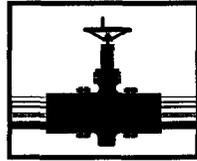


1R - 120

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

1997 - 2004



# PLAINS

MARKETING, L.P.

September 20, 2004

Mr. Ed Martin  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: Plains Marketing, L.P. (formerly Link Energy) Remediation Sites  
Various Locations in Lea County

Dear Mr. Martin:

Based on the results of our ongoing groundwater monitoring and sampling program at several of our remediation and groundwater monitoring sites in Lea County, we have identified the need for additional groundwater monitor and/or recovery wells at the flowing sites.

| Site Name                     | Plains EMS No. | Site Location            | Number of Wells |
|-------------------------------|----------------|--------------------------|-----------------|
| Jct 34 to Lea                 | 2002-10286     | Section 21, T20S, R37E   | 3               |
| Livingston Line-Bob McCasland | 2001-11043     | Section 3, T21S, R37E    | 2               |
| Hugh Gathering                | 2002-10235     | Section 11, T21S, R37E   | 1               |
| C. S. Cayler                  | 2002-10250     | Section 6, T17S, R37E    | 5               |
| Lovington Deep 6-Inch         | 2002-1-312     | Section 6, T21S, R36E    | 6               |
| Kimbrough Sweet               | 2000-10757     | Section 3, T18S, R37E    | 2               |
| 8" Moore to Jal #1            | 2002-10270     | Section 16, T17S, R37E   | 3               |
| 8" Moore to Jal #2            | 2002-10273     | Section 16, T17S, R37E   | 3               |
| Darr Angell #1                | Darr Angell #1 | Section 11, T15S, R37E   | 1               |
| Darr Angell #4                | 2001-10876     | Section 2/11, T15S, R37E | 2               |
| Red Byrd #1                   | Red Byrd #1    | Section 1, T19S, R36E    | 5               |
| HDO 90-23                     | HDO 90-23      | Section 6, T20S, R37E    | 2               |
| Monument 6" Pipeline          | 2001-11056     | Section 5, T20S, R37E    | 3               |
| Texaco Skelly F               | 2002-11229     | Section 21, T20S, R37E   | 1               |
| SPS-11                        | SPS-11         | Section 18, T18S, R36E   | 2               |
| Monument #11                  | TNM Mon #11    | Section 30, T19S, R37E   | 2               |
| Monument #2                   | TNM Mon #2     | Section 6, T20S, R37E    | 1               |
| Monument #17                  | TNM Mon #17    | Section 29, T19S, R37E   | 1               |
| Monument #18                  | TNM Mon #18    | Section 7, T20S, R37E    | 2               |
| 98-05A                        | TNM 98-05A     | Section 26, T21S, R37E   | 1               |
| LF-59                         | LF-59          | Section 32, T19S, R37E   | 2               |

The proposed well locations are illustrated on the attached site maps. Plains requests your approval of the proposed monitor well locations at the above-referenced sites. We anticipate commencement of drilling activities the week of October 4, 2004.

Should you have any questions or comments concerning this information, please contact me at (713) 646-4657.

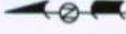
Sincerely,



Jeffrey P. Dann, P.G.  
Sr. Environmental Specialist  
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM  
Camille Reynolds, Plains  
Todd Choban, Nova  
Pat McCasland, EPI

File: c:\jeff-files/OCD-DrillingSchOct2004



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

PMW

MW-4

PMW

MW-2

MW-3

MW-1

Road



Proposed Monitor Well

Figure 3  
Site Map

Plains Pipeline, L.P.  
Monument 11  
Lea County, NM



NOVA Safety and Environmental

|                                  |                                |                 |
|----------------------------------|--------------------------------|-----------------|
| Scale: 1" = 60'                  | Prep By: CS                    | Checked By: TCC |
| September 2, 2004                | SE 1/4 NE 1/4 Sec 30 T18S R07E |                 |
| 32° 30' 07.2" N 103° 16' 58.0" W |                                |                 |



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

3600.00

3599.50

3599.00

0.012 ft/ft

PMW

MW-4  
(3600.22)

MW-3  
(3599.09)

MW-2  
(3599.34)

MW-1  
(3598.73)

PMW

Road



Monitor Well Location  
 Groundwater Elevation Contour  
 (3599.10) Groundwater Elevation

0.012 ft/ft  
 Gradient Direction And Magnitude  
 Proposed Monitor Well

PMW

Figure 2D  
 Inferred Groundwater  
 Gradient Map  
 12/15/03  
 Plains Pipeline, L.P.  
 Monument 11  
 Lea County, NM

**NOVA**  
 NOVA Safety and Environmental

|                                  |                               |                 |
|----------------------------------|-------------------------------|-----------------|
| Scale: 1" = 60'                  | Prep By: CS                   | Checked By: TAC |
| March 18, 2004                   | SE 1/4 NE 1/4 Sec 30 T9S R02E |                 |
| 32° 36' 07.2" N 102° 18' 58.0" W |                               |                 |



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor

April 28, 2004

**Joanna Prukop**  
Cabinet Secretary  
Acting Director  
Oil Conservation Division

Mr. Robert B. Eidson  
Environmental Technology Group, Inc.  
2540 West Marland  
Hobbs, NM 88240

IR-120

RE: Your "Annual Sampling and Quarterly Gauging of Groundwater Monitor Wells Meeting Regulatory Clean-up Standards" letter dated March 25, 2004

Sampling of the below-listed monitor wells may be done in the timeframes indicated:

Darr Angell #1: MW-4, 11, 15, 16, 19, and 20 may be sampled annually; MW-7 may be sampled semi-annually.

Darr Angell #2: MW-1, 5, 6, 7, 8, 9, and 10 may be sampled annually; MW-3, and 4 may be sampled semi-annually.

Darr Angell #4: MW-1, 2, 4, 5, 7, and 12 may be sampled annually; MW-9 may be sampled semi-annually.

HDO 90-23: MW-1, 7, and 8 may be sampled annually; MW-4, and 5 may be sampled semi-annually.

LF-37: MW-1, 2, 5, 6, 7, 8, and 9 may be sampled annually; MW-4 may be sampled semi-annually.

LF-59: MW-3, 5, and 6 may be sampled annually; MW-7 may be sampled semi-annually.

Monument 2: MW-6, and 7 may be sampled annually; MW-4 may be sampled semi-annually.

Monument 10: MW-4 may be sampled annually; MW-6, and 7 may be sampled semi-annually.

Monument 11: MW-1, 2, and 3 may be sampled annually.

Monument 17: MW-5, and 8 may be sampled annually. MW-4, and 6 may be sampled semi-annually.

Monument 18: MW-2, 6, 7, and 8 may be sampled annually. MW-5 may be sampled semi-annually.

TNM 97-04: MW-1, 7, 8, 10, and 12 may be sampled annually.

TNM 97-17: MW-1, 3, 11, 12, 13, 16, 17, 18, and 28 may be sampled annually. MW-22, 23, 24, 25, and 27 may be sampled semi-annually.

TNM 97-18: MW-1, 8, 9, 11, 12, 13, 14, 15, 16, 19, 20, and 21 may be sampled annually. MW-22, 26, 28, 29, and 30 may be sampled semi-annually.

TNM 97-23: MW-1, 2, 3, and 5 may be sampled annually.

TNM 98-05: MW-3, and 4 may be sampled annually.

TNM 98-05A: MW-5, and 8 may be sampled annually. MW-6, and 7 may be sampled semi-annually.

SPS-11: MW-2, 3, 13, 19, 20, 21, 22, 25, 27, 30, and 31 may be sampled annually. MW-10, and 18 may be sampled semi-annually.

Conditions:

1. Gauging of all monitor wells will continue on a quarterly basis.
2. A request for a change in sampling frequency for any other monitor wells must be made specifically for those wells. This approval of annual and semi-annual sampling for the above wells does not constitute a "blanket" approval for any other monitor well not shown above.

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

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script, appearing to read "Ed Martin".

Ed Martin  
Environmental Bureau

March 25, 2004

Mr. Ed Martin  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**RE: Annual sampling and quarterly gauging of groundwater monitor wells meeting regulatory cleanup standards.**

Mr. Martin:

Environmental Technology Group, Inc. (ETGI) for Link Energy is requesting that the groundwater sampling schedule of the wells listed below be changed from a quarterly to an annual sampling schedule. Quarterly gauging will continue on all site monitor wells during the regularly scheduled monitoring events. Benzene and total BTEX concentrations have been below regulatory standards in all of the monitor wells listed below for at least eight consecutive monitoring periods:

- ✓ HDO 90-23: MW-1, 4, 5, 7 and 8;
- ✓ LF-37: MW-1, 2, 4, 5, 6, 7, 8 and 9;
- ✓ LF-59: MW-3, 5, 6 and 7;
- ✓ Monument 2: MW-4, 6 and 7;
- ✓ Monument 10: MW-1, 4, 5, 6 and 7;
- ✓ Monument 11: MW-1, 2 and 3;
- ✓ Monument 17: MW-4, 5, 6 and 8;
- ✓ Monument 18: MW-2, 5, 6, 7 and 8;
- ✓ TNM 97-04: MW-1, 7, 8, 10 and 12;
- ✓ TNM97-17: MW-1, 3, 11, 12, 13, 16, 17, 18, 22, 23, 24, 25, 27 and 28;
- ✓ TNM 97-18: MW-1; + E-mail
- ✓ TNM 97-23: MW-1, 2, 3 and 5;
- ✓ TNM 98-05: MW-3 and 4;
- ✓ TNM 98-05A: MW-5, 6, 7 and 8;
- ✓ SPS-11: MW-2, 3, 13, 15, 18, 19, 20, 21, 22, 25, 27, 30 and 31. + E-mail (#10)

As additional monitor wells meet the eight consecutive monitoring events requirement with concentrations below regulatory standards we will formally request that they too be sampled on an annual basis.

DRAFT

Please contact me with any questions you have concerning ETGI's proposed groundwater sampling schedule at these sites.

Sincerely;

Robert B. Edison  
Geologist / Senior Project Manager  
ETGI, Hobbs, New Mexico

(505) 397-4882 office phone  
(505) 631-2974 cell  
(505) 397-4701 fax

**From:** Robert Eidson [reidson@etgi.cc]  
**Sent:** Tuesday, April 27, 2004 10:53 AM  
**To:** Ed Martin  
**Subject:** Groundwater sampling frequency letter  
Ed:  
The letter is attached for your reference.

Tabulated analytical results are included in all of the Annual Groundwater Monitoring reports. The Figure 3's should also be helpful in determining sampling frequency changes. Of those sites which show only seven consecutive quarters of acceptable groundwater sampling results, I checked the first quarter results of this year to meet the requirement (8). All wells will continue to be gauged during each sampling event.

- ✓ At the **Darr Angell 1 site (AP-07)** we would like to sample monitor wells MW-4, 7, 11, 15, 16, 19 and 20 annually.
- ✓ At the **Darr Angell 2 site (AP-07)** we would like to sample monitor wells MW-1, 3, 4, 5, 6, 7, 8, 9 and 10 annually.
- ✓ At the **Darr Angell 4 site (AP-07)** we would like to sample monitor wells MW-1, 2, 4, 5, 7, 9 and 12 annually.

Additionally, we would like to add the following monitor wells to the list shown on the attached letter:

- ✓ At **TNM 97-18 (AP-13)** monitor wells MW-8, 9, 11, 12, 13, 14, 15, 16, 19, 20, 21, 22, 26, 28, 29 and 30. and SPS-11.
- ✓ At **SPS-11** monitor wells MW-10 and MW-19.

I will send the corresponding maps in groups to speed transmission and delivery.

Sincerely,  
Robert B. Eidson  
Geologist / Sr. Project Manager  
ETGI  
Hobbs, New Mexico  
505-397-4882 office  
505-397-4701 fax  
505-631-2974 cell

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For more information please visit <http://www.messagelabs.com/email>

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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

May 24, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051-3204**

Mr. Glen Waldrop  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
Midland, Texas 79702

**RE: MONUMENT SITE #11  
LEA COUNTY, NEW MEXICO**

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership (EOTT) February 16, 2000 "MONUMENT SITE 11, LEA COUNTY, NEW MEXICO". This document contains additional information on the results of EOTT's investigation of the extent of soil and ground water contamination related to a crude oil pipeline spill at the Monument Site #11 in response to the OCD's December 27, 1999 request for information.

The above referenced document does not provide all of the information requested by the OCD. As stated in the OCD's December 27, 1999 correspondence, in order to complete a review of EOTT's October 22, 1999 recommendations, the OCD requires that EOTT submit the following information:

1. In the OCD's May, 5, 1999 approval of EOTT's site investigation work plan the OCD required that EOTT install an additional monitor well at soil boring location B11-10 to determine the ground water quality at the source of the contamination. The site map provided in EOTT's October 22, 1999 document does not show the location of the prior spills or the location of the new monitor wells in relation to the spills and the prior site soil borings. Please provide the OCD with a map showing the location of the new monitor wells in relation to the site spills, any excavated or remediated areas and the prior site soil borings.
2. Prior site soil borings showed that high levels of soil contamination existed in the vicinity of soil boring B11-2. Were any soil remediation actions conducted in this area?
3. The document does not specify how EOTT will determine when contaminated soils in the vicinity of monitor well MW-4 have been remediated. Please provide this information.

Mr. Glen Waldrop  
May 24, 2000  
Page 2

Please submit the above information to the OCD Santa Fe Office by June 30, 2000 with a copy provided to the OCD Hobbs District Office. Submission of this information will allow the OCD to complete a review of EOTT's proposed recommendations for the site.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

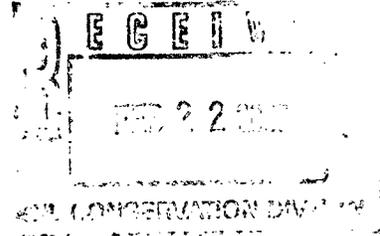


William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

# **EOTT ENERGY Pipeline Limited Partnership**

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-3761



February 16, 2000

State of New Mexico  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505  
Attn: William Olson

**RE: MONUMENT SITE #11  
LEA CO., NM**

Dear Mr. Olson:

As per your letter dated December 27, 1999, attached please find a site map showing the location of the prior spill, new monitor wells and previous soil borings at the above captioned location.

EOTT is in the process of reorganizing our Environmental Department. We recognize the importance of completing cleanup of this site, however, many of these sites are going to be reevaluated by our new group to determine the most economical and feasible method of cleanup.

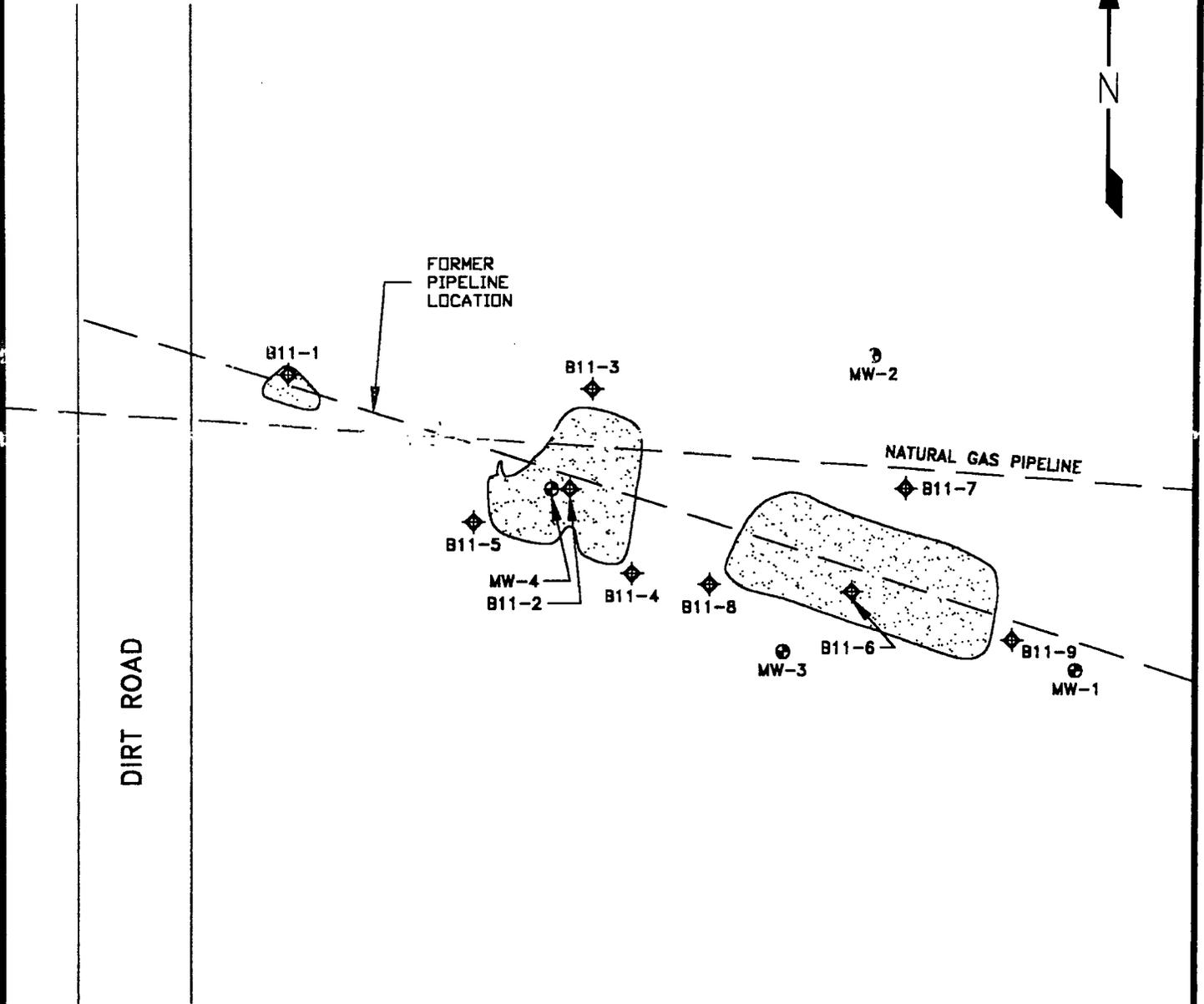
EOTT will keep the OCD informed on this project and we hope to begin soil remediation soon. I hope all meets with OCD approval but if you have any questions, please don't hesitate to call.

Sincerely,

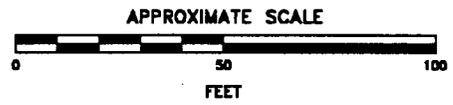
Lennah Frost  
Sr. Environmental Engineer

cc: Chris Williams - Hobbs

# SITE MAP



-  APPROXIMATE LOCATION OF SURFACE STAIN
-  KEI SOIL BORING
-  MONITOR WELL



EOOT TNM  
 MONUMENT SITE NO. 11  
 LEA COUNTY, NEW MEXICO

 **ENERCON SERVICES, INC.**  
 2775 VILLA CREEK, SUITE 120  
 DALLAS, TEXAS 75234  
 972/484-3854

DATE  
 AUG, 1999  
 PROJECT NO.  
 EOT-E99-2002

FIGURE  
 1



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

December 27, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-747**

Ms. Lennah Frost  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
Midland, Texas 79702

**RE: MONUMENT SITE #11  
LEA COUNTY, NEW MEXICO**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership (EOTT) October 22, 1999 "MONUMENT SITE 11, LEA COUNTY, NEW MEXICO". This document contains the results of EOTT's investigation of the extent of soil and ground water contamination related to a crude oil pipeline spill at the Monument Site #11. The document also contains EOTT's recommendations for remediation and monitoring of contaminated soils and ground water at the site.

The investigation actions taken to date are satisfactory. However, in order to complete a review of the above referenced recommendations, the OCD requires that EOTT submit the following information:

1. In the OCD's May, 5, 1999 approval of EOTT's site investigation work plan the OCD required that EOTT install an additional monitor well at soil boring location B11-10 to determine the ground water quality at the source of the contamination. The site map provided in EOTT's October 22, 1999 document does not show the location of the prior spills or the location of the new monitor wells in relation to the spills and the prior site soil borings. Please provide the OCD with a map showing the location of the new monitor wells in relation to the site spills, any excavated or remediated areas and the prior site soil borings.
2. Prior site soil borings showed that high levels of soil contamination existed in the vicinity of soil boring B11-2. Were any soil remediation actions conducted in this area?

Ms. Lennah Frost  
December 27, 1999  
Page 2

3. The document does not specify how EOTT will determine when contaminated soils in the vicinity of monitor well MW-4 have been remediated. Please provide this information.

Please submit the above information to the OCD Santa Fe Office by January 28, 2000 with a copy provided to the OCD Hobbs District Office. Submission of this information will allow the OCD to complete a review of EOTT's proposed recommendations for the site.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

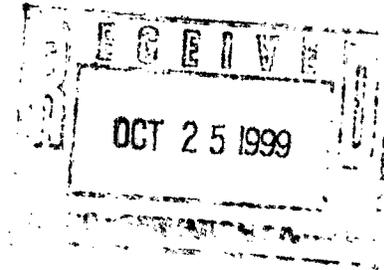


William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

# **EOTT ENERGY Pipeline Limited Partnership**

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-3761



**VIA CERTIFIED MAIL**  
**RETURN RECEIPT #Z470 651 233**

October 22, 1999

State of New Mexico  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505  
Attn: William Olson

**RE: MONUMENT SITE 11**  
**LEA COUNTY, NEW MEXICO**

Dear Mr. Olson:

Attached please find the groundwater delineation and assessment report for the above captioned leaksite. Based upon this assessment completed by our contractor, Enercon Services, Inc., we are recommending:

1. Insitu remediation of the impacted soil around MW-4.
2. Natural attenuation of the groundwater at the site.
3. Quarterly sampling of all monitor wells at the site until 4 consecutive quarters of clean water are achieved.

I hope all meets with OCD approval. If you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,

Lennah Frost  
Sr. Environmental Engineer

cc: Al Hugh - Environmental File  
NMOCD Hobbs District Office



5309 Wurzbach Suite 101  
San Antonio, Texas 78208  
(210) 680-3767  
(210) 680-3768 FAX

March 4, 1999

Mr. Tony Savoie  
TEXAS - NEW MEXICO PIPE LINE COMPANY  
P.O. Box 1030  
Jal, New Mexico 88252

RECEIVED

MAR 10 1999

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Re: Soil Boring B11-10  
Monument Site 11  
Unit A, Section 30, Township 19 South, Range 37 East  
Lea County, New Mexico  
KEI Job No. 610057-2-11

Dear Mr. Savoie:

Transmitted with this letter is the Subsurface Investigation Report for the installation of 1 soil boring at the referenced site. Please review the report and contact me or Theresa Nix at (210) 680-3767 if you have any questions.

Respectfully,

A handwritten signature in cursive script, appearing to read 'Monica Slentz', is written over a horizontal line.

Monica Slentz  
Project Manager

Enclosure

cc: Marc Oler; Equilon  
Bill Olson, OCD Santa Fe ✓  
OCD Hobbs



5309 Wurzbach, Suite 100  
San Antonio, Texas 78238  
(210) 680-3767  
(210) 680-3763 FAX

June 11, 1997

Mr. Tony Savoie  
TEXAS - NEW MEXICO PIPE LINE COMPANY  
P.O. Box 1030  
Jal, New Mexico 88252

RECEIVED

JUN 15 1998

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Re: Comprehensive Assessment Report  
Monument Site No. 11  
Lea County, New Mexico  
Job No. 610057-4-11

Dear Mr. Savoie:

Transmitted with this letter is the final copy of the Comprehensive Assessment Report for Monument Site No. 11, located in Lea County, New Mexico. The report satisfies item No. 9 of the OCD work plan approval letter dated August 16, 1996. One copy has been forwarded to OCD Hobbs and one to OCD Sante Fe.

Please call me at (210) 680-3767 if you have any questions or comments.

Respectfully,

*Daryl Stang*  
for

Theresa Nix  
Project Manager

Enclosure

cc: Marc Oler; TTTI  
Wayne Price, OCD Hobbs  
William Olson, OCD Sante Fe ✓