Groundwater Gradient Map
(02/05/09)
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale 1" = 120'	Prep By: SAT	Checked By: TJL
February 23, 2009		



LEGEND:

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

Figure 2B
Inferred Groundwater Gradient Map
(05/30/09)
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'	Prep By: SAT	Checked By: TJL
June 9, 2009		

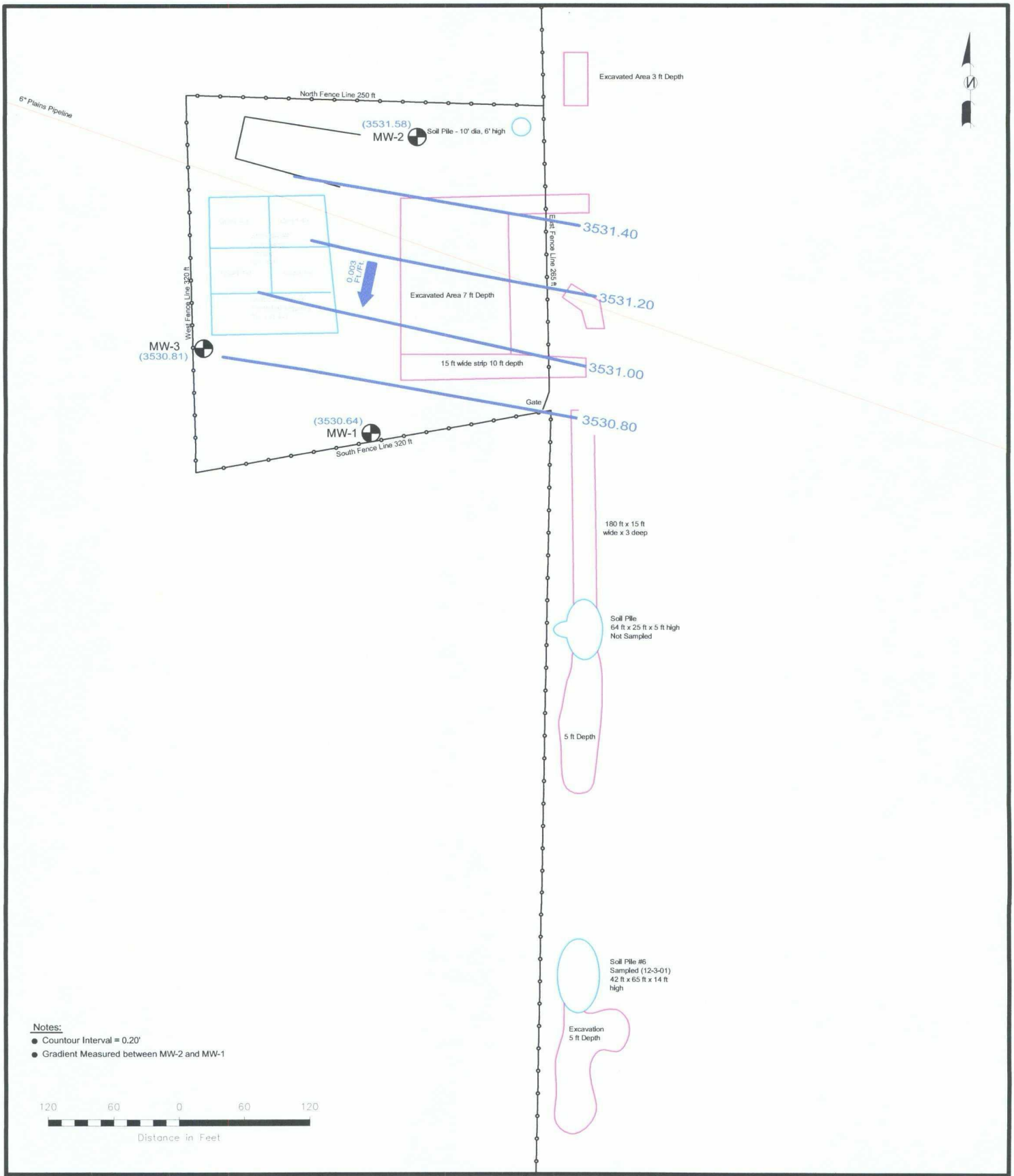
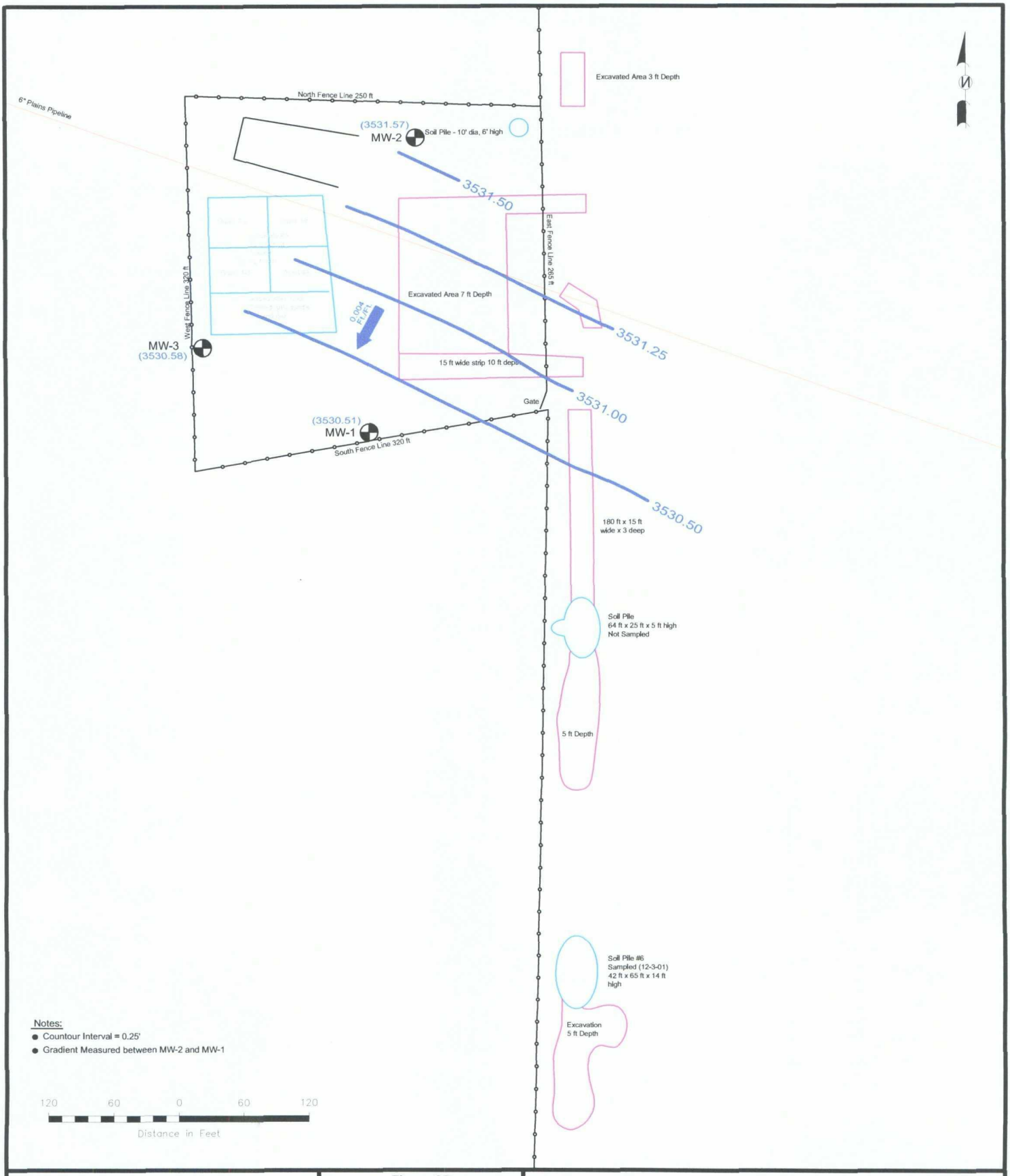


Figure 2C
Inferred Groundwater Gradient Map
(08/15/09)
Plains Marketing, L.P.
Plains EMS #2001-11193
South Monument Gathering Sour
Monument, NM

NOVA Safety and Environmental

NOVA safety and environmental

Scale 1" = 120'	Prep By: SAT	Checked By: RKR
October 15, 2009		



LEGEND:

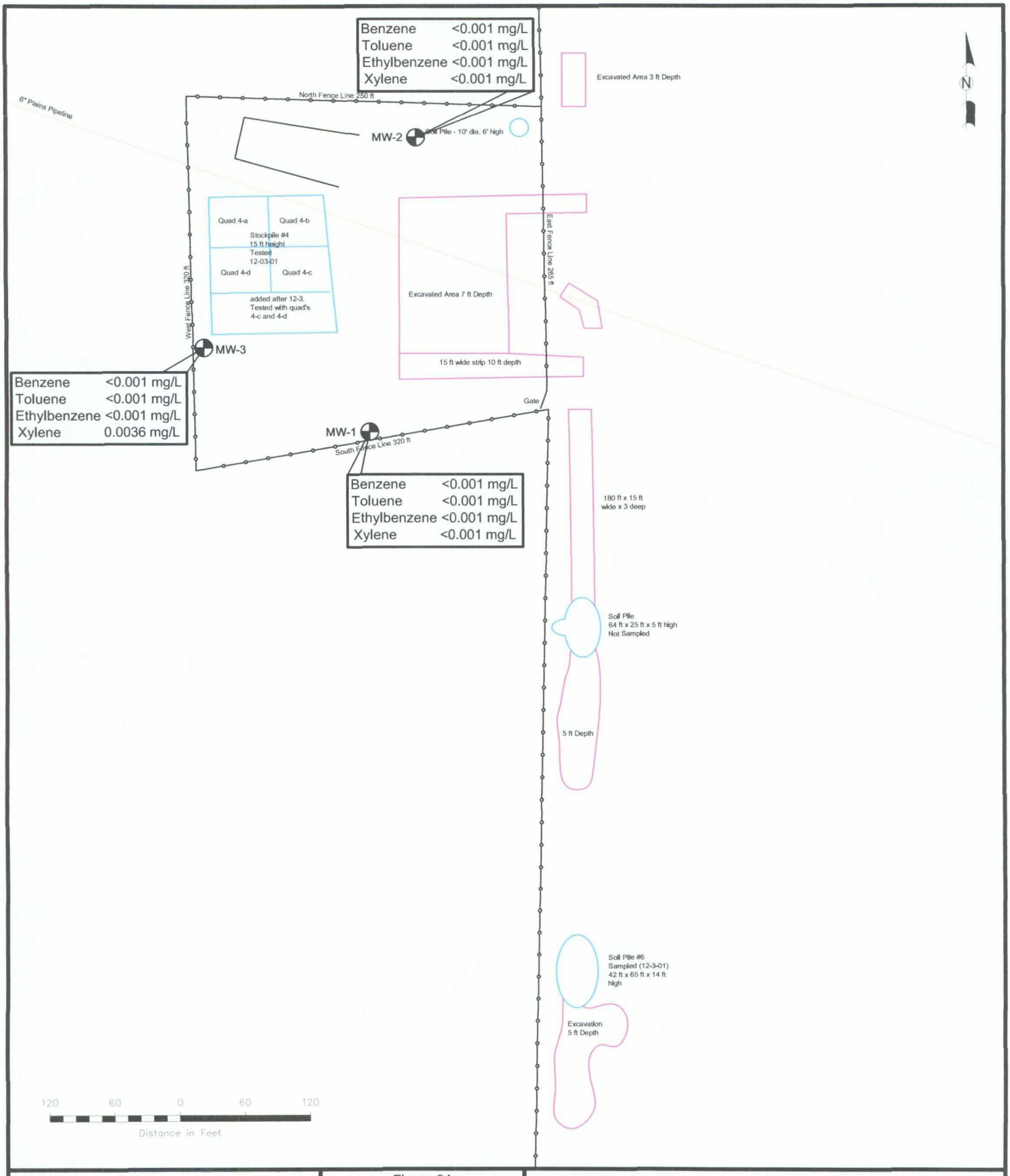
- Pipeline
- Fence
- Excavation
- Stockpile
- Monitor Well Location
- (3791.69) Grounwater Elevation (Feet)
- Grounwater Elevation Contour Line
- Groundwater Direction and Magnitude

Figure 2D
Inferred Groundwater Gradient Map
(11/19/09)
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'	Prep By: SAT	Checked By: RKR
December 15, 2009		



LEGEND:

- Monitor Well Location
- *Pipeline*
- Fence
- Excavation
- Stockpile

(NS) Not Sampled

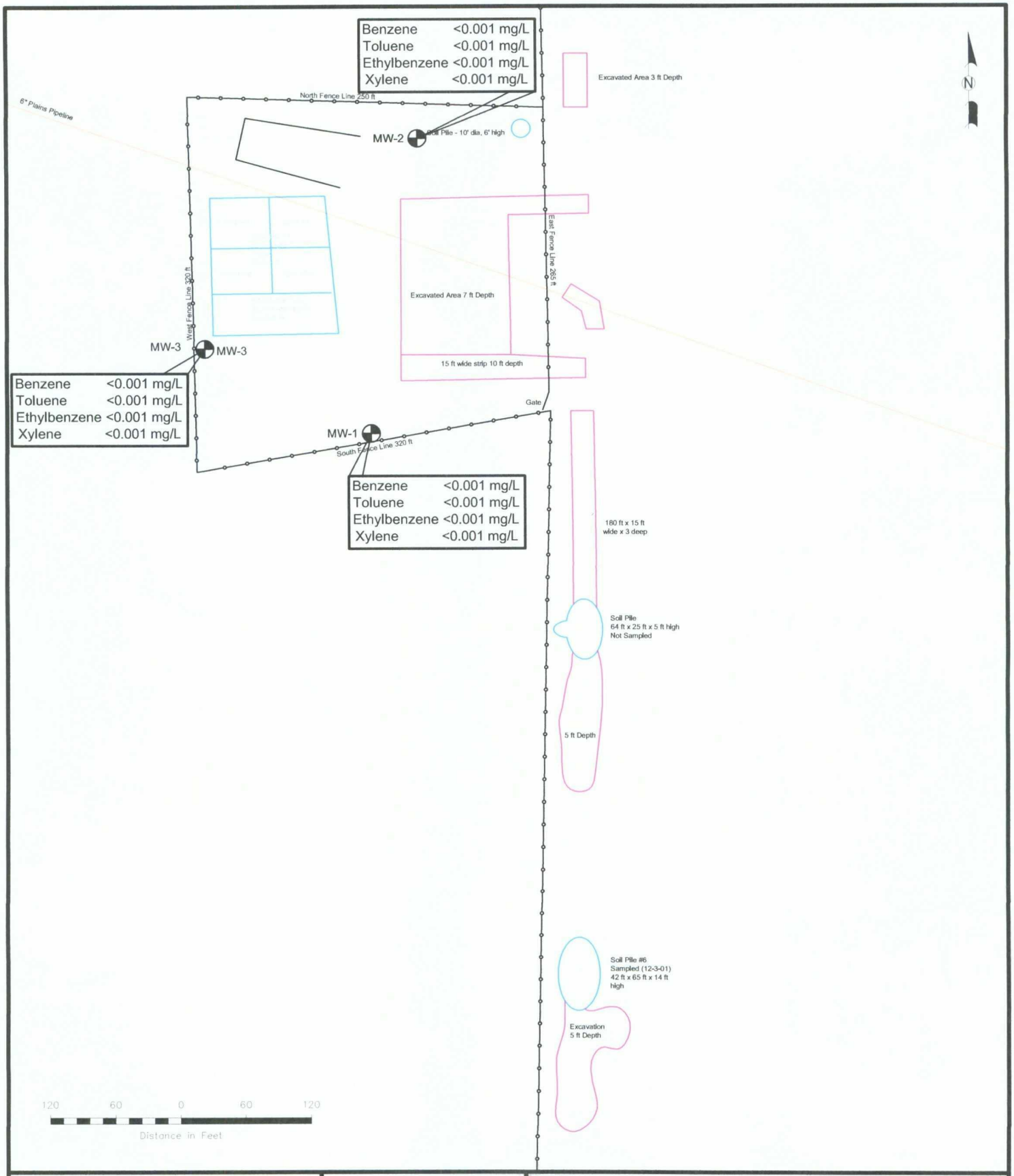
<0.001 Constituent Concentration (mg/L)

Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (02/05/09)
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:SAT	Checked By: TJL
February 23, 2009		



LEGEND:

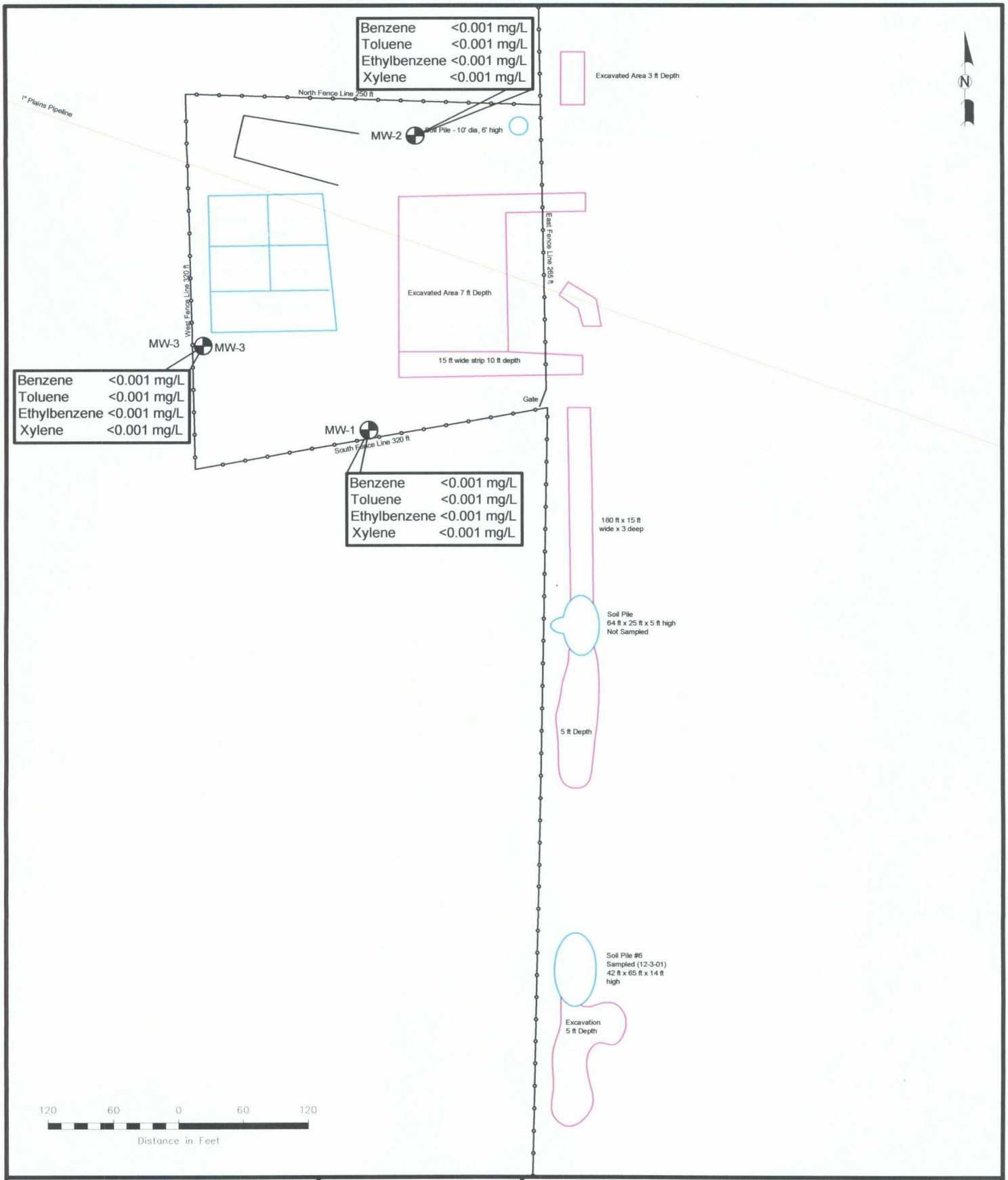
- Monitor Well Location
- Pipeline
- Fence
- Excavation
- Stockpile
- (NS) Not Sampled
- <0.001 Constituent Concentration (mg/L)

Figure 3B
Groundwater Concentration and Inferred PSH Extent Map (05/30/09)
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:SAT	Checked By: RKR
August 19, 2009		



LEGEND:

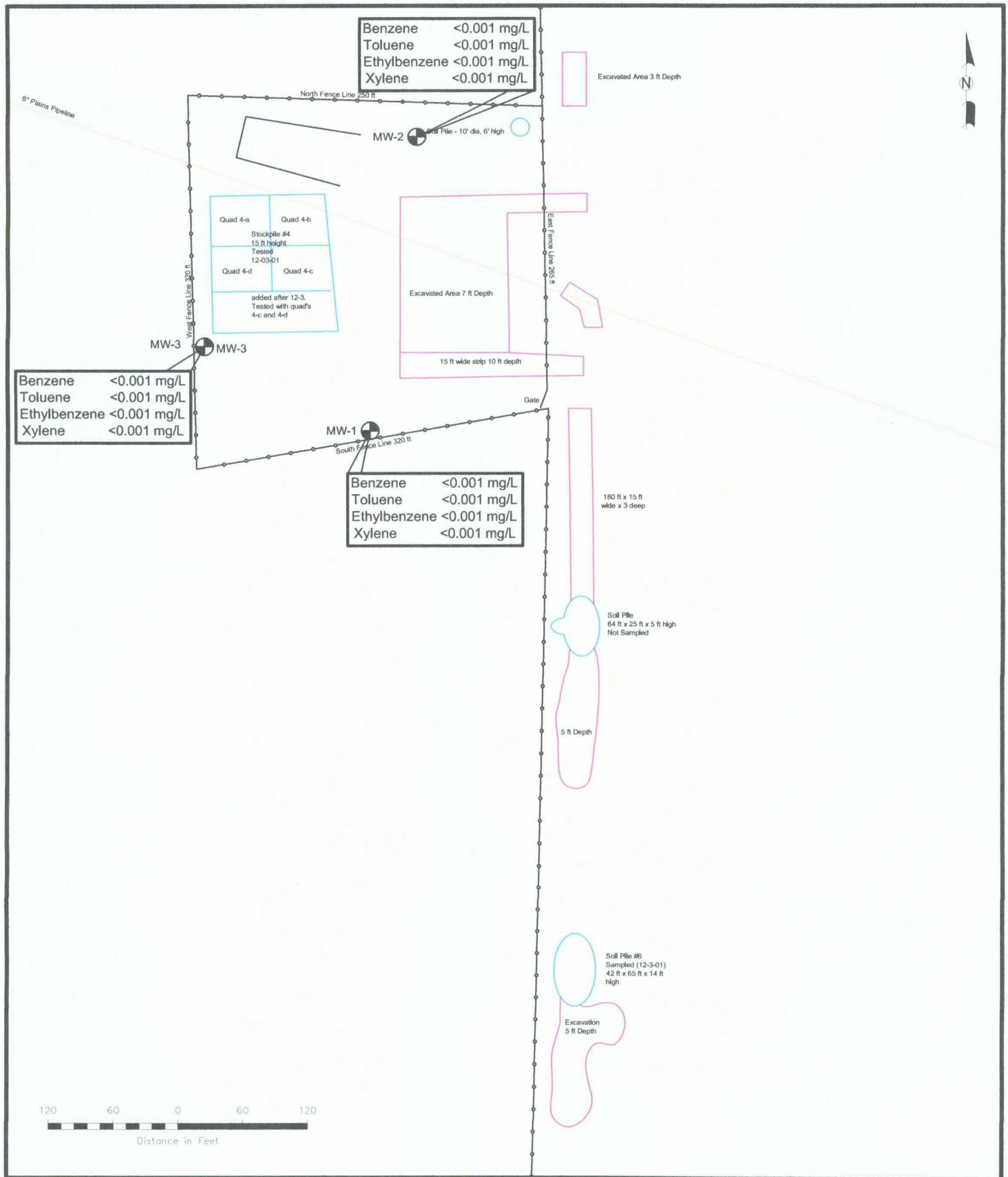
- Monitor Well Location
- Pipeline
- Fence
- Excavation
- Stockpile
- (NS) Not Sampled
- <0.001 Constituent Concentration (mg/L)

Figure 3D
Groundwater Concentration and Inferred PSH Extent Map (11/19/09)
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:SAT	Checked By: RKR
December 15, 2009		



LEGEND:

- Monitor Well Location
- Pipeline
- Fence
- Excavation
- Stockpile
- (NS) Not Sampled
- <0.001 Constituent Concentration (mg/L)

Figure 3C
Groundwater Concentration and Inferred PSH Extent Map (08/15/09)
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:SAT	Checked By: RKR
October 15, 2009		

Tables

TABLE 1

2009 - 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	*02/05/09*	3,564.20	-	33.49	0.00	3,530.71
MW-1	*05/30/09*	3,564.20	-	33.45	0.00	3,530.75
MW-1	*08/15/09*	3,564.20	-	33.56	0.00	3,530.64
MW-1	*11/19/09*	3,564.20	-	33.69	0.00	3,530.51
MW-2	*02/05/09*	3,563.83	-	32.21	0.00	3,531.62
MW-2	*05/30/09*	3,563.83	-	32.24	0.00	3,531.59
MW-2	*08/15/09*	3,563.83	-	32.25	0.00	3,531.58
MW-2	*11/19/09*	3,563.83	-	32.26	0.00	3,531.57
MW-3	*02/05/09*	3,564.42	-	33.37	0.00	3,531.05
MW-3	*05/30/09*	3,564.42	-	33.54	0.00	3,530.88
MW-3	*08/15/09*	3,564.42	-	33.61	0.00	3,530.81
MW-3	*11/19/09*	3,564.42	-	33.84	0.00	3,530.58

** Complete Historical Tables are presented on the attached CD.*

TABLE 2

2009 - CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
SOUTH MONUMENT GATHERING SOUR
Lea County, New Mexico
NMOCD REFERENCE NUMBER RP-951

All concentrations are in mg/kg

Sample Date	Sample Location	Benzene	Toluene	Ethylbenzene	Xylene
NMOCD REGULARY LIMIT		**0.010**	**0.750**	**0.750**	**0.620**
02/05/09	MW-1	<0.001	<0.001	<0.001	<0.001
05/30/09	MW-1	<0.001	<0.001	<0.001	<0.001
08/15/09	MW-1	<0.001	<0.001	<0.001	<0.001
11/19/09	MW-1	<0.001	<0.001	<0.001	<0.001
02/05/09	MW-2	<0.001	<0.001	<0.001	<0.001
05/30/09	MW-2	<0.001	<0.001	<0.001	<0.001
08/15/09	MW-2	<0.001	<0.001	<0.001	<0.001
11/19/09	MW-2	<0.001	<0.001	<0.001	<0.001
02/05/09	MW-3	<0.001	<0.001	<0.001	0.0036
05/30/09	MW-3	<0.001	<0.001	<0.001	<0.001
08/15/09	MW-3	<0.001	<0.001	<0.001	<0.001
11/19/09	MW-3	<0.001	<0.001	<0.001	<0.001

** Complete Historical data Tables are presented on the attached CD.*

TABLE 3

POLYCYCLIC AROMATIC HYDROCARBON CONCENTRATIONS IN GROUNDWATER

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
	11/19/09	<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	0.00043	0.000627	<0.000184	<0.000184	<0.000184	0.000584
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
	11/19/09	<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
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
	11/19/09	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183	<0.000183

Appendices

Appendix A
Release Notification and Corrective Action
(Form C-141)

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

x Initial Report ☐ Final Report

Name of Company Plains Marketing, LP	Contact Camille Reynolds
Address 5805 East Hwy. 80, Midland, TX 79706	Telephone No. 505-441-0965
Facility Name South Monument Gathering Sour	Facility Type 6"Steel Pipeline

Surface Owner Jimmie Cooper	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
B	5	20S	37E					Lea

Latitude 32° 36'29.0" **Longitude** 103° 16' 26.8"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 1200 barrels	Volume Recovered 910 barrels
Source of Release 6" Steel Pipeline	Date and Hour of Occurrence 11-20-01	Date and Hour of Discovery 11-20-01
Was Immediate Notice Given? x Yes ☐ No ☐ Not Required	If YES, To Whom? Paul Sheeley	
By Whom? Frank Hernandez	Date and Hour 11-20-01@16:15	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of 6 inch steel pipeline resulted in crude oil release. Clamp was applied to the line to mitigate the release.

Describe Area Affected and Cleanup Action Taken.* The crude oil was vacuumed up and the impacted soil was excavated and stockpiled on plastic. Initial response activities included excavation and stockpiling of approximately 5,000 to 7,000 cubic yards of soil. Future response activities will include a soil and groundwater investigation and preparation of a remedial action plan.

NOTE: This information was obtained from historical EOTT files, Plains acquired EOTT/Link Energy on April 1, 2004 and Plains assumes this information to be correct.

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:	
Title: Remediation Coordinator	Approval Date:	Expiration Date:
E-mail Address: cjreynolds@paalp.com	Conditions of Approval:	Attached ☐
Date: 12-29-04 Phone:505-441-0965		

* *Attach Additional Sheets If Necessary*