

1R - 120

REPORTS

DATE:

6/22/2005



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

June 22, 2005

Ms. Camille Reynolds
Plains Pipeline
3112 West Highway 82
Lovington, NM 88260

Re: 2004 Annual Monitoring Report
Monument 11 Release Site
SW/4 NE/4 of Section 28, Township 20 South, Range 37 East
Lea County, New Mexico
Plains EMS Number: TNM 97-18-Known
NMOCD Reference 1R-120

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the above report submitted on behalf of Plains Marketing, L.P. (Plains) by Nova Safety and Environmental and dated April 2005. This report is accepted with the following understandings and conditions:

1. Quarterly sampling and annual reporting will continue throughout 2005.
2. Passive product recovery will continue throughout 2005.
3. Return of monitor well MW-1 to quarterly sampling is approved. Further, annual sampling is approved should this well exhibit two consecutive sampling events below NMOCD standards.

NMOCD acceptance does not relieve Plains of responsibility should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other federal, state, or local governmental entity.

If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Cc: NMOCD, Hobbs



PLAINS ALL AMERICAN

March 29, 2005

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

Re: Plains All American – Annual Monitoring Reports
21 Sites in Lea County, New Mexico

Dear Mr. Martin:

Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico Oil Conservation Division (NMOCD). In accordance with the rules and regulations of the NMOCD, Plains All American hereby submits our Annual Monitoring reports for the following sites:

| | |
|------------------------|--|
| LF-59 | Section 32, Township 19 South, Range 37 East, Lea County |
| TNM 97-04 | Section 11, Township 16 South, Range 35 East, Lea County |
| HDO 90-23 | Section 06, Township 20 South, Range 37 East, Lea County |
| Darr Angell 2 | Section 11, 14, Township 15 South, Range 37 East, Lea County |
| SPS 11 | Section 18, Township 18 South, Range 36 East, Lea County |
| TNM 97-17 | Section 21, Township 20 South, Range 37 East, Lea County |
| TNM 97-18 | Section 28, Township 20 South, Range 37 East, Lea County |
| TNM 98-05A | Section 26, Township 21 South, Range 37 East, Lea County |
| Red Byrd # 1 | Section 01, Township 20 South, Range 36 East, Lea County |
| Bob Durham | Section 31, 32, Township 19 South, Range 37 East, Lea County |
| Monument Site 11 | Section 30, Township 19 South, Range 37 East, Lea County |
| Darr Angell 1 | Section 11, Township 15 South, Range 37 East, Lea County |
| TNM 98-05B | Section 26, Township 21 South, Range 37 East, Lea County |
| Monument Site 2 | Section 6, 7, Township 20 South, Range 37 East, Lea County |
| Monument Site 10 | Section 32, Township 19 South, Range 37 East, Lea County |
| Monument Site 17 | Section 29, Township 19 South, Range 37 East, Lea County |
| Monument Site 18 | Section 07, Township 20 South, Range 37 East, Lea County |
| Monument Barber 10" PL | Section 32, Township 19 South, Range 37 East, Lea County |
| Darr Angell 4 | Section 11, 02, Township 15 South, Range 37 East, Lea County |
| Monument to Lea 6" | Section 05, Township 20 South, Range 37 East, Lea County |
| Texaco Skelly "F" | Section 21, Township 20 South, Range 37 East, Lea County |



**PLAINS
ALL AMERICAN**

Nova prepared these documents and has vouched for their accuracy and completeness, and on behalf of Plains All American, I have personally reviewed the documents and interviewed Nova in order to verify the accuracy and completeness of these documents. It is based upon these inquiries and reviews that Plains All American submits the enclosed Annual Monitoring Reports for the above 21 facilities.

If you have any questions or require further information, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds for CR

Camille Reynolds
Remediation Coordinator
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

2004
ANNUAL MONITORING REPORT

IR-120

MONUMENT 11
LEA COUNTY, NEW MEXICO
SE ¼ NE ¼ SECTION 30, TOWNSHIP 19 SOUTH, RANGE 37 EAST
PLAINS EMS NUMBER: TNM MONUMENT-11

Prepared For:

PLAINS MARKETING, L.P.
333 CLAY STREET, SUITE 1600
HOUSTON, TEXAS 77002



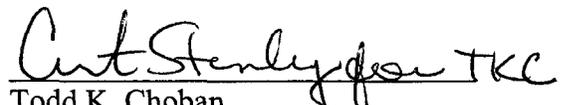
Prepared By:

NOVA Safety and Environmental
2057 Commerce Street
Midland, Texas 79703

April, 2005



Ryan Epley
Geologist / Project Manager



Todd K. Choban
Vice President Technical Services

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Figure 2A – Inferred Groundwater Gradient Map – March 4, 2004

2B – Inferred Groundwater Gradient Map – May 25, 2004

2C – Inferred Groundwater Gradient Map – August 31, 2004

2D – Inferred Groundwater Gradient Map – December 8, 2004

Figure 3A – Groundwater Concentration Map and Inferred PSH Extent Map – March 4, 2004

3B – Groundwater Concentration and Inferred PSH Extent Map – May 25, 2004

3C – Groundwater Concentration and Inferred PSH Extent Map – August 31, 2004

3D – Groundwater Concentration and Inferred PSH Extent Map – December 8, 2004

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Table 1 – Groundwater Elevation Data (2004)

Table 2 – Concentrations of Benzene and BTEX in Groundwater (2004)

APPENDICES

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

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ENCLOSED ON DATA DISK

2004 Annual Monitoring Report

2004 Tables 1 and 2 - Groundwater Elevation and BTEX Concentration Data

2004 Figures 1, 2A-2D, and 3A-3D

Electronic Copies of Laboratory Reports

Historic Table 1 and 2 - Groundwater Elevation and BTEX Concentration Tables

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 1st of each year. Beginning on May 29, 2004, project management responsibilities for the Monument 11 site (the site) were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The site, which was formerly the responsibility of Enron Oil Trading and Transportation (EOTT), is now the responsibility of Plains. This report is intended to be viewed as a complete document with text, figures, tables, and appendices. This report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2004 only. However, historic data tables as well as 2004 laboratory analytical reports are presented on the enclosed disk. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each of four (4) quarters during 2004 to assess the levels and extent of dissolved phase and phase separated hydrocarbon (PSH) constituents. Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH atop the water column, 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

The legal description of the site is SE ¼ NE ¼ Section 30, Township 19 South, Range 37 East. No information with respect to the release date, volume of crude oil released and recovered, excavation dimensions or pipeline repair is available as this release occurred while the pipeline was operated by Texas New Mexico pipeline Company (TNM). The initial site investigation, which consisted of the installation of four (4) groundwater monitor wells (MW-1 through MW-4), was conducted by other consultants.

On November 3, 2004, two (2) monitor wells were installed on the up gradient side of the impact zone to more fully delineate the extent of impact at the site. Six (6) groundwater monitor wells (MW-1 through MW-6) are currently on-site. An absorbent sock is installed in monitor well MW-4 for passive product recovery. Gauging occurs weekly for monitor well MW-4, the only monitor well to display measurable thicknesses of PSH in 2003.

FIELD ACTIVITIES

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule, which was approved by the NMOCD in correspondence dated April 28, 2004:

| NMOCD Approved Sampling Schedule | |
|----------------------------------|----------|
| MW-1 | Annually |
| MW-2 | Annually |
| MW-3 | Annually |

| NMOCD Approved Sampling Schedule, Continued | |
|---|-----------|
| MW-4 | Quarterly |
| MW-5 | Quarterly |
| MW-6 | Quarterly |

The site monitor wells were gauged and sampled on March 4th, May 25th, August 31st, and December 8th of 2004. During each sampling event, sampled monitor wells were purged of approximately three (3) well volumes of water or until the wells failed to produce water using a PVC bailer or electric Grundfos Pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected 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 by Key Energy of Hobbs, New Mexico utilizing a licensed disposal facility (OCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed from measurements collected during the four (4) quarterly monitoring events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2004 is provided as Table 1. Historic groundwater elevation data beginning at project inception is enclosed on the attached data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.007 ft./ft. to the southeast as measured between groundwater monitor wells MW-1 and MW-4. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3598.72 and 3603.08 feet above mean sea level, in MW-1 on May 25, 2004 and MW-4 on December 8, 2004, respectively.

No measurable thicknesses of PSH were detected in any of the monitor wells (MW-1 through MW-6) during 2004. No PSH was recovered from the site during 2004. Approximately 12 gallons (0.3 barrels) of product have been recovered by manual recovery methods since project inception.

LABORATORY RESULTS

Groundwater samples collected during the first three quarterly monitoring events were delivered to AnalySys Inc., Austin, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8260b. Fourth quarter sample analysis was performed by Trace Analysis, Inc., of Lubbock, Texas for determination of BTEX constituent concentrations by EPA Method SW846-8021b. A listing of BTEX constituent concentrations for 2004 is summarized in Table 2. Copies of the laboratory reports for 2004 are provided on the enclosed disk. The quarterly groundwater sample results for benzene and BTEX concentrations are depicted on Figures 3A-3D.

Review of laboratory analytical results of the groundwater samples obtained during the 2004 monitoring period indicate that the benzene and total BTEX concentrations remain below applicable NMOCD standards in monitor wells MW-2 and MW-3. Samples collected from the newly installed monitor wells MW-5 and MW-6 are also below applicable NMOCD Regulatory Standards. However, during at least one quarterly monitor event, samples from monitor wells

MW-1 and MW-4 displayed concentrations of benzene above the applicable NMOCD Regulatory Standard. All groundwater samples analyzed during the reporting period indicate concentrations of BTEX below the applicable NMOCD Regulatory Standard. 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 2004 annual monitoring period. On November 3, 2004, two (2) monitor wells (MW-5 and MMW-6) were installed on the up-gradient side of the impact zone to more fully delineate the extent of impact at the site. Currently, there are six (6) groundwater monitor wells (MW-1 through MW-6) on-site. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.007 ft./ft. to the southeast.

As discussed above, no measurable thicknesses of product have been recorded in any of the on-site monitor wells since December 4, 2003. No PSH was recovered during the 2004 reporting period, although approximately twelve (12) gallons of PSH have been recovered since project inception. None of the monitor wells have exhibited PSH at any time during the monitoring period with the exception of a sheen in MW-4. Although MW-4 does consistently display a PSH sheen during gauging events and has an absorbent sock for passive product recovery, it has not exhibited a measurable thicknesses of PSH since December 4, 2003. PSH impact at the site appears to be limited and decreasing at this time.

Review of laboratory analytical results of the groundwater samples obtained during the 2004 monitoring period indicate the benzene concentration is above the applicable NMOCD standard in monitor wells MW-1 and MW-4 during at least one (1) quarterly monitoring event. Analytical results of samples collected from the monitor wells MW-2, MW-3, as well as from the newly installed monitor wells MW-5 and MW-6, are below the NMOCD Regulatory Standards for benzene and total BTEX. Dissolved phase impact at this time appears to be limited to monitor wells MW-1 and MW-4. Although dissolved phase impact was expected at MW-4, analytical results of groundwater samples collected from MW-1 had indicated concentrations below the NMOCD standard since 2000. Water levels at the site in December 2004 were approximately two to three feet above normal due to higher than normal rainfall. The observed elevated benzene concentration in MW-1 may be the result of contact with a smear zone and may not be indicative of formation water.

The Release Notification and Corrective Action Form (C-141) is provided as Appendix A.

ANTICIPATED ACTIONS

Groundwater monitoring and annual reporting will continue in 2005. Monitor well MW-1 will return to a quarterly sampling schedule based on the concentration of benzene displayed during the fourth quarter sampling event of 2004 which was above the NMOCD regulatory limit. However, if groundwater samples from MW-1 exhibit two consecutive sampling events below NMOCD standards the sampling protocol will go back to annual.

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

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

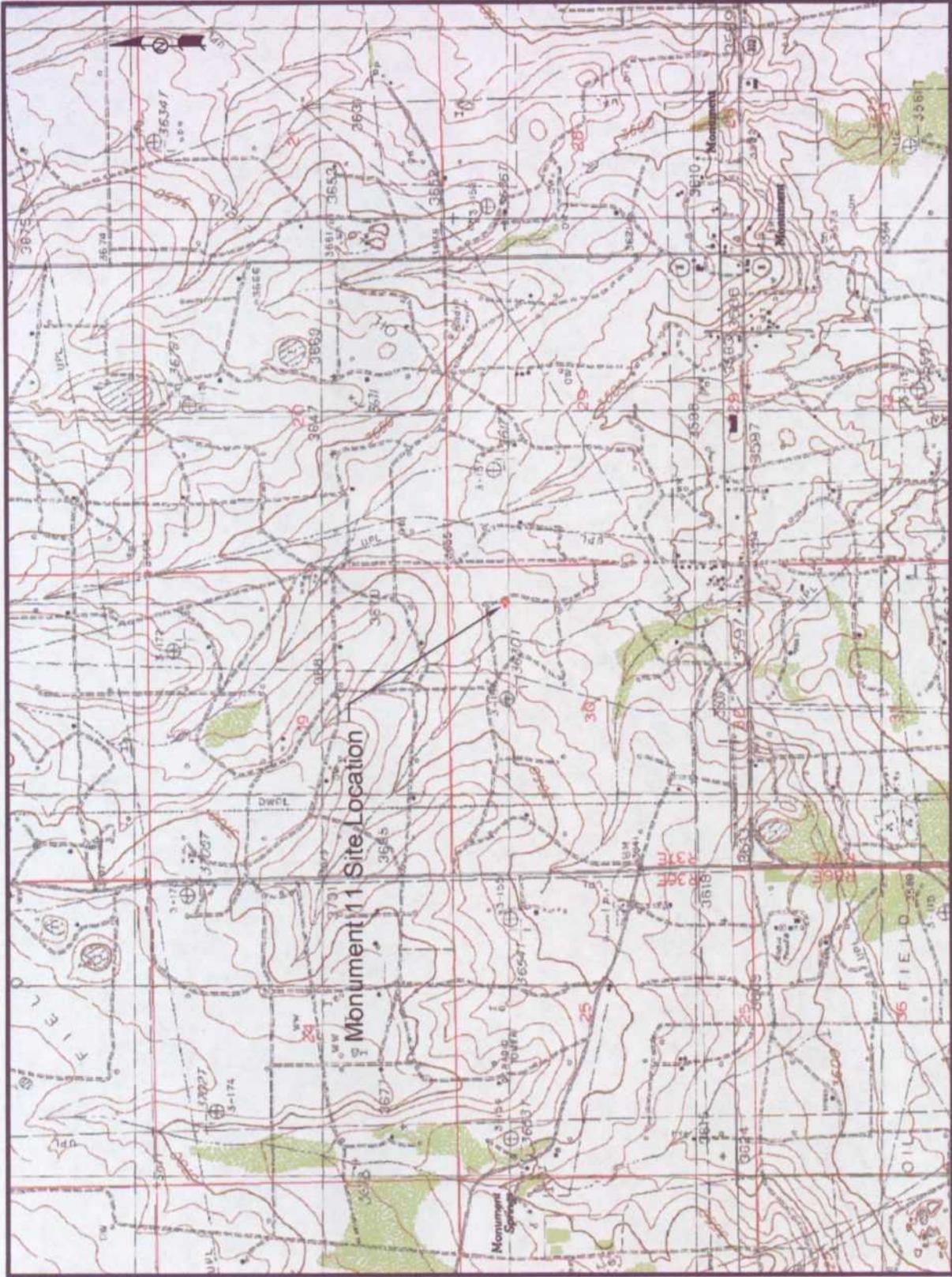
Copy 3: Camille Reynolds
Plains Marketing, L.P.
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cjreynolds@paalp.com

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

Copy Number:

Figures



Monument 11 Site Location

Distance in Miles
 0.5 0 0.25 0.5

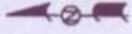
Figure 1
 Site Location Map

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

NOVA
 safety and environmental

NOVA Safety and Environmental

| | | |
|---|---------------------------------|-----------------|
| Scale: 1" = 3 Miles | Prep By: CDS | Checked By: CDS |
| February 24, 2004 | SW 1/4 NE 1/4 Sec. 30 T186 R07E | |
| Lat. 132° 38' 0.2" Long. W002° 17' 2.4" | | |



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

3599.50

3600.00

3599.00

MW-2
(3599.34)

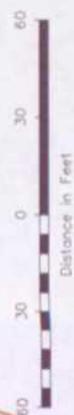
MW-4
(3600.24)

0.007 ft/ft

MW-3
(3599.11)

MW-1
(3598.75)

Road



NOTE:
Groundwater Gradient measured between MW-1 and MW-4
Contour Interval : 0.5'

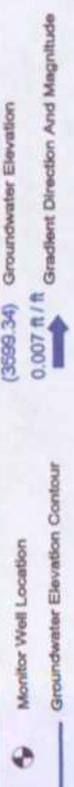
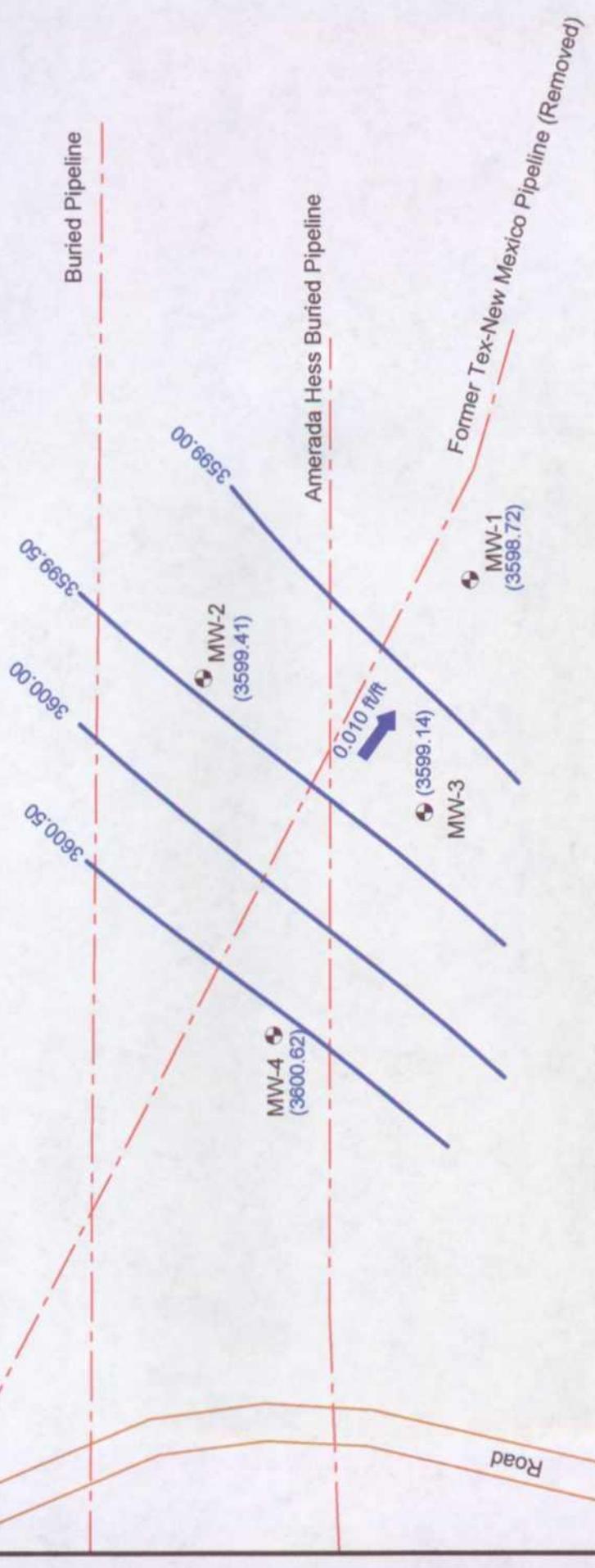
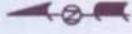


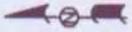
Figure 2A
Inferred Groundwater
Gradient Map
(3/4/04)
Plains Marketing, L.P.,
Monument 11
Lea County, NM



NOTE:
 Groundwater Gradient measured between MW-1 and MW-4
 Contour Interval : 0.5'

- Monitor Well Location
- Groundwater Elevation Contour
- (3598.41) Groundwater Elevation
- 0.010 ft/ft Gradient Direction And Magnitude

Figure 2B
 Inferred Groundwater
 Gradient Map
 (5/25/04)
 Plains Marking, L.P.
 Monument 11
 Lea County, NM



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

3599.50

3599.00

3600.00

0.008 ft/ft

MW-2
(3599.33)

MW-3
(3599.08)

MW-1
(3598.75)

MW-4
(3600.33)

Road



NOTE:

Groundwater Gradient measured between MW-1 and MW-4
Contour Interval : 0.5'

Monitor Well Location

Groundwater Elevation Contour

(3599.33) Groundwater Elevation

0.008 ft/ft

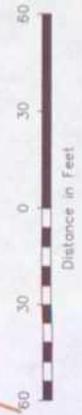
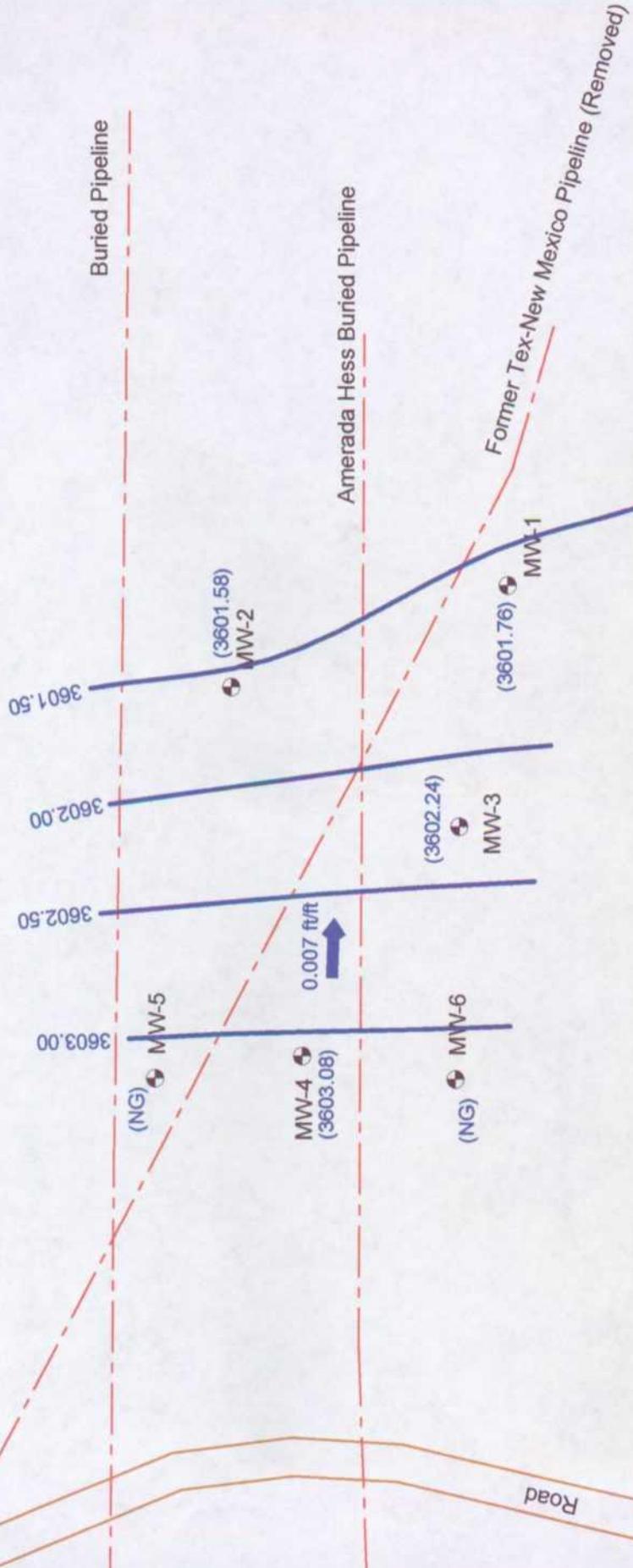
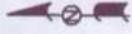
Gradient Direction And Magnitude

Figure 2C
Inferred Groundwater
Gradient Map
(8/31/04)
Plains Marketing, L.P.
Monument 11
Lea County, NM

NOVA Safety and Environmental



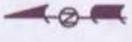
Scale: 1" = 80'
March 15, 2005
Prep By: CDS
Checked By: JRE
SE 1/4 NE 1/4 Sec 30 T16S R37E
32° 38' 07.2" N 103° 18' 50.7" W



NOTE:
 Groundwater Gradient measured between MW-1 and MW-4
 Contour Interval : 0.5'

| Monitor Well Location | Groundwater Elevation | Groundwater Elevation Contour | Gradient Direction And Magnitude | Groundwater Elevation | Gradient Direction And Magnitude |
|-----------------------|-----------------------|-------------------------------|----------------------------------|-----------------------|----------------------------------|
| (3601.58) | (3601.58) | 3601.50 | 0.007 ft / ft | (3601.58) | 0.007 ft / ft |
| (NG) | (NG) | 3602.00 | NG | (NG) | NG |

Figure 2D
 Inferred Groundwater Gradient Map
 (12/8/04)
 Plains Marketing, L.P.
 Monument 11
 Lea County, NM



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

Benzene <0.001 mg/L
BTEX <0.002 mg/L

MW-2

Benzene 0.00266 mg/L
BTEX 0.040 mg/L

MW-4

Benzene <0.001 mg/L
BTEX <0.002 mg/L

MW-3

Benzene <0.001 mg/L
BTEX <0.002 mg/L

MW-1

Road



No measurable PSH

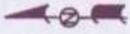
Monitor Well Location
<0.001 Constituent Concentration (mg/L)

Figure 3A
Groundwater Concentration
and Inferred PSH Extent
Map (3/4/04)
Plains Marketing, L.P.,
Monument 11
Lea County, NM

NOVA Safety and Environmental



Scale: 1" = 80'
Prep By: CPU
Checked By: JRE
February 23, 2005
SE 1/4 NE 1/4 Sec 20 T19S R37E
32° 38' 07.2" N 103° 18' 58.0" W



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

NS
MW-2

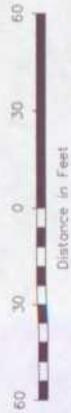
NS
MW-3

NS
MW-1

Benzene 0.0174 mg/L
BTEX 0.0575 mg/L

MW-4

Road



No measurable PSH

Monitor Well Location

0.0174 Constituent Concentration (mg/L)

NS Not Sampled

Figure 3B
Groundwater Concentration
and Inferred PSH Extent
Map (5/25/04)

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

Concentrations in BOLD are above the NMOC Regulatory Limit

NOVA Safety and Environmental



Scale: 1" = 60'

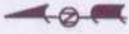
Prep By: CPU

Checked By: MIE

February 23, 2005

SE 1/4 NE 1/4 Sec 30 T19S R30E

32° 38' 07" 2" N 103° 16' 50.7" W



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

NS
MW-2

NS
MW-3

NS
MW-1

Benzene 0.00232 mg/L
BTEX 0.0370 mg/L

MW-4

No measurable PSH



Note: PSH Thickness in feet

Monitor Well Location

0.00232 Constituent Concentration (mg/L)

NS Not Sampled

Figure 3C
Groundwater Concentration
and Inferred PSH Extent
Map (8/31/04)
Plains Marketing, L.P.
Monument 11
Lea County, NM

NOVA Safety and Environmental



Scale: 1" = 87'

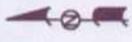
Prep By: DPM

Checked By: ARE

February 23, 2005

SE 1/4 NE 1/4 Sec 30 T186 R37E

32° 38' 07.2" N, 103° 18' 56.0" W



Buried Pipeline

Amerada Hess Buried Pipeline

Former Tex-New Mexico Pipeline (Removed)

Benzene <0.001 mg/L
BTEX <0.001 mg/L

* MW-5

Benzene <0.001 mg/L
BTEX <0.001 mg/L

NS
MW-2

Benzene 0.00590 mg/L
BTEX 0.0327 mg/L

MW-4

* MW-6

Benzene <0.001 mg/L
BTEX <0.001 mg/L

MW-3

Benzene <0.001 mg/L
BTEX <0.001 mg/L

MW-1

Benzene 0.024 mg/L
BTEX 0.024 mg/L

Road



No measurable PSH

Monitor Well Location
<0.001 Constituent Concentration (mg/L)

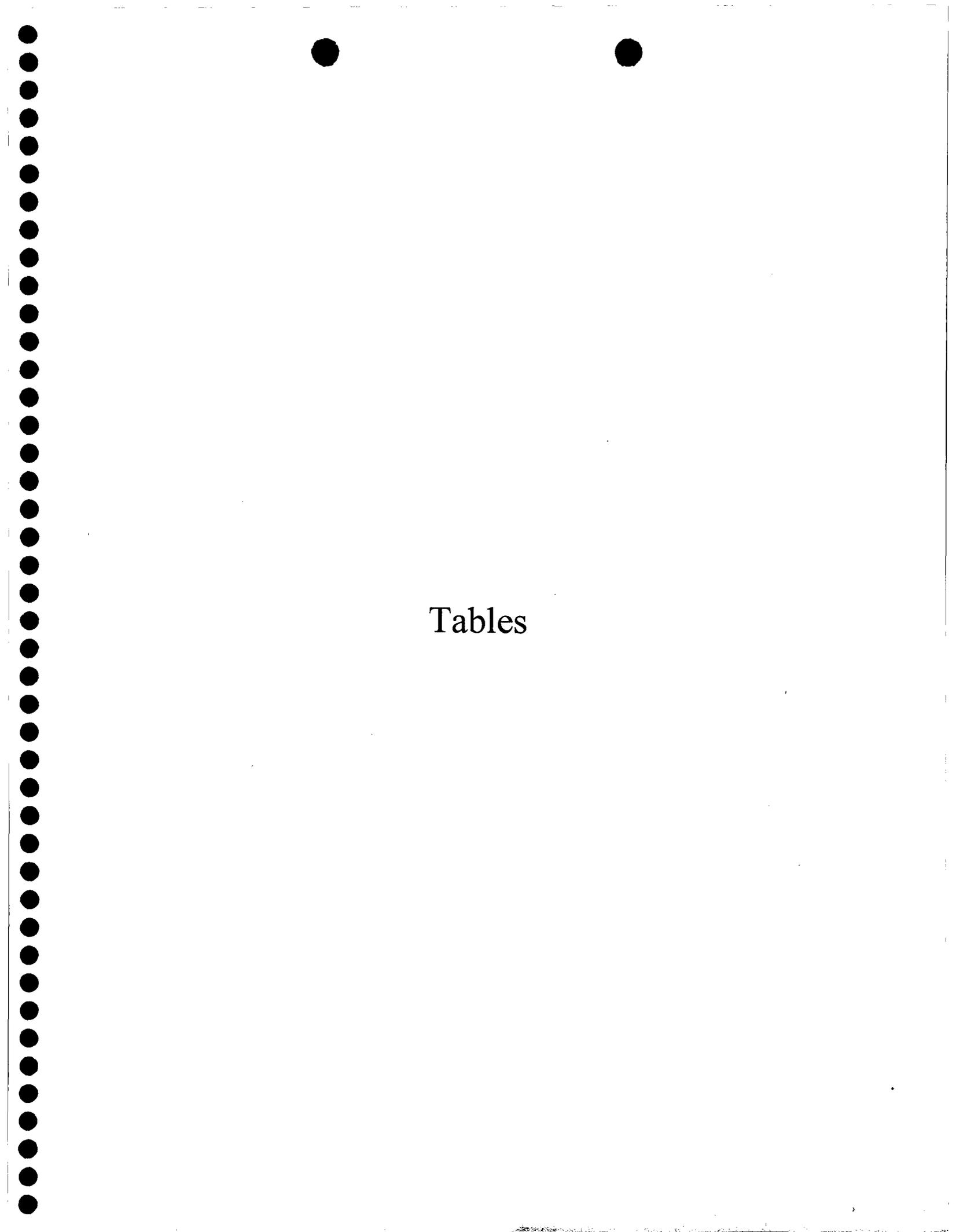
* Samples Collected 11/10/04
Concentrations in BOLD are above the NMOCD Regulatory Limit

Figure 3D
Groundwater Concentration
and Inferred PSH Extent
Map (12/08/04)
Plains Marketing, L.P.
Monument 11
Lea County, NM

NOVA Safety and Environmental



Scale: 1" = 80'
Prep By: DPH
Checked By: JRE
February 23, 2005
SE 1/4 NE 1/4 Sec 30 T196 R37E
32° 38' 03.2" N 102° 18' 58.7" W



Tables

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P.
 MONUMENT 11
 LEA COUNTY, NEW MEXICO

| WELL NUMBER | DATE MEASURED | TOP OF CASING ELEVATION | DEPTH TO PRODUCT | DEPTH TO WATER | PSH THICKNESS | CORRECTED GROUNDWATER ELEVATION |
|-------------|---------------|-------------------------|------------------|----------------|---------------|---------------------------------|
| MW - 1 | 03/04/04 | 3,624.90 | - | 26.15 | 0.00 | 3,598.75 |
| | 05/25/04 | 3,624.90 | - | 26.18 | 0.00 | 3,598.72 |
| | 08/31/04 | 3,624.90 | - | 26.15 | 0.00 | 3,598.75 |
| | 12/08/04 | 3,624.90 | - | 23.14 | 0.00 | 3,601.76 |
| MW - 2 | 03/04/04 | 3,624.91 | - | 25.57 | 0.00 | 3,599.34 |
| | 05/25/04 | 3,624.91 | - | 25.50 | 0.00 | 3,599.41 |
| | 08/31/04 | 3,624.91 | - | 25.58 | 0.00 | 3,599.33 |
| | 12/08/04 | 3,624.91 | - | 23.33 | 0.00 | 3,601.58 |
| MW - 3 | 03/04/04 | 3,623.90 | - | 24.88 | 0.00 | 3,599.11 |
| | 05/25/04 | 3,623.90 | - | 24.85 | 0.00 | 3,599.14 |
| | 08/31/04 | 3,623.90 | - | 24.91 | 0.00 | 3,599.08 |
| | 12/08/04 | 3,623.90 | - | 21.75 | 0.00 | 3,602.24 |
| MW-4 | 02/10/04 | 3,624.02 | - | 23.61 | 0.00 | 3600.41 |
| | 02/18/04 | 3,624.02 | - | 23.77 | 0.00 | 3600.25 |
| | 02/26/04 | 3,624.02 | - | 23.81 | 0.00 | 3600.21 |
| | 03/04/04 | 3,624.02 | - | 23.78 | 0.00 | 3600.24 |
| | 03/11/04 | 3,624.02 | - | 23.87 | 0.00 | 3600.15 |
| | 03/16/04 | 3,624.02 | - | 24.14 | 0.00 | 3599.88 |
| | 03/23/04 | 3,624.02 | - | 24.21 | 0.00 | 3599.81 |
| | 03/30/04 | 3,624.02 | - | 24.19 | 0.00 | 3599.83 |
| | 04/07/04 | 3,624.02 | - | 25.25 | 0.00 | 3598.77 |
| | 04/13/04 | 3,624.02 | - | 23.61 | 0.00 | 3600.41 |
| | 04/20/04 | 3,624.02 | - | 23.10 | 0.00 | 3600.92 |
| | 04/27/04 | 3,624.02 | - | 23.22 | 0.00 | 3600.80 |
| | 05/11/04 | 3,624.02 | - | 23.77 | 0.00 | 3,600.25 |
| | 05/25/04 | 3,624.02 | - | 23.41 | 0.00 | 3,600.61 |
| | 06/03/04 | 3,624.02 | - | 23.40 | 0.00 | 3,600.62 |
| | 06/08/04 | 3,624.02 | - | 23.39 | 0.00 | 3,600.63 |
| 06/22/04 | 3,624.02 | - | 23.52 | 0.00 | 3,600.50 | |
| 06/29/04 | 3,624.02 | - | 23.52 | 0.00 | 3,600.50 | |
| 07/07/04 | 3,624.02 | - | 23.60 | 0.00 | 3,600.42 | |
| 07/12/04 | 3,624.02 | - | 23.52 | 0.00 | 3,600.50 | |
| 07/20/04 | 3,624.02 | - | 23.52 | 0.00 | 3,600.50 | |
| 08/02/04 | 3,624.02 | - | 23.53 | 0.00 | 3,600.49 | |

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P.
 MONUMENT 11
 LEA COUNTY, NEW MEXICO

| WELL NUMBER | DATE MEASURED | TOP OF CASING ELEVATION | DEPTH TO PRODUCT | DEPTH TO WATER | PSH THICKNESS | CORRECTED GROUNDWATER ELEVATION |
|-------------|---------------|-------------------------|------------------|----------------|---------------|---------------------------------|
| | 08/11/04 | 3,624.02 | - | 23.57 | 0.00 | 3,600.45 |
| | 08/16/04 | 3,624.02 | - | 23.55 | 0.00 | 3,600.47 |
| | 08/31/04 | 3,624.02 | - | 23.69 | 0.00 | 3,600.33 |
| | 09/29/04 | 3,624.02 | sheen | 22.25 | 0.00 | 3,601.77 |
| | 10/05/04 | 3,624.02 | sheen | 21.22 | 0.00 | 3,602.80 |
| | 10/12/04 | 3,624.02 | sheen | 21.23 | 0.00 | 3,602.79 |
| | 10/19/04 | 3,624.02 | sheen | 21.60 | 0.00 | 3,602.42 |
| | 10/25/04 | 3,624.02 | sheen | 21.68 | 0.00 | 3,602.34 |
| | 11/01/04 | 3,624.02 | sheen | 22.10 | 0.00 | 3,601.92 |
| | 11/09/04 | 3,624.02 | sheen | 21.99 | 0.00 | 3,602.03 |
| | 11/16/04 | 3,624.02 | sheen | 22.40 | 0.00 | 3,601.62 |
| | 11/22/04 | 3,624.02 | sheen | 22.27 | 0.00 | 3,601.75 |
| | 12/08/04 | 3,624.02 | - | 21.00 | 0.00 | 3,603.02 |
| | 12/13/04 | 3,624.02 | sheen | 21.00 | 0.00 | 3,603.02 |
| | 12/27/04 | 3,624.02 | sheen | 21.26 | 0.00 | 3602.76 |
| | 12/20/04 | 3,624.02 | sheen | 21.44 | 0.00 | 3602.58 |
| | | | | | | |
| MW-5 | 11/08/04 | 3,625.24 | - | 21.01 | 0.00 | 3604.23 |
| | 11/10/04 | 3,625.24 | - | 21.08 | 0.00 | 3604.16 |
| | | | | | | |
| MW-6 | 11/08/04 | 3,623.71 | - | 23.38 | 0.00 | 3600.33 |
| | 11/10/04 | 3,623.71 | - | 23.62 | 0.00 | 3600.09 |

Note:

Elevations based on the North America Vertical Datum of 1929.

"-" indicates no measurable PSH detected.

TABLE 2

CONCENTRATIONS OF BTEX IN GROUNDWATER FOR 2004

PLAINS PIPELINE, L.P.
 MONUMENT 11
 LEA COUNTY, NEW MEXICO

All concentrations are in mg/L

| SAMPLE DATE | SAMPLE DATE | SW 846-8260b, SW 846-8021b | | | | |
|----------------------------|-------------|----------------------------|---------|---------------|-----------------------|------------|
| | | BENZENE | TOLUENE | ETHYL-BENZENE | m, p - XYLENES | o - XYLENE |
| NMMOCD Regulatory Standard | | 0.01 | 0.75 | 0.75 | Total XYLENES 0.62 | |
| MW - 1 | 03/04/04 | <0.001 | <0.001 | <0.001 | <0.002 | <0.001 |
| | 12/08/04 | 0.0236 | <0.001 | <0.001 | <0.001 | |
| MW - 2 | 03/04/04 | <0.001 | <0.001 | <0.001 | <0.002 | <0.001 |
| | 12/08/04 | <0.001 | <0.001 | <0.001 | <0.001 | |
| MW - 3 | 03/04/04 | <0.001 | <0.001 | <0.001 | <0.002 | <0.001 |
| | | | | | | |
| MW - 4 | 03/04/04 | 0.00266 | <0.001 | 0.00386 | 0.0321 | 0.00139 |
| | 05/25/04 | 0.0174 | 0.00313 | 0.00361 | 0.0317 | 0.00164 |
| | 08/31/04 | 0.00232 | <0.001 | 0.00306 | 0.0304 | 0.00118 |
| | 12/08/04 | 0.00590 | <0.005 | <0.005 | 0.0268 | |
| MW-5 | 11/10/04 | <0.001 | <0.001 | <0.001 | <0.001 | |
| MW-6 | 11/10/04 | <0.001 | <0.001 | <0.001 | <0.001 | |

Note:

m, p and o Xylenes combined when analyzed by Trace Laboratories, Inc. only.
 Concentrations in BOLD are above the applicable NMOCD Regulatory Limit.

Appendix A
Notification of Release and Corrective
Action

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 # 11 | Facility Type: | Pipeline |

| | | |
|--|---------------|-----------|
| Surface Owner: New Mexico State Land Office | Mineral Owner | Lease No. |
|--|---------------|-----------|

LOCATION OF RELEASE

| | | | | | | | | |
|------------------|---------------|-----------------|--------------|---------------|------------------|---------------|----------------|---------------|
| Unit Letter A | Section 30 | Township 19S | Range 37E | Feet from the | North/South Line | Feet from the | East/West Line | County Lea |
|------------------|---------------|-----------------|--------------|---------------|------------------|---------------|----------------|---------------|

Latitude 32 degrees 38' 9.2" Longitude 103 degrees 17' 2.4"

NATURE OF RELEASE

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

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: cgreynolds@paalp.com | Conditions of Approval: | | Attached <input type="checkbox"/> |
| Date: 3/21/2005 | Phone: (505)441-0965 | | |

Attach Additional Sheets If Necessary