

1R - 123

REPORTS

DATE:

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

May 2, 2006

Ms. Camille Reynolds
Plains Marketing, L.P.
3112 West Highway 82
Lovington, NM 88260

RE: 2005 Annual Monitoring Reports
Various Plains Marketing, L.P. Sites

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the Annual Monitoring Reports shown below. All are accepted and approved with the understandings and conditions, if any, shown:

1. **TNM 97-17**; NE/4 SW/4 Section 21, Township 20 South, Range 37 East; EMS number TNM 97-17, NMOCD file AP-017; quarterly gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Site Restoration Work Plan and Soil Closure Strategy Report" by June 30, 2006.
2. **Bob Durham**; NW/4 NW/4 Section 32, Township 19 South, Range 37 East; EMS number TNM LF2000-07; NMOCD file AP-0016; quarterly monitoring and sampling will continue in 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007.
3. **Monument 17**; SE/4 NW/4 Section 29, Township 19 South, Range 37 East; EMS number TNM Monument-17-Known; NMOCD file 1R-0123; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by June 30, 2006.
4. **Monument 10**; SE/4 NE/4 Section 30, Township 19 South, Range 37 East; EMS number TNM monument-10; NMOCD file 1R-0119; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by June 30, 2006.
5. **Lea Station to Monument 6 Inch**; NE/4 SE/4 Section 5, Township 20 South, Range 37 East; EMS number 2001-11056; NMOCD file 1R-0404; monitor well gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring

Report due by April 1, 2007. The NMOCD expects a separate report on additional soil investigation/remediation by September 30, 2006.

6. **Monument Barber 10-Inch Sour**; SW/4 SW/4 Section 32, Township 19 South, Range 37 East; EMS number 2000-10655; NMOCD file 1R-0388; monitor well gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a work plan, by June 30, 2006, to address further excavation of the sidewalls of the existing excavation for possible soil closure at the site.
7. **Monument 18**; NW/4 NW/4 Section 7, Township 20 South, Range 37 East; EMS number TNM Monument 18-Known; NMOCD file 1R-0124; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by September 30, 2006.
8. **Monument 2**; SW/4 SW/4 Section 6, Township 20 South, Range 37 East and the NW/4 NW/4 Section 7, Township 20 South, Range 37 East; EMS number TNM Monument 2-Known; NMOCD file 1R-0110; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by September 30, 2006.
9. **LF-59**; NW/4 SW/4 Section 32, Township 19 South, Range 37 East; EMS number TNM-LF-59; NMOCD file 1R-0103; monitor well gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007.

NMOCD approval of these reports does not relieve Plains of liability should its operations at any of these sites 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 governmental agency.

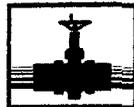
If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION



Edwin E. Martin
Environmental Bureau

Copy: NMOCD, Hobbs
Curt Stanley, NOVA



**PLAINS
Marketing, L.P.**

March 24, 2006

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

Re: Plains – Annual Monitoring Reports
16 Sites in Lea County, New Mexico

Dear Mr. Martin:

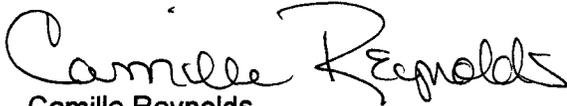
Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico 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:

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
TNM 98-05B	Section 26, Township 21 South, Range 37 East, Lea County
TNM 97-04	Section 11, Township 16 South, Range 35 East, Lea County
Texaco Skelly "F"	Section 21, Township 20 South, Range 37 East, Lea County
Darr Angell #2	Sections 11 and 14, Township 15 South, Range 37 East, Lea County
LF-59	Section 32, Township 19 South, Range 37 East, Lea County
SPS-11	Section 18, Township 18 South, Range 36 East, Lea County
Monument #2	Sections 6 and 7, Township 20 South, Range 37 East, Lea County
Monument #10	Section 32, Township 19 South, Range 37 East, Lea County
Monument #17	Section 29, Township 19 South, Range 37 East, Lea County
Monument #18	Section 7, Township 20 South, Range 37 East, Lea County
Bob Durham	Sections 31 and 32, Township 19 South, Range 37 East, Lea County
Monument Barber 10" Sour	Section 32, Township 19 South, Range 37 East, Lea County
Lea Station to Monument 6"	Section 5, Township 20 South, Range 37 East, Lea County

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 facilities.

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

Sincerely,



Camille Reynolds
Remediation Coordinator
Plains All American Pipeline

CC: Larry Johnson, NMOCD, Hobbs, New Mexico

Enclosure

2005
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
NMOCD REFERENCE: 1R-123

Report is on
the L-Drive

Prepared For:

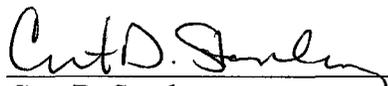
PLAINS MARKETING, L.P.
333 CLAY STREET, SUITE 1600
HOUSTON, TEXAS 77002



Prepared By:

NOVA Safety and Environmental
2057 Commerce Street
Midland, Texas 79703

March, 2006


Curt D. Stanley
Project Manager


Todd K. Choban, P.G.
Vice President Technical Services

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FIGURES

Figure 1 – Site Location Map

Figure 2A – Inferred Groundwater Gradient Map – March 14, 2005

2B – Inferred Groundwater Gradient Map – June 24, 2005

2C – Inferred Groundwater Gradient Map – September 8, 2005

2D – Inferred Groundwater Gradient Map – December 1, 2005

Figure 3A – Groundwater Concentration and Inferred PSH Extent Map – March 14, 2005

3B – Groundwater Concentration and Inferred PSH Extent Map – June 24, 2005

3C – Groundwater Concentration and Inferred PSH Extent Map – September 8, 2005

3D – Groundwater Concentration and Inferred PSH Extent Map – December 1, 2005

TABLES

Table 1 – 2005 Groundwater Elevation Data

Table 2 – 2005 Concentrations of Benzene and BTEX in Groundwater

APPENDICES

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

ENCLOSED ON DATA DISK

2005 Annual Monitoring Report

2005 Tables 1 and 2 - Groundwater Elevation and BTEX Concentration Data

2005 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 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 2005 only. Historic data tables as well as 2005 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 quarterly sampling event of 2005 to assess the levels and extent of dissolved phase constituents and the presence of Phase Separated Hydrocarbon (PSH). Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH on 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 $\frac{1}{4}$ of the NW $\frac{1}{4}$ 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 Release Notification and Corrective Action Form (C-141) is provided as Appendix A. The initial site investigation, consisting of the installation of eight (8) groundwater monitor wells (MW-1 through MW-8), was performed by previous consultants.

Monitor well MW-9 was installed November 4, 2004. Monitor well MW-6 was plugged and abandoned in September, 2005 as per NMOCD correspondence dated June 21, 2005. Currently, there are eight (8) groundwater monitor wells (MW 1 through 5 and MW 7 through 9) present on site.

FIELD ACTIVITIES

The NMOCD approved the plugging and abandonment of monitor well MW-6 in correspondence dated June 21, 2005. On September 13, 2005, monitor well MW-6 was plugged and abandoned as directed by the NMOCD. Monitor well MW-7 * was the only well on site to exhibit PSH or a sheen during the 2005 reporting period. 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 2005 reporting period.

** Monitor well MW-7 gauging data collected on September 8, 2005 indicates a PSH thickness of 0.01 feet, this data appears to be incongruous based on prior and subsequent data and historical trends.*

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 and amended in NMOCD correspondence dated June 21, 2005:

NMOCD Approved Sampling Schedule					
MW-1	Quarterly	MW-4	Semi-Annual	MW-7	Quarterly
MW-2	Quarterly	MW-5	Annually	MW-8	Annually
MW-3	Quarterly	MW-6	Plugged and Abandoned	MW-9	Quarterly

The site monitor wells were gauged and sampled on March 14th, June 24th, September 8th, and December 1st, 2005. 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 2005 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 0.002 ft./ft. to the southeast as measured between groundwater monitor wells MW-5 and MW-9. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged from 3587.25 to 3589.32 feet above mean sea level, in MW-6 on September 8, 2005 and MW-5 on March 14, 2005, respectively.

LABORATORY RESULTS

Groundwater samples collected during the 2005 monitoring activities were delivered to Trace Analysis, Inc., Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8021b. A listing of BTEX constituent concentrations for 2005 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 benzene and total BTEX constituent concentrations were below applicable NMOCD regulatory standards in monitor wells MW-2 (with the exception of 1st quarter), MW-4, MW-5, MW-6, MW-8 and MW-9. The remaining monitor wells (MW 1, MW-3 and MW-7) returned analytical results indicating benzene concentrations above the NMOCD regulatory standard during at least one quarterly sampling event. Benzene concentrations in monitor well MW-1 ranged from <0.001 to 0.0709 mg/L. Benzene concentrations in monitor well MW-3 ranged from 0.0053 to 0.0308 mg/L. Benzene concentrations in monitor well MW-7 ranged from <0.005 to 0.0129 mg/L. All groundwater

samples analyzed during the reporting period indicate total BTEX concentrations below the 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 2005 annual monitoring period. Currently, there are eight (8) groundwater monitor wells present at the site. Monthly gauging of monitor well MW-7 indicated only a sheen during the reporting period. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.002 ft./ft. to the southeast. This is consistent with data presented on Figures 2A-2C from earlier in the year.

No measurable amount of PSH was recovered from the site during the 2005 reporting period.

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 four (4) of the nine (9) monitor wells at some time during the reporting period. All other sample locations exhibited constituent concentrations below the applicable NMOCD regulatory standard for the reporting period.

A hydrocarbon sheen 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-2, MW-3, and MW-7. No trends with respect to changing dissolved phase impact are apparent from the 2005 analytical data; however, the historic trend is toward declining benzene and BTEX constituent concentrations.

ANTICIPATED ACTIONS

Monitor well gauging, sampling, and product recovery will continue in 2006. Plains will submit a Soil Investigation Work Plan to the NMOCD in 2006.

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: Larry Johnson and Paul Sheeley
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.
3112 Highway 82
Lovington, NM
cjreynolds@paalp.com
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Houston, TX 77002
jpdann@paalp.com
- Copy 5: NOVA Safety and Environmental
2057 Commerce Street
Midland, TX 79703
cstanley@novatraining.cc

Figures

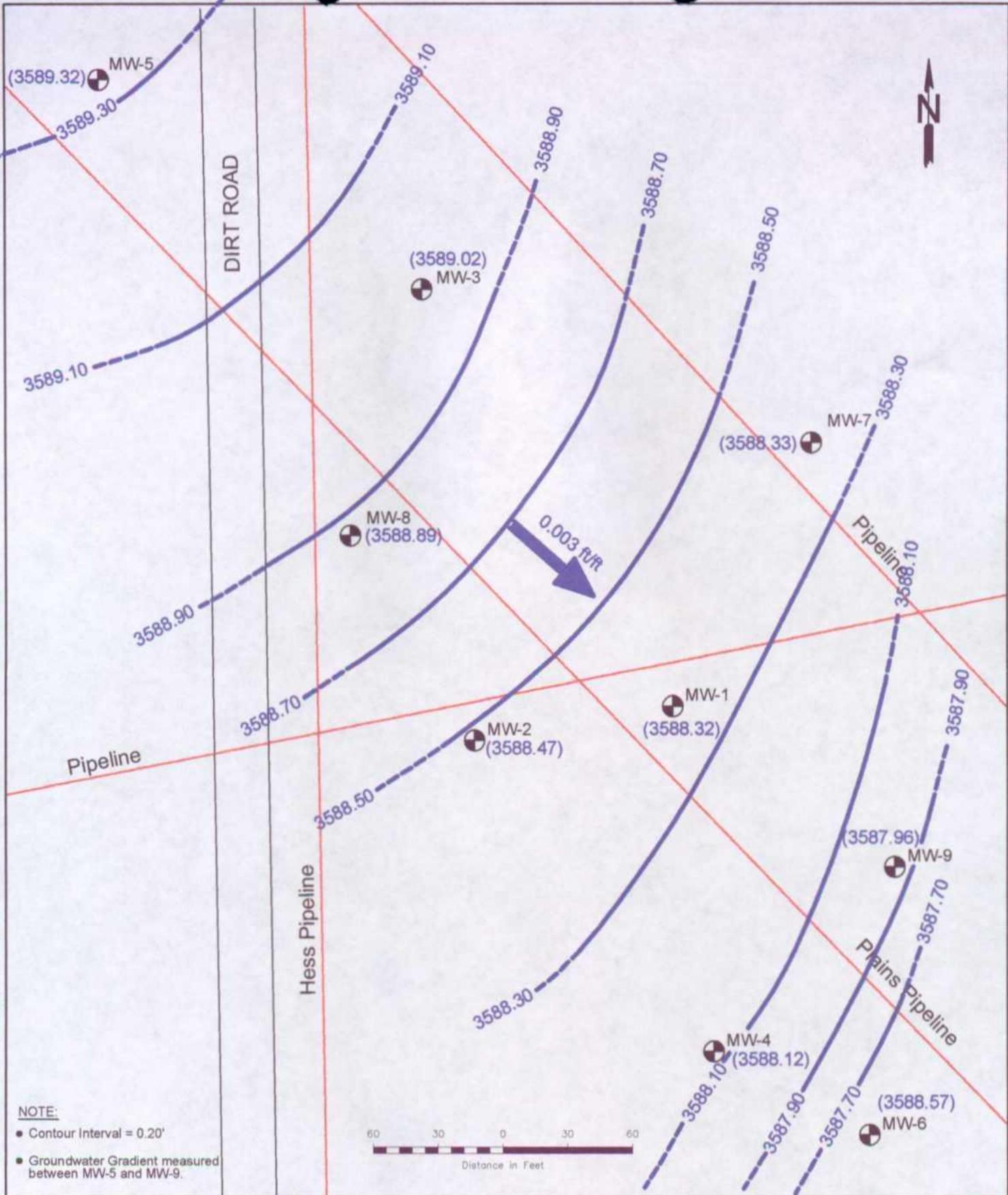


Figure 1
 Site Location Map
 Plains Marketing, L.P.
 Monument 17
 Lee County, NM

Scale: 1" = 5 Miles
 Prep By: CDG | Checked By: TKC
 February 17, 2005
 Section 28 Township 18S Range 30E

NOVA
 safety and environmental

32° 37' 57.74" 103° 18' 31.67W



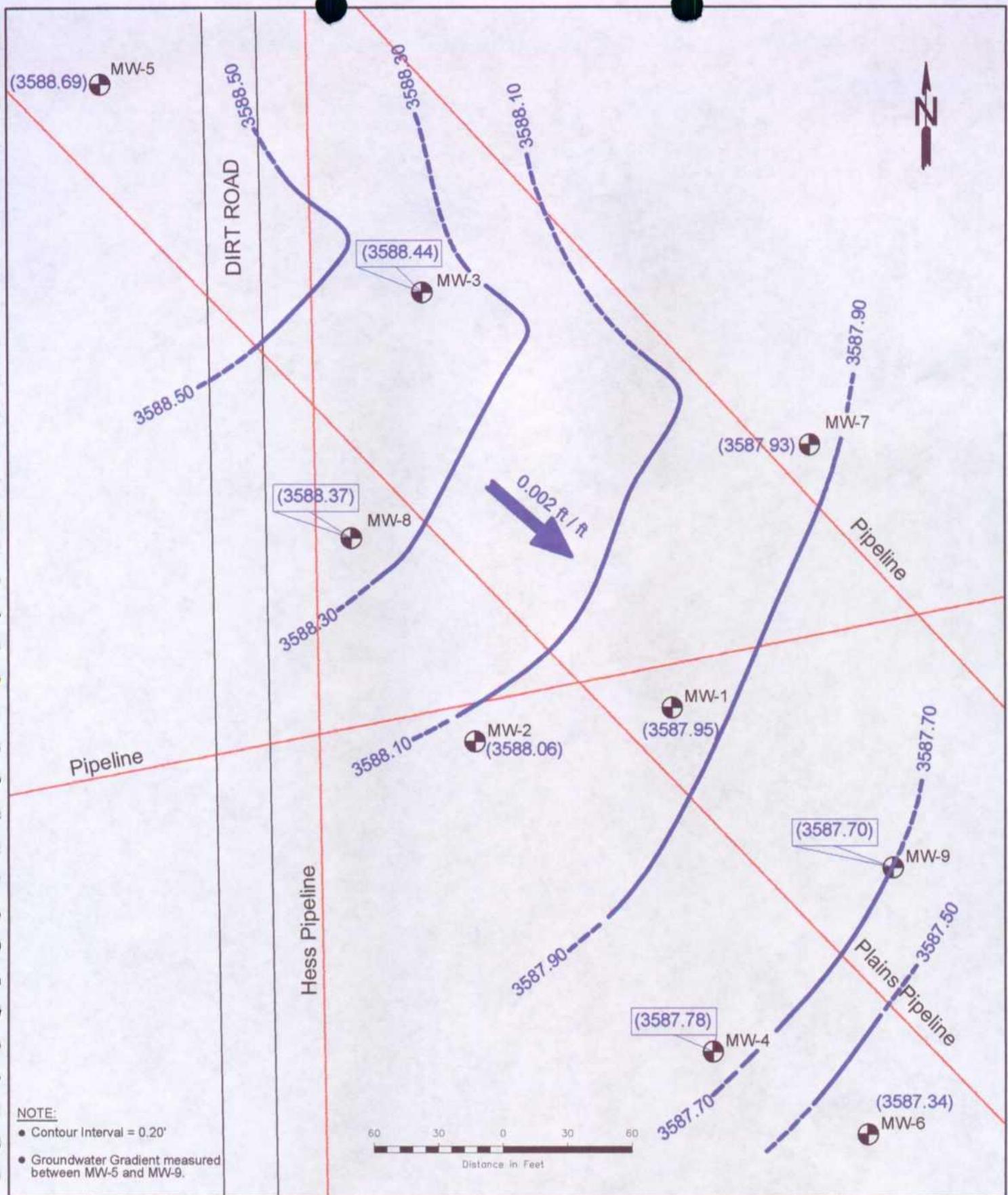
LEGEND:

- Monitor Well Location
- Pipeline
- Ground Water Contour Line
- Groundwater Elevation (feet)
- Groundwater Gradient
- Direction and Magnitude

Figure 2A
Inferred Groundwater Gradient Map (3/14/05)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

May 6, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: DPM	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



NOTE:
 • Contour Interval = 0.20'
 • Groundwater Gradient measured between MW-5 and MW-9.

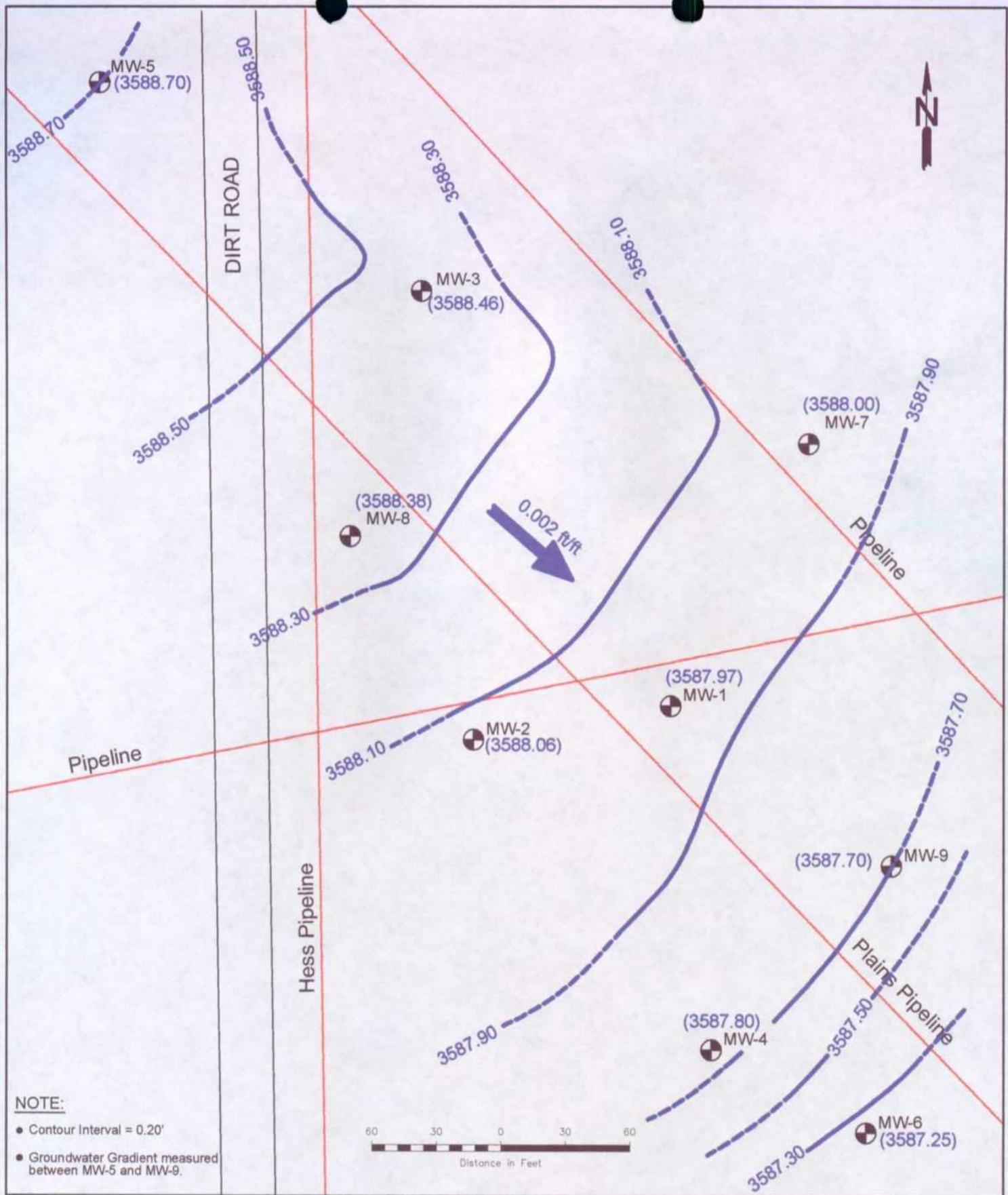
- LEGEND:**
- Monitor Well Location
 - Pipeline
 - Ground Water Contour Line
 - (3588.06) Groundwater Elevation (feet)
 - 0.002 ft/ft Groundwater Gradient Direction and Magnitude

Figure 2B
Inferred Groundwater Gradient Map (6/24/05)
Plains Marketing, L.P.
Monument 17
Lea County, NM



NOVA Safety and Environmental

July 25, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: DPM	Checked By: CDS
SE1/4 NW1/4 Sec.29 T19S R37E		



NOTE:

- Contour Interval = 0.20'
- Groundwater Gradient measured between MW-5 and MW-9.

LEGEND:

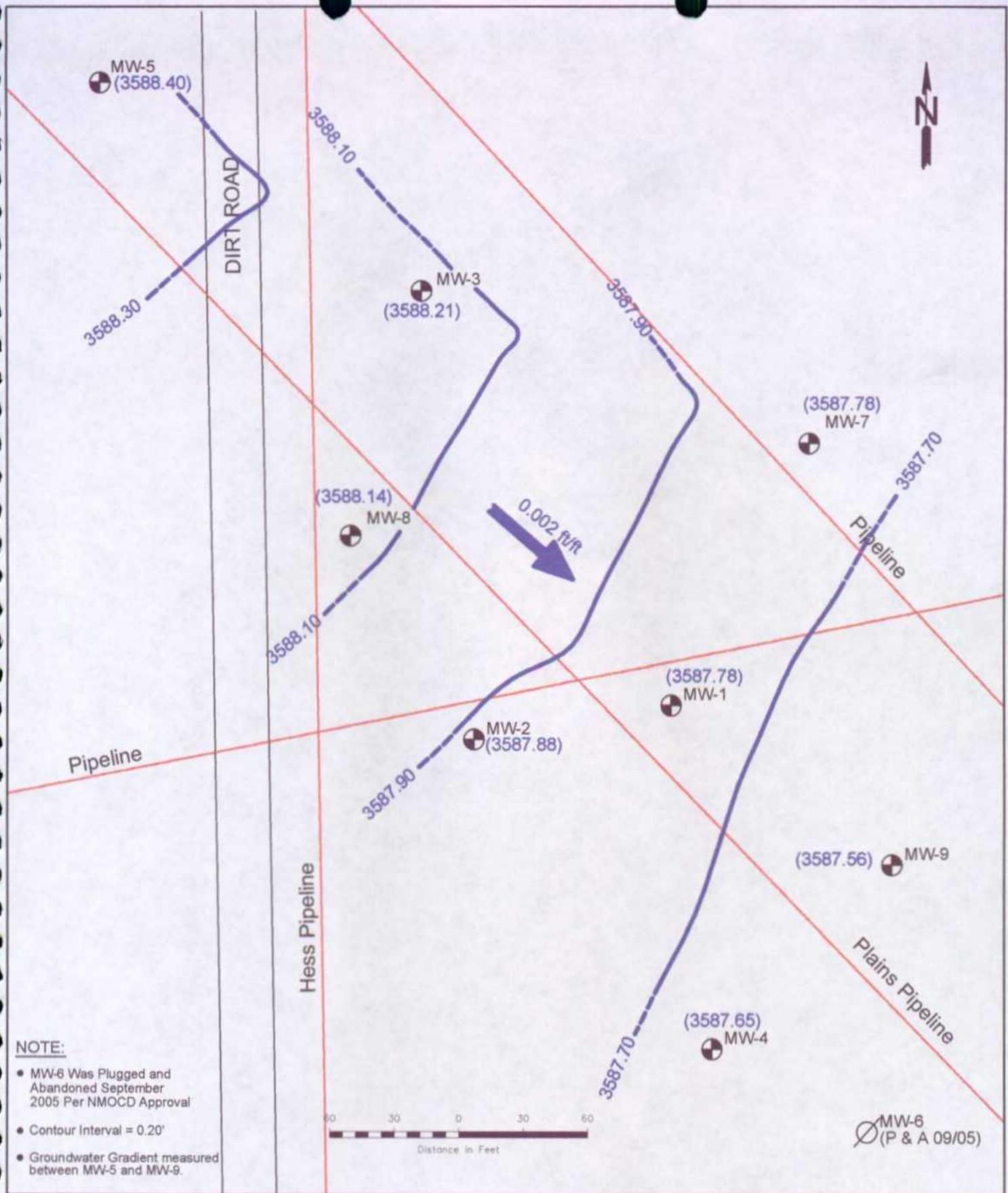
- ⊕ Monitor Well Location
- Pipeline
- Ground Water Contour Line
- (3588.06) Groundwater Elevation (feet)
- 0.002 ft/ft Groundwater Gradient Direction and Magnitude

Figure 2C
Inferred Groundwater Gradient Map (9/8/05)
Plains Marketing, L.P.
Monument 17
Lea County, NM



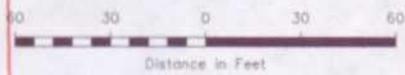
NOVA Safety and Environmental

October 21, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.8"
Scale: 1" = 60'	Prep By: DPM Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E	



NOTE:

- MW-6 Was Plugged and Abandoned September 2005 Per NMOCD Approval
- Contour Interval = 0.20'
- Groundwater Gradient measured between MW-5 and MW-9.



LEGEND:

- Monitor Well Location
- ⊘ Plugged and Abandoned Well Location
- Pipeline
- Ground Water Contour Line
- (3588.21) Groundwater Elevation (feet)
- 0.002 ft/ft Groundwater Gradient
- Direction and Magnitude

Figure 2D
Inferred Groundwater Gradient Map (12/01/05)
Plains Marketing, L.P.
Monument 17
Lea County, NM



NOVA Safety and Environmental

January 13, 2006	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"
Scale: 1" = 60'	Prep By: DPM Checked By: CDS
SE1/4 NW1/4 Sec.29 T19S R37E	



MW-5
(NS)

DIRT ROAD

MW-3
Benzene 0.0053 mg/L
BTEX 0.0079 mg/L

Benzene <0.005 mg/L
BTEX <0.005 mg/L

MW-7

MW-8
(NS)

Pipeline

MW-1
Benzene 0.0059 mg/L
BTEX 0.0059 mg/L

MW-2

Benzene **0.018 mg/L**
BTEX 0.018 mg/L

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

MW-9

Pipeline

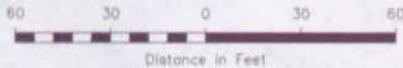
Hess Pipeline

Plains Pipeline

MW-4
(NS)

MW-6
(NS)

NOTE:
• MWs 4, 5, and 8 Are On Reduced Sampling Schedule.
• **BOLD** Indicates Concentration Above NMOCD Regulatory Limit



LEGEND:
⊕ Monitor Well Location
— Pipeline
<0.001 Constituent Concentration (mg/L)
(NS) Not Sampled

Figure 3A
Groundwater Concentration
and Inferred PSH Extent
Map (3/14/05)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental



May 6, 2005	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"	
Scale: 1" = 60'	Prep By: DPM	Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E		



MW-5
(NS)

DIRT ROAD

MW-3

Benzene **0.0308 mg/L**
BTEX 0.0348 mg/L

Benzene **0.0129 mg/L**
BTEX 0.0129 mg/L

MW-7

MW-8
(NS)

Pipeline

MW-1

Benzene **0.0413 mg/L**
BTEX 0.067 mg/L

MW-2

Benzene 0.0036 mg/L
BTEX 0.0036 mg/L

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

MW-9

Pipeline

Hess Pipeline

Plains Pipeline

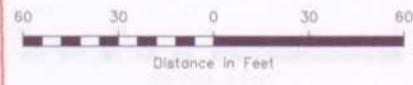
MW-4

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

MW-6

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

NOTE:
• MWs 4, 5, and 8 Are On Reduced Sampling Schedule.
• **BOLD** Indicates Concentration Above NMOC Regulatory Limit



LEGEND:

- Monitor Well Location
- Pipeline
- <0.001 Constituent Concentration (mg/L)
- (NS) Not Sampled

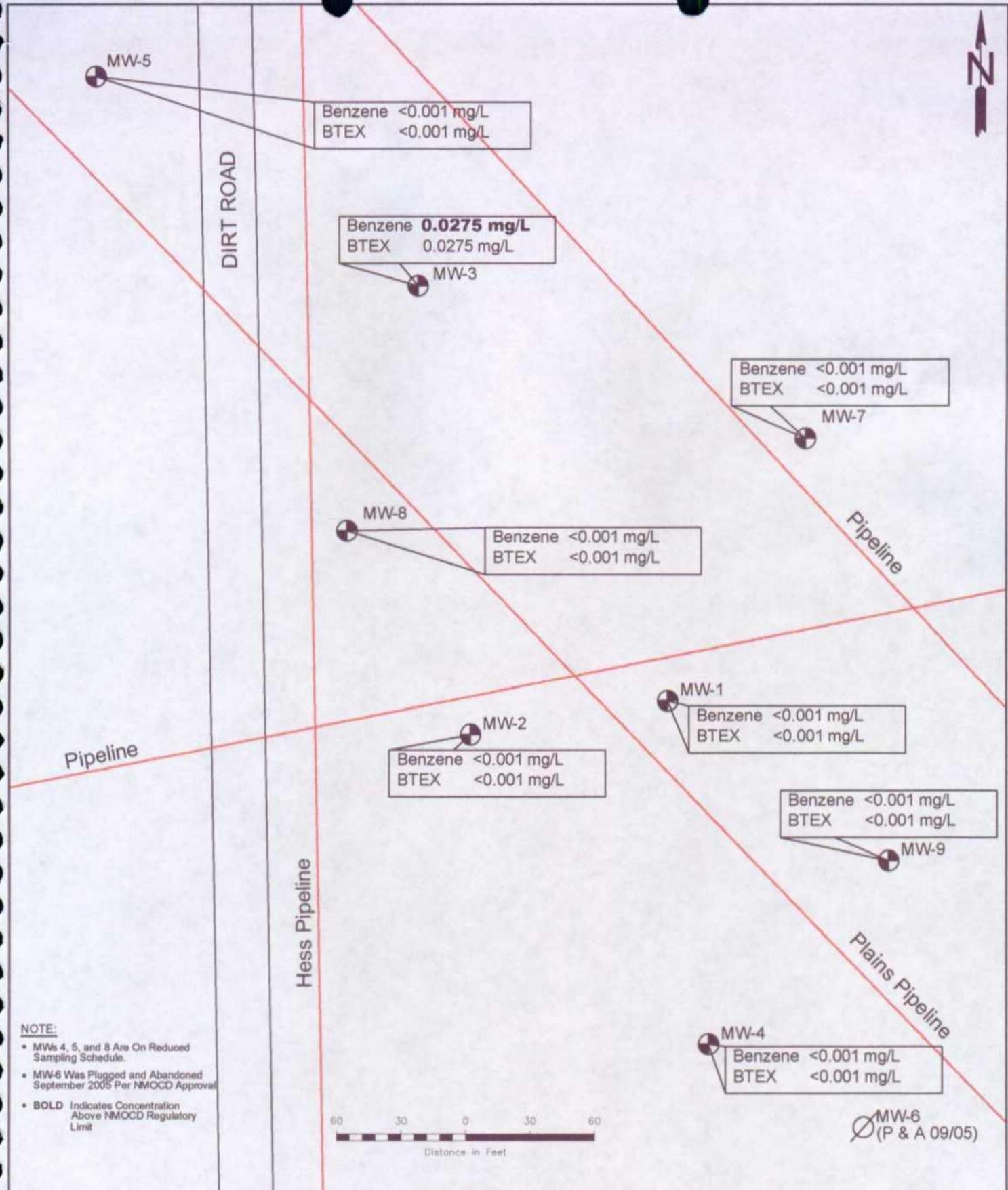
Figure 3B
Groundwater Concentration
and Inferred PSH Extent
Map (6/24/05)
Plains Marketing, L.P.
Monument 17
Lea County, NM

NOVA Safety and Environmental

July 25, 2005 Lat. N32° 37' 57.7" Long. W103° 16' 31.6"

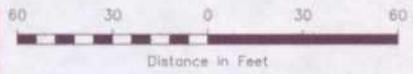
Scale: 1" = 60' Prep By: DPM Checked By: CDS

SE1/4 NW1/4 Sec.29 T19S R37E



NOTE:

- MWs 4, 5, and 8 Are On Reduced Sampling Schedule.
- MW-6 Was Plugged and Abandoned September 2005 Per NMOCD Approval
- BOLD** Indicates Concentration Above NMOCD Regulatory Limit



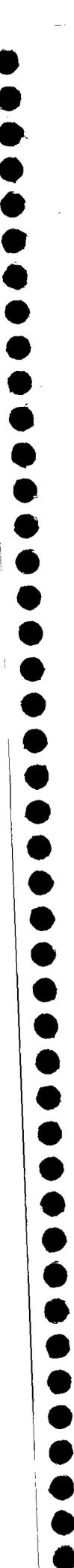
LEGEND:

- ⊕ Monitor Well Location
- ⊗ Plugged and Abandoned Well Location
- Pipeline
- <0.001 Constituent Concentration (mg/L)

Figure 3D
Groundwater Concentration and Inferred PSH Extent Map (12/01/05)
 Plains Marketing, L.P.
 Monument 17
 Lea County, NM

NOVA Safety and Environmental

January 13, 2006	Lat. N32° 37' 57.7" Long. W103° 16' 31.6"
Scale: 1" = 60'	Prep By: DPM Checked By: MRE
SE1/4 NW1/4 Sec.29 T19S R37E	



Tables

TABLE 1
2005 GROUNDWATER ELEVATION DATA

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	03/14/05	3,607.16	-	18.84	0.00	3,588.32
	06/24/05	3,607.16	-	19.21	0.00	3,587.95
	09/08/05	3,607.16	-	19.19	0.00	3,587.97
	12/01/05	3,607.16	-	19.38	0.00	3,587.78
MW-2	03/14/05	3,607.08	-	18.61	0.00	3,588.47
	06/24/05	3,607.08	-	19.02	0.00	3,588.06
	09/08/05	3,607.08	-	19.02	0.00	3,588.06
	12/01/05	3,607.08	-	19.20	0.00	3,587.88
MW-3	03/14/05	3,608.43	-	19.41	0.00	3,589.02
	06/24/05	3,608.43	-	19.99	0.00	3,588.44
	09/08/05	3,608.43	-	19.97	0.00	3,588.46
	12/01/05	3,608.43	-	20.22	0.00	3,588.21
MW-4	03/14/05	3,606.12	-	18.00	0.00	3,588.12
	06/24/05	3,606.12	-	18.34	0.00	3,587.78
	09/08/05	3,606.12	-	18.32	0.00	3,587.80
	12/01/05	3,606.12	-	18.47	0.00	3,587.65
MW-5	03/14/05	3,610.17	-	20.85	0.00	3,589.32
	06/24/05	3,610.17	-	21.48	0.00	3,588.69
	09/08/05	3,610.17	-	21.47	0.00	3,588.70
	12/01/05	3,610.17	-	21.77	0.00	3,588.40
MW-6	03/14/05	3,604.44	-	16.89	0.00	3,587.55
	06/24/05	3,604.44	-	17.10	0.00	3,587.34
	09/08/05	3,604.44	-	17.19	0.00	3,587.25
	09/13/05	Plugged and Abandoned				
MW-7	01/10/05	3,607.38	sheen	18.26	0.00	3,589.12
	01/17/05	3,607.38	sheen	18.39	0.00	3,588.99
	01/24/05	3,607.38	sheen	18.48	0.00	3,588.90
	01/31/05	3,607.38	sheen	18.59	0.00	3,588.79
	02/07/05	3,607.38	sheen	18.69	0.00	3,588.69
	02/14/05	3,607.38	sheen	18.81	0.00	3,588.57
	02/21/05	3,607.38	sheen	18.87	0.00	3,588.51
	02/28/05	3,607.38	sheen	18.93	0.00	3,588.45
	03/08/05	3,607.38	sheen	18.86	0.00	3,588.52

TABLE 1
2005 GROUNDWATER ELEVATION DATA
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-7	03/14/05	3,607.38	sheen	19.05	0.00	3,588.33	
	03/16/05	3,607.38	sheen	18.80	0.00	3,588.58	
	03/21/05	3,607.38	sheen	19.11	0.00	3,588.27	
	03/28/05	3,607.38	sheen	19.15	0.00	3,588.23	
	04/04/05	3,607.38	sheen	19.20	0.00	3,588.18	
	04/13/05	3,607.38	sheen	19.23	0.00	3,588.15	
	04/18/05	3,607.38	sheen	19.22	0.00	3,588.16	
	05/23/05	3,607.38	sheen	19.36	0.00	3,588.02	
	06/21/05	3,607.38	sheen	19.45	0.00	3,587.93	
	06/24/05	3,607.38	-	19.45	0.00	3,587.93	
	07/26/05	3,607.38	sheen	19.51	0.00	3,587.87	
	08/24/05	3,607.38	sheen	19.28	0.00	3,588.10	
	*	09/08/05	3,607.38	19.38	19.39	0.01	3,588.00
		09/26/05	3,607.38	sheen	19.46	0.00	3,587.92
		10/25/05	3,607.38	sheen	19.54	0.00	3,587.84
		11/14/05	3,607.38	sheen	19.58	0.00	3,587.80
	12/01/05	3,607.38	-	19.60	0.00	3,587.78	
	12/28/05	3,607.38	sheen	19.68	0.00	3,587.70	
MW-8	03/14/05	3,607.99	-	19.10	0.00	3,588.89	
	06/24/05	3,607.99	-	19.62	0.00	3,588.37	
	09/08/05	3,607.99	-	19.61	0.00	3,588.38	
	12/01/05	3,607.99	-	19.85	0.00	3,588.14	
MW-9	03/14/05	3,606.83	-	18.87	0.00	3,587.96	
	06/24/05	3,606.83	-	19.13	0.00	3,587.70	
	09/08/05	3,606.83	-	19.13	0.00	3,587.70	
	12/01/05	3,606.83	-	19.27	0.00	3,587.56	

Elevations based on the North America Vertical Datum of 1929.

** Monitor well MW-7 gauging data collected on September 8, 2005 indicates a PSH thickness of 0.01 feet, this data appears to be incongruous based on prior and subsequent data and historical trends.*

TABLE 2

2005 CONCENTRATIONS OF BTEX IN GROUNDWATER

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
NMOCD REGULATORY LIMIT		0.01	0.75	0.75	0.62	
MW-1	03/14/05	0.0059	<0.001	<0.001	<0.001	
	06/24/05	0.0413	<0.001	0.0168	0.0084	
	09/08/05	0.0709	<0.001	0.0096	0.0082	
	12/01/05	<0.001	<0.001	<0.001	<0.001	
MW-2	03/14/05	0.0180	<0.001	<0.001	<0.001	
	06/24/05	0.0036	<0.001	<0.001	<0.001	
	09/08/05	0.0075	<0.001	<0.001	<0.001	
	12/01/05	<0.001	<0.001	<0.001	<0.001	
MW-3	03/14/05	0.0053	<0.001	0.0026	<0.001	
	06/24/05	0.0308	<0.001	0.004	<0.001	
	09/08/05	0.0141	<0.001	0.0022	<0.001	
	12/01/05	0.0275	<0.001	<0.001	<0.001	
MW-4	03/14/05	Not Sampled Due to Sample Reduction				
	06/24/05	<0.001	<0.001	<0.001	<0.001	
	09/08/05	Not Sampled Due to Sample Reduction				
	12/01/05	<0.001	<0.001	<0.001	<0.001	
MW-5	03/14/05	Not Sampled Due to Sample Reduction				
	06/24/05	Not Sampled Due to Sample Reduction				
	09/08/05	Not Sampled Due to Sample Reduction				
	12/01/05	<0.001	<0.001	<0.001	<0.001	
MW-6	03/14/05	Not Sampled Due to Sample Reduction				
	06/24/05	<0.001	<0.001	<0.001	<0.001	
	09/08/05	Not Sampled Due to Sample Reduction				
	09/13/05	Plugged and Abandoned				
MW-7	03/14/05	<0.005	<0.005	<0.005	<0.005	
	06/24/05	0.0129	<0.005	<0.005	<0.005	
	09/08/05	Not Sampled				
	12/01/05	<0.001	<0.001	<0.001	<0.001	
MW-8	03/14/05	Not Sampled Due to Sample Reduction				
	06/24/05	Not Sampled Due to Sample Reduction				

TABLE 2

2005 CONCENTRATIONS OF BTEX IN GROUNDWATER

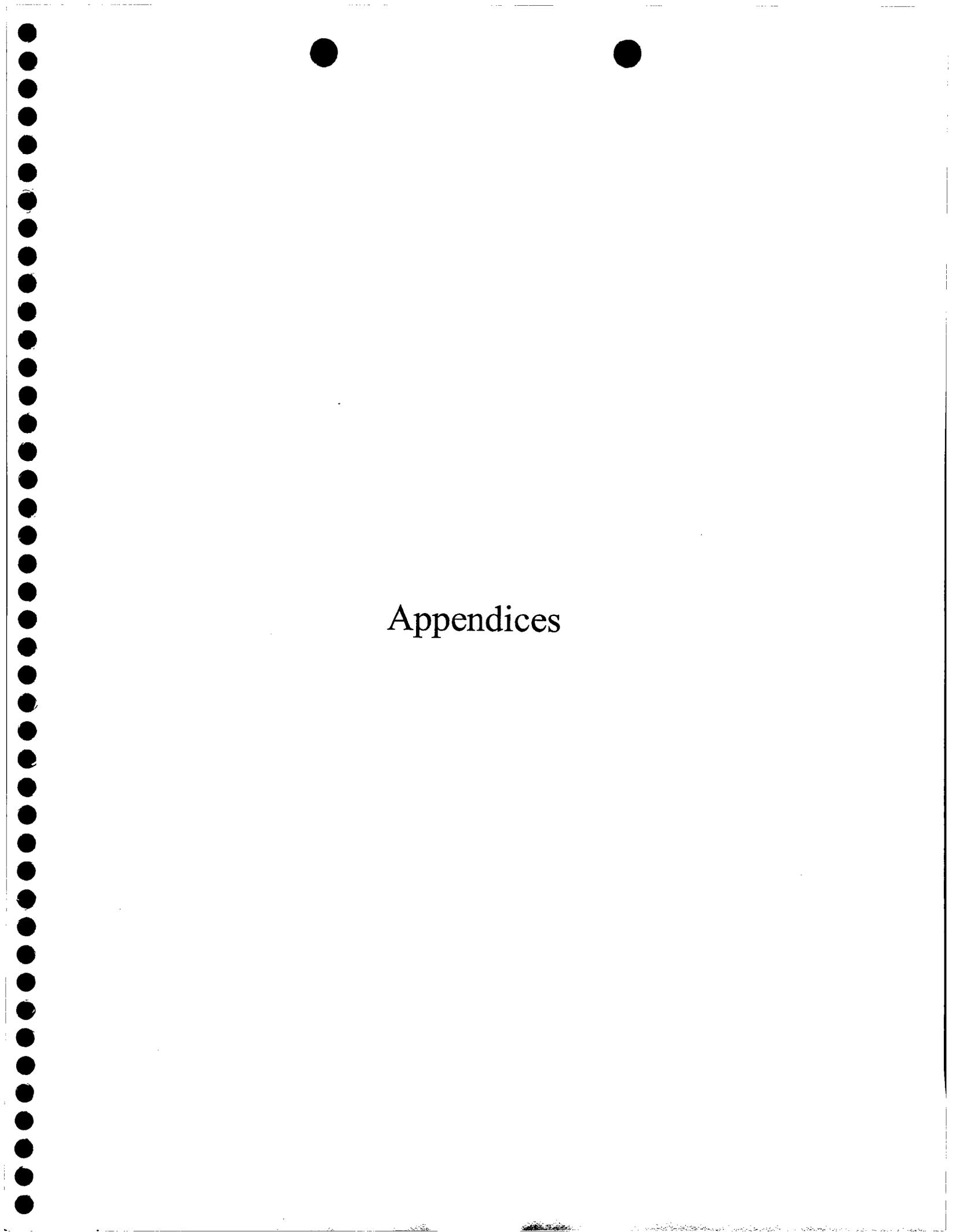
PLAINS MARKETING, L.P.
 MONUMENT 17
 LEA COUNTY, NEW MEXICO

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
NMOCD REGULATORY LIMIT		0.01	0.75	0.75	0.62
MW-8	09/08/05	Not Sampled Due to Sample Reduction			
	12/01/05	<0.001	<0.001	<0.001	<0.001
MW-9	03/14/05	<0.001	<0.001	<0.001	<0.001
	06/24/05	<0.001	<0.001	<0.001	<0.001
	09/08/05	<0.001	<0.001	<0.001	<0.001
	12/01/05	<0.001	<0.001	<0.001	<0.001

Note: m, p and o Xylenes combined when analyzed by Trace Laboratories, Inc. only.

Note: EB denotes Equipment Blank collected during the sampling event.



Appendices

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

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 # 17	Facility Type:	Pipeline

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

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

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

Attach Additional Sheets If Necessary