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By OCD; Dr. Oberding at 9:22 am, Aug 17, 2015



APPROVED

By OCD; Dr. Oberding at 9:22 am, Aug 17, 2015

May 6, 2015

Dr. Tomas Oberding
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Interim Remediation Summary and Revised Proposed Soil Closure Strategy
Monument #18
Unit Letter "D", Section 07, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico
Plains SRS # TNM Monument 18-Known
NMOCD Reference # IRP-0124

Dear Dr. Oberding,

TRC Solutions, Inc., formerly NOVA Safety and Environmental (NOVA), on behalf of Plains Marketing, L.P., (Plains), has prepared this Interim Remediation Summary and Revised Proposed Soil Closure Strategy (2015 Work Plan) for the Release Site known as TNM Monument 18-Known (Monument 18). The purpose of this Work Plan is to summarize soil closure efforts to date and propose revised additional activities designed to progress the site toward a New Mexico Oil Conservation Division (NMOCD) approved soil closure. The legal description of the Release Site is Unit Letter "D", Section 07, Township 20 South, Range 37 East, in Lea County, New Mexico. A Site Location Map and 2014 Excavation Map depicting excavation extents and soil sample locations are provided as Figure 1 and Figure 2, respectively. The Release Notification and Corrective Action (NMOCD Form C-141) is provided as Attachment B.

In March 2013, A "Remediation Summary and Proposed Soil Closure Strategy" (2013 Work Plan) was submitted to the NMOCD – Santa Fe Office. On April 22, 2013, the 2013 Work Plan was approved by the NMOCD - Santa Fe Office.

Prior to the commencement of the initial excavation activities, Plains requested pipeline operators re-route existing pipelines located in the pipeline corridor at the Release Site. During the months prior to the commencement of the initial excavation activities DCP, Targa, and Gary Morgan Operating complied with Plains request to re-route their pipelines. Regency Energy Partners (Regency), formerly South Union Gas Services (SUGS), was unable to comply with Plains request until a later date and consequently, the SUGS four (4) inch steel pipeline remained supported on "pipe stands" and a "soil plug" throughout the initial excavation activities. On or about July 1, 2013, the NMOCD approved soil remediation activities commenced at the Monument 18 Release Site. Excavated soil was stockpiled adjacent to the excavation and transported to C&C Landfarm in Monument, New Mexico. Due to safety concerns and per the approved

2013 Work Plan, the depth of the excavation was limited to approximately nineteen (19) feet below ground surface (bgs).

In September 2013, two (2) phase separated hydrocarbon (PSH) recovery trenches (South Trench and North Trench) were installed in the floor of the excavation, extending two (2) feet below the groundwater interface. PSH and dissolved-phase hydrocarbon recovery from the recovery trenches was conducted twice weekly.

On September 12, 2013, fourteen (14) soil samples (ESW-1 @ 18', ESW-2 @ 18', ESW-3 @ 18', ESW-4 @ 18', SSW-1 @ 18', SSW-2 @ 18', SSW-3 @ 18', NSW-1 @ 18', NSW-2 @ 18', NSW-3 @ 18', WSW-1 @ 18', WSW-2 @ 18', WSW-3 @ 18', and WSW-4 @ 18') were collected from the initial excavation sidewalls and submitted to TraceAnalysis Laboratory in Midland, Texas for determination of concentrations of benzene, toluene, ethylbenzene, and xylene (BTEX) and total petroleum hydrocarbon (TPH) by EPA Method SW 846-8021B and EPA Method SW 846-8015M, respectively. The analytical results indicated benzene concentrations were less than the appropriate laboratory method detection limit (MDL) in all fourteen (14) submitted soil samples. BTEX concentrations ranged from less than the appropriate laboratory MDL in soil samples ESW-1 @ 18', ESW-2 @ 18', ESW-3 @ 18', ESW-4 @ 18', SSW-1 @ 18', SSW-2 @ 18', SSW-3 @ 18', NSW-1 @ 18', NSW-2 @ 18', NSW-3 @ 18', and WSW-2 @ 18' to 0.394 mg/Kg in soil sample WSW-4 @ 18'. TPH concentrations ranged from less than the appropriate laboratory MDL in soil samples ESW-1 @ 18', SSW-1 @ 18', SSW-2 @ 18', SSW-3 @ 18', and NSW-3 @ 18' to 7,540 mg/Kg in soil sample WSW-3 @ 18'. Based on the analytical results, additional excavation and delineation was warranted in the areas represented by soil samples ESW-2 @ 18', ESW-3 @ 18', ESW-4 @ 18', and NSW-1 @ 18'. A summary of Concentrations of BTEX and TPH in Soil is provided as Table 1. Please refer to Figure 2 for locations of the soil samples. Laboratory analytical reports are provided on the enclosed data disk.

As previously discussed, soil samples WSW-1 @ 18' through WSW-4 @ 18' were collected from the west sidewall of the initial excavation, which is located approximately fifteen (15) to twenty (20) feet east of Maddox Road. The analytical results indicated the west sidewall soil samples (WSW-1 @ 18' through WSW-4 @ 18') exhibited TPH concentrations in excess of the NMOCD regulatory guidelines. Due to safety concerns associated with excavation near Maddox Road, an investigation trench (W Trench) was advanced on November 5, 2013. The investigation trench was located on the west side of Maddox Road and excavated to a depth of approximately eighteen (18) feet bgs (See Figure 2). Soil samples were collected at five (5), ten (10), fifteen (15) and eighteen (18) feet bgs. The analytical results indicated benzene, BTEX and TPH concentrations were less than the appropriate laboratory MDL in each of the submitted soil samples. Refer to Figure 2 for locations of the soil samples.

On September 12, 2013, eight (8) excavation floor soil samples (Floor-1 @ 19' through Floor-8 @ 19') were collected and submitted to the laboratory for determination of concentrations of BTEX and TPH. The analytical results indicated benzene concentrations were less than the appropriate laboratory MDL in all of the submitted soil samples. BTEX concentrations ranged from less than the appropriate laboratory MDL in soil sample Floor-1 @ 19' and Floor-2 @ 19' to 58.8 mg/Kg in soil sample Floor-5 @ 19'. TPH concentrations ranged from less than the appropriate laboratory MDL in soil samples Floor-1 @ 19' and Floor-2 @ 19' to 7,390 mg/Kg in soil sample Floor-6 @ 19'. Refer to Figure 2 for locations of the soil samples.

On October 8, 2013, additional delineation activities were conducted in the areas represented by soil samples ESW-2 @ 18', ESW-3 @ 18', ESW-4 @ 18' and NSW-1 @ 18'. A trackhoe was used to excavate approximately one (1) foot horizontally into the initial excavation sidewall. Soil samples were collected at

two (2), ten (10) and eighteen (18) feet bgs in each of the areas of concern, with the exception of the area represented by soil sample ESW-4, which required an excavation of five (5) feet horizontally into the excavation sidewall. The analytical results confirmed benzene, BTEX, and TPH concentrations were delineated to less than the appropriate laboratory MDL in each of the areas of concern.

As of June 11, 2014, approximately 14,412 cubic yards of impacted soil had been transported to C&C Landfarm in Monument, New Mexico. Approximately 1,500 cubic yards of soil stockpiled on site and represented by composite soil samples SP-1, SP-2 and NE Ramp SP has been analyzed for concentrations of BTEX and TPH. The analytical results indicated concentrations of benzene and BTEX were less than the laboratory MDL in each of the three (3) submitted composite soil samples. TPH concentrations ranged from less than the laboratory MDL in composite soil sample "NE Ramp SP" to 26.2 mg/Kg in composite soil sample SP-1. Based on the analytical results, the soil represented by soil samples SP-1, SP-2, and NE Ramp SP exhibited BTEX and TPH concentrations less than the NMOCD regulatory guidelines and will be utilized as backfill material.

On June 16, 2014, Plains representatives met with a representative of the NMOCD in the NMOCD – Santa Fe Office. The Plains representatives submitted and received NMOCD approval for the "Interim Remediation Summary and Amended Proposed Closure Strategy" (2014 Work Plan) dated June 11, 2014. Please reference the 2014 Work Plan for details.

On June 26, 2014, Plains representatives and an NMOCD representative, met with Mr. Jimmie Cooper (Landowner) at the Site. The Plains representatives presented the details of 2014 Work Plan to the landowner. The NMOCD representative was present to answer the landowners' questions, concerns and provide regulatory guidance.

On conclusion of the meeting, the Landowner requested the excavation continue to the groundwater interface. To differentiate initial excavation activities (surface to nineteen (19) feet bgs) from additional landowner requested excavation activities (nineteen (19) feet bgs to groundwater interface), the excavation activities which commenced on July 23, 2014 will be referred to as "Stage 2 Excavation Activities".

On July 14, 2014, remediation activities resumed at the Release Site. The Regency, formerly SUGS four (4) inch pipeline and the "soil plug" supporting the pipeline was removed after the pipeline was re-routed by Regency. Following the removal of the pipeline from the excavation, Regency transported the pipe off-site. The soil removed from the soil plug was stockpiled outside the excavation and on July 23, 2014, a soil sample (SP-6) was collected and analyzed by the laboratory. The analytical results indicated the soil sample exhibited a benzene concentration less the laboratory MDL and the BTEX concentration was 0.00625 mg/Kg. The soil sample exhibited a TPH concentration of 808.6 mg/Kg and the stockpile was transported to C&C Landfarm for disposal.

Due to the depth of groundwater (approximately thirty (30) feet bgs) at the Site, excavation equipment could not excavate to the groundwater interface from the ground surface. As an alternative, ramps were cut into the excavation sidewalls to allow excavation equipment to conduct the Stage 2 Excavation Activities from the initial excavation floor at approximately nineteen (19) feet bgs.

On July 23, 2014, Stage 2 Excavation Activities commenced at the southern end of initial excavation floor and worked toward the north. Impacted soil was excavated and stockpiled adjacent to the excavation and a composite soil sample (SP-7) was collected from the stockpile. The analytical results indicated benzene

concentrations were less than the laboratory MDL and BTEX concentrations were 0.0594 mg/Kg. The TPH concentration of soil sample SP-7 was 3,650 mg/Kg and based the TPH concentration the soil represented by soil sample SP-7 the stockpile was transported to C&C Landfarm. Based on visual and olfactory observations and the analytical results of soil sample SP-7, additional soil samples were not collected from the soil stockpiles generated from the Stage 2 Excavation Activities. Impacted soil excavated from the Stage 2 Excavation Activities was transported to C&C Landfarm.

To allow the excavation equipment to “swing” during the Stage 2 Excavation Activities, the east and south sidewalls were over-excavated to the east and south of the initial excavation to a depth of nineteen (19) feet bgs. The over-excavation of the sidewalls created a twelve (12) foot wide bench which allowed excavation equipment to safely and efficiently conduct Stage 2 Excavation Activities to the groundwater interface. Over-excavated soil from the sidewalls and installation of the ramps was stockpiled adjacent to the excavation and confirmation composite soil samples (SP-4, SP-5, East Wall Stockpile (SP-8), SP-9, SP-10, SP-11, and SP-12) were collected from the stockpiles and submitted to the laboratory for BTEX and TPH analysis. Based on the analytical results, soil stockpiles represented by soil samples SP-5, East Wall Stockpile (SP-8), SP-9, SP-10, SP-11, and SP-12 exhibited BTEX and TPH concentrations less than the NMOCD regulatory guidelines and were deemed suitable as backfill material. Based on the analytical results, soil stockpiles exhibiting BTEX and TPH concentrations less than the NMOCD regulatory guidelines were moved to the north end of the Site and combined into a large bulk stockpile for use as backfill material. The soil stockpile represented by soil sample SP-4 exhibited a TPH concentration of 105 mg/Kg and was transported to C&C Landfarm. On or about November 5, 2014, Stage 2 Excavation Activities were completed.

In addition, during the Stage 2 Excavation Activities (July 14, through November 5, 2014), approximately 9,924 cubic yards of impacted soil was transported to C&C Landfarm in Monument, New Mexico. Approximately 3,000 cubic yards of soil stockpiled on site and represented by composite soil samples SP-5, East Wall Stockpile (SP-8), and SP-9 through SP-12) was analyzed for concentrations of BTEX and TPH and moved to the bulk soil stockpile.

Since project inception, a total of approximately 24,336 cubic yards of impacted soil was transported to C&C Landfarm. A total of approximately 4,500 cubic yards of soil deemed suitable for backfill by analysis was stockpiled at the north end of the site.

During and after the completion of the Stage 2 Excavation Activities, phase-separated hydrocarbons (PSH) were observed on the groundwater within the excavation. A vacuum truck was utilized to periodically remove the PSH and dissolved phase impacted groundwater. As of March 31, 2015, approximately 10,206 bbls of water and PSH were removed from the groundwater within the excavation. The volume of PSH recovered from the trenches and excavation cannot be accurately determined.

Based on the analytical results of excavation soil samples, field observations, and NMOCD approval, Plains proposes the following activities designed to progress the Monument 18 Release Site toward an NMOCD approved soil closure status:

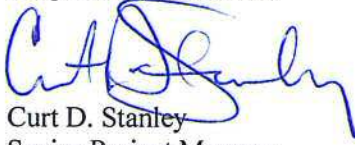
- Approximately one (1) foot of gravel or equivalent material will be placed in the western half of the excavation to reestablish the natural groundwater flow.

- Prior to backfilling activities, up to three (3) recovery sumps will be installed along the west sidewall of the excavation. The sumps will provide additional recovery points, should residual PSH be observed on the groundwater
- Commence excavation backfill activities, utilizing backfill material purchased from the Landowner and soil deemed suitable as backfill through laboratory analysis.
- Reestablish monitor wells MW-4 and MW-8 as backfilling activities proceed.
- The excavation will be backfilled and compacted in eighteen (18) inch lifts to minimize future settling of the soil within the excavation footprint. Following backfill activities, the surface of the excavation will be contoured to fit the surrounding topography. The Release Site will be reseeded with vegetation acceptable to the landowner at a time of the landowner's choosing.
- Following the completion of the proposed activities, a "Remediation Summary and Soil Closure Request" will be prepared and submitted to the NMOCD - Santa Fe Office. Groundwater monitoring and sampling activities will continue until the NMOCD approves cessation of these activities. An "Annual Monitoring Report" will be submitted to the NMOCD by April 1st of each year.

Plains is prepared to begin the activities outlined in this Work Plan on NMOCD approval.

If you have any questions, or if additional information is required, please feel free to call me at 432-520-7720 (office) or 432-559-3296 (cell) or Camille Bryant (Plains) at 575-441-1099.

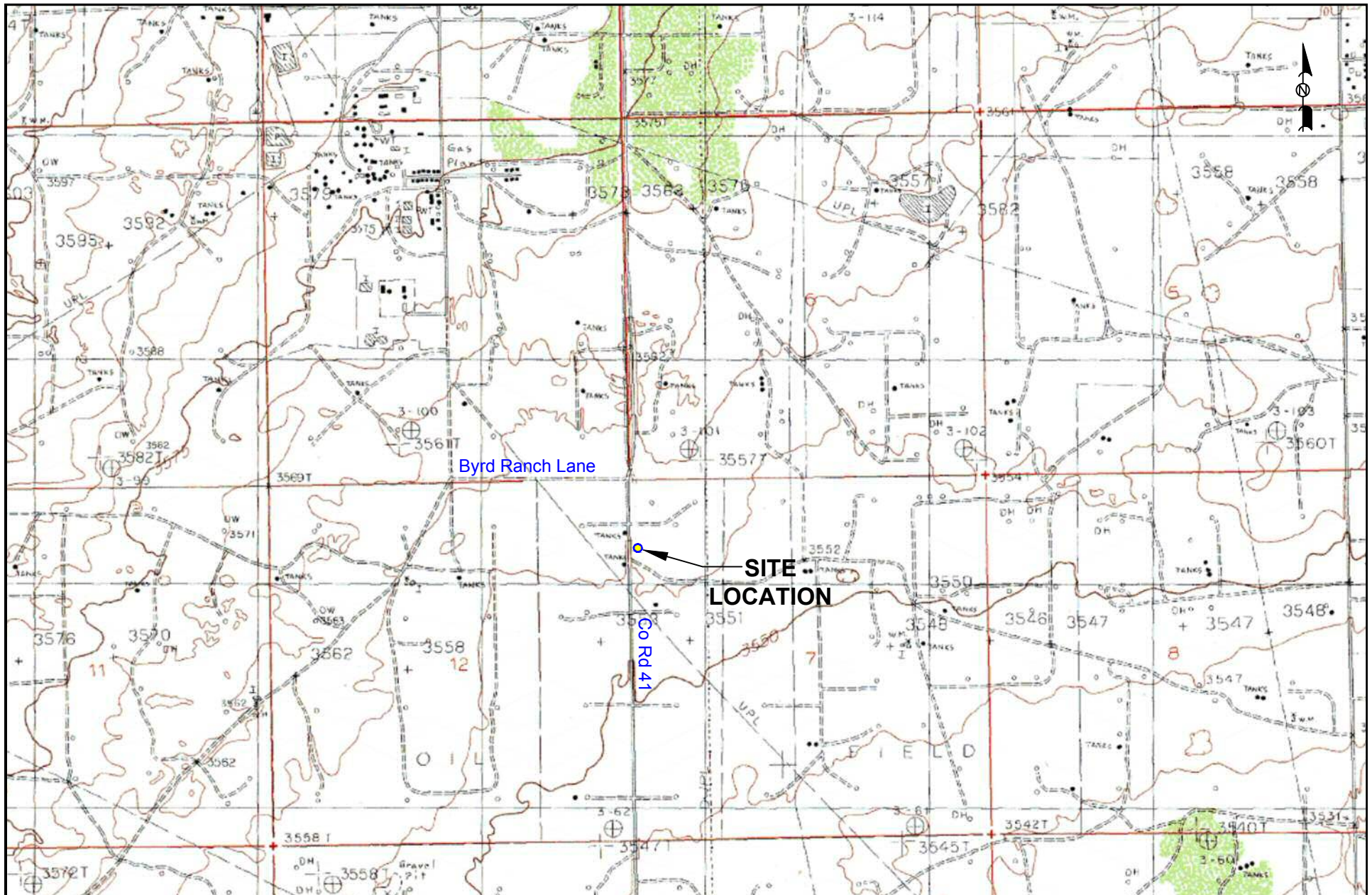
Respectfully submitted,


Curt D. Stanley
Senior Project Manager
TRC Solutions, Inc.

Attachments:

Figure 1 - Site Location Map
Figure 2 - 2014 Excavation Map
Table 1 - Concentrations of BTEX and TPH in Soil
Attachment A - Limitations
Attachment B - Release Notification and Corrective Action (NMOCD Form C-141)
Laboratory Analytical Reports on enclosed data disk

cc: Dr. Tomas Oberding, NMOCD - Santa Fe
NMOCD - Hobbs District Office
Jeff Dann, Plains Marketing, L.P.
Camille Bryant, Plains Marketing, L.P.
File



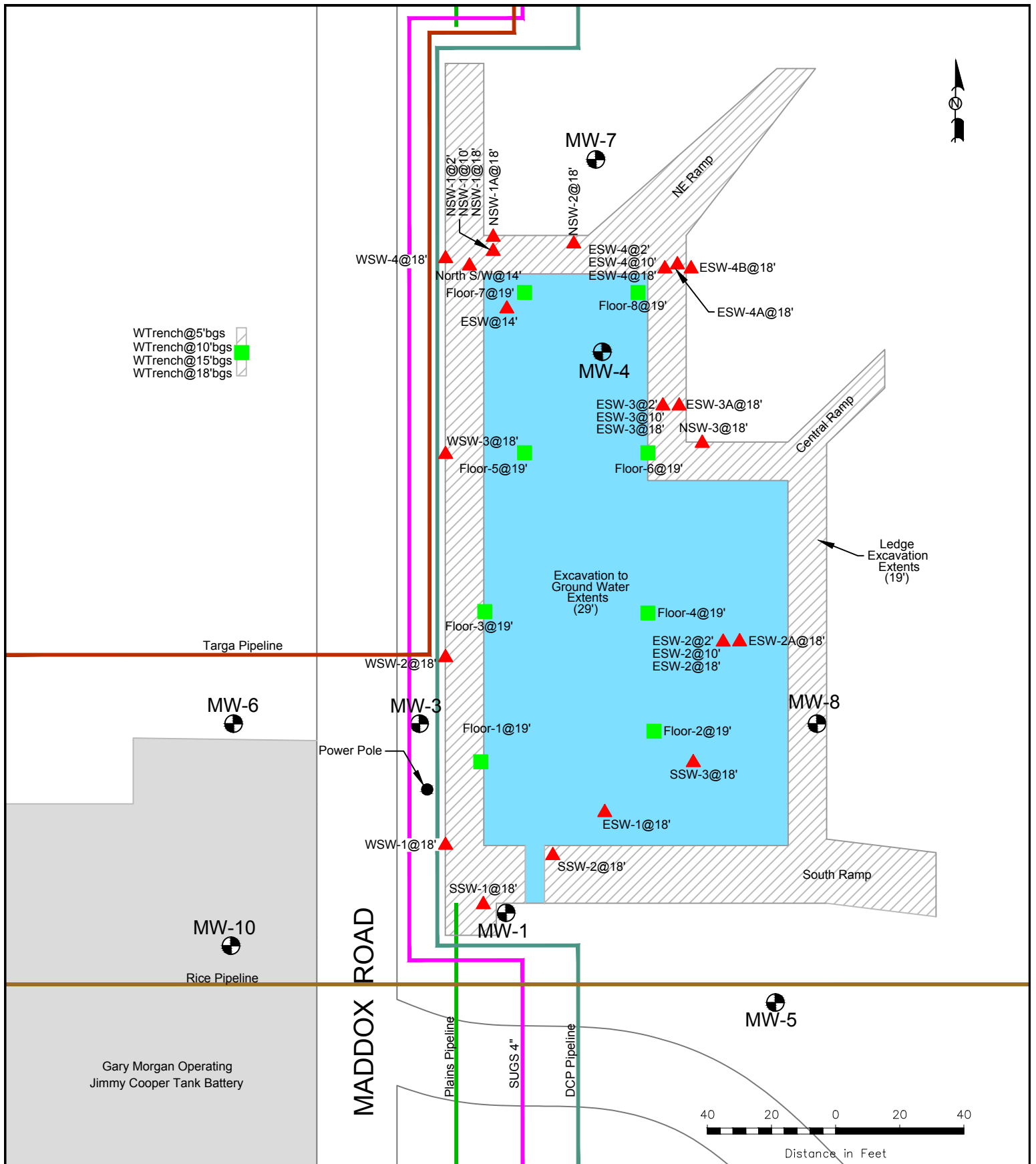
LEGEND:

2000 1000 0 1000 2000
Distance in Feet

Figure 1
Site Location Map
Plains Marketing, L.P.
Monument 18
NMOCD Reference # 1RP-124-0
Lea County, NM

Scale: 1" = 2000'
CAD By: TA
Checked By: CS
Draft: February 24, 2015
Lat. N 32° 35' 30.37" Long. W 103° 17' 58.68"
NW1/4 NW1/4 Sec 7 T20S R37E

TRC
2057 Commerce Drive
Midland, Texas 79703
432.520.7720



LEGEND:
 ● Monitor Well Location
 ■ Floor Soil Sample Location
 ▲ Sidewall Soil Sample Location
 — Pipeline
 — Proposed Sidewall Excavation

Figure 2
 October 2014
 Excavation Map
 Plains Marketing, L.P.
 Monument 18
 Lea County, NM

Scale: 1" = 40'
 CAD By: TA
 Checked By: CS
 Draft: May 6, 2015
 Lat. N 32° 35' 30.73" Long. W 103° 17' 56.26"
 NW1/4 NW1/4 Sec 7 T20S R37E

TRC
 2057 Commerce Drive
 Midland, Texas 79703
 432.520.7720

TABLE 1
CONCENTRATIONS OF BTEX AND TPH IN SOIL

MONUMENT #18
PLAINS MARKETING, L.P.
LEA COUNTY, NM
NMOCD Reference # 1RP-0124
PLAINS SRS NUMBER: TNM MONUMENT 18-KNOWN

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	Methods: EPA SW 846-8021B, 5030					Methods:			
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	m,p,o-XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M			
								GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TPH (mg/Kg)
MW 18-8	07/15/98	0 - 2'	<0.020	<0.020	<0.020	<0.040	<0.020	-	-	-	9.6
MW 18-8	07/15/98	8' - 10'	<0.020	<0.020	<0.020	<0.040	<0.020	-	-	-	7.3
MW 18-8	07/15/98	28' - 30'	<0.020	<0.020	<0.020	<0.040	<0.020	-	-	-	15.6
MW-9	11/04/04	10'	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	<1	<50	-	<50
MW-9	11/04/04	20'	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	<1	<50	-	<50
MW-9	11/04/04	30'	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	<1	<50	-	<50
MW-10	11/04/04	15'	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	<1	<50	-	<50
MW-10	11/04/04	30'	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	<1	<50	-	<50
North S/W @ 14'	07/12/13	14'	<0.00199	<0.00398	<0.00199	<0.00398	<0.00398	<14.9	<14.9	<14.9	<14.9
ESW @ 14'	07/24/13	14'	<0.00100	0.00245	0.00385	0.0133	0.0196	15.8	119	29.1	164
SP-1	08/14/13	N/A	<0.000992	<0.00198	<0.000992	<0.000992	<0.00198	<15.0	26.2	<15.0	26.2
SP-2	08/14/13	N/A	<0.000992	<0.00198	<0.000992	<0.000992	<0.00198	<15.0	22.1	<15.0	22.1
NE Ramp SP	09/12/13	N/A	<0.00132	<0.00263	<0.00132	<0.00263	<0.00263	<19.8	<19.8	<19.8	<19.8
Central Ramp	09/12/13	N/A	<0.00131	<0.00262	<0.00131	<0.00262	<0.00262	<19.7	<19.7	<19.7	<19.7
ESW-1 @ 18'	09/12/13	18'	<0.00117	<0.00233	<0.00117	<0.00233	<0.00233	<17.5	<17.5	<17.5	<17.5
ESW-2 @ 18'	09/12/13	18'	<0.00111	<0.00222	<0.00111	<0.00222	<0.00222	<16.8	611	<16.8	611

TABLE 1
CONCENTRATIONS OF BTEX AND TPH IN SOIL

MONUMENT #18
PLAINS MARKETING, L.P.
LEA COUNTY, NM
NMOCD Reference # 1RP-0124
PLAINS SRS NUMBER: TNM MONUMENT 18-KNOWN

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	Methods: EPA SW 846-8021B, 5030					Methods:			
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	m,p,o-XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M			
								GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TPH (mg/Kg)
ESW-3 @ 18'	09/12/13	18'	<0.00108	<0.00216	<0.00108	<0.00216	<0.00216	<16.2	981	<16.2	981
ESW-4 @ 18'	09/12/13	18'	<0.00108	<0.00217	<0.00108	<0.00217	<0.00217	<81.4	884	<81.4	884
SSW-1 @ 18'	09/12/13	18'	<0.00111	<0.00222	<0.00111	<0.00222	<0.00222	<16.7	<16.7	<16.7	<16.7
SSW-2 @ 18'	09/12/13	18'	<0.00114	<0.00229	<0.00114	<0.00229	<0.00229	<17.2	<17.2	<17.2	<17.2
SSW-3 @ 18'	09/12/13	18'	<0.00112	<0.00224	<0.00112	<0.00224	<0.00224	<16.8	<16.8	<16.8	<16.8
NSW-1 @ 18'	09/12/13	18'	<0.00110	<0.00220	<0.00110	<0.00220	<0.00220	79.0	1,450	<16.5	1,530
NSW-2 @ 18'	09/12/13	18'	<0.00110	<0.00219	<0.00110	<0.00219	<0.00219	<16.4	80.8	<16.4	80.8
NSW-3 @ 18'	09/12/13	18'	<0.00103	<0.00206	<0.00103	<0.00206	<0.00206	<15.5	<15.5	<15.5	<15.5
WSW-1 @ 18'	09/12/13	18'	<0.00114	<0.00228	0.00478	0.0338	0.0386	299	1,320	<17.2	1,620
WSW-2 @ 18'	09/12/13	18'	<0.00117	<0.00233	<0.00117	<0.00233	<0.00233	279	1,230	<17.4	1,510
WSW-3 @ 18'	09/12/13	18'	<0.00118	0.00312	0.0395	0.188	0.0231	2,060	5,480	<88.1	7,540
WSW-4 @ 18'	09/12/13	18'	<0.00115	<0.00230	0.023	0.371	0.394	1,470	4,320	<17.4	5,790
Floor-1 @ 19'	09/12/13	19'	<0.00124	<0.00248	<0.00124	<0.00248	<0.00248	<18.6	<18.6	<18.6	<18.6
Floor-2 @ 19'	09/12/13	19'	<0.00117	<0.00234	<0.00117	<0.00234	<0.00234	<17.6	<17.6	<17.6	<17.6
Floor-3 @ 19'	09/12/13	19'	<0.00117	<0.00234	0.257	0.291	0.548	1,110	3,610	<17.7	4,720
Floor-4 @ 19'	09/12/13	19'	<0.00118	<0.00236	0.00319	0.0115	0.0147	71.4	210	<17.8	281
Floor-5 @ 19'	09/12/13	19'	<0.0588	<0.118	17.4	41.4	58.8	1,130	2,230	<88.2	3,360
Floor-6 @ 19'	09/12/13	19'	<0.0221	<0.0441	4.14	7.72	11.9	1,170	6,220	<83.1	7,390
Floor-7 @ 19'	09/12/13	19'	<0.0257	<0.0514	1.97	5.78	7.75	583	1,470	<19.2	2,050
Floor-8 @ 19'	09/12/13	19'	<0.00109	<0.00218	0.0255	0.0404	0.0659	247	3,920	<16.4	4,170
ESW-2 @ 2'	10/08/13	2'	<0.00106	<0.00211	<0.00106	<0.00211	<0.00211	<15.8	<15.8	<15.8	<15.8
ESW-2 @ 10'	10/08/13	10'	<0.00126	<0.00252	<0.00126	<0.00252	<0.00252	<19.0	<19.0	<19.0	<19.0

TABLE 1
CONCENTRATIONS OF BTEX AND TPH IN SOIL

MONUMENT #18
PLAINS MARKETING, L.P.
LEA COUNTY, NM
NMOCD Reference # 1RP-0124
PLAINS SRS NUMBER: TNM MONUMENT 18-KNOWN

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	Methods: EPA SW 846-8021B, 5030					Methods: EPA SW 846-8015M			
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	m,p,o-XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TPH (mg/Kg)
ESW-2A @ 18'	10/08/13	18'	-	-	-	-	-	<18.6	<18.6	<18.6	<18.6
ESW-3 @ 2'	10/08/13	2'	<0.00102	<0.00204	<0.00102	<0.00204	<0.00204	<15.3	<15.3	<15.3	<15.3
ESW-3 @ 10'	10/08/13	10'	<0.00101	<0.00203	<0.00101	<0.00203	<0.00203	<15.2	<15.2	<15.2	<15.2
ESW-3A @ 18'	10/08/13	18'	-	-	-	-	-	<16.7	<16.7	<16.7	<16.7
NSW-1 @ 2'	10/08/13	2'	<0.00101	<0.00202	<0.00101	<0.00202	<0.00202	<15.1	<15.1	<15.1	<15.1
NSW-1 @ 10'	10/08/13	10'	<0.00101	<0.00202	<0.00101	<0.00202	<0.00202	<15.2	<15.2	<15.2	<15.2
NSW-1A @ 18'	10/08/13	18'	-	-	-	-	-	<18.8	<18.8	<18.8	<18.8
ESW-4 @ 2'	10/08/13	2'	<0.00106	<0.00212	<0.00106	<0.00212	<0.00212	<15.9	<15.9	<15.9	<15.9
ESW-4 @ 10'	10/08/13	10'	<0.00102	<0.00205	<0.00102	<0.00205	<0.00205	<15.3	<15.3	<15.3	<15.3
ESW-4A @ 18'	10/08/13	18'	-	-	-	-	-	31.3	1,440	<16.4	1,470
ESW-4B @ 18'	10/08/13	18'	-	-	-	-	-	<17.4	<17.4	<17.4	<17.4
W Trench @ 5' bgs	11/05/13	5'	<0.000996	<0.00199	<0.000996	<0.00199	<0.00199	<16.7	<16.7	<16.7	<16.7
W Trench @ 10' bgs	11/05/13	10'	<0.000994	<0.00199	<0.000994	<0.00199	<0.00199	<16.6	<16.6	<16.6	<16.6
W Trench @ 15' bgs	11/05/13	15'	<0.000990	<0.00198	<0.000990	<0.00198	<0.00198	<16.6	<16.6	<16.6	<16.6
W Trench @ 18' bgs	11/05/13	18'	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<17.3	<17.3	<17.3	<17.3
SP-4	07/23/14	-	<0.000996	<0.00199	0.00187	0.0120	0.013870	<15.3	105	<15.3	105
SP-5	07/23/14	-	<0.000998	<0.00200	<0.000998	0.00351	0.00351	<15.4	89	<15.4	89
SP-6	07/23/14	-	<0.000994	<0.00199	<0.000994	0.00625	0.00625	20.2	716	72.4	808.6
SP-7	07/23/14	-	<0.000996	<0.00199	0.0106	0.0488	0.0594	332	3,150	168	3,650
East Wall Stockpile	08/08/14	-	<0.00104	<0.00208	<0.00104	<0.00208	<0.00208	<15.6	60.3	<15.6	60.3
SP-9	08/19/14	-	<0.00102	<0.00203	<0.00102	<0.00203	<0.00203	<15.3	49.9	<15.3	49.3

TABLE 1
CONCENTRATIONS OF BTEX AND TPH IN SOIL

MONUMENT #18
PLAINS MARKETING, L.P.
LEA COUNTY, NM
NMOCD Reference # 1RP-0124
PLAINS SRS NUMBER: TNM MONUMENT 18-KNOWN

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	Methods: EPA SW 846-8021B, 5030					Methods:			
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	m,p,o- XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M			
								GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TPH (mg/Kg)
SP-10	08/19/14	-	<0.00102	<0.00204	<0.00102	<0.00204	<0.00204	<15.4	66.4	<15.4	66.4
SP-11	10/13/14	-	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<4.00	<50.0	<50.0	<50.0
SP-12	10/13/14	-	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<4.00	<50.0	<50.0	<50.0

LIMITATIONS

TRC Solutions, Inc. has prepared this Interim Remediation Summary and Revised Proposed Soil Closure Strategy to the best of its ability. No other warranty, expressed or implied, is made or intended.

TRC Solutions, Inc. has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. TRC Solutions, Inc. 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. TRC Solutions, Inc. has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. TRC Solutions, Inc. 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 TRC Solutions, Inc. and/or Plains.

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

☒ Initial Report ☐ Final Report

Name of Company	Plains Pipeline, LP	Contact:	Camille Reynolds
Address:	3705 E. Hwy 158, Midland, TX 79706	Telephone No.	505-441-0965
Facility Name	Monument # 18	Facility Type:	Pipeline

Surface Owner:	Mineral Owner	Lease No.
Jim B Cooper		

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	7	20S	37E					Lea

Latitude 32 degrees 35' 30.0" Longitude 103 degrees 17' 55.9"

NATURE OF RELEASE

Type of Release:	Volume of Release:	Volume Recovered
Source of Release:	Date and Hour of Occurrence	Date and Hour of Discovery
	Unknown	
Was Immediate Notice Given?	If YES, To Whom?	
Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required <input type="checkbox"/>		
By Whom?	Date and Hour	
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

NOTE: Texas-New Mexico Pipeline was the owner/operator of the pipeline system at the time of the release, initial response information is unavailable.

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.

		<u>OIL CONSERVATION DIVISION</u>	
Signature:		Approved by District Supervisor:	
Printed Name:	Camille Reynolds		
Title:	Remediation Coordinator	Approval Date:	Expiration Date:
E-mail Address:	cjreynolds@paalp.com	Conditions of Approval:	
Date: 3/21/2005	Phone: (505)441-0965	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary