AP - 16

APPROVALS

YEAR(S):

2010

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, June 10, 2010 4:20 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Ron Rounsaville
Subject: Groundwater Monitoring Program Amendment Approval (AP-16) - Bob Durham Release Site

RE: Groundwater Monitoring Program Amendment Approval
for the Plains Marketing, L.P.
Bob Durham Release Site (AP-0016)
Unit Letter D, Section 32, T19S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has reviewed the submitted proposed Groundwater Monitoring Program Amendment, dated June 9 & 10, 2010, for the above-referenced site. The OCD hereby conditionally approves the Amendment (i.e., Amendment to the Abatement Plan, AP-0016):

> Plains Marketing, L.P. must sample the downgradient monitoring groundwater well, MW-56, at the Bob Durham Release Site on the same schedule and for the same constituents as for MW-38.

Please be advised that OCD approval of this Amendment does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Also, please be advised that the request for alternative groundwater sampling program for this Abatement Plan will be addressed under separate cover.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Jason Henry [JHenry@paalp.com]
Sent: Thursday, June 10, 2010 7:29 AM
To: Hansen, Edward J., EMNRD
Subject: FW: Emailing: Revised Bob Durham 2010.pdf
Attachments: BD MW-56 Trace Report_Packet.pdf

Ed,

Attached is the Trace Analysis laboratory report for the ground water sample collected from MW-56 on 05/19/2010.

Thank you,
Jason Henry

-----Original Message-----
From: Jason Henry
Sent: Wednesday, June 09, 2010 5:38 PM
To: 'edwardj.hansen@state.nm.us'
Subject: Fw: Emailing: Revised Bob Durham 2010.pdf

Ed,

Attached is a revised version of the Bob Durham (AP-016) site map.
MW-56 has been added to the map southwest of Bob Durham MW-38. MW-56 is associated with another site to the south of the Bob Durham site. Based on the ground water gradient maps from the Bob Durham 2009 Annual Report, MW-56 appears to be down gradient of Bob Durham MW-38.

Also, I have recent ground water analytical data for MW-56 and I will forward the lab report to you tomorrow.

Thank you,
Jason Henry

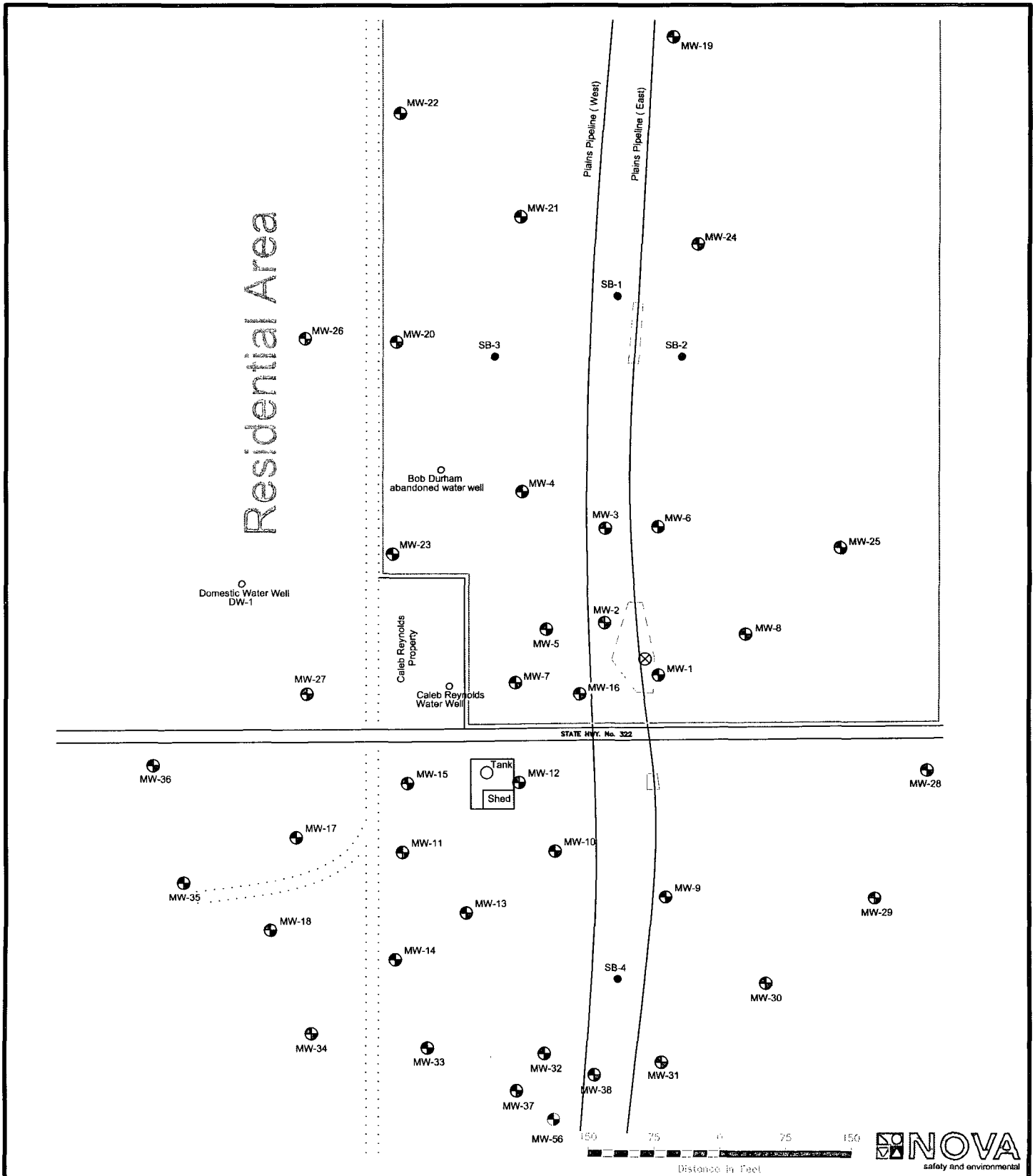
----- Original Message -----
From: Ron Rounsaville <rrounsaville@novatraining.cc>
To: Jason Henry
Sent: Wed Jun 09 16:10:00 2010
Subject: Emailing: Revised Bob Durham 2010.pdf

Jason,
Attached is the revised Bob Durham site map including MW-56 at the south end.
Call me if you have any questions.

Ron
Your message is ready to be sent with the following file or link
attachments:

Revised Bob Durham 2010.pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



LEGEND:

- Plains Monitor Well Locations
- Release Point
- Soil Boring Locations
- Excavation Areas
- Bob Durham Property Line
- Dirt Road

Figure 2
Site Map

Plains Marketing, L.P.
Bob Durham
Lea County, NM

NOVA Safety and Environmental

NW1/4 NW1/4 Sec 32 T19S R37E		Lat. 32° 37' 27" Long. 103° 16' 53"
Scale: 1" = 150'	Drawn By: DPM	Prep. By: RKR
June 09, 2010		

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
200 East Sunset Road, Suite E El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
5002 Basin Street, Suite A1 Midland, Texas 79703 432•689•6301 FAX 432•689•6313
6015 Harris Parkway, Suite 110 Ft. Worth, Texas 76132 817•201•5260
E-Mail: lab@traceanalysis.com

Certifications

WBENC: 237019 **HUB:** 1752439743100-86536 **DBE:** VN 20657
NCTRCA WFWB38444Y0909

NELAP Certifications

Lubbock: T104704219-08-TX LELAP-02003 Kansas E-10317 **El Paso:** T104704221-08-TX LELAP-02002 **Midland:** T104704392-08-TX

Analytical and Quality Control Report

Ron Rounsaville
Nova Safety & Environmental
2057 Commerce St.
Midland, TX, 79703

Report Date: May 28, 2010

Work Order: 10052024

Project Location: Monument, Lea County, NM
Project Name: Bob Durham
Project Number: TNM-LF-2000-07

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
232369	MW-56	water	2010-05-19	15:30	2010-05-20

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Dr. Blair Leftwich, Director
Dr. Michael Abel, Project Manager

Standard Flags

B - The sample contains less than ten times the concentration found in the method blank.

Case Narrative

Samples for project Bob Durham were received by TraceAnalysis, Inc. on 2010-05-20 and assigned to work order 10052024. Samples for work order 10052024 were received intact without headspace and at a temperature of 4.0 C.

Samples were analyzed for the following tests using their respective methods.

Test	Method	Prep Batch	Prep Date	QC Batch	Analysis Date
BTEX	S 8021B	60311	2010-05-26 at 16:00	70430	2010-05-26 at 23:28

Results for these samples are reported on a wet weight basis unless data package indicates otherwise.

A matrix spike (MS) and matrix spike duplicate (MSD) sample is chosen at random from each preparation batch. The MS and MSD will indicate if a site specific matrix problem is occurring, however, it may not pertain to the samples for work order 10052024 since the sample was chosen at random. Therefore, the validity of the analytical data reported has been determined by the laboratory control sample (LCS) and the method blank (MB). These quality control measures are performed with each preparation batch to ensure data integrity.

All other exceptions associated with this report have been footnoted on the appropriate analytical page to assist in general data comprehension. Please contact the laboratory directly if there are any questions regarding this project.

Analytical Report

Sample: 232369 - MW-56

Laboratory:	Midland				
Analysis:	BTEX	Analytical Method:	S 8021B	Prep Method:	S 5030B
QC Batch:	70430	Date Analyzed:	2010-05-26	Analyzed By:	AG
Prep Batch:	60311	Sample Preparation:	2010-05-26	Prepared By:	AG

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.00100	mg/L	1	0.00100
Toluene		<0.00100	mg/L	1	0.00100
Ethylbenzene		<0.00100	mg/L	1	0.00100
Xylene		<0.00100	mg/L	1	0.00100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.107	mg/L	1	0.100	107	65.2 - 130.3
4-Bromofluorobenzene (4-BFB)		0.103	mg/L	1	0.100	103	51.1 - 121.7

Method Blank (1) QC Batch: 70430

QC Batch:	70430	Date Analyzed:	2010-05-26	Analyzed By:	AG
Prep Batch:	60311	QC Preparation:	2010-05-26	Prepared By:	AG

Parameter	Flag	MDL Result	Units	RL
Benzene		<0.000300	mg/L	0.001
Toluene		<0.000200	mg/L	0.001
Ethylbenzene		<0.000200	mg/L	0.001
Xylene		<0.000900	mg/L	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.110	mg/L	1	0.100	110	73.6 - 126.6
4-Bromofluorobenzene (4-BFB)		0.108	mg/L	1	0.100	108	62.6 - 117.5

Laboratory Control Spike (LCS-1)

QC Batch:	70430	Date Analyzed:	2010-05-26	Analyzed By:	AG
Prep Batch:	60311	QC Preparation:	2010-05-26	Prepared By:	AG

Param	LCS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
Benzene	0.101	mg/L	1	0.100	<0.000300	101	79.4 - 112.4
Toluene	0.101	mg/L	1	0.100	<0.000200	101	79.3 - 110
Ethylbenzene	0.0992	mg/L	1	0.100	<0.000200	99	73.8 - 113.1
Xylene	0.298	mg/L	1	0.300	<0.000900	99	73.9 - 113.6

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
Benzene	0.0991	mg/L	1	0.100	<0.000300	99	79.4 - 112.4	2	20
Toluene	0.0991	mg/L	1	0.100	<0.000200	99	79.3 - 110	2	20
Ethylbenzene	0.0981	mg/L	1	0.100	<0.000200	98	73.8 - 113.1	1	20
Xylene	0.295	mg/L	1	0.300	<0.000900	98	73.9 - 113.6	1	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	0.0942	0.0947	mg/L	1	0.100	94	95	73.2 - 129.6
4-Bromofluorobenzene (4-BFB)	0.0961	0.0956	mg/L	1	0.100	96	96	77.9 - 119.8

Matrix Spike (MS-1) Spiked Sample: 232538

QC Batch: 70430 | Date Analyzed: 2010-05-26 | Analyzed By: AG
Prep Batch: 60311 | QC Preparation: 2010-05-26 | Prepared By: AG

Param	MS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
Benzene	15.7	mg/L	50	5.00	11.4572	85	77.3 - 117.4
Toluene	4.66	mg/L	50	5.00	<0.0100	93	75 - 111.8
Ethylbenzene	4.67	mg/L	50	5.00	0.1337	91	78.8 - 106.6
Xylene	13.7	mg/L	50	15.0	<0.0450	91	68.9 - 114

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
Benzene	16.0	mg/L	50	5.00	11.4572	91	77.3 - 117.4	2	20
Toluene	4.84	mg/L	50	5.00	<0.0100	97	75 - 111.8	4	20
Ethylbenzene	4.86	mg/L	50	5.00	0.1337	94	78.8 - 106.6	4	20
Xylene	14.2	mg/L	50	15.0	<0.0450	95	68.9 - 114	4	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	4.55	4.79	mg/L	50	5	91	96	76.3 - 129.8

continued ...

matrix spikes continued ...

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
4-Bromofluorobenzene (4-BFB)	4.60	4.83	mg/L	50	5	92	97	75.2 - 112.8

Standard (CCV-2)

QC Batch: 70430 Date Analyzed: 2010-05-26 Analyzed By: AG

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/L	0.100	0.0997	100	80 - 120	2010-05-26
Toluene		mg/L	0.100	0.0993	99	80 - 120	2010-05-26
Ethylbenzene		mg/L	0.100	0.0975	98	80 - 120	2010-05-26
Xylene		mg/L	0.300	0.293	98	80 - 120	2010-05-26

Standard (CCV-3)

QC Batch: 70430 Date Analyzed: 2010-05-26 Analyzed By: AG

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/L	0.100	0.0997	100	80 - 120	2010-05-26
Toluene		mg/L	0.100	0.0993	99	80 - 120	2010-05-26
Ethylbenzene		mg/L	0.100	0.0975	98	80 - 120	2010-05-26
Xylene		mg/L	0.300	0.293	98	80 - 120	2010-05-26

LAB Order ID # 10052024

Page 1 of 1

TraceAnalysis, Inc.

email: lab@traceanalysis.com

6701 Aberdeen Avenue, Suite 9
Lubbock, Texas 79424
Tel (806) 794-1296
Fax (806) 794-1298
1 (800) 378-1296

5002 Basin Street, Suite A1
Midland, Texas 79703
Tel (432) 689-6301
Fax (432) 689-6313

200 East Sunset Rd., Suite E
El Paso, Texas 79922
Tel (915) 585-3443
Fax (915) 585-4944
1 (888) 588-3443

BioAquatic Testing
2501 Mayes Rd., Ste 100
Carrollton, Texas 75006
Tel (972) 242-7750

Company Name: NOVA — Phone #:

Address: (Street, City, Zip) — Fax #:

Contact Person: Ron Rounsaville — E-mail:

Invoice to: (If different from above) PLAINS

Project #: TNM-LF-2000-7 — Project Name: Bob Durham

Project Location (including state): N.M. — Sampler Signature: Ron Rounsaville

ANALYSIS REQUEST
(Circle or Specify Method No.)

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume / Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCl	HNO_3	H_2SO_4	NaOH	ICE	NONE	SAMPLING: DATE	TIME
232369	MW-56	3	V04	X								X		5-19-10	1530

MTBE 8021 / 602 / 8260 / 624	BTEX 8021 / 602 / 8260 / 624	TPH 418.1 / TX1005 / TX1005 Ext(C35)	TPH 8015 GRO / DRO / TVHC	PAH 8270 / 625	Total Metals Ag As Ba Cd Cr Pb Se Hg 6010/200.7	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	TCLP Pesticides	RCI	GC/MS Vol. 8260 / 624	GC/MS Semi. Vol. 8270 / 625	PCB's 8082 / 608	Pesticides 8081 / 608	BOD, TSS, pH	Moisture Content	Cl, Fl, S04, NO3, NO2, Alkalinity	Na, Ca, Mg, K, TDS, EC						Turn Around Time if different from standard	Hold
	X																									

Relinquished by:	Company:	Date:	Time:	Received by:	Company:	Date:	Time:	
		5/20/10	1246		TRACE	5/20/10	1246	INST ___ OBS 4.0 °C COR ___ °C
Relinquished by:	Company:	Date:	Time:	Received by:	Company:	Date:	Time:	INST ___ OBS ___ °C COR ___ °C
Relinquished by:	Company:	Date:	Time:	Received by:	Company:	Date:	Time:	INST ___ OBS ___ °C COR ___ °C

LAB USE ONLY

Intact Y / N

Headspace Y / N / NA

Log-In-Review

REMARKS:

All tests-Midland

- ☐ Dry Weight Basis Required
- ☐ TRRP Report Required
- ☐ Check If Special Reporting Limits Are Needed

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C. O. C.

Carrier # Carrizo

ORIGINAL COPY

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 10, 2010 1:22 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD
Subject: Groundwater Monitoring Program Amendment Approval (AP-0016) - Plains Bob Durham Release Site

RE: Groundwater Monitoring Program Amendment Approval
for the Plains Marketing, L.P.
Bob Durham Release Site (AP-0016)
Unit Letter D, Section 32, T19S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has reviewed the submitted proposed Groundwater Monitoring Program Amendment as specified in the 2009 Annual Report, dated March 2010, for the above-referenced site. The OCD hereby conditionally approves the Amendment (i.e., Amendment to the Abatement Plan, AP-0016):

> Plains Marketing, L.P. must submit to the OCD within 30 days a plan to monitoring groundwater downgradient of well, MW-38, at the Bob Durham Release Site.
>
> The material used to plug the four specified groundwater monitoring wells (MW-9, MW-14, MW-26 and MW-29) at the Bob Durham Release Site must be a cement grout with 1% to 3% bentonite or other plugging material approved by the OCD. Please submit to the OCD a final plugging report within 60 days.

Please be advised that OCD approval of this Amendment does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Also, please be advised that the request for alternative groundwater sampling program for this Abatement Plan will be addressed under separate cover.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, April 29, 2010 1:51 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Ron Rounsaville
Subject: Soil Closure Proposal Approval (AP-0016) Bob Durham Release Site

RE: Soil Closure Proposal Approval
for the Plains Marketing, L.P.
Bob Durham Release Site (AP-0016)
Unit Letter C, Section 32, T19S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has reviewed the submitted proposed Soil Closure Proposal (work plan), dated October, 2008, and supplemental information for the work plan, dated April 28, 2010, for the above-referenced site. The OCD hereby conditionally approves the work plan (i.e., Addendum to the Abatement Plan, AP-0016):

Plains Marketing, L.P. must submit to the OCD the Soil Closure Report within 90 days of this approval.

Please be advised that OCD approval of this work plan does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Also, please be advised that the request for alternative groundwater sampling program for this Abatement Plan will be addressed under separate cover.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Jason Henry [JHenry@paalp.com]
Sent: Wednesday, April 28, 2010 9:40 AM
To: Hansen, Edward J., EMNRD
Cc: Jeffrey P Dann; Ron Rounsaville; Shawn M Harris
Subject: Plains Bob Durham site - AP-0016

Ed,

During your review of the October 2008 Soil Closure Proposal report for the Bob Durham site (AP-0016) you had requested that Plains contact the landowner to make sure that he didn't have any objections to the proposed soil remediation strategy set forth in the Soil Closure Proposal. The landowner (Bob Durham) resides in Cookson, Oklahoma so I was not able to meet with him in person to discuss the details of the report. Instead, I spoke with Mr. Durham on the phone and mailed him a copy of the Soil Closure Proposal to review. I then placed a follow-up phone call to Mr. Durham on 04/27/2010 to address any questions or concerns that he had after reviewing his copy of the report. Mr. Durham had no objections to Plains conducting the following soil remediation activities:

- Excavating the soil to approximately 15 feet below ground surface in Excavation Area #1
- Excavating the soil to approximately 10 feet below ground surface in Excavation Area #2
- Excavating the sidewalls in Excavation Area #1 and Excavation Area #2 to a TPH level of 100 mg/kg
- Placing a poly liner in the bottom holes of Excavation Area #1 and Excavation Area #2
- Backfilling on top of the liners with remediated soil that exhibits TPH concentrations of <1,000 mg/kg
- Using clean soil (TPH concentration of <100 mg/kg) for the top 1 foot of backfill
- Re-seeding of disturbed areas with a landowner approved seed mix

Please let me know if you have any questions or need more information.

Thank you for your time.

Jason Henry
575-441-1099