1R-2637

WORKPLANS

Date: 6-21-13

Hansen, Edward J., EMNRD

From: Ben J. Arguijo

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Sent: Friday, June 21, 2013 7:38 AM **To:** Hansen, Edward J., EMNRD

Subject: Chevron Grayburg 6-Inch Sec. 6 (Historical), 1RP-2637

Attachments: Chevron Grayburg_DelineationPictures.pdf; ChevronGrayburgSec6

_ProposedSBLocations.pdf; ChevronGrayburgSec6_PSBAerial.pdf;

ChevGrey_SiteLocationMap.pdf

Mr. Hansen,

I am writing to request an extension for the submittal of the Groundwater Investigation Plan for the release site known as *Chevron Grayburg 6-Inch Sec. 6 (Historical)* (NMOCD Reference #1RP-2637, henceforth "Chevron Grayburg").

On May 28, 2013, Basin Environmental Service Technologies, LLC (Basin Environmental), on behalf of Plains Pipeline, LP (Plains), conducted a delineation event at the Chevron Grayburg release site. During the delineation event, a series of seven (7) delineation trenches (Trench #1 through Trench #7) were advanced at the site to 1.) determine if the presence of phase-separated hydrocarbons (PSH) in monitor well MW-7 was attributable to an additional, heretofore undiscovered leak on the Chevron Grayburg 6-Inch pipeline, and 2.) investigate the horizontal extent of contamination attributable to an historical tank battery and/or an historical drilling pit adjacent to the site. The delineation trenches were advanced to depths ranging from approximately one foot (1') to three feet (3') below ground surface (bgs). Further vertical delineation was precluded by the presence of a hard rock layer running underneath the site. Photographs of the delineation event are included in the attached file, "Chevron Grayburg DelineationPictures.pdf", and the locations of the delineation trenches are depicted in the attached map, "ChevronGrayburgSec6 ProposedSBLocations.pdf".

During the advancement of delineation trenches Trench #1 through Trench #5, visibly stained soil was encountered at approximately six inches (6") to one foot (1') bgs. Heavily stained, black soil was present in delineation trenches Trench #1, Trench #4, and Trench #5, which are up-gradient (both surface and subsurface) of monitor well MW-7 and the Chevron Grayburg 6-Inch pipeline. Olfactory and visual inspection of the stained soil indicated that soil contamination increased as proximity to the historical drilling pit adjacent to (and to the north of) the Chevron Grayburg release site increased.

No evidence of an additional leak on the Chevron Grayburg 6-Inch pipeline was discovered. A "smart pig" was utilized to detect a failing section of the pipeline in 2010, the replacement of which ultimately lead to the October 2010 release. Basin Environmental and Plains believe that this "smart pig" would also have detected any leaks or additional weak spots further along the pipeline.

Basin Environmental and Plains believe that the historical drilling pit and/or the historical tank battery may be responsible for the PSH encountered in monitor well MW-7. However, further vertical and horizontal delineation of the area is required before such a determination can be made. To that end, Plains proposes to advance a series of soil borings in the inferred area of historical contamination (see attached map), which was estimated based on observations made during the May 28, 2013, delineation event, analysis of historical aerial imagery of the site, and review of laboratory analytical data from soil samples collected during the advancement of the on-site monitor wells. Up to eleven (11) soil borings will be advanced in a grid-like pattern to investigate the horizontal and vertical extent of the historical contamination. The locations of the proposed soil borings are depicted in the attached map.

Plains also proposes to perform a "fingerprint" analysis of both the PSH in monitor well MW-7 and the crude oil in the Chevron Grayburg 6-Inch pipeline to determine if the substances are chemically identical.

Following the drilling event and the fingerprint analysis, a summary report, including laboratory analytical data and a list of anticipated actions, will be submitted to the NMOCD.

Please note that permits for the proposed drilling event (and all subsequent drilling events) may be delayed. The land in question is owned by the State of New Mexico and administered by the New Mexico State Land Office. It typically takes two to four months to receive permission to drill on State-owned land.

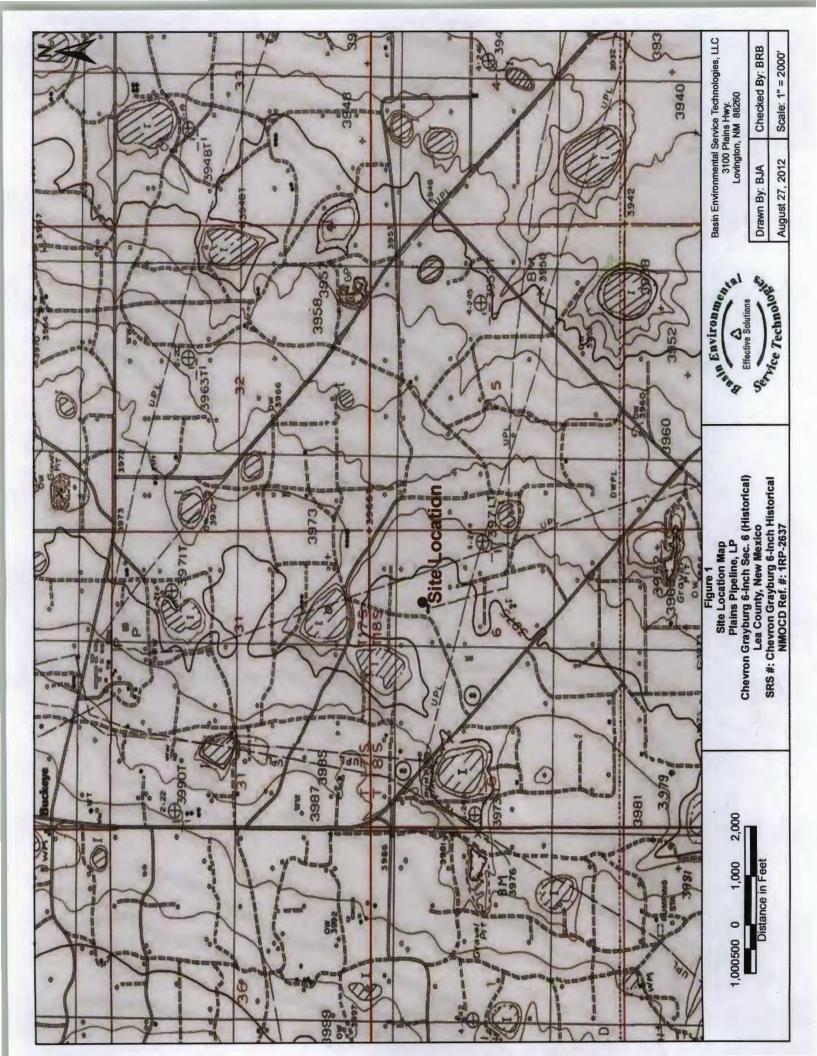
For reference, an aerial image of the site depicting the locations of the on-site monitor wells, delineation trenches, and proposed soil borings is attached as "ChevronGrayburgSec6_PSBAerial.pdf".

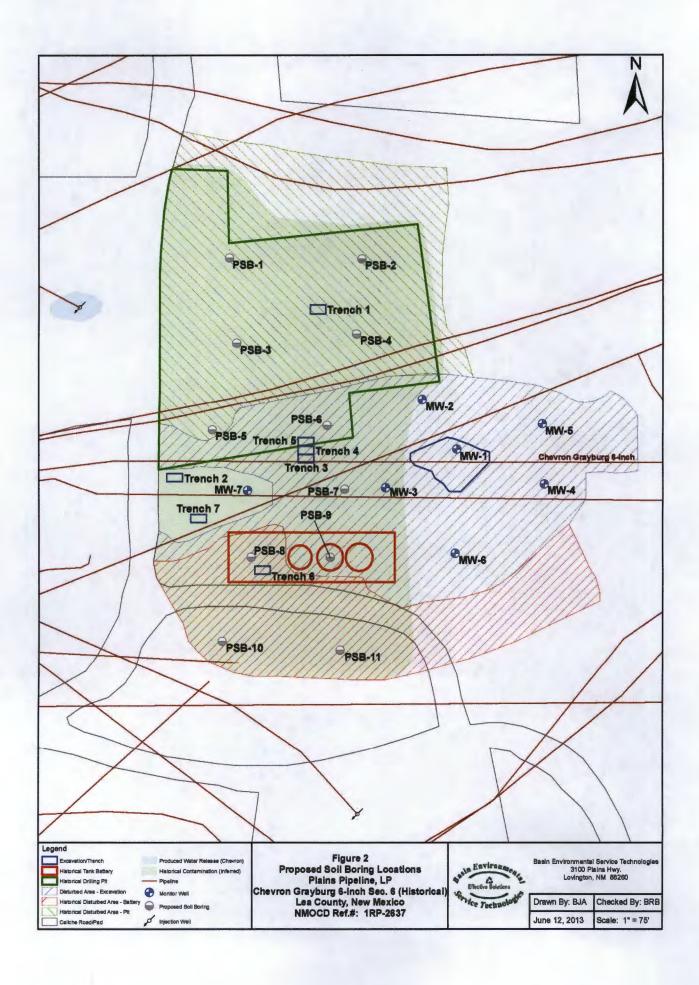
If you have any questions, please do not hesitate to contact me.

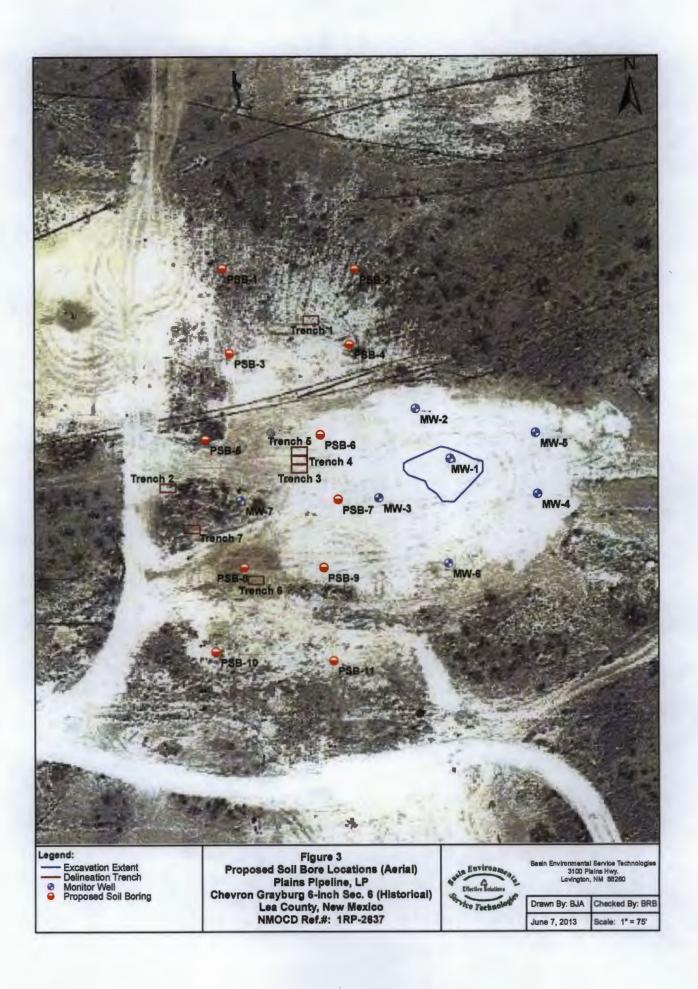
Thank you for your time and consideration.

Respectfully, Ben J. Arguijo

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Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #1



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #1



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #1



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #2



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #2



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #3



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #3



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Chevron Grayburg 6-Inch Pipeline & Staining in Delineation Trench #3



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #4



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #4



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #4



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #5



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Staining in Delineation Trench #5



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #6



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Delineation Trench #6



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Advancement of Delineation Trench #7



Chevron Grayburg 6-Inch Sec. 6 (Historical) - Delineation Trench #7