1R - 123

REPORTS

DATE:

6-21-2005

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 21, 2005

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

Re: 2004 Annual Monitoring Report
Monument 17 Release Site Located in the
SE/4 NW/4 of Section 29, Township 19 South, Range 37 East
Lea County, New Mexico
Plains EMS Number: TNM Monument-17-Known
NMOCD Reference: 1R-123

Dear Ms. Reynolds:

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

1. Groundwater monitoring and annual reporting will continue throughout 2005.
2. Monitor well MW-6, may be plugged and abandoned using a slurry containing 3% - 5% bentonite.

NMOCD acceptance of this report 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 agency.

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

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin

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,

Dan Byrd for CR

Camille Reynolds
Remediation Coordinator
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

2004
ANNUAL MONITORING REPORT

1R-123

MONUMENT 17
SE ¼ NW ¼ of SECTION 29, TOWNSHIP 19 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS EMS NUMBER: TNM MONUMENT-17-KNOWN

Prepared For:

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

NOVA
safety and environmental

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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ENCLOSED ON DATA DISK

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 1 of each year. Beginning on May 29, 2004, project management responsibilities for the Monument 17 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. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2004 only. Historic data tables as well as 2004 laboratory analytical reports are provided 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 feet were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is SE ¼ of the NW ¼ of Section 29, Township 19 South, Range 37 East. No Information with respect to the release date, volume of crude oil released or recovered, excavation volumes, or pipeline repair is currently available as the release occurred while the pipeline was operated by Texas New Mexico Pipeline Company (TNM). The initial site investigation, consisting of the installation of eight (8) groundwater monitor wells (MW-1 through MW-8), was performed by another environmental consultant.

Currently, there are nine (9) groundwater monitor wells present at the site. Monitor well MW-9 was installed November 4, 2004. Manual product recovery occurs weekly from the only monitor well, MW-7, which has displayed measurable amounts of PSH during the reporting period. An absorbent boom is installed in MW-7 for passive product recovery.

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	Quarterly
MW-2	Quarterly
MW-3	Quarterly
MW-4	Semi-Annual

NMOCD Approved Sampling Schedule Continued	
MW-5	Annually
MW-6	Semi-Annual
MW-7	Quarterly
MW-8	Annually
MW-9	Quarterly

The site monitor wells were gauged and sampled on February 23rd, May 13th, August 26th, and December 13th, 2004. During each sampling event, sampled monitor wells were purged of approximately three 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 (NMOCD 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 is presented in the enclosed 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-4 and MW-8. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged from 3586.51 to 3590.84 feet above mean sea level, in MW-6 on February 23, 2004 and MW-5 on December 13, 2004, respectively.

Monitor well MW-9 was installed on November 4, 2004 to further delineate the impact to soil and groundwater in the down-gradient portion of the site. During the reporting period, a measurable thickness of PSH was detected in monitor well MW-7 from January to August 2004. These measurements ranged from 0.19 to 0.01 feet. The remaining monitor wells did not exhibit measurable thicknesses of PSH at any time during the reporting period. No measurable PSH was recovered from the site during the 2004 reporting period, other than the PSH absorbed by the socks.

LABORATORY RESULTS

Groundwater samples collected during the first three (3) monitoring events of 2004 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., 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 and electronic copies of the laboratory reports generated during this reporting period are provided on the enclosed disk. The inferred extent of PSH on-site and quarterly groundwater sampling results for benzene and total BTEX concentrations are depicted on Figures 3A through 3D.

Review of the laboratory results generated from analysis of the groundwater samples obtained during the reporting period indicate that benzene and total BTEX constituent concentrations are below applicable NMOCD regulatory standards in monitor wells MW-2, MW-4, MW-5, MW-6, MW-8 and MW-9. Monitor well MW-3 reported benzene concentrations above the NMOCD regulatory standards during each monitoring event of 2004. Monitor well MW-7 had a measurable thickness of PSH in excess of 0.01 feet during the first quarterly monitoring event on February 23, 2004 and was not sampled. During the second quarterly monitoring event, monitor well MW-7 reported a benzene concentration above the NMOCD regulatory standard. During the third and fourth quarterly monitoring events, MW-7 displayed concentrations of benzene below the method detection limit. Additionally, monitor well MW-1 displayed a concentration of benzene above the NMOCD regulatory standard during the second quarterly monitoring event, on May 13, 2004, only. During other quarterly events of the reporting period, MW-1 displayed a benzene concentration below the NMOCD regulatory standard. All sampling locations displayed concentrations of BTEX below the NMOCD regulatory standard for each quarterly sampling event of the reporting period.

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. Currently, there are nine (9) groundwater monitor wells present at the site. Manual product recovery occurs weekly from the only monitor well, MW-7, which has displayed measurable amounts of PSH during the reporting period. An absorbent boom is installed in MW-7 for passive product recovery. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.007 ft./ft. to the southeast. The magnitude of this gradient is less than that displayed during previous quarters of 2004; however, the direction is consistent with data presented on Figures 2A-2C from earlier in the year.

As discussed above, only monitor well MW-7 displayed a measurable thickness of PSH during the 2004 reporting period. No measurable amount of PSH was recovered during the 2004 reporting period. No trends with respect to changing PSH thicknesses are apparent from the monitoring data.

A review of the laboratory analytical results for groundwater samples obtained during the reporting period and gauging data collected throughout the year indicates benzene concentrations were above applicable NMOCD regulatory standards in three (3) of the nine (9) monitor wells at some time during the reporting period. All other sample locations displayed constituent concentrations below the applicable NMOCD regulatory standard for the reporting period. No trends with respect to changing dissolved phase impact are apparent from the analytical data.

PSH impact appears to be limited to monitor well MW-7 at this time. Dissolved phase impact above the applicable NMOCD regulatory standard appears to be limited to monitor wells MW-1,

MW-3, and MW-7. Although monitor well MW-2 displayed concentrations of benzene below the NMOCD regulatory standard during this reporting period, monitor well MW-2 has historically displayed concentrations of benzene above the NMOCD regulatory standard.

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

ANTICIPATED ACTIONS

Monitor well gauging, sampling, and product recovery will continue in 2005.

Plains requests permission from the NMOCD to plug and abandon monitor well MW-6 due to the following considerations:

- Down-gradient control along the northern perimeter of the leak zone is provided by monitor wells MW-4 and the newly installed MW-9. MW-4 has historically displayed BTEX constituent concentrations below the method detection limit. The only sampling of monitor well MW-9 occurred just after installation and returned analytical results below applicable NMOCD regulatory standards for benzene and total BTEX. Because these two (2) monitor wells are up-gradient from MW-6, detection of any BTEX constituents which may migrate down-gradient can be expected in monitor wells MW-4 and MW-9.

- Since its installation in 1999, MW-6 has never displayed concentrations of dissolved phase impact above the method detection limit.

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
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cjreynolds@paalp.com

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2057 Commerce Street
Midland, TX 79703
repley@novatraining.cc

Copy Number:

Figures

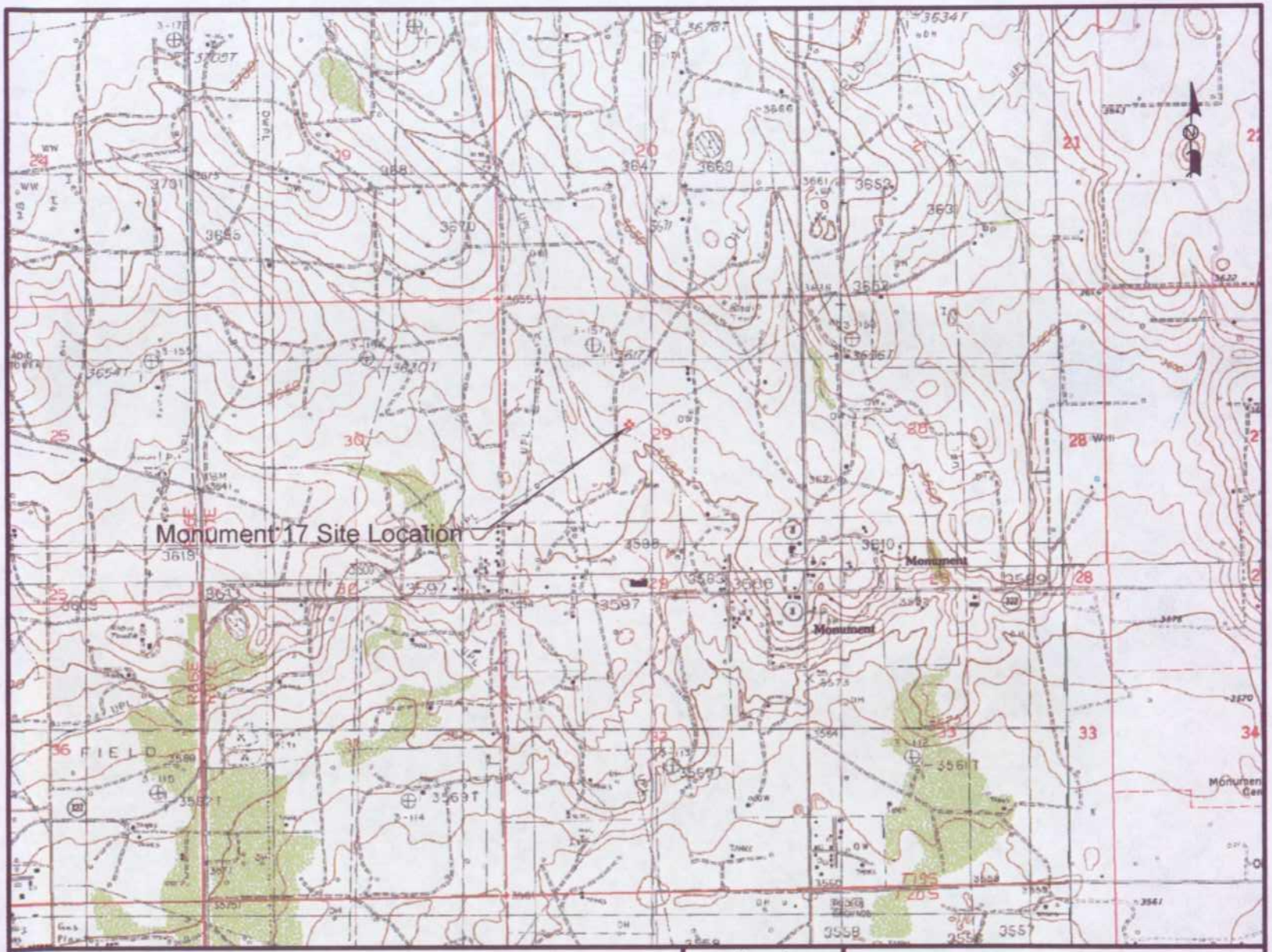
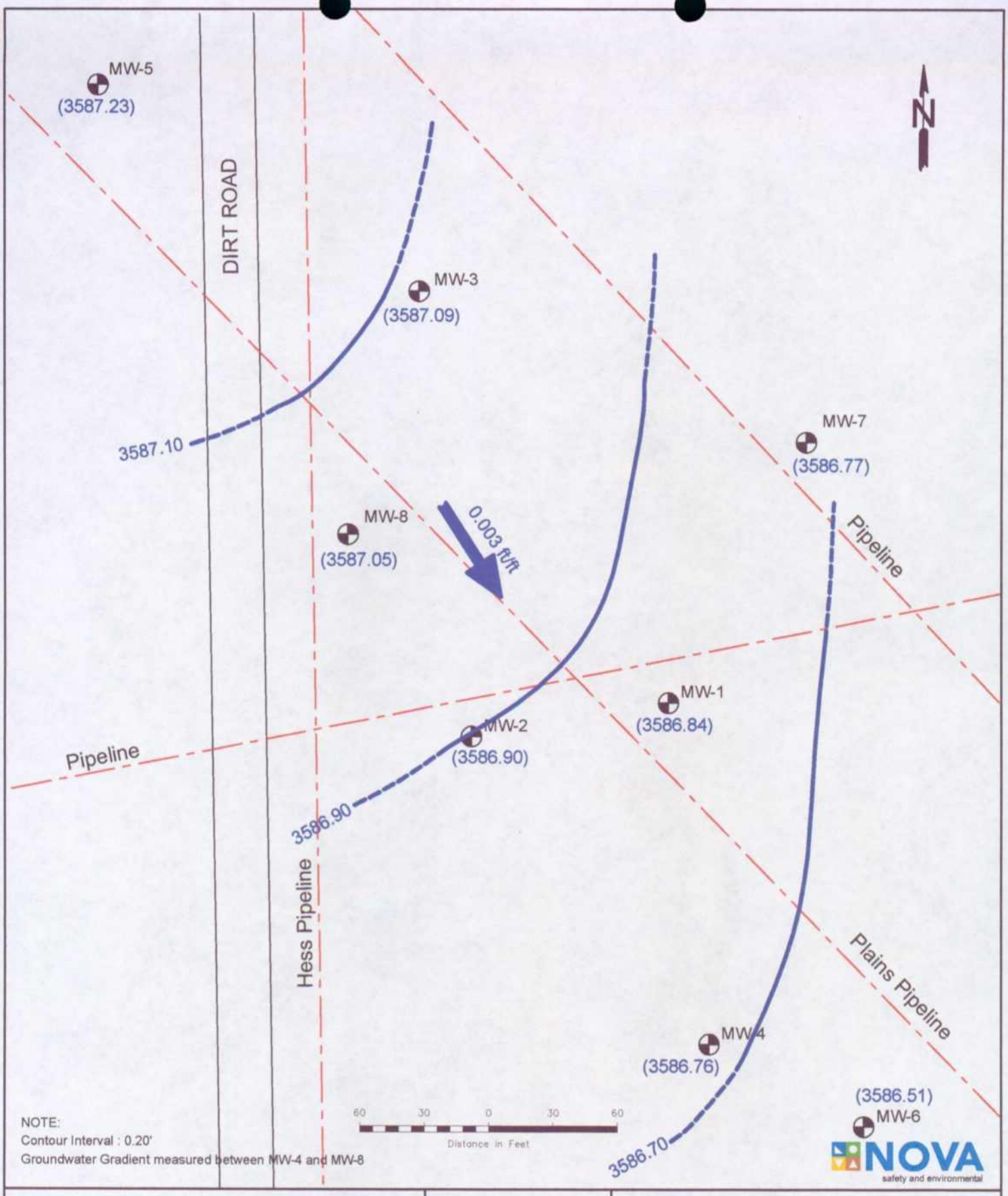


Figure 1
Site Location Map

Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

Scale: 1" = .5 Miles	Prep By: CDS	Checked By: TKC
February 17, 2005	Section 29 Township 19S Range 37E	
	32° 37' 57.7"N 103° 16' 31.8"W	



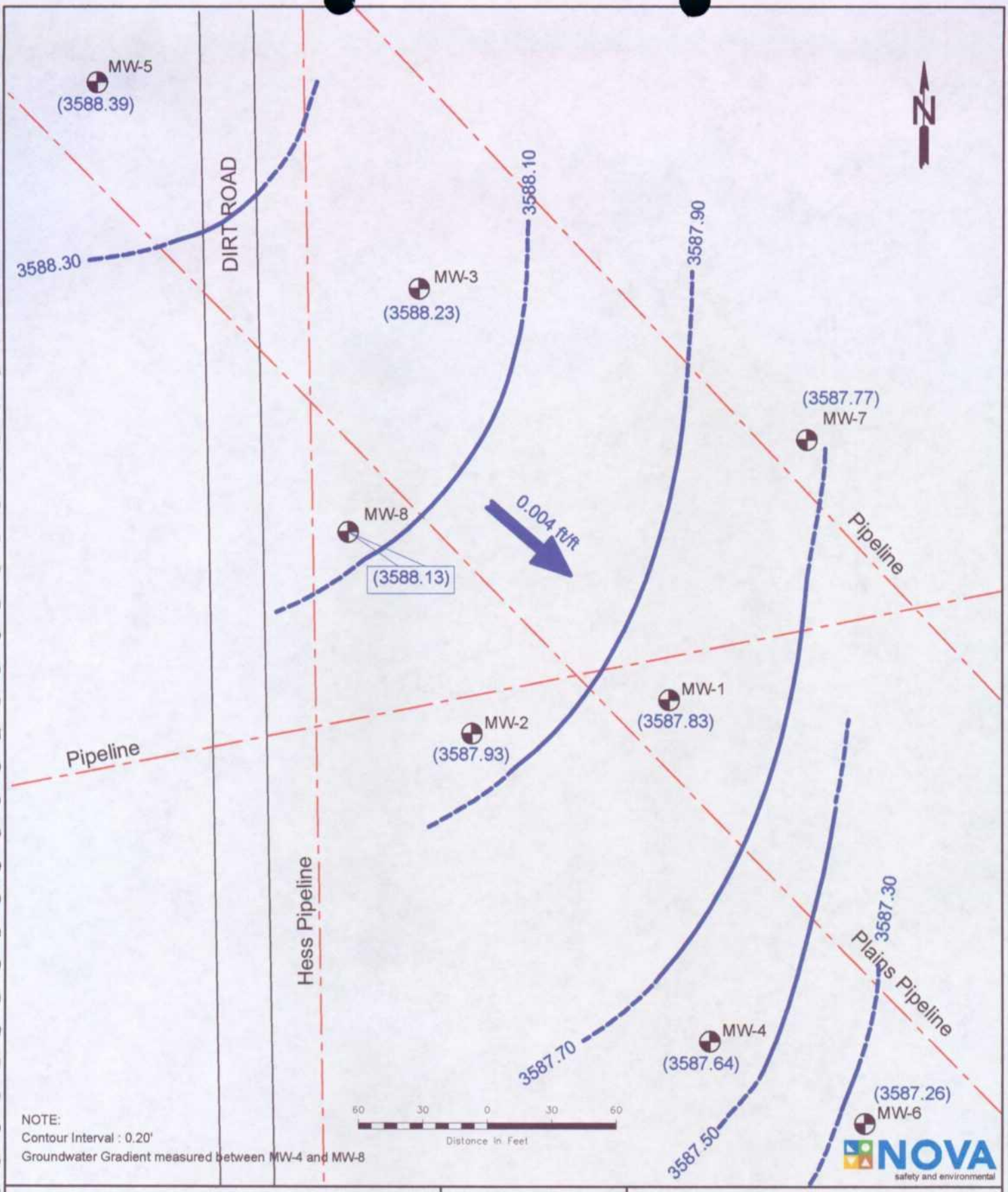
LEGEND:

- Monitor Well Locations
- Ground Water Contour Lines
- (3587.54) Groundwater Elevation
- 0.003 ft / ft Groundwater Gradient Direction and Magnitude

Figure 2A
Inferred Groundwater Gradient Map (2/23/04)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1' = 60'	Prep By: CDS	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



LEGEND:

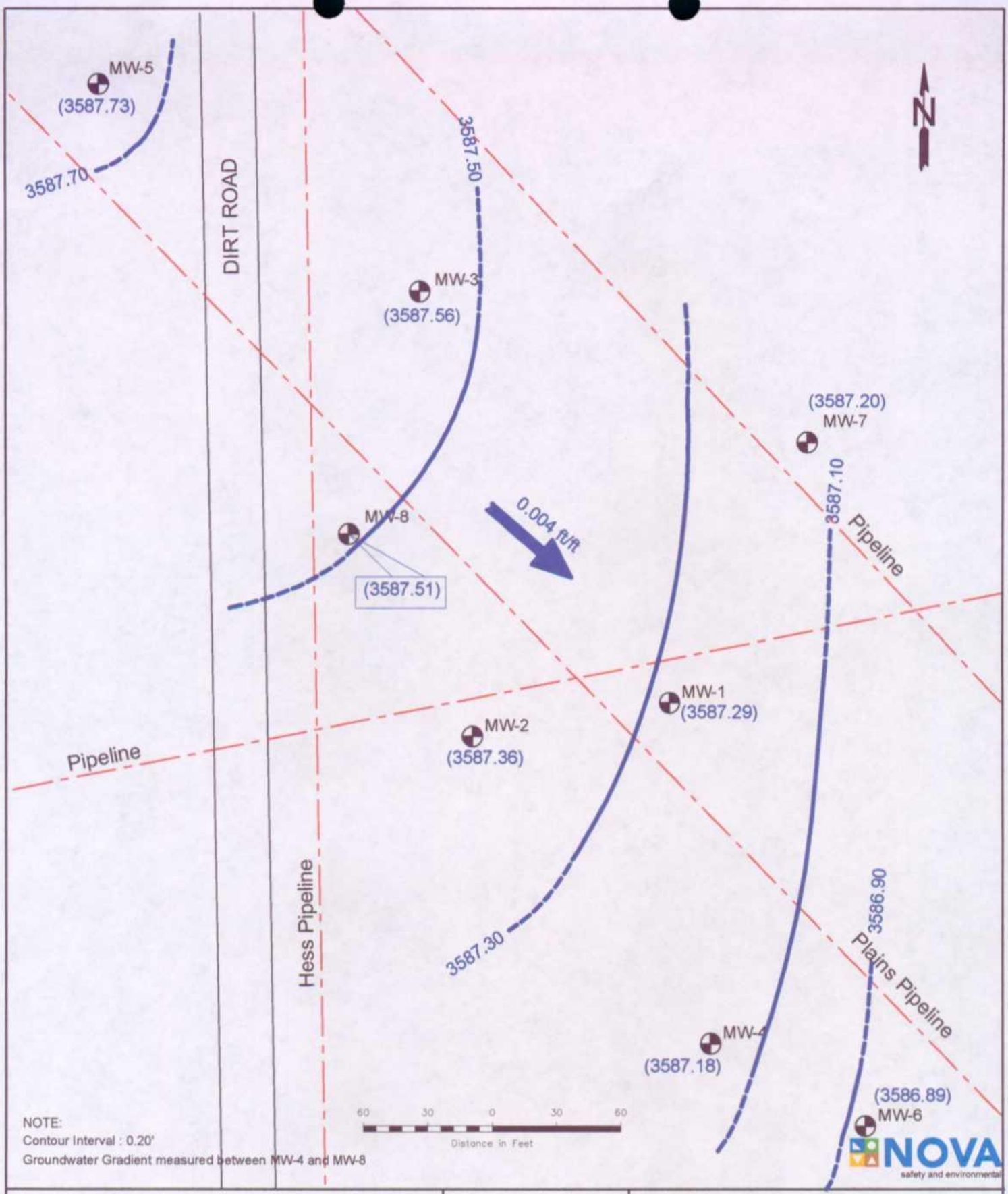
- Monitor Well Locations
- Ground Water Contour Lines
- (3587.54) Groundwater Elevation
- 0.004 ft / ft Groundwater Gradient Direction and Magnitude

Figure 2B
Inferred Groundwater Gradient Map (5/13/04)

Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1' = 60'	Prep By: CDS	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



LEGEND:

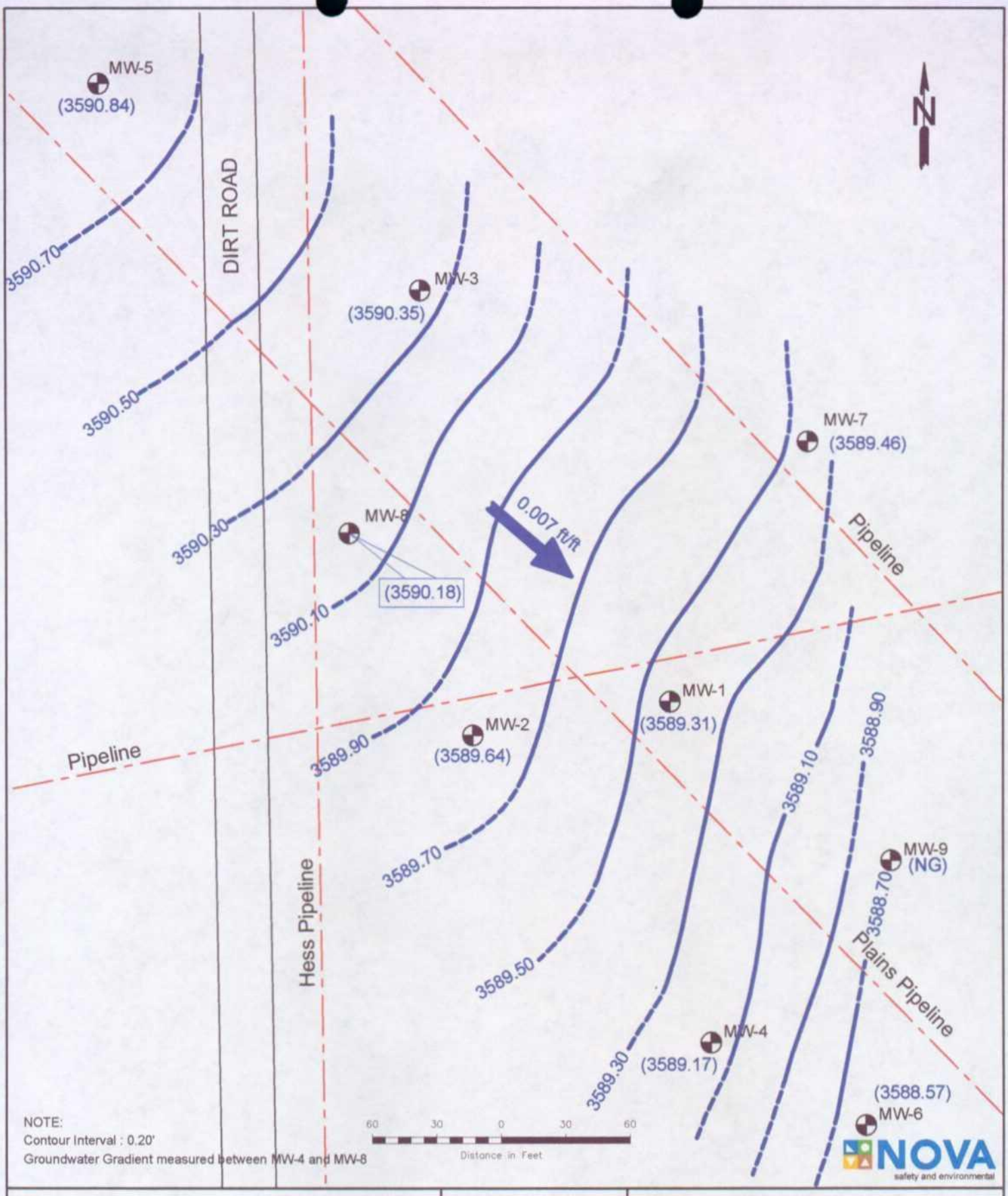
- Monitor Well Locations
- Ground Water Contour Lines
- (3587.54) Groundwater Elevation
- 0.004 ft/ft Groundwater Gradient Direction and Magnitude

Figure 2C
Inferred Groundwater Gradient Map (8/26/04)

Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: CDS	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



LEGEND:

- Monitor Well Locations
- Ground Water Contour Lines
- (3587.54) Groundwater Elevation
- 0.004 ft/ft Groundwater Gradient Direction and Magnitude

Figure 2D
Inferred Groundwater Gradient Map (12/13/04)

Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: CDS	Checked By: MRE
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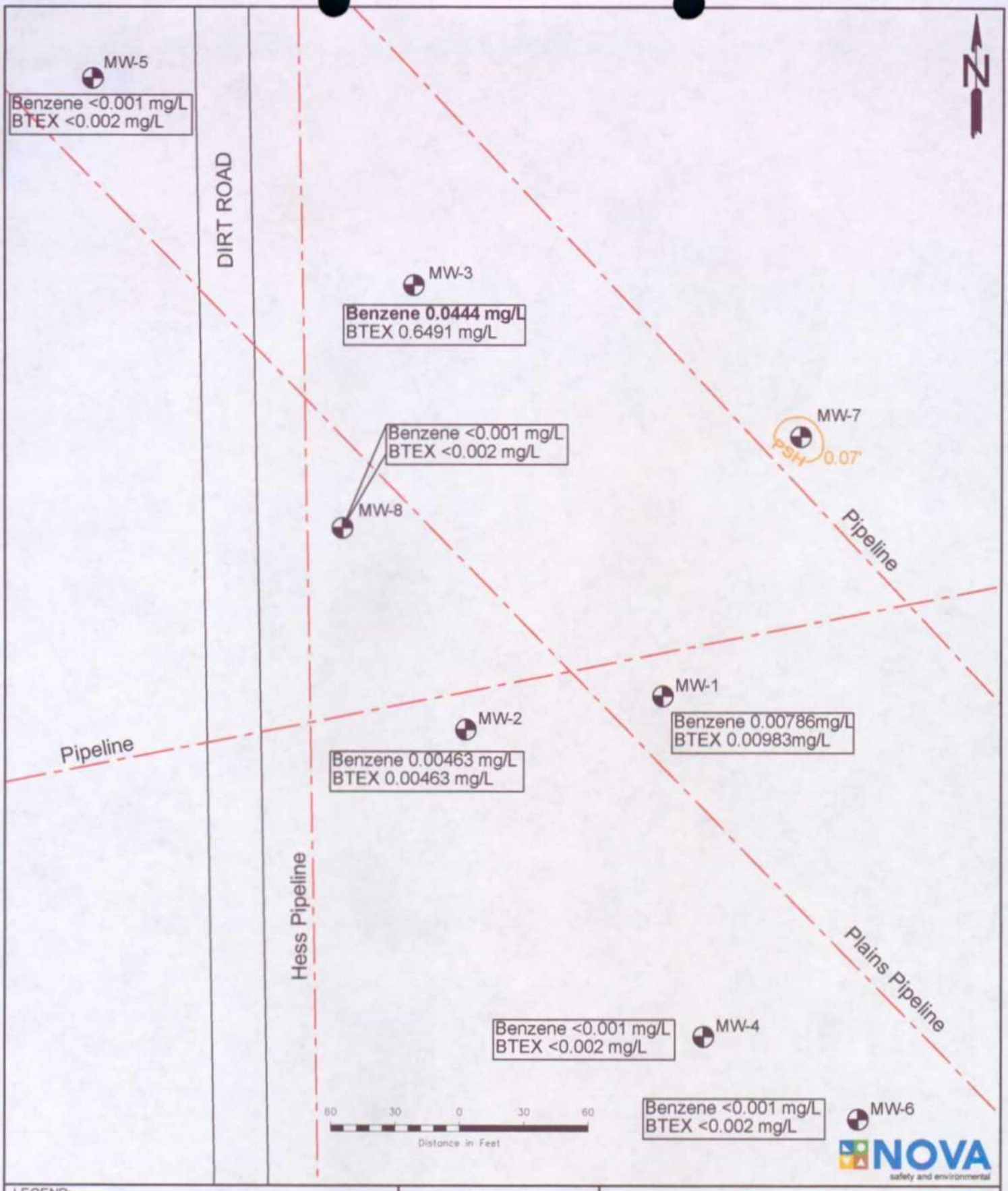

LEGEND:

- Monitor Well Location
- Inferred PSH Extent
- 0.07' Thickness of PSH (feet)
- NS Not Sampled

Note: PSH Thickness in Feet

Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (2/23/04)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: CDS	Checked By: MRE
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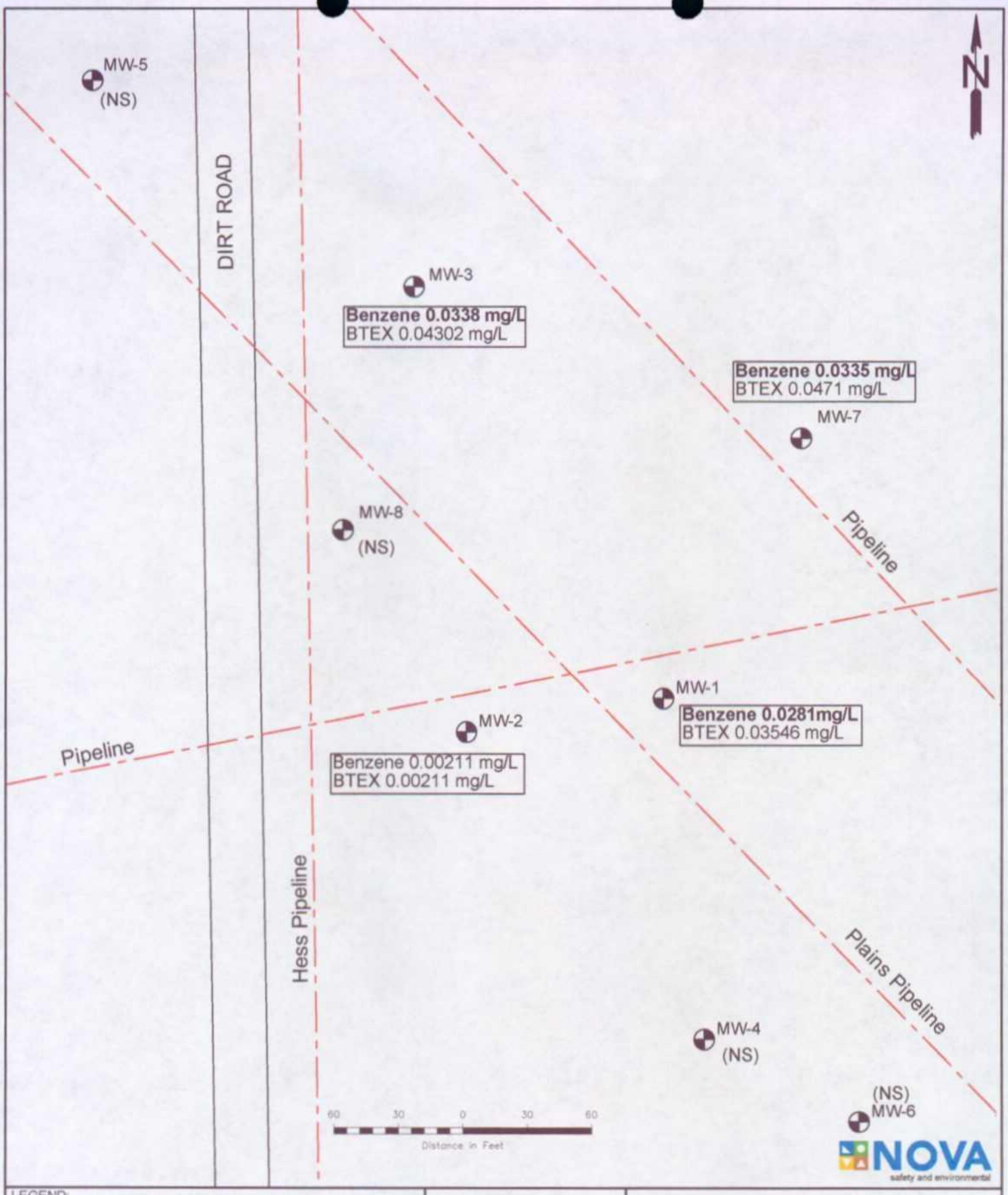


LEGEND:

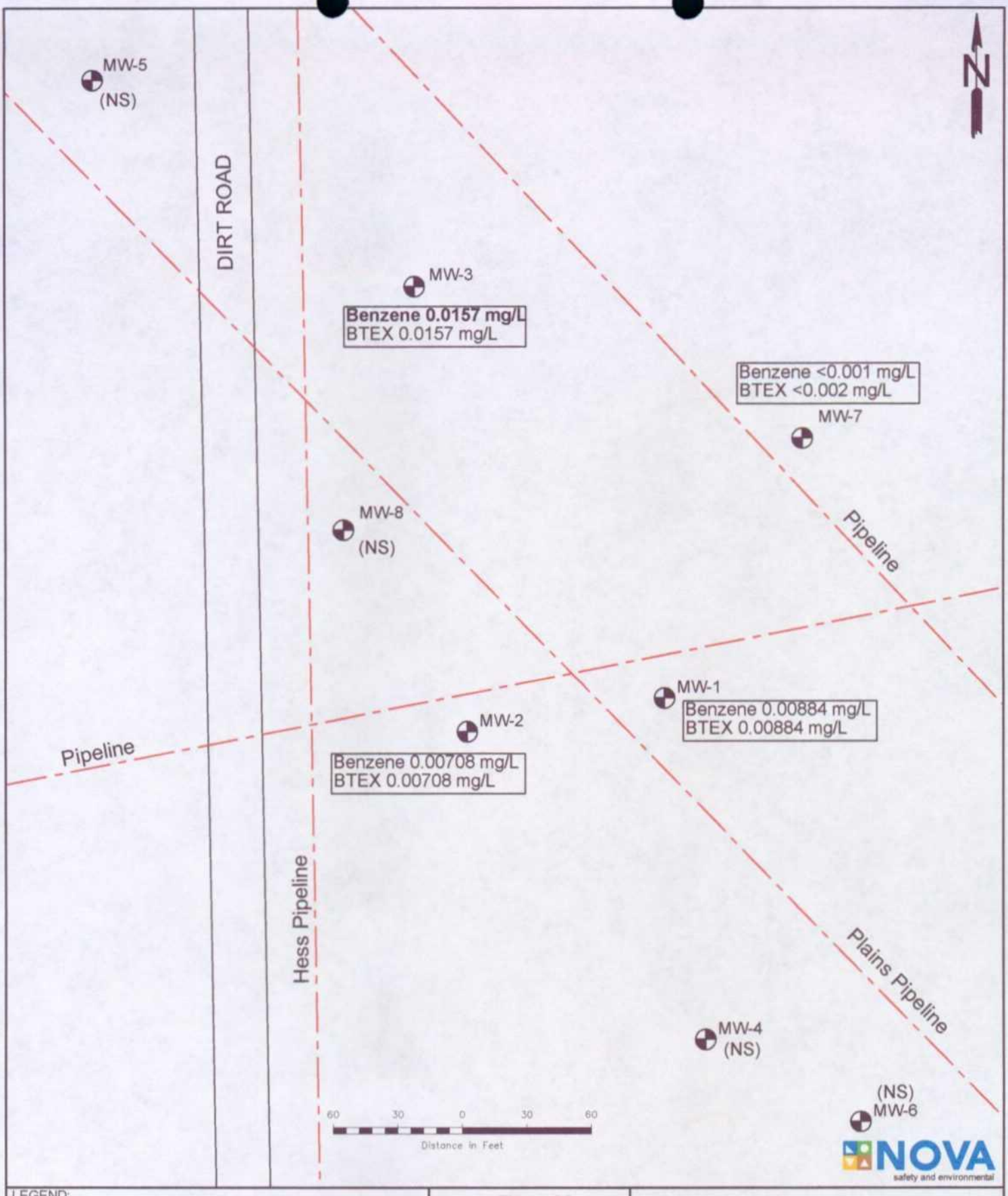
- Monitor Well Location
- NS Not Sampled
- Inferred PSH Extent
- 0.07' Thickness of PSH (feet)

Note: PSH Thickness in Feet

Figure 3B
Groundwater Concentration and Inferred PSH Extent Map (5/13/04)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: CDS	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



LEGEND:

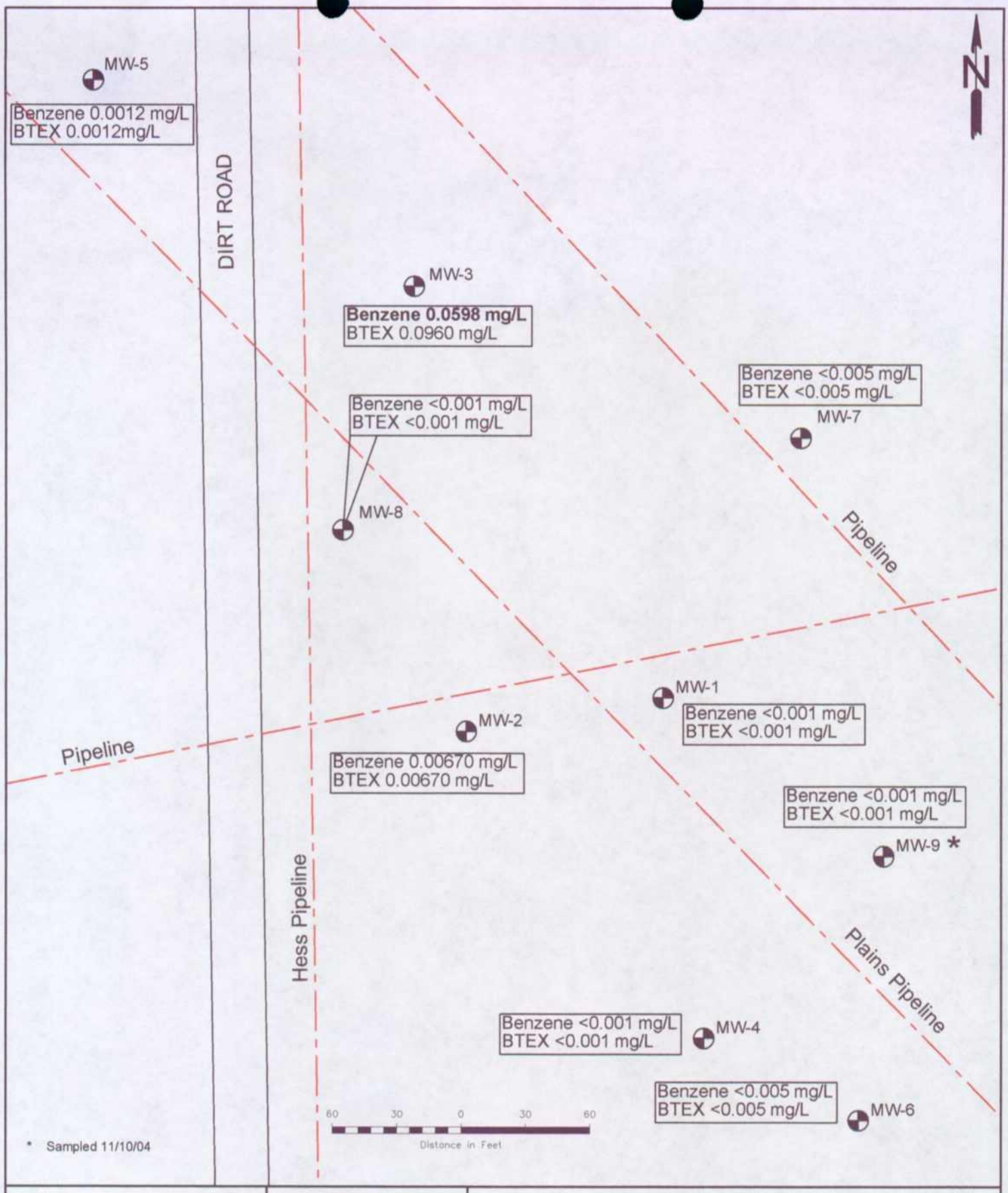
- Monitor Well Location
- Inferred PSH Extent
- 0.07' Thickness of PSH (feet)
- NS Not Sampled

Note: PSH Thickness in Feet

Figure 3C
Groundwater Concentration and Inferred PSH Extent Map (8/26/04)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: CDS	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



LEGEND:

- Monitor Well Location
- Inferred PSH Extent
- 0.07' Thickness of PSH (feet)
- NS Not Sampled

Note: PSH Thickness in Feet

Figure 3D
Groundwater Concentration and Inferred PSH Extent Map (12/13/04)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

March 16, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1' = 60'	Prep By: CDS	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		

Tables

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P.
MONUMENT 17
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	02/23/04	3,607.16	-	20.32	0.00	3,586.84
	05/13/04	3,607.16	-	19.33	0.00	3,587.83
	08/26/04	3,607.16	-	19.87	0.00	3,587.29
	12/13/04	3,607.16	-	17.85	0.00	3,589.31
MW - 2	02/23/04	3,607.08	-	20.18	0.00	3,586.90
	05/13/04	3,607.08	-	19.15	0.00	3,587.93
	08/26/04	3,607.08	-	19.72	0.00	3,587.36
	12/13/04	3,607.08	-	17.44	0.00	3,589.64
MW - 3	02/23/04	3,608.43	-	21.34	0.00	3,587.09
	05/13/04	3,608.43	-	20.20	0.00	3,588.23
	08/26/04	3,608.43	-	20.87	0.00	3,587.56
	12/13/04	3,608.43	-	18.08	0.00	3,590.35
MW-4	02/23/04	3,606.12	-	19.36	0.00	3,586.76
	05/13/04	3,606.12	-	18.48	0.00	3,587.64
	08/26/04	3,606.12	-	18.94	0.00	3,587.18
	12/13/04	3,606.12	-	16.95	0.00	3,589.17
MW - 5	02/23/04	3,610.17	-	22.94	0.00	3,587.23
	05/13/04	3,610.17	-	21.78	0.00	3,588.39
	08/26/04	3,610.17	-	22.44	0.00	3,587.73
	12/13/04	3,610.17	-	19.33	0.00	3,590.84
MW - 6	02/23/04	3,604.44	-	17.93	0.00	3,586.51
	05/13/04	3,604.44	-	17.18	0.00	3,587.26
	08/26/04	3,604.44	-	17.55	0.00	3,586.89
	12/13/04	3,604.44	-	15.87	0.00	3,588.57
MW 7	01/13/04	3,607.38	21.08	21.11	0.03	3,586.30
	02/18/04	3,607.38	20.77	20.96	0.19	3,586.58
	02/23/04	3,607.38	20.60	20.67	0.07	3,586.77
	03/11/04	3,607.38	20.85	20.89	0.04	3,586.52
	04/09/04	3,607.38	20.11	20.15	0.04	3,587.26
	05/03/04	3,607.38	19.79	19.92	0.13	3,587.57
	05/13/04	3,607.38	19.62	19.61	0.01	3,587.77
	07/01/04	3,607.38	19.94	19.95	0.01	3,587.44
	08/26/04	3,607.38	20.18	20.19	0.01	3,587.20

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P.
MONUMENT 17
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
	09/21/04	3,607.38	sheen	20.25	0.00	3,587.13
	09/29/04	3,607.38	sheen	19.03	0.00	3,588.35
	10/05/04	3,607.38	sheen	18.33	0.00	3,589.05
	10/19/04	3,607.38	sheen	18.66	0.00	3,588.72
	10/12/04	3,607.38	sheen	18.50	0.00	3,588.88
	10/25/04	3,607.38	sheen	18.70	0.00	3,588.68
	11/01/04	3,607.38	sheen	18.80	0.00	3,588.58
	11/09/04	3,607.38	sheen	18.81	0.00	3,588.57
	11/16/04	3,607.38	sheen	18.34	0.00	3,589.04
	11/22/04	3,607.38	sheen	17.78	0.00	3,589.60
	12/07/04	3,607.38	sheen	17.50	0.00	3,589.88
	12/13/04	3,607.38	sheen	17.92	0.00	3,589.46
	12/20/04	3,607.38	sheen	17.96	0.00	3,589.42
	12/27/04	3,607.38	sheen	18.10	0.00	3,589.28
MW - 8	02/23/04	3,607.99	-	20.94	0.00	3,587.05
	05/13/04	3,607.99	-	19.86	0.00	3,588.13
	08/26/04	3,607.99	-	20.48	0.00	3,587.51
	12/13/04	3,607.99	-	17.81	0.00	3,590.18
MW-9	11/4/2004		-	18.68	0.00	
	11/10/2004		-	18.70	0.00	

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 MARKETING, L.P.
MONUMENT 17
LEA COUNTY, NEW MEXICO

All Concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	Methods:SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o-XYLENE
Regulatory Limit		0.01 mg/L	0.75 mg/L	0.75 mg/L	0.62 mg/L	
MW-1	02/23/04	0.00786	<0.001	.00197	<0.002	<0.001
	05/13/04	0.0281	<0.001	0.00473	0.00263	<0.001
	08/26/04	0.00884	<0.001	<0.001	<0.002	<0.001
	12/13/04	<0.001	<0.001	<0.001	<0.001	
MW - 2	02/23/04	0.00463	<0.001	<0.001	<0.002	<0.001
	05/13/04	0.00211	<0.001	<0.001	<0.002	<0.001
	08/26/04	0.00708	<0.001	<0.001	<0.002	<0.001
	12/13/04	0.00670	<0.001	<0.001	<0.001	
MW - 3	02/23/04	0.0444	0.00355	0.0112	0.00576	<0.001
	05/13/04	0.0338	<0.001	0.00922	<0.002	<0.001
	08/26/04	0.0157	<0.001	<0.001	<0.002	<0.001
	12/13/04	0.0598	<0.005	0.0362	<0.005	
MW - 4	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/13/04	<0.001	<0.001	<0.001	<0.001	
MW - 5	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/13/04	0.00120	<0.001	<0.001	<0.001	
MW - 6	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/13/04	<0.005	<0.005	<0.005	<0.005	
MW - 7	05/13/04	0.0335	<0.001	0.0136	<0.002	<0.001
	08/26/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/13/04	<0.005	<0.005	<0.005	<0.005	
MW - 8	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/13/04	<0.001	<0.001	<0.001	<0.001	
MW-9	11/10/04	<0.001	<0.001	<0.001	<0.001	

Note:

m, p and o Xylenes combined when analyzed by Trace Laboratories, In

Appendices

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

x 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 # 17	Facility Type:	Pipeline

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

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	29	19S	37E					Lea

Latitude 32 degrees 37' 57.7" N **Longitude** 103 degrees 16' 31.6" W

NATURE OF RELEASE

Type of Release:	Volume of Release:	Volume Recovered
Source of Release:	Date and Hour of Occurrence Unknown	Date and Hour of Discovery
Was Immediate Notice Given? Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ 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.

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

Attach Additional Sheets If Necessary