GW - 351

PERMITS, RENEWALS, & MODS Application

PLAINS MARKETING, L.P.

RECEIVED
2008 DEC 9 PM 1 14

December 8, 2008

Mr. Wayne Price, Environmental Bureau Chief
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Approval of Discharge Permit Renewal (GW-351)
Lea Crude Station
NW/4 Section 28, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico

Mr. Price:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, and the Oil Conservation Division (OCD) approval/renewal of the subject discharge permit, Plains Marketing, L. P. (Plains) hereby submits the signed copy of the Attachment to the Discharge Permit along with payment in the amount of $1,200.00 to cover the associated permit fee.

If you have any questions, please feel free to contact me at the numbers below or by email at weroberts@paalp.com.

On behalf of Plains, I wish to thank you and the OCD staff for your cooperation during this discharge permit review.

Sincerely,

Wayne E Roberts

Wayne E. Roberts
Director, Environmental & Regulatory Compliance
S & SW Divisions - Plains All American
3705 E. Hwy. 158
Midland, TX 79706
432.686.1767 office
432.413.2574 cell
432.686.1770 fax

Attachments

Cc: OCD District I Office, Hobbs

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

November 19, 2008

Wayne E. Roberts
Plains Marketing, L.P.
3705 E. Hwy 158
Midland, TX 79706

Re: Discharge Permit Renewal (GW-351)
Lea Crude Station
NW/4 Section 28, Township 20 South, Range 37 East, NMPM,
Lea County, New Mexico,

Dear Mr. Roberts:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **Plains Marketing, L.P.** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the OCD Santa Fe Office within 30 days of receipt of this letter, including the permit fee.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Edward J. Hansen of my staff at (505-476-3489) or E-mail at edwardj.hansen@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

WP:ejh

Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. ***The flat fee for a crude oil pump station is $1200.00.*** Please submit this amount along with signed permit. Checks should be made payable to: **New Mexico Water Quality Management Fund**.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on August 1, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its March 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class

II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. Drum Storage: The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or

depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking

water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Plains
Midland, TX

Company Name-print name above

Wayne E. Roberts

Company Representative- print name

Wayne E. Roberts

Company Representative- Signature

Title DIRECTOR, ENV. & REG. COMP.

Date: 12-08-2008

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 12/3/08

or cash received on _____ in the amount of $ 1200 00

from PLAINS PIPELINE LP

for GW-351

Submitted by: LAWRENCE ROMERO Date: 12/10/08

Submitted to ASD by: LAWRENCE ROMERO Date: 12/10/08

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

November 19, 2008

Wayne E. Roberts
Plains Marketing, L.P.
3705 E. Hwy 158
Midland, TX 79706

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Sincerely,

Wayne Price
Environmental Bureau Chief

WP:ejh

Attachments-1
xc: OCD District Office

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4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its March 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

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6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class

II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

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7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

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A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or

depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

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B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking

water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

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17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

PLAINS
PIPELINE, L.P.

March 20, 2008

Mr. Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505

Re: Discharge Permit Renewal

Loco Hills Crude Station (GW-289)
SE/4 NE/4 Section 23, Township 17 South, Range 31 East, NMPM,
Lea County, New Mexico,

Discharge Permit Renewal
Lea Crude Station (GW-351)
NW/4 Section 28, Township 20 South, Range 37 East, NMPM,
Lea County, New Mexico,

Dear Mr. Price:

Plains Pipeline, L. P. (Plains) hereby submits documentation to satisfy the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC for the above-referenced permit renewals. Plains proposes that the records accomplish and demonstrate to the NMOCD our full cooperation with the notification process. NMOCD will now provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest. The publication date of March 14, 2008 will mark the beginning of the 30-day comment period.

Should any requests for hearings arise, or if f there are any questions regarding this matter, please do not hesitate to contact me at (432) 686-1767 or by E-mail at weroberts@paalp.com.
Alternatively, you can contact Camille Reynolds at (505) 441-0965.

Thanks & Best Regards,

Wayne E Roberts

Wayne E. Roberts
Director, Environmental & Regulatory Compliance
S & SW Divisions - Plains All American
3705 E. Hwy. 158
Midland, TX 79706
432.686.1767 office
432.413.2574 cell
432.686.1770 fax

Cc: Camille Reynolds
Rebecca Esparza
Charles Manis
File

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

PUBLISHER

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published in the regular and entire issue of said paper, and not a supplement thereof for a period

of 1 issue(s).
Beginning with the issue dated
MARCH 14, 2008
and ending with the issue dated
MARCH 14, 2008

Kathi Bearden
PUBLISHER

Sworn and subscribed to before me this 19TH day of MARCH, 2008

Dora Montz
Notary Public.

My Commission expires
February 07, 2009
(Seal)

OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: _____

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

49101441-000 49687535
PLAINS ALL AMERICAN
3705 EAST HIGHWAY 158
PO BOX 3119
MIDLAND, TX 79702

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Plains Marketing, L.P. Wayne E. Roberts, 432-686-1767, 3705 E. Hwy 158, Midland, Texas 79706, has submitted discharge permit renewal applications for the following Crude Oil Pump stations. The station(s) receives, store, and transfers crude oil from various leases in Eddy and Lea Counties, New Mexico. Crude oil products, waste oil and water may be stored in above ground tanks prior to being transported off-site to OCD approved facilities. The discharge permit addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-289) Loco Hills Crude Oil Pump Station located in the NW/4 of Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth exceeding 400 feet with a total dissolved solids concentration of approximately 3000 mg/l.

(GW-351) Lea Crude Oil Pump Station located in the SW/4 NW/4 of Section 23, Township 17 South, Range 31 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of 30 feet with a total dissolved solids concentration of approximately 1600 mg/l.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en Idioma español, sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Departamento Del Energía, Minerales y Recursos Naturales de Nuevo México), oil Conservación División (Adepto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 07th day of March 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, February 15, 2008 3:13 PM
To: Jeffrey P Dann
Cc: Williams, Chris, EMNRD; Johnson, Larry, EMNRD
Subject: Discharge Permits -Attention Wayne Roberts
Attachments: Renewal WQCC Notice Regs.pdf; Discharge Plan App Form.pdf; Guidelines For Discharge Plans.pdf; PN Flow Chart.20.6.2renewal.pdf

Please forward to Mr. Wayne Roberts: I would like a return E-mail from Mr. Roberts indicating he has received the notice.

Dear Discharge Permit (GW-289) Holder:

The New Mexico Oil Conservation Division's (NMOCD) records indicate that your ***discharge permit has expired.*** New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. You may be operating without a permit. Please submit a permit renewal application, identifying any changes and updates, with a filing fee (20.6.2.3114 NMAC) of $100.00 by February 29, 2008. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. An application form and guidance document is attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

The Oil Conservation Division's (OCD) records indicate that the following discharge plans will expire this year:

GW-351 Lea Station Expiration Date: 08/01/2008

New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

Please submit a permit renewal application, identifying any changes and updates, with a filing fee (20.6.2.3114 NMAC) of $100.00 at least 120 days before the discharge plan expires. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. An application form and guidance document is attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3490
Fax: 505-476-3462

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

March 07, 2008

Mr. Wayne E. Roberts
Plains Pipeline , L.P.
3705 E. Hwy 158
Midland, Tx 79706

Re: **DRAFT** Discharge Permit Renewal
Lea Crude Station (GW-351)
NW/4 Section 28, Township 20 South, Range 37 East, NMPM,
Lea County, New Mexico,

Dear Mr. Roberts:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Plains Pipeline , L.P. (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**.

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact me at (505-476-3490) or E-mail Wayne.price@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. ***The flat fee for a crude oil pump station is $1200.00. Please submit this amount along with the signed certification item 23 of this document after the final permit is issued in approximately 45 days.***

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on August 01, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its March 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-

approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. Drum Storage: The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or

depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-

regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written

notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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(GW-289) Loco Hills Crude Oil Pump Station located in the NW/4 of Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth exceeding 400 feet with a total dissolved solids concentration of approximately 3000 mg/l.

(GW-351) Lea Crude Oil Pump Station located in the SW/4 NW/4 of Section 23, Township 17 South, Range 31 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of 30 feet with a total dissolved solids concentration of approximately 1600 mg/l.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 07th day of March 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 2/28/08

or cash received on _____ in the amount of $ 100 00

from Plains Marketing

for GW-351

Submitted by: Laurence Romero Date: 3/6/08

Submitted to ASD by: Laurence Romero Date: 3/6/08

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

PLAINS
PIPELINE, L.P.

RECEIVED
2008 MAR 5 PM 2 58

March 3, 2008

Mr. Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505

Re: Groundwater Discharge Plan Renewal Submittal, Lea Station
GW-351
Lea County, New Mexico

Dear Mr. Price:

Enclosed please find the Discharge Plan Renewal Application for Plains Pipeline's Lea Station in Lea County, NM. Also enclosed is the Discharge Plan Application form, the draft public announcements, and the $100 filing fee.

If you have any questions or comments about this information, please do not hesitate to call me at 432-686-1767. Alternatively, you can contact Rebecca Esparza at 713-646-4625.

Thanks & Best Regards,

Wayne E Roberts

Wayne E. Roberts
Director, Environmental & Regulatory Compliance
S & SW Divisions - Plains All American
3705 E. Hwy. 158
Midland, TX 79706
432.686.1767 office
432.413.2574 cell
432.686.1770 fax
email:weroberts@paalp.com

Cc: Camille Reynolds
Rebecca Esparza
Charles Manis
File

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

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: **GW Discharge Plan for Remediation Site**
2. Operator: **Plains Pipeline, L. P.**

   Address: **P. O. Box 4648, Houston, TX 77210-4648**

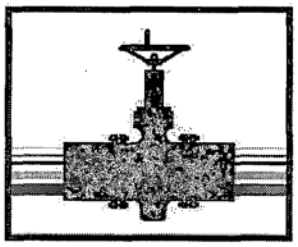
   Contact Person: **Wayne E. Roberts, Director, Env/Reg Compliance; Phone: (432) 686-1767**
3. Location: **NW ¼,** Section **28** Township **20S** Range **37E**

   Submit large-scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Wayne E. Roberts Title: Director, Env/Reg Compliance

Signature: Wayne E. Roberts Date: March 3, 2008

E-mail Address: weroberts@paalp.com



PLAINS
PIPELINE, L.P.

Lea Station Groundwater Discharge Plan

NW ¼ Section 28 Township 20 South Range 37 East
Lea County New Mexico
Latitude: 32° 32'51. 3"N Longitude: 103°15'37. 0"W
Site Elevation: 3,495'

1. Type of Operation

Plains Pipeline, L. P.'s (Plains) Lea Station is a crude oil pumping station operated by Plains Pipeline, L. P. with an average daily throughput of 23,700 barrels (bbls) (42 US gallons per barrel). Inbound crude oil is received from the Livingston Ridge Gathering System, Loco Hills Gathering System, Lynch Gathering System, Monument Gathering, Eunice Gathering, Anderson Ranch, Denton West Lovington, Saunders, and Lovington Deep. Outbound crude oil is pumped into either the 8" Jal or the 8" Wink mainlines.

2. Facility Description

The facility is located in the NW ¼ of Section 28 in Township 20 South and Range 37 East in south-central Lea County New Mexico at Latitude: 32°32'51. 3"N and Longitude: 103°15'37. 0"W. The facility is enclosed with a 4 wire barbed wire fence to exclude livestock that graze the surrounding area with a single access gate on the east side secured by a lock to prevent public access. The interior consists of four unlined bermed containment areas, i.e., three storage and receiving tank areas and one primary pump area. A single internal floating roof 25,000-barrel crude oil storage tank is located central to the facility with two external floating roof 80,000-barrel tanks to the west. The pump area is located adjacent to and east of the 25,000-barrel tank.

Several ground water monitor wells and vapor extraction wells have been installed and are being routinely managed by Shell Pipeline Company as a part a New Mexico Oil Conservation Division (NMOCD) approved Rule 19 Stage II Ground Water Pollution Abatement Plan implemented to address release(s) during the time Shell owned the facility. A single domestic use water well bore is located in the northeast corner of the facility but has not been in use since the late 1960's.

Plains currently monitors attenuation of an in-situ bio-cell that was constructed east of the facility with approval by the NMOCD.

Located just outside of the exclusionary fence on the northeast corner of the facility are two bermed crude oil storage batteries that receive crude oil transported by truck and are isolated from Lea Station. Leaks and spills from these facilities cannot reasonably affect the interior of Lea Station. See Attachment I - Maps and Figures for reference.

3. Materials Stored or Used at the Facility

New replacement pipe is temporarily stored in the northeast corner of the fenced area.

Crankcase oil for the crude oil pumps is stored in two 55-gallon steel drums in the south end of the East pump area.

Naphtha (UN 1268) is stored in a steel 250-gallon overhead tank and is used for cleaning.

Small volumes of a mixture of Methyl and Isopropyl alcohol are injected continuously from two fiberglass overhead tanks located in the pump area into the outbound pipelines to prevent paraffin buildup and corrosion.
All overhead storage tanks are set inside inert fiberglass containment basins sized to hold 1.5 times vessel volume in the event of a leak or spill. Plains personnel and contractors maintain material Safety Data Sheets (MSDS) at the Eunice office for reference.

4. Sources of Effluent and Waste Solids:

Effluent Sources include:

- Small quantities of crude oil collect in concrete basins and pans under the pumps, valves, and sampling points.
- Used pump crankcase oil
- Storm water
- Small quantities of crude oil recovered by Shell Pipeline Company as a part of the on-going ground water remediation project.

There are no restroom facilities requiring sewage management or disposal at the facility.

Waste Solids include:

- Small quantities of domestically generated trash and maintenance and construction waste
- Crude oil contaminated soil,
- Paraffin and grease from pipeline maintenance activities, i. e., "pigging" and "scrapers"

Crude oil contains compounds that are inherently "hazardous" and listed in the Resource Conservation and Recovery Act (RCRA) CFR 40 Part 261 Subpart D as promulgated by the U.S. Environmental Protection Agency (EPA), however, crude oil contaminated soil is typically characterized as RCRA "non-hazardous" in accordance with CFR 40 Part 261 Subpart C analytical procedures (TCLP). Please refer to Analytical Reports included in the attachments.

5. Description of Current Liquid and Solid Waste Collection/Storage/Disposal

Liquids and Solid Wastes generated at Lea Station are collected, stored, and recycled or disposed of in accordance with the waste management regulations governing the facility. Being a no-release facility with no operational processes capable of generating constant waste streams, Lea Station does not currently have any collection and storage systems, or surface impoundments, leach fields, injection wells, drying beds or pits, solids disposals, or land farms. Satellite containers and bins are used for solid wastes and concrete collection basins are constructed around all pumps. All pumps on site are driven by electric motors. No used engine oil is generated at the facility. Metal pans and/or buckets are located at points in the system where stream sampling occurs to catch spillage. There are six underground crude oil sumps located at the facility.

5.1 Liquid Waste

- Crude oil from pumping or facility operations and maintenance is collected in subsurface pump gallery sumps and pumped back into the pipeline system.
    1. LACT#1
    2. LACT #2
    3. Sour Field Suction Pump
    4. North and South Booster Pumps
    5. Mainline Pumps
    6. Junction 34 Line Receiver

- Used crankcase oil is stored in a sealed steel 55-gallon drum and given or sold to a used oil contractor for recycling.

- Storm water that accumulates to unacceptable volumes in the bermed areas or overhead tank catch basins is disposed of at a NMOCD approved facility.
- Shell Pipeline Company manages crude oil recovered during the Shell Pipeline Company ground water remediation project.
- Other than the sump for the East Pump Gallery, Lea Station does not have a common buried drain/collection system.

5.2 Solid Waste

- Domestic and non-metallic construction waste is managed by the individual generator by depositing in the "Waste Management" dumpster located at the entrance to the facility. The dumpster is emptied weekly.
- Metallic construction waste is stored in a bin in the Eunice yard and sold to a metal recycling company.
- Crude oil contaminated soil, with concurrence with the NMOCD, is either remediated on-site or transported to an approved disposal facility, i.e., South Monument SWMF #NM-01-0032, S25 T20S R36E, 834 W. Gold, Hobbs, New Mexico 88240 (505) 391-8391 or Environmental Plus, Inc. #NM-01-0013, S15 T22S R37E, P.O. Box 1558, Eunice, New Mexico 88231 (505) 394-3481. Hazardous characteristics, i.e., Reactivity (R), Corrosivity (C), Ignitability (I), and Toxicity are determined in accordance with RCRA 40 CFR Part 261, Subparts C and D. Toxicity of the soil is determined by analyzing the leachate collected during the "Toxicity Characteristic Leaching Procedure' (TCLP) for Volatiles (EPA method 8270), and Metals. The soil historically has been characterized as RCRA "non-hazardous." Please refer to the attachments.
- Pipeline "pigging" and "scrapers" wastes from routine pipeline maintenance activities are accumulated in the 800 cubic foot steel roll-off storage bin rented from CRI, Hobbs, New Mexico. The waste, consisting primarily of paraffin and grease from pigging and scrapers, is collected by Plans personnel in sealable 5-gallon steel cans at off site locations, transported to Lea Station, and mechanically transferred into the roll-off bin. Following hazardous characterization according to RCRA 40 CFR Part 261, Subpart D, the "RCRA non-exempt" waste is disposed of at a NMOCD approval disposal facility.

6. Inspection and Maintenance Plan

All pressurized underground piping and valves within the facility are tested for integrity and functionality at least annually and the surface facilities visually inspected twice daily. The level of crude oil accumulated in the basins, pans/buckets, and sumps are noted daily and the crude oil routinely reintroduced to the system via truck. Each Plains employee is trained and tested in the operation, inspection, and maintenance of Lea Station prior to being allowed to operate the facility.

6.1 Pressure Testing, Valve Operation, and Tank Height

The underground piping within the facility, along with the inbound gathering system lines and outbound mainlines, are pressure tested to 125% of the designed working pressure at least annually. Functional testing of the remotely operated facility is conducted semi-annually on all facilities including Plains' Department of Transportation (DOT) regulated pipelines. Failures are replaced or repaired immediately and iteratively tested before being placed back in service. Fluid

levels are displayed on the "Panel View" system at the station and monitored remotely on a 24-hour basis from the Pipeline Control Center in Midland, Texas.

6.2 Routine Inspection and Maintenance

As a routine order of operation and maintenance, Plains personnel conduct a visual inspection of the entire facility twice daily.

6.2.1 Mechanical and Instrumentation Inspection and Maintenance

During the operations and maintenance routine the visual inspection identifies pumping equipment and instrumentation issues requiring attention, as well as, determining the need for repair or maintenance of lighting systems, fences, and facility berms and roads, adequacy of the safety equipment and communications, and disposition of satellite container and bin wastes and sump contents. All leaks are mitigated and reported immediately to Plains Environmental and Regulatory Compliance personnel in Midland, Texas, consistent with the Plains Facility Response Plan and company spill reporting policy.

6.2.2 Tank Fluid Levels

Each storage tank at Lea Station is equipped with a direct-read mechanical gauge line manufactured by "VAREC." These gauges lines are read each day and compared to the "Panel View" readouts to ensure consistency and accuracy of the electronic monitoring system. If a discrepancy is observed, the malfunctioning device or system is taken off-line and repaired.

6.2.3 Containment System Inspection and Maintenance

The berms are visually inspected twice daily, initiating maintenance or repair when berms become eroded or are disturbed. In the event storm water accumulations persist for more than 24 hours, effectively reducing the berm or catch basin storage volume to less than the maximum potential release volume, the water will be immediately removed to an NMOCD approved disposal facility

6.2.4 Basins, Pans/Buckets, and Sumps Inspection and Maintenance

Crude oil released during normal operation or maintenance is collected in basins, pans/buckets, and sumps. Plains personnel monitor the levels daily and empty when necessary.

6.2.4.1 Basins

All station pumps are installed inside of concrete basins designed to collect crude oil released from the pumps during operations and maintenance. Some basins drain into a common sump. Basins and drains are routinely cleared of sand debris.

6.2.4.2 Pans/Buckets

Like the Basins, all pans/buckets deployed about the site are inspected daily and, as necessary, collected and reintroduced to the system.

6.2.4.3 Sumps

There are five subsurface sumps installed at Lea Station. These are non-pressurized vessels constructed of ¼" steel plate.

6.2.4.3.1 East Pump Gallery Sump

This sump is located just north of the east pump gallery and receives crude oil from the five basins. This sump has a level-actuated pump that will automatically inject crude oil back into the pipeline. A high sump level sensor is also installed and will shut down the station when activated.

6.2.4.3.2 34 Junction LACT Sump

This sump receives crude oil from the 34 Junction LACT skid.

6.2.4.3.3 #1 and#2 LACT Sump

This sump receives crude oil from the #1 and #2 LACT units.

6.2.4.3.4 Tank 808-C Booster Pumps Sump

This sump receives crude oil from the Booster Pumps due east of Tank 808-C located inside the bermed area.

6.2.4.3.5 Lynch Station Receiver and Meter Sump

Crude oil released at the meter skid drains into this sump. Prior to retrieving the pipeline scraper from the receiver, the receiver is isolated and drained into the sump.

7. Contingency Plan; Spill/Leak Prevention and Reporting Procedures

Plains Facility Response Plan identifies hazards associated with the operation of the Lea Station and identifies administrative and engineered controls designed to minimize and mitigate hazards associated with a spill or release of crude oil at the facility. Plains' Facility Response Plan directs response to, and management of, crude oil spills and leaks that occur at Lea Station.

7.1 Facility Inspections and Remote Monitoring

Trained Plains personnel perform routine maintenance on the pumps and instrumentation as needed, and also inspect the above ground facilities, i.e., tanks, valves, and piping. The Pipeline Control Center in Midland, Texas remotely monitors the inbound and outbound flow rates, tank levels, and inlet and discharge pump pressures 24 hours per day and can operate the system remotely or divert control to on-site personnel. Aerial surveillance of the entire pipeline gathering and transmission system is conducted at least every 3 weeks under normal conditions to check for leaks.

7.2 Facility Shutdown

If the Pipeline Control Center personnel deem any of the parameters monitored "abnormal", a local technician is dispatched to verify the problem. If warranted, the facility can be shut down remotely from Midland or by the responding technician. "Abnormal" conditions would include, pump failure, high levels in the storage tanks or east pump gallery sump, fire, or a major leak or spill. The emergency shutdown is located just inside the east entrance gate and when activated will shut down the pumps and close the system block valves to minimize release volumes. The facility will be shutdown in the event of a fire that cannot be controlled with the handheld fire extinguishers deployed throughout the facility, a catastrophic failure of a tank, pump, or piping that results in an uncontrolled release of crude oil, or at the discretion of Plains to preempt an imminent spill or release.

7.3 Secondary Containment Systems

Tank areas where large volumes of crude oil accumulate and pump areas with high throughput volumes are enclosed within earthen/caliche berms to prevent major releases from migrating off-site. The overhead storage tanks for pipeline treating chemicals stand inside fiberglass basins. Accumulated storm water in the bermed areas or fiberglass basins which persists for more than 24 hours and reduces the containment system volume appreciably below 1.5 times the maximum release volumes will be tested and disposed of off-site at an NMOCD approved facility.

7.3.1 Crude Oil Storage Tank Containment System

Each storage tank is enclosed by an 8-foot high caliche berm designed to contain at least 1.5 times the respective tank volumes. Each berm is approximately 20 feet wide at the base with a 4 - 5 foot wide flattened top. Below are the calculated containment volumes for the storage tank areas.

- 25,000 barrel tank = 69,902 barrels, berm dimensions--Diameter: 250'; Height: 8'
- 80,000 barrel tanks = 140,158 barrels, berm dimensions—Diameter: 354'; Height: 8'

7.3.2 East Pump Area Containment System

The land surface in the main pump area on the east side of the facility slopes slightly to the southeast causing run-off to flow in that direction. A down gradient berm is in place to contain all run-off from the pump area, whether storm water or crude oil, and has a calculated capacity of 1.5 times the maximum facility throughput, i.e. 25,000 bbls/day x 1.5 = 37,500 bbls (157,890 ft^3). Below are the calculated containment volumes for the East Pump Area Containment System basin.

- Basin volume: 200' X 220' X 5' = 220,000 ft^3
- Maximum crude oil release volume: 25,000 bbls = 140,364 ft^3

7.3.3 Overhead Tanks Containment System:

To prevent an environmental release of treating and cleaning chemicals stored in overhead tanks, each vessel is placed inside of inert fiberglass catch basins capable of holding at least 1.5 times the respective volumes of fluid.

7.4 Fire Suppression

Incipient fires will be extinguished with the six 20-pound Dry Chemical (ABC) fire extinguishers strategically deployed in the areas of the pumps, meters, controls, and valves. All fire extinguishers are housed in readily accessible, highly visible (red) weatherproof enclosures with NFPA approved signage. The extinguishers are routinely serviced and inspected consistent with the NFPA guidelines, i.e., annually and monthly, respectively. All employees are trained annually in their use and limitations. In the case of a catastrophic fire, local, municipal and county Fire and Rescue personnel will be summoned and will be deployed by the first responders.

7.5 NMAC 19.15.3.118, Hydrogen Sulfide Gas (H_2S) Contingency Plan

Hydrogen Sulfide is present in a portion of the sour crude oil streams that pass through Lea Station. On February 15,2002, a H_2S survey was conducted at the facility by Callaway Safety Equipment Company with "zero'/"null" results, therefore exempting this facility from the requirements of NMAC 19.15.3.118.D, i.e., Hydrogen Sulfide Contingency Plan. Nevertheless, Plains employees and contractors are required to wear calibrated and checked personal H_2S monitors when on Plains property and are required to be trained in H_2S Safety.

7.6 Response to Spills and Leaks

During a crude oil spill or leak the governing Plains documents are he Facility response Plan and the Operations and Maintenance Procedures Manual. Upon discovery and confirmation of a crude oil release at the facility, Plains Environmental & Regulatory Compliance personnel will collect information necessary to document and assess the release, such as:

Occurrence Date and Time
Discovery Date and Time
Crude oil volume Released
Crude oil volume Recovered
Effected Surface Area
Legal Description
Driving Directions
Landowner
Cause
Initial response and mitigation activities

7.6.1 Rule 116 Notification

Plains Environmental & Regulatory Compliance personnel will notify the NMOCD consistent with NMOCD Rule 116.

7.6.1.1 Releases >25 Barrels

Plains Environmental & Regulatory Compliance personnel will immediately notify the local NMCOD office of leaks >25 bbls, convey the necessary information, and submit a completed NMOCD form C-141 within 15 days of the occurrence.

7.6.1.2 Releases <25 Barrels but >5 Barrels

For leaks <25 bbls but >5 bbls, Plains Environmental & Regulatory Compliance personnel will submit a completed NMOCD form C-141 within 15 days of the occurrence.

7.6.1.3 Releases <5 Barrels

Spills <5 bbls do not need to be reported but will be remediated consistent with the NMOCD Guidelines.

7.6.1.4 Releases Capable of Affecting the Public

If the Plains Environmental & Regulatory Compliance personnel determine that a release is capable of negatively affecting the public as they traverse New Mexico State Road 8, approximately 600 feet east of the east facility perimeter, he/she will contact the New Mexico State Police, Lea County Sheriff, and the National Response Center.

7.6.2 Initial Response and Mitigation

After the system has been taken out of service, Plains personnel will recover pooled crude oil and reintroduce it into the system and repair or replace the defective equipment or device. Coincident with the repair or replacement activities, crude oil saturated soil will be excavated and placed on a plastic barrier to mitigate vertical migration and minimize impacted soil volume. This process may involve the use of qualified local contractors.

7.6.3 Remediation Procedure

Following mitigation of the spill, collecting and analyzing soil samples from the excavation and/or by soil borings will delineate, the vertical and horizontal extents of the release. Based on the delineation information, contaminated soil will be disposed of in a NMOCD approved land farm and the excavation backfilled with clean soil or, with NMOCD approval, will be remediated on-site using an acceptable remediation alternative, i.e., bio-treatment, in-situ remediation, blending, or land farming. All environmental management activities will be implemented consistent with the "New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills, and Releases".

8. Employee Training

Plains conducts an extensive employee safety-training program. The Plains Contractor Safety Program requires Plains' contractors to implement a similar program. Each Plains employee is trained and tested to recognize occupational and operational hazards and how they should be managed safely and efficiently.

8.1 Occupational Safety Training

Prior to going into the field, each new Plains employee receives occupational safety training that provides a discussion of the hazards encountered on the job and specific safety training in how these hazards should be mitigated or managed, consistent with 29CFR 1910 (OSHA). Training is refreshed annually with attendance mandatory and proficiency documented. Topics include, but are not limited to, HAZWOPER Level III, Benzene, and H_2S.

8.2 Operational Training

Plains employees are cross-trained to perform multiple jobs within the system. Class room and "on the job training" (OJT) of operational procedures are required before a Plains employee is allowed to work independently in the field. Proficiency must also be documented.

9. Site Characteristics

Lea Station is located in an area of Lea County New Mexico with no naturally occurring surface water bodies. A water well was drilled for domestic use in the northeast part of the site during the 1950s and has been abandoned since the mid 1960s but not plugged. No other wells occur within 0.5 miles; notwithstanding, it is a relatively sensitive area because of the occurrence of shallow and relatively high quality ground water. For the purposes of this Discharge Plan, the 70 acres of land owned by Plains located west of the west perimeter fence but not currently utilized is considered to be part of the facility.

9.1 Area Surface Water Bodies

There are no naturally occurring surface water bodies, i.e., streams, distinct drainages or arroyos, or ground water discharge points (springs, seeps, marshes, and swamps) recorded or observed within 1.0 mile of the facility perimeter.

9.2 Area Water Wells

The New Mexico Office of the State Engineer records the on-site water well in Section 28 and two in Section 33 adjacent to the southwest of Section 28 where Lea Station is located. The ground

water well location map is included in the attachments to this plan along with the New Mexico Office of the State Engineer well report.

NM Office of The State Engineer	Use	Tws	Rng	Sec	Q	Q	Q	Zone	Easting	Northing	Date	Well Depth (bgs)	Water Level (bgs)
L 02402	DOM	20S	37E	28	1	4	1	13	663465	3602173	1/10/54	60	40
L 07355	SAN	20S	37E	33	1	2	2	13	663687	3600964	7/4/75		120
L 08157	SAN	20S	37E	33	1	2	2	13	663867	3600964	10/8/79	395	275

9.3 Geological/hydrological Information

The general reference document for southern Lea County New Mexico is "United States Geological Survey-Ground Water Report 6, Geology and Ground Water Conditions in Southern Lea county, New Mexico, Alexander Nicholson, Jr. and Alfred Clebsch, Jr. 1961" (Nicholson & Clebsch). Geologic and hydrologic maps are included in the attachments to this plan.

9.3.1 Geological Description

Lea Station is located at the lower end of Laguna Valley as it transitions into Monument Draw. The surface soil consists of tan to reddish sand and consolidates with depth. The Ogallala Formation that mantles the High Plains to the north has been eroded and subsequently filled with Quaternary Alluvium. A study by Theis in 1954 at a location in Monument Draw approximately 4 miles east of Lea Station found, that, at that location, the Triassic Red-Bed Clays underlying the Ogallala Formation have been depressed probably by erosion and suggests that the Quaternary fill washed into the depression from the Ogallala Formation that rims the north side of Monument Draw. Soil borings advanced at Lea Station identified intermittent occurrences of caliche mixed with fine tan sand from the surface to 25 feet below ground surface (bgs), but no pure indurate caliche interbed, as is typical of lithologies of the High Plains Province to the north where the Ogallala Formation is capped by an intergrade of caliche and siliceous sandstone of varying thicknesses. The confining Triassic Red-Beds occur approximately 3 5' bgs and are overlain by Quaternary Alluvium and is consistent with the Theis study. Please refer to Figure 18 in the attachments to this plan.

9.3.2 Hydrologic Description

From monitor well records, ground water occurs beneath Lea Station at approximately 30'bgs. Nicholson & Clebsch considered inflow from Laguna Valley as the principle source of saturation encountered in the Monument Draw with minimal contributions from infiltration during precipitation events. At Lea Station the ground water flow follows the depression in Monument Draw to the east. The Environmental Lab of Texas, Inc. analyzed a sample from a Shell Pipeline Company perimeter monitor well located east of Lea Station in May 2001. The following table summarizes part of the results. A copy of the Analytical Report is included in the Attachments. Please note that the Metals were unfiltered.

Parameter	Units	Value	Parameter	Value (mg/Kg)
Total Dissolved Solids	mg/L	1688	Benzene	0.001
PH	SU	7.09	Toluene	<0.001
Conductivity	uS/cm	2000	Ethylbenzene	<0.001
			m,p-Xylene	<0.001
			o-Xylene	0.001
			Chloride	151

A potentiometric map from Nicholson & Clebsch is included in the attachments to this plan.

9.3.3 Site Run-in and Run-off

The topography at Lea Station tilts slightly to the east and is surrounded on all sides by a dunal system of tan to reddish sand. There are no well defined surficial drainages up-gradient to provide "run-in" and the system of containment berms constructed to control run-off will likewise prevent run-in. A "100 year storm event" with >12 inches of rain in 24 hours occurred during the 1980's but did not flood the facility.

10 Facility Closure

At a time in the future when Lea Station is no longer in operation, the facility will be closed and decommissioned consistent with the closure plan requirements described in the New Mexico Water Quality Control Commission (WQCC) Title 20.6.6.2 Section 3107.A.11 regulations. Delineation and remediation will proceed consistent with the "NMOCD Guidelines for Remediation of Pipeline Spills, Leaks and Releases in New México, July 2000".

10.1 Site Assessment

After the Lea Station infrastructure is removed, the site subsurface will be delineated to identify levels of the Constituents of Concern (CoCs) that are in excess of the NMOCD remedial goals for the site.

10.1.1 Soil Assessment

The NMOCD site ranking score for the Lea Station is 20, requiring achievement of the following CoC remedial goals:

- Benzene = 10 mg/Kg
- BTEX = 50mg/Kg (BTEX is the mass sum of Benzene, Toluene, Ethylbenzene, and Xylenes)
- Total Petroleum Hydrocarbon 8015m (TPH^{8015m}) = 100 mg/Kg

1 0. 1 .2 Ground Water Assessment

Given that Shell Pipeline Company is implementing a NMOCD approved Rule 19 Stage II Abatement Plan at the site, it is assumed that the ground water pollution abatement processes will continue to be implemented and monitored until compliance is achieved.

10.2 Site Remediation

CoC concentrations in excess of the NMOCD remedial goals will be remediated to acceptable levels consistent with the NMOCD Guidelines and "General Work Plan for Remediation of Pipeline Spills, Leaks and Releases in New Mexico, July 2000." Remediation alternatives that may be proposed will include disposal, on-site blending, in-situ bio-cell, and risk assessment. Remediation alternatives, other than disposal, require a plan be submitted to the NMOCD for approval.

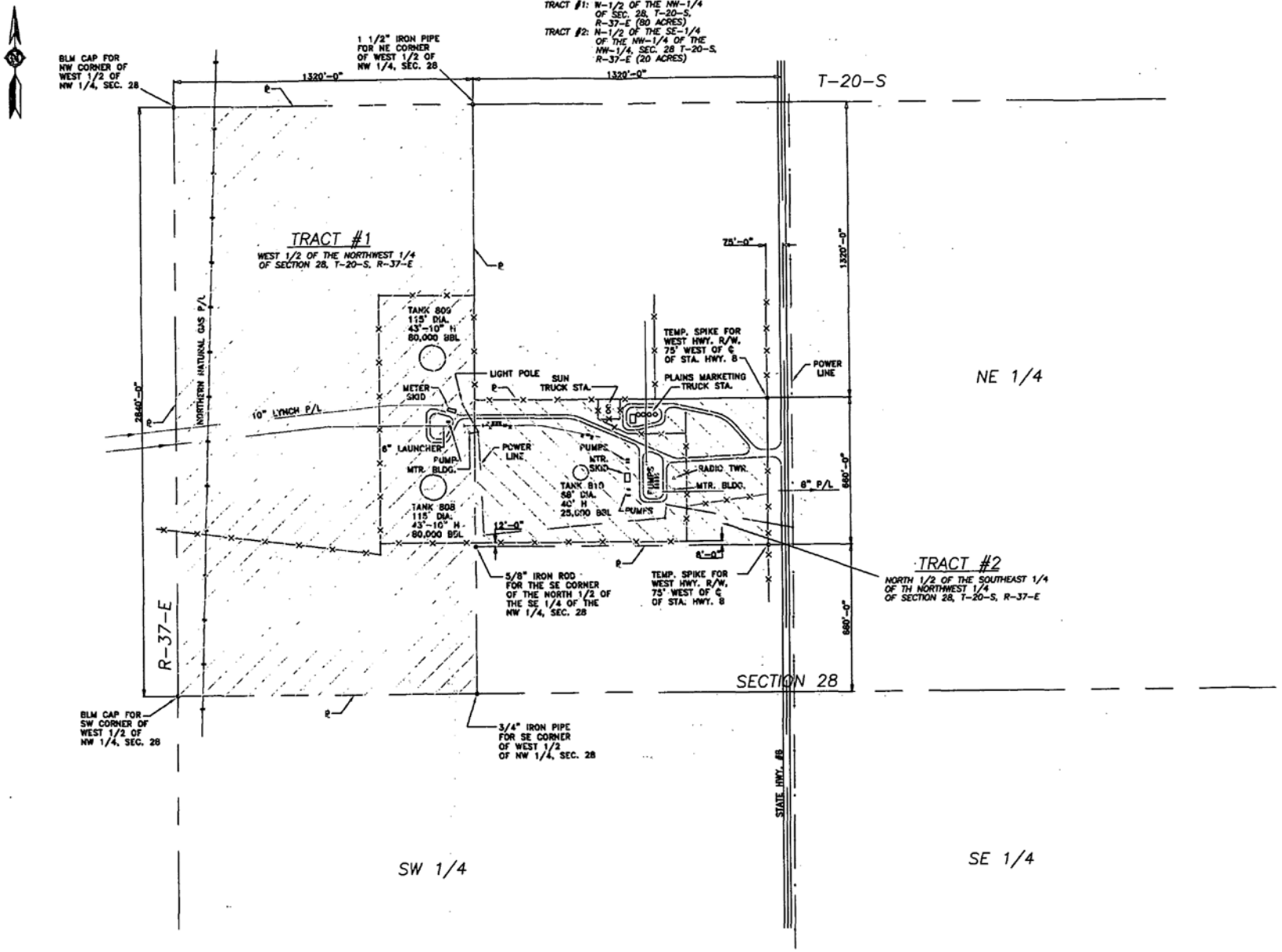
10.3 Financial Assurance

Plains will provide the warranted financial assurance to the NMOCD to see that any long term maintenance or monitoring plans are viably implemented. Similarly, Shell Pipeline Company will be responsible financially for assuring that the current Ground Water Pollution Abatement Plan presently being implemented at the site will continue until compliance is achieved.

Attachment 1. Plot Plan
(11" X 17" Drawing, folded)

LEA STATION

2 TRACTS–100.00 ACRES
TRACT #1: W–1/2 OF THE NW–1/4 OF SEC. 28, T–20–S, R–37–E (80 ACRES)
TRACT #2: N–1/2 OF THE SE–1/4 OF THE NW–1/4 OF THE NW–1/4, SEC. 28 T–20–S, R–37–E (20 ACRES)



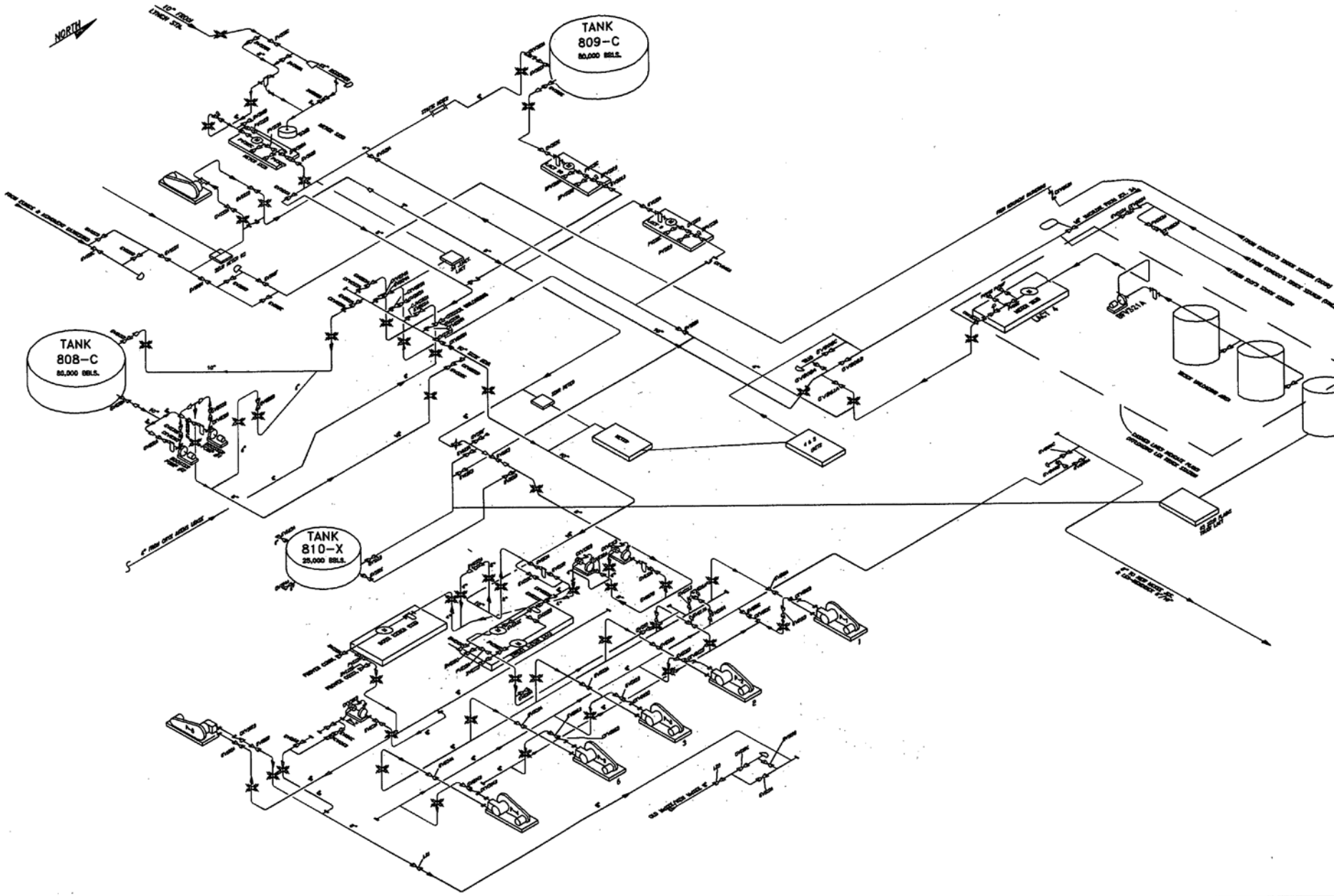
DATE	REVISION	BY	APP.
6-17-06	Redrawn	JS	BF

PLAINS

Plot Plan
LEA STATION
Lea County, New Mex

SCALE = None | PAGE 1 of 1 | PPS

Attachment 2. Valve Operating Schematic
(11" X 17" Drawing, folded)



DATE	REVISION	BY	APP.
6-16-06	Redrawn	JS	BF

PLAINS

Valve Operating Scher
LEA STATION
Lea County, New Me

SCALE = None | PAGE 1 of 1 | PPS

Attachment 3
Section 216A, O & M Procedures Manual
Lea Station

Section 216A - Lea Station

General:

- Lea Station is located in Lea County New Mexico approximately 5.8 miles south of Monument on State Highway 8.
- GPS 32.547500N; 103.260278W
- This station is DOT jurisdictional.
- Crude oil is received from a field gathering system. The station is equipped with three storage tanks. The oil from the gathering system is received into tank 808; truck and field oil is received into 809 and 810.

- The following equipment is installed here:

Unit #	Type	Horsepower	Flow rate (BPH)	High Discharge Pressure Shutdown Setting (PSI)
1	Gaso 2652	200	500	850
2	Gaso 1742	100	250	850
3	Gaso 1742	100	250	850
6	Gaso 2652	200	500	850
7	Peerless	100	720	190
LACT 7	Peerless	100	565	190
LACT 2	Gould 3656	30	500	37
LACT 3	Gould 3770	7.5	210	37
LACT 4	Peerless 8196	30	210	134
North Booster	Peerless 8196	50	1400	42
South Booster	Peerless 8196	50	1400	42

- The following tanks are located at this facility; all are equipped with high-level alarms.

Tank #	Capacity (Barrels)	Roof Design	High Alarm	Hi-Hi Alarm	Low Alarm
808	80,000	External Floater	32'-0"	34'-0"	7'-0"
809	80,000	External Floater	32'-0"	34'-0"	7'-0"
810	25,000	Internal Floater	36'-0"	36'-0"	7'-5"

- Station Alarms are as follows:
  - Station Shutdown
  - Lockout all pumps
  - Power failure
  - Relief flow
  - Discharge line bypass
  - Station shutdown lockout
  - Local Control Status/Control
  - Booster pump lockout
  - High tank level
  - Midland Control gets an On/Off status on pumps
  - Meter fails alarm
  - High Sump
  - Individual Unit Lockout
  - RTU No Reply
  - Sweet Station Bypass Flow
  - Sweet Meter Fail
  - Sour Meter Fail
  - Unit Status (Unit #1, #2, #3, #4)
  - Unit Control (Units #1, #2, #3, #4)
  - Sweet Station Discharge Pressure
  - Total Line #2 Flow rate
  - Total Line #2 Barrel count
  - Line #1 Station Discharge Pressure
  - Total Line #1 Barrel Count
  - Sweet Booster Status
  - Unit #1 Bypass Valve Status

Catholic protection is provided by an impressed current system.

Start up procedure:

- The normal operation for this station is to be remotely controlled from the Control Center.
- The control center will align the proper valves to allow receipt of sweet or sour crude oil into
  tankage. The control center will align the proper valves for proper delivery.

Shut down procedure:

- The station is normally shut down via remote control from the Control Center.

Emergency shut down procedure:

- Contact the Control Center to make an emergency shut down. Turn the "Off-Auto-Selector" switch located at the control panel to the off position.
- The Operations Technician is to perform a Lock Out/Tag Out (LOTO) for each pump and control valve.
- The Operations Technician is responsible to ensure that LOTO procedures are performed for
  any upstream facility as a result of an emergency shut down.

Emergency Telephone Numbers:

Fire	Eunice NM	505-394-3258
LEPC	Eunice NM	505-397-9231
Sheriff	Eunice NM	505-394-2020
Police	Eunice NM	505-394-2112
DPS	Eunice NM	505-392-5588
Ambulance	Eunice NM	505-394-3258
Power Co.	Eunice NM	800-750-2520
Gas Co	Eunice NM	505-392-2142
Hospital	Eunice NM	505-492-5000

Valve Positions:

- The Lea Station Valve Chart shows the general layout of the facilities. The valve chart is Included as Attachment 2 of the Lea Station Groundwater Discharge Plan.

Attachment 4
New Mexico Office of the State Engineer
Well Report
And
Geology/Hydrology Maps

New Mexico Office of the State Engineer
POD Reports and Downloads

Township: 20S Range: 37E Sections: 20,21,22,27,28,29,32,33,34

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) Non-Domestic Domestic All

POD / Surface Data Report Avg Depth to Water Report Water Column Report

POD / SURFACE DATA REPORT 03/03/2008

(quarters are 1=NW 2=NE 3=SW 4=SE)

ft per annum)			(quarters are biggest to smallest X Y are in Feet								UTM are in Meters)			Start	Finish	Depth	Depth (in feet)
Use	Diversion	Owner	POD Number	Source	Tws	Rng	Sec	q	q	q	Zone	UTM_Zone	Easting	Northing	Date	Date	Well	Water
DM	3	GULF REFINING COMPANY-SOUTHERN	L 02402	Shallow	20S	37E	28	1	4	1		13	663415	3602377	01/10/1954	01/10/1954	60	40
O				Shallow	20S	37E	28	1	4	1		13	663415	3602377	01/10/1954	01/10/1954	60	40
AN	0	NORTHERN NATURAL GAS CO.	L 07108 EXP		20S	37E	33	1	2	2		13	663636	3601169				
AN	3	NORHTERN NATURAL GAS CO.	L 07355	Shallow	20S	37E	33	1	2	2		13	663636	3601169	07/04/1975	07/04/1975		120
AN	3	NORTHERN NATURL GAS CO.	L 08157	Shallow	20S	37E	33	1	2	2		13	663636	3601169	10/03/1979	10/08/1979	395	275

5

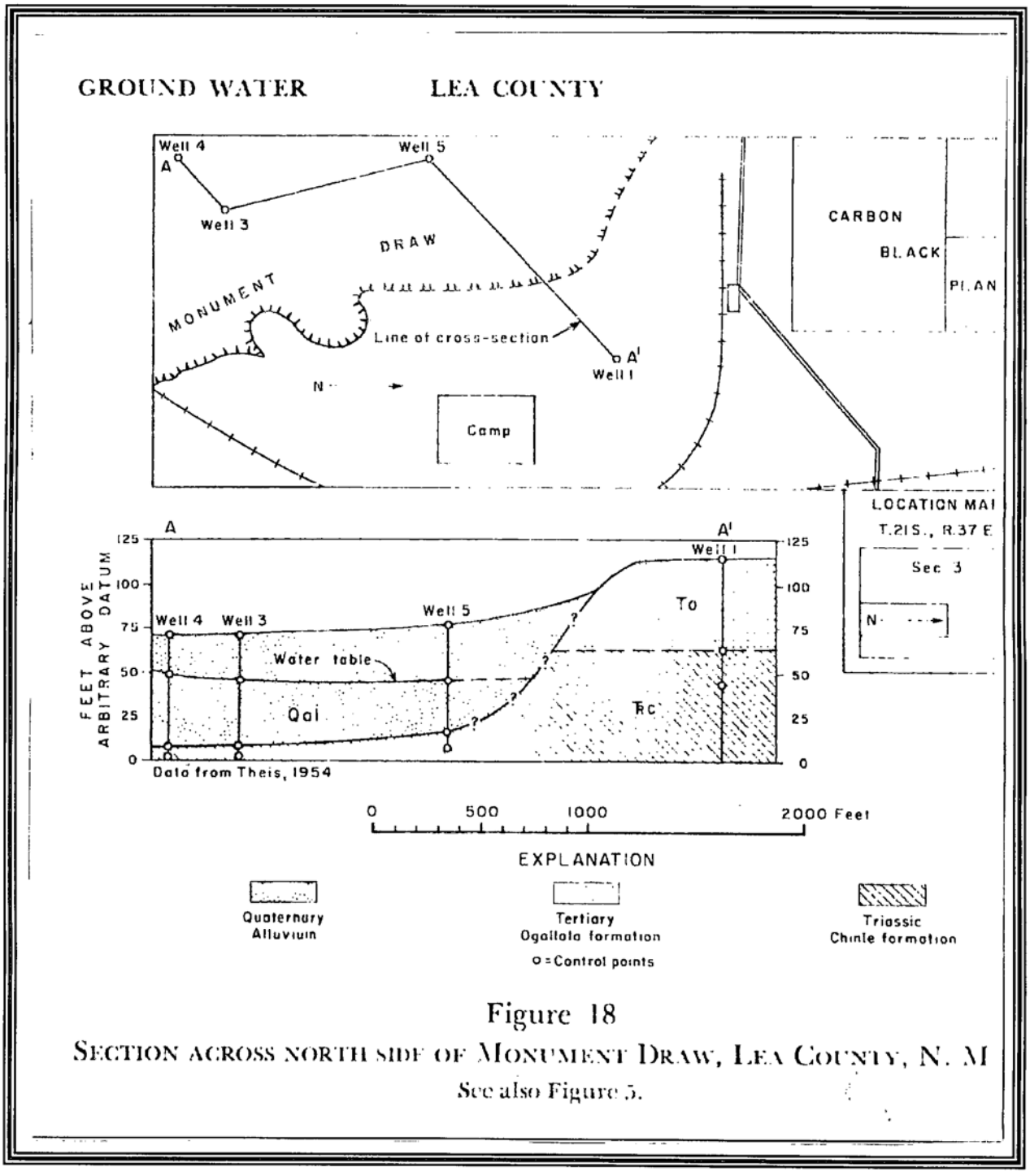


Figure 18

SECTION ACROSS NORTH SIDE OF MONUMENT DRAW, LEA COUNTY, N. M

See also Figure 5.

Lea Station Discharge Plan

Groundwater Section

Attachment 5
Original Laboratory Analytical Reports:
Ground Water and Soil RCRA Characterizations

ANALYTICAL REPORT

Prepared for:

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Project:	Junction 34
PO#:	2002-10286
Order#:	G0205277
Report Date:	12/27/2002

Certificates
US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706
915-684-3456

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0205277-01	SEJ4121702SP	SOIL	12/17/02 9:00	12/17/02 14:51	L glass	Ice

Lab Testing: Rejected: No Temp: 2.0 C

8260B TCLP
8270C Semivolatile Organics - TCLP
METALS RCRA 7 TCLP
Mercury, TCLP
TPH 418.1 FTIR

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

Lab ID: 0205277-01
Sample ID: SEJ4121702SP

8260B TCLP

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
	12/19/02	12/20/02 16:27	5	1	CK	1311/8260B

Parameter	Result µg/L	RL
Carbon tetrachloride	<1	1.00
Benzene	1.06	1.00
1,2-Dichloroethane	<1	1.00
Chlorobenzene	<1	1.00
1,1-Dichloroethene	<1	1.00
1,4-Dichlorobenzene	<1	1.00
2-Butanone (MEK)	<1	1.00
Chloroform	<1	1.00
Tetrachloroethene	<1	1.00
Trichloroethene	<1	1.00
Vinyl chloride	<1	1.00

Surrogates	% Recovered	QC Limits (%)	
Dibromofluoromethane	115%	53	144
1,2-dichloroethane-d4	94%	57	147
Toluene-d8	102%	64	128
4-Bromofluorobenzene	92%	47	158

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

Lab ID: 0205277-01
Sample ID: SEJ4121702SP

8270C Semivolatile Organics - TCLP

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0004176-02	12/20/02	12/26/02 22:31	1	1	CK	1311/8270C

Parameter	Result µg/L	RL
Pyridine	<5	5.00
1,4-Dichlorobenzene	<5	5.00
2-Methylphenol	<5	5.00
Hexachloroethane	<5	5.00
Nitrobenzene	<5	5.00
Hexachlorobutadiene	<5	5.00
2,4,6-Trichlorophenol	<5	5.00
2,4,5-Trichlorophenol	<5	5.00
2,4-Dinitrotoluene	<5	5.00
Hexachlorobenzene	<5	5.00
Pentachlorophenol	<5	5.00
4-Methylphenol	<5	5.00

Surrogates	% Recovered	QC Limits (%)	
2-Fluorophenol	19%	21	110
Phenol-d5	15%	10	110
Nitrobenzene-d5	52%	35	114
2-Fluorobiphenyl	56%	43	116
2,4,6-Tribromophenol	89%	10	123
p-Terphenyl-d14	58%	33	141

Approval: Celey D. Keene 12/28/02
Date

Raland K. Tuttle, Lab Director, QA Officer
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Bizzugbe, Lab Tech.
Sara Molina, Lab Tech.

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

Lab ID: 0205277-01
Sample ID: SEJ4121702SP

METALS RCRA 7 TCLP

Parameter	Result	Units	Dilution Factor	RL	Method	Date Prepared	Date Analyzed	Analyst
Arsenic	<0.008	mg/L	1	0.008	1311/6010B	12/21/2002	12/23/02	SM
Barium	0.108	mg/L	1	0.001	1311/6010B	12/21/2002	12/23/02	SM
Cadmium	<0.001	mg/L	1	0.001	1311/6010B	12/21/2002	12/23/02	SM
Chromium	<0.002	mg/L	1	0.002	1311/6010B	12/21/2002	12/23/02	SM
Lead	0.038	mg/L	1	0.011	1311/6010B	12/21/2002	12/23/02	SM
Selenium	<0.004	mg/L	1	0.004	1311/6010B	12/21/2002	12/23/02	SM
Silver	<0.002	mg/L	1	0.002	1311/6010B	12/21/2002	12/23/02	SM

Test Parameters

Parameter	Result	Units	Dilution Factor	RL	Method	Date Prepared	Date Analyzed	Analyst
Mercury, TCLP	< 0.0005	mg/L	1	0.00050	1311 / 7470	12/21/2002	12/23/02	SM

Approval: Celey D. Keene 12/30/02
Date

Raland K. Tuttle, Lab Director, QA Officer
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

Environmental Lab of Texas, Inc.

12600 West I-20 East,
Odessa, Texas 79763
Phone 915 563-1800
Fax 915 563-1713

Project Manager: FRANK HERNANDEZ
Company Name: EOTT ENERGY PIPELINE
Company Address: 5605 E HIGHWAY 80
City/State/Zip: MIDLAND TX 79701
Telephone No. 915-556-0190
Sampler Signature:

Project Name: JUNCTION 34
Project #: 2002 10286
Project Loc:
PO#:

Lab I.D.	Field Code	Date Sampled	Time Sampled	No. of Containers	Preservative: ICE	HNO	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (Specify)	Analyze For: TCLP / TOTAL: TDS/CL/SAR/EC	TPH 418.1	TPH TX 1005-1006	TPH 8015M GRO/DRO	Metals	Volatiles	Semivolatiles	btex 8021B/5030	RUSH TAT	Standard TAT
1	SEJ4121702SP	12/12/2002	9:00	1	X									X			X			X	X	X			

Special Instructions:
FAX RESULTS TO PAT MCCASLAND

Sample Containers Intact: Y N
Temperature Upon Request
Laboratory Comments: Rec 2.0°C

Relinquished:	Date	Time	Received by:	Date	Time
	12/12	900			
Relinquished:	Date	Time	Received by:	Date	Time
	12/17	1351		12-17-02	1451

ANALYTICAL REPORT

Prepared for:

Frank Hernandez
EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701

Project:	Monument 6" 72202
PO#:	2002-10197
Order#:	G0204002
Report Date:	08/01/2002

Certificates
US EPA Laboratory Code TX00158

The Monument 6" site is in the same system as the Junction 34 to Lea Site

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701
915-684-3456

Order#: G0204002
Project: 2002-10197
Project Name: Monument 6" 72202
Location: UL A Sec 5 T 20S R 36E

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0204002-01	SEM72402SPC	SOIL	7/24/02 14:30	7/25/02 14:20	1. Glass	Ice

Rejected: No Temp: 0.0 c

Lab Testing:

8015M
RCI
TCLP BTEX 8021B,1311

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Frank Hernandez
EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701

Order#: C0204002
Project: 2002-10197
Project Name: Monument 6" 72202
Location: UL A Sec 5 T 20S R 36E

Lab ID: 0204002-01
Sample ID: SEM172402SPC

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
	7/25/02	7/25/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	378	10.0
TOTAL, C6-C35	378	10.0

TCLP BTEX 8021B,1311

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0802649-02	7/26/02	7/29/02 23:54	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Ethylbenzene	<0.001	0.001
Toluene	<0.001	0.001
p/m-Xylene	<0.001	0.001
o-Xylene	<0.001	0.001

Approval: Raland K Tuttle 8-02-02
Raland K. Tuttle, Lab Director, QA Officer — Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Frank Hernandez
EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701

Order#: G0204002
Project: 2002-10197
Project Name: Monument 6" 72202
Location: Ul. A Sec 5 T 20S R 36E

Lab ID: 0204002-01
Sample ID: SEM72402SPC

RCI

Parameter	Result	Units	Dilution Factor	RL	Method	Date Analyzed	Analyst
Ignitability	>100	C	1	NA	1010	7/29/02	SB
pH	7.92	pH Units	1	N/A	9045C	7/26/02	MB
Reactive Cyanide	<0.09	mg/kg	1	0.09	SW846 Ch 7	7/27/02	SB
Reactive Sulfide	<5.00	mg/kg	1	5.00	SW846 Ch 7	7/30/02	SB

Approval: Roland K Tuttle 8-02-02
Date

Roland K. Tuttle, Lab Director, QA Officer
Celey D Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Diezugbe, Lab Tech.
Sara Molina, Lab Tech.

RL = Reporting Limit N/A = Not Applicable

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Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa Texas 79763
Phone. 915-563-1800
Fax 915-563-1713

Project Manager: FRANK HERNANDEZ
Company Name: EOTT ENERGY PIPELINE
Company Address: 5805 E. HIGHWAY 80
City/State/Zip: MIDLAND TX 79701
Telephone No: 915-556-0190
Sampler Signature: Brett Clay

Project Name: Monument 6" 72202
Project #: 2002-10197
Project Loc: UL A Sec 5 T 20S R 36E
PO#:

	Date Sampled	Time Sampled	No. of Containers	ICE	HNO	HCl	NaOH	HSO	None	Other (Specify)	Water	Sludge	Soil	Other (Specify)	Analyze For: TDS/CL/SAR/EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals	Volatiles	Semivolatiles	btex 8021B/5030	Reactivity	Corrosivity	Ignitability			RUSH TAT	Standard TAT
															TCLP														
															TOTAL							x							
SEM72402SPC	07/24/2002	2:30	1	X									X					X				X	X	X	X				

Special Instructions
FAX RESULTS TO PAT MCCASLAND ASAP

Sample Containers Intact: Y / N
Temperature Upon Request
Laboratory Comments: 0.0°C

Relinquished:	Date	Time	Received by:	Date	Time
Brett Clay	7-25	0700am	[illegible]	7-25	1020
Relinquished:	Date	Time	Received by:	Date	Time
Matt Coy	7-26	1420	[illegible]	7-25-02	1420

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W1/2 NW 1/4 Sec 28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: 05/21/01

ELT#	FIELD CODE	GRO C6-C10 mg/L	DRO >C10-C28 mg/L
40328	GWS1601ELSMW1	<0.5	<0.5
	QUALITY CONTROL	540	541
	TRUE VALUE	500	500
	% INSTRUMENT ACCURACY	108	108
	SPIKED AMOUNT	500	500
	ORIGINAL SAMPLE	<0.5	<0.5
	SPIKE	663	639
	SPIKE DUP	558	544
	% EXTRACTION ACCURACY	112	109
	BLANK	<0.5	<0.5

Methods: EPA SW 846-8015M GRO/DRO

Raland K. Tuttle

5 30 01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W1/2 NW 1/4 Sec28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Extraction Date: 05/21/01
Analysis Date: 05/24/01
Field Code: GW51601ELSMW1

EPA SW846 8270C (mg/L)	REPORT LIMIT	ELT# 10328	RPD	%EA	%DEV
Naphthalene	0.00555	ND			-0.4
Acenaphthylene	0.00555	ND			0.8
Acenaphthene	0.00555	ND	0	103	2.2
Fluorene	0.00555	ND			2.5
Phenanthrene	0.00555	ND			9.0
Anthracene	0.00555	ND			9.4
Fluoranthene	0.00555	ND			-2.1
Pyrene	0.00555	ND	13	105	13.0
Benzo[a]anthracene	0.00555	ND			-16.4
Chrysene	0.00555	ND			-17.4
Benzo[b]fluoranthene	0.00555	ND			-17.2
Benzo[k]fluoranthene	0.00555	ND			4.9
Benzo [a]pyrene	0.00555	ND			-10.5
Indeno[1,2,3-cd]pyrene	0.00555	ND			14.2
Dibenz[a,h]anthracene	0.00555	ND			17.6
Benzo[g,h,i]perylene	0.00555	ND			18.7

	% RECOVERY
Nitrobenzene-d5 SURR	73
2-Fluorobiphenyl SURR	88
p-Terphenyl-d14 SURR	102

ND= not detected at report limit.
Method: EPA SW 846 8270C , 3510

Raland K. Tuttle

5-30-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: TNM-IF-105-Unknown
Project Name: Lea Station
Project Location: W 1/2 NW 1/4 Sec28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: See Below

ELT#	FIELD CODE	pH s.u	Conductivity uS/cm	Chloride mg/L	Sulfate mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L
40328	GW51601ELSMW1	7.09	2000	151	444	<2	792	1688
	REPORTING LIMIT	*	*	10	0.5	2	10	10
	Quality Control	7.10	1412	5052	46.5	*	*	*
	True Value	7.00	1413	5000	50.0	*	*	*
	% Instrument Accuracy	101	100	101	93	*	*	*
	Blank	*	*	<10	<0.5	<2	<10	<10
	ANALYSIS DATE	5/18/01	5/18/01	5/18/01	5/30/01	5/18/01	5/18/01	5/21/01

METHODS: SW846-9253, EPA 150.1, 120.1, 375.4, 310.2, 160.1

Raland K. Tuttle

5-30-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ HNO3
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W1/2 NW 1/4 Sec 28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: 05/24/01
Analysis Date: Hg 05/25/01

TOTAL METALS (mg/L)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
40328	GW51601ELSMW1	ND	1.592	0.0178	0.0026	0.0189	ND	ND	ND
	REPORT LIMIT	0.002	0.008	0.001	0.001	0.002	0.002	0.011	0.004
	QUALITY CONTROL	4.675	4.976	5.086	5.017	4.925	0.0156	4.996	5.037
	TRUE VALUE	5.000	5.000	5.000	5.000	5.000	0.0150	5.000	5.000
	% INSTRUMENT ACCURACY	94	100	102	100	98	104	100	101
	ORIGINAL SAMPLE	<0.002	<0.008	<0.001	<0.001	<0.002	<0.002	<0.011	<0.004
	SPIKED AMOUNT	1.000	0.2000	1.000	0.2000	1.000	0.0150	1.000	0.2000
	SPIKE	1.315	0.2181	1.129	0.2220	1.067	0.0152	1.046	0.1856
	% EXTRACTION ACCURACY	132	109	113	111	107	101	105	93
	BLANK	<0.002	<0.008	<0.001	<0.001	<0.002	<0.002	<0.011	<0.004
	RPD	15.4	5.36	0.00	0.90	0.00	17.6	0.95	7.25

ND= Not detected at report limit.

METHODS: EPA SW 846- 3015, 7470, 6010B

Raland K. Tuttle

5-30-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79703
FAX: 684-3456
FAX: 505-394-2601

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W 1/2 NW 1/4 Sec 28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: 05/26/01

ELT#	FIELD CODE	Ca mg/L	K mg/L	Mg mg/L	Na mg/L
40328	GW51601ELSMW1	110.2	32.75	122.4	253.1
	QUALITY CONTROL	5.278	5.176	5.174	5.243
	TRUE VALUE	5.000	5.000	5.000	5.000
	% INSTRUMENT ACCURACY	106	104	103	105
	SPIKED AMOUNT	1.00	1.00	1.00	1.00
	ORIGINAL SAMPLE	<0.01	<0.05	<0.001	<0.002
	SPIKE	1.048	0.8516	1.048	0.8560
	SPIKE DUP	1.024	0.8582	1.053	0.8600
	% EXTRACTION ACCURACY	105	85	105	86
	BLANK	<0.01	<0.05	<0.001	<0.002
	RPD	2.90	1.17	0.00	0.00

METHODS: SW846-6010B

Raland K. Tuttle

Raland K. Tuttle

5-30-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: WAYNE BRUNETTE
Company Name: ENRON TRANSPORTATION SERVICES
Company Address: 5805 East Highway 80
City/State/Zip: Midland, TX 79701
Telephone No: 915.556.0190 or 684.3479 Fax No: 915.684.3456
Sampler Signature:

Project Name: Lea Station
Project #:
Project Loc:
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (Specify)	Analyze For: TCLP / TOTAL: (GC) SAR / EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semi-volatiles	BTEX 8021B/5030						RUSH TAT (Pre-Schedule)	Standard TAT
~~10328~~			1130	1	✓		✓					✓											✓							✓
10328			1135	1	✓															✓										✓
			1140	1																										
			1145	1						✓						✓														
			1150	1	✓																									

Special Instructions: CoC requested
FAX TO W. Brunette & Pat McCasland EPI 505.394.2601

Relinquished by:	Date	Time	Received by:	Date	Time
Relinquished by	Date	Time	Received by ELOT:	Date	Time

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments:

Attachment 6
Original Land Farm Authorization

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

November 12, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Jeffrey P. Dann, C.P.G.
Link Energy Limited Partnership
P.O. Box 4666
Houston, Texas 77210-4666

RE: Landfarm Operation
Lea Station GW-351
Lea County, New Mexico

Dear Mr. Dann:

The New Mexico Oil Conservation Division (OCD) is in receipt of Link Energy Limited Partnership's request, dated October 31, 2003, to establish a landfarm operation at the Lea Station located in the NW/4 Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. Based upon the information received the request for landfarm operations is **hereby approved subject to the following stipulations:**

a. Disposal may occur only when an attendant is on duty. The landfarm facility must be secured when no attendant is present at the site.

b. All contaminated soils received at the facility must be spread and disked within 72 hours of receipt.

c. Soils must be spread on the surface in twelve (12) inch lifts or less.

d. Moisture must be added as necessary to enhance bioremediation and to control blowing dust. There may be no ponding/pooling or run-off of water allowed. Any ponding of precipitation must be removed within twenty-four (24) hours of discovery.

e. Landfarm inspection and maintenance must be conducted on a timely basis or immediately following a consequential rainstorm or windstorm.

f. The facility is authorized to accept only exempt and "non-hazardous" non-exempt oilfield wastes that are generated in the state of New Mexico by Link Energy Limited Partnership on Link Energy Limited Partnership's facilities.

g. At no time may any OCD-permitted surface waste management facility accept wastes that are hazardous by either listing or characteristic testing.

h. No free liquids or soils with free liquids may be accepted at the facility.

i. Soils must be disked a minimum of once every two weeks (biweekly) to enhance biodegradation of contaminants.

j. Landfarm inspection and maintenance must be conducted on a weekly basis or immediately following a consequential rainstorm or windstorm events.

k. Records of all material disposed of at the facility must be maintained by the discharge plan holder.

l. The OCD offices in Santa Fe and Hobbs must be notified when operation of the landfarm is discontinued for a period in excess of six (6) months or if there is a change in the configuration of the landfarm within the property covered by the discharge plan.

Please be advised this approval does not relieve Link Energy Limited Partnership from liability should operations result in contamination to the environment. If you have any questions contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,

Roger C. Anderson,
Environmental Bureau
Oil Conservation Division

RCA/wjf

cc: OCD Hobbs District Office

Attachment 7
Public Notices

PUBLIC NOTICE

Plains Pipeline, L.P., Wayne Roberts, Southern Division Director of Environmental and Regulatory Compliance, P. O. Box 3119, Midland, Texas 79702, has submitted a renewal application for the previously approved discharge plan (GW-351) for the Plains Pipeline Lea Station, located in the NW ¼ of Section 28 in Township 20 South and Range 37 East in south-central Lea County New Mexico at Latitude: 32°32'51. 3"N and Longitude: 103°15'37. 0"W. Lea Station consists of four unlined bermed containment areas, i.e., three storage and receiving tank areas and one primary pump area. A single internal floating roof 25,000-barrel crude oil storage tank is located central to the facility with two external floating roof 80,000-barrel tanks to the west. The pump area is located adjacent to and east of the 25,000-barrel tank

Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 50 feet below ground surface, with a total dissolved solids concentration of approximately 500 to 2000 mg/l. The discharge plan addresses how impacted groundwater and recovered crude oil will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information; submit comments or request to be placed on a facility specific mailing list for future notices by contacting Wayne Price at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3489. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

To be published in the Hobbs News Sun, which has a circulation of approximately 20,000 subscribers (online and in print).

NOTA PUBLICA

Plains Pipeline, L.P., Wayne Roberts, Director Meridional de División de la Conformidad Ambiental y Regulativa, P. O. La caja 3119, la Región Central, Tejas 79702, se han sometido una aplicación de la renovación para el plan previamente aprobados de la descarga (GW-351) para la Plains Pipeline Estación de Lea, localizados en el NO ¼ de la Sección 28 en el Municipio 20 Sur y Recorren 37 al este en Condado del sur-central de Lea Nuevo México en la Latitud: 32°32'51. 3" N y la Longitud: 103°15'37. 0" W. La Estación de Lea consiste en cuatro áreas sin rayar de la contención de bermed, es decir, tres almacenamiento y áreas recipientes de tanque y una área primaria de bomba. Un solo tanque de almacenaje flotante interno del petróleo crudo del techo 25,000-barril es localizado central a la facilidad con dos tanques flotantes externos de techo 80,000-barril al oeste. El área de la bomba es localizada adyacente a y al este del tanque 25,000-barril

La agua subterránea muy probable de ser afectada por un rocía, el escape o la descarga accidental están en una profundidad de aproximadamente 50 pies debajo de superficie de suelo, con un suma la concentración disuelta de sólidos de aproximadamente 500 a 2000 mg/L. El plan de la descarga dirige agua subterránea cómo impresionada y petróleo crudo recuperado serán manejado apropiadamente, serán almacenados, y serán deshechos de, inclusive cómo rocía, los escapes, y otras descargas accidentales a la superficie serán manejadas de proteger agua dulce. Alguna persona interesada puede obtener información; sométase los comentarios o el pedido para ser colocado en una facilidad lista de envío específica para notas futuras contactando el Wayne Price en el Nuevo México OCD en 1220 S. del sur. Francis Maneja, Santa Fe, Nuevo México 87505, el Teléfono (505) 476-3489. El OCD aceptará los comentarios y las declaraciones del interés con respecto a la renovación y creará una lista de envío facilidad-específico para personas que desea recibir notas futuras.

Ser publicado en el Sol de Noticias de Hobbs, que tienen una circulación de aproximadamente 20.000 suscriptores (en línea y en la impresión)

Attachment 8
Applicable Facility Response Plan
Sections

Section 8. Prevention & Detection Plan

In This Section

Introduction

This section discusses the types of prevention programs and leak detection methods used by Plains Pipeline, LP.

Prevention Programs

CCR §817.02(c)(4)(A), 5(E)

Plains Pipeline, LP' philosophy is prevention of emergencies to ensure:

- A safe work environment for employees, and
- Protection of the general population and environment.

In order to support Plains Pipeline, LP's prevention philosophy, the following programs are provided:

Program	Description
Safety	Promotes safe work practices and procedures.
Preventive Maintenance	Provides preventive maintenance procedures and inspections for: • Cathodic protection • Computer systems • Communications systems • Electrical equipment and controls • Mechanical equipment and controls • Paint • Pipeline coatings and inhibitors, and • Tanks and pressure vessels.

Program	Description
Field Inspections	Inspection programs that enable Plains Pipeline, LP to assess: • Status of and need for corrective actions in the preventive maintenance programs • Input from field staff, and • Effectiveness of operation and maintenance procedures.
Pipeline Rights-of-Way (ROW) Inspection	As specified by Department of Transportation (DOT) Code of Federal Regulations (CFR), Part 195, pipeline inspections are documented and maintained.
One-Call System	In states where Plains Pipeline, LP has facilities, Plains Pipeline, LP actively participates in One-Call systems by: • Paying dues • Using and promoting the system, and • Requiring contractors to use the system.

Automatic Controls

CCR §817.02(c)(5)(C)

All pipeline facilities covered by this Plan contain a variety of automatic controls, which are operated either locally or by Plains Pipeline, LP' Control Center in Midland, Texas. Plains Pipeline, LP' control center has the ability to remotely:

- Start and stop pumps
- Open and close motor operated valves, and
- Monitor the status of each remotely operable device.

Line Monitoring & Leak Detection

CCR §817.02(c)(4)(B), (5)(B)

Pipelines operated by Plains Pipeline, LP are monitored either locally or remotely for leak detection. Facilities that are operated locally are manually supervised during periods of shipments. Remote pipeline monitoring occurs at Plains Pipeline, LP's Control Center in Midland, Texas, utilizing the devices or methods listed below.

Line Balance

Line balance calculations are performed to compare receipt and delivery points. Meter readings are updated once each minute for line balance and throughput calculations to determine 60-minute and 24-hour over/short values. Line fill inventories are adjusted using static and dynamic delivery points.

Rate of Change (ROC)

ROC processing alarms/alerts are generated whenever there is a change within a specified period of time, which exceeds the preset values of pressure, flow rate, and temperature.

Overpressure Protection & Safety Devices

CCR §817.02(c)(5)(B)

Each pipeline is equipped with a means of overpressure protection. Listed below are over pressure safety devices:

- Pressure and surge relief valves
- Thermal pressure (includes differential) relief valves
- Unit/station discharge pressure trip(s)
- Station control valve system - discharge pressure: transmitter/controller/setpoint
- Meter station high pressure trip/high downstream pressure controller, and
- High line pressure switch/line block valve (surge protection).

Drug and Alcohol Testing

CCR §817.02(c)(5)(D)

All personnel (including supervisors and contractors) associated with the operation and maintenance of the pipeline facilities covered by this Plan are subject to drug and alcohol testing as dictated by the United States Department of Transportation (DOT) under 49 CFR Part 199. These regulations provide for mandatory pre-employment, random, and post accident drug and alcohol testing.

Security of Facilities

CCR §817.02(c)(5)(F)

All pipelines subject to DOT jurisdiction must comply with the security requirements listed in 49 CFR Part 195.

Section 10. Notifications

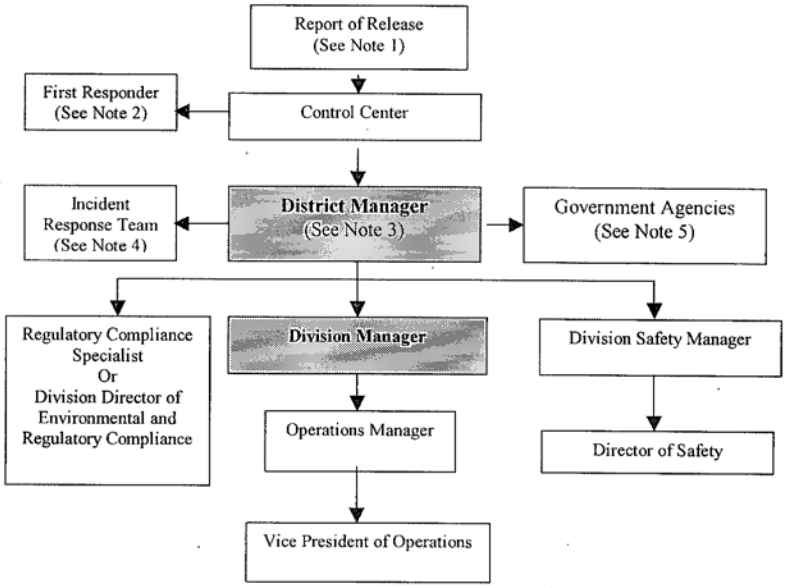
CFR §194.107(d)(1)(ii), (2)

In This Section

Internal Notification

General Notification Flowchart

The following is a general notification flowchart that is to be used as a guide for all incidents.



Notes: Shaded boxes denote **Qualified Individuals**

1. Report of release can come from a non-Plains entity.
2. First Responder is the Plains personnel closest to the potential problem dispatched to respond. In many cases, the District Manager is the closest operations responder. The District Manager may designate a proxy first responder as part of the Incident Response Team.
3. A Qualified Individual, or his alternate, will make subsequent notifications, based on his professional judgment, for each response and will coordinate with EH&S as necessary.
4. The Incident Response Team reflects the level of support required to address each response. In addition to Plains personnel, OSROs, Contractors, suppliers, and the Location Response Team may be included.
5. Government Agencies include federal, state, and local agencies that require notification for each response.

Situation Reporting (Spill Event Information Collection)

To properly collect and record the required information in the event of a spill, Plains requires that the following information be included in a situation report to the extent practicable, or submitted to the appropriate Operations supervisor, manager, on-scene Incident Commander, and/or EH&S staff as soon as possible. The initial report should not be delayed in an attempt to gather additional information. This following list is not all inclusive; any additional information relevant to the spill event should be identified and forwarded to the Incident Command, Operations, and EH & S Staff as soon as it becomes available: **(See Situation Report Worksheet on page 3)**

1) Time and Date of spill event.
2) Name of pipeline system/operator involved.
3) Location of discharge (GIS coordinates and/or driving directions).
4) Type of crude oil spilled/released.
5) Amount of spill/release (in gallons and barrels).
6) Cause of spill/release (reason, if known).
7) Weather conditions on scene (include forecast if available).
8) Has spill/release been contained?
9) What is current status of initial response?
    - How much product has been recovered to date?
10) Has product impacted navigable waters?

The following information should be included in a follow-up report to Operations and senior EH & S command:

- If spill/release caused by equipment failure, then;
    - Has equipment been repaired?
    - Has equipment been tested? (Include test dates)
        - What type of testing was done?
        - What are the results of testing?
    - Has a project been prepared to repair/replace the equipment?
    - What is current status of repair project?
- Will a site assessment be required?
    - When will site assessment begin?
- Will further remediation be required? If remediation will be required then:
    - What type of remediation is being considered?
    - Have federal, state or local authorities been informed of the planned remediation?
    - Has the appropriate regulatory agency given approval of the remediation plan?
- Has groundwater been impacted?

Provide copies of any maps that identify the spill site and the location of the impacted area. Maps should be of adequate scale to indicate the impacted area and should identify all structures on or in the immediate area of the spill site.

Situation Report (Spill Event) Information Collection Worksheet	
Today's date & time:	
Name of person calling/reporting:	**Caller/Reporter:**
	Information taken by:
Date of Spill or Event:	
Time of Spill or Event	
Name of Pipeline System or Operator involved	
Weather Conditions at scene: (include forecast and wind directions if possible)	
Landowner: (identity/contact)?	
Location:	
Legal Description:	
Latitude:	
Longitude:	
County:	
Driving Instructions:	
Cause of spill/release:	
Type of crude/product released:	
Amount of spill/release:	**Barrels:** **Gallons:**
Current Response Status:	
Has Spill been contained?	
Amount recovered:	**Barrels:** **Gallons:**
Has product impacted navigable waters (waters of the state)?	**Name of lake, stream, river, or waterway:**
Fire/Police/Sheriff contacted?	
Local, State, or Federal Agencies contacted?	
Name/Position/Agency:	
Name/Position/Agency:	
Name/Position/Agency:	
Name/Position/Agency:	
Name/Position/Agency:	

Key Region Personnel

The following table lists key response zone employees who may need to be contacted in the event of a release.

Southwestern Response Zone

Name/Position	LRT	Office	Cellular	Home
Corporate Personnel				
Wade Guerin, Director of Safety	N/A	713-646-4615	713-376-5210	281-489-9785
Doug Kennedy, Remediation & Special Projects Mgr.	N/A	713-646-4610	713-376-5375	713-622-3958
Mark Shires, Senior VP-Operations	N/A	713-646-4690	713-582-4151	832-203-8117
Dan Rohrbacher (**QI**), Western Region Operations Manager	N/A	713-646-4130	832-474-8746	936-273-1916
Phil Smith (**QI**), Eastern Region Operations Manager	N/A	713-646-4382	713-851-1765	936-273-1067
Troy Valenzuela, VP, EH&S	N/A	713-646-4614	713-444-6984	281-301-5937

Name/Position	LRT	Office	Cellular	Home
Southwestern Response Zone Personnel				
Jimmy Sheppard (**QI**), Southern Division Manager	Incident Commander	940-766-8902	432-413-8071	940-691-2698
Joel Jones (**QI**), Southern Division Asst. Mgr.	Incident Commander	940-766-8967	432-413-8097	940-696-3092
Allen Shafer (**QI**), Southwest Division Manager	Incident Commander	432-686-1777	432-413-3497	432-756-3105
Roddy Hughes (**QI**), Southwest Division Asst. Mgr.	Incident Commander	432-686-1707	432-413-9831	342-694-2847
Greg Wood (**QI**), Abilene District Manager	Incident Commander	325-692-7744	325-665-5836	325-698-2509
Cloyd Marsh (**QI**), Wichita Falls District Manager	Incident Commander	940-766-8901	432-413-8096	940-495-2693
Jack Bryant (**QI**), Midland District Manager	Operations Section Chief	432-682-5393	432-413-8079	4320687-0953
Charles Manis (**QI**), Permian PL South District Manager	Operations Section Chief	432-527-3497	432-940-3953	432-586-9398
This row intentionally left blank	---	---	---	---

Name/Position	LRT	Office	Cellular	Home
Howard Thomas (**QI**), Permian PL East District Manager	Operations Section Chief	432-687-6900	432-559-0840	432-694-5890
Gary Crutcher (**QI**), Permian PL North District Manager	Operations Section Chief	806-592-7629	806-543-8050	806-592-2860
Wayne E. Roberts, Director, Env. & Reg. Compliance	Public Information/Liaison Officer	432-682-5392	432-413-2574	432-683-5987
Jerry Green, Safety & Health Manager	Safety Officer	432-682-5390	432-638-3172	432-520-3085
Johnny Wright, Safety & Health Manager	Safety Officer	432-686-1751	432-638-6363	432-697-4455
Brad Fivecoat, Regulatory Compliance Specialist	Liaison Officer	432-683-3680	432-553-1797	432-697-7547
Gary Cole, Elec/Comm Technician	Communication Officer	432-687-6900	432-853-0161	432-686-1827
Dennis Wainright Elec/Comm Technician	Communication Officer	432-685-3415	432-413-8027	432-697-8639
C. M. (Marlin) Farris Maintenance Supervisor	Operations Section Chief	432-682-5395	432-413-8076	432-687-0953
Tracy Talbot, Engineering Assistant	Planning Section Chief	940-766-8917	432-413-8102	940-592-9466
David Wyman, Sr. Project Engineer	Planning Section Chief	432-686-1775	432-553-04521	432-694-6356
Paul Chester, Field Supervisor	Logistics Section Chief	432-686-1706	432-528-3200	432-699-7465
Miquel Montes, Field Supervisor	Operations Section Chief	915-775-3218	915-526-1081	915-589-3554
Reserved				
Jim Barrett, Maintenance Lead	Logistics Section Chief	915-775-3372	915-526-1079	915-886-3035
Robert Argumaniz, Pipeline Operator	Logistics Section Chief	915-775-3212	915-526-8562	915-252-6475
Mike Francis, Pipeline Operator	Logistics Section Chief	915-775-3212	915-526-6924	915-581-8344
Randy Calhoun, Mechanical Technician	Logistics Section Chief	505-542-3310	505-259-2780	505-899-0650
Dwayne Greaser Field Supervisor	Operations Section Chief	505-242-3310	505-238-0136	505-897-4522
Joe Delgado Pipeline Operator	Planning Section Chief	915-775-3212	915-491-3940	915-490-5177
Julian Garcia Pipeline Operator	Logistics Section Chief	505-242-3310	505-379-0735	505-831-9801
Jim Melton E&I Technician	Planning Section Chief	915-775-3327	915-539-5761	
Reserved				

Name/Position	LRT	Office	Cellular	Home
Jerry Brungardt, Mechanical Technician	Logistics Section Chief	940-766-8912	432-413-8098	940-691-3743
Kathie Hamilton, Administrative Assistant	Finance Section Chief	432-682-5391	N/A	432-699-0537
Penny Sevart, Administrative Assistant	Finance Section Chief	432-682-5397	N/A	432-570-7604

Note:

(QI) Designations include the capabilities to act as both Qualified Individual or as an Alternate Qualified Individual to relieve Incident Command burden.

External Notification

Federal Reporting

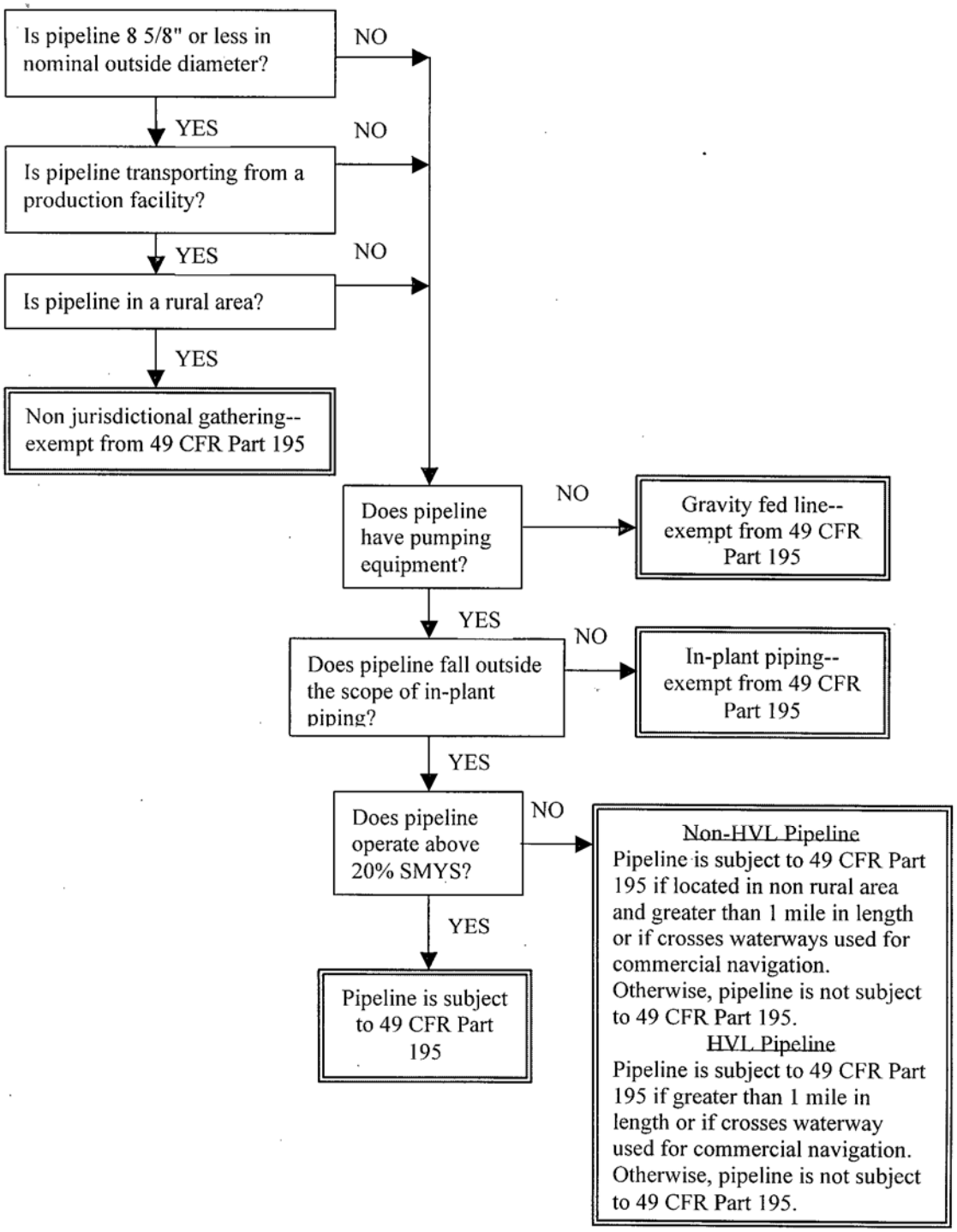
Federal Reporting Requirements

Federal Reporting Requirements	
Agency	**Requirements**
National Response Center Nationwide: 800-424-8802 202-267-2675	**Discharges of Oil to Navigable Waters** For all facilities, immediately report all discharges of oil or refined petroleum product into, or likely to reach, navigable waters of the United States.  Notification of the regional Coast Guard Captain of the Port is also recommended if release has affected or might affect a navigable waterway.

Federal Reporting Requirements	
Agency	**Requirements**
National Response Center (continued)	**Discharges of Hazardous Liquids or CO_2 From Pipeline** *CFR §195.50; 195.52; 195.54;195.402(c)(2)* For a DOT pipeline or facility, immediately report (within 2 ours of discovery) any release of a hazardous liquid or carbon dioxide that: ▪ Results in an unintentional fire or explosion ▪ Causes a death or personal injury requiring hospitalization ▪ Causes property damage, including clean up costs exceeding $50,000, or ▪ Is significant in other respects. For DOT pipelines or facilities, a written report (DOT form 7000-1) must be filed with the DOT within 30 days after discovery of the accident. This form must also be filed within 30 days for any spill that results in a loss of 5 or more gallons of hazardous liquid or carbon dioxide, or 5 or more gallons of HVL.  To determine if a hazardous liquid pipeline is subject to DOT regulation, please see the flowchart below.  Be sure to review incident for possible employee drug and alcohol testing.

Federal Reporting Requirements	
Agency	**Requirements**
National Response Center (continued)	**CERCLA Reporting** Immediately report any release of a CERCLA hazardous substance exceeding the reportable quantity (RQ). 40 CFR 302.4 lists the CERCLA hazardous substances with RQ's. MSDS's may also be used to determine if a spilled substance is reportable under CERCLA.  Under the CERCLA petroleum exclusion, refined petroleum product and crude oil spills do not have to be reported even though these products may contain hazardous substances.

Flow Chart For Determining if a Hazardous Liquid Pipeline Is Subject to DOT Regulation (49 CFR Part 195)



New Mexico

New Mexico Spill Reporting Requirements	
Agency	**Requirements**
New Mexico Environment Dept. 24 hour: 505-827-9329 http://www.nmenv.state.nm.us	Report any discharge from any facility of oil or other water containment whose quantity may, with reasonable probability, injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, as soon as possible after learning of such a discharge, but in no event more than 24 hours thereafter. A written report must be submitted within one week. *Title 20 (Environmental Protection), Chapter 6 (Water Quality), Part 2 (Ground and Surface Water Protection), § 1203*

New Mexico Spill Reporting Requirements	
Agency	**Requirements**

New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
 	
District I (Hobbs)
505-393-6161
District II (Artesia)
505-748-1283
District III (Aztec)
505-334-6178
District IV (Santa Fe)
505-476-3440
 	
Environmental Bureau Chief
 	
505-476-3490
 	
http://www.emnrd.state.nm.us/ocd/
	The following releases of crude oil, condensate or natural gas from transportation facilities require a verbal report (required within 24 hours of discovery) and a written Division Form C-141 report (required within 15 days of discovery):
	• Releases in excess of 25 barrels (for crude oil or condensate)
	• Releases of any volume which:
	  • Result in fire
	  • Will reach a ***water course***, or
	  • May with reasonable probability endanger public health?
	• Releases which result in substantial damage to property or the environment, or
	• Releases of any volume, which may with reasonable probability, be detrimental to water.
	
	 
	Water course shall mean any lake bed, or gully, draw, stream bed, wash arroyo, or natural or human-made channel through which water flows or has flowed.
	
	The following releases of crude oil or natural gas from transportation facilities only require a written Division Form C-141 report (required within 15 days of discovery):
	• Releases greater than 5 barrels, but less than 25 barrels of crude oil or condensate, or
	• Releases greater than 50 Mcf, but less than 500 Mcf of gas.
	
	 
	For releases that may be detrimental to surface or ground water, a verbal report (required within 24 hours) and a written Division Form C-141 report (required within 15 days of discovery) is required to be filed with the Division's Environmental Bureau Chief.
	
	19 NMAC 15.C.116

New Mexico Spill Reporting Requirements	
Agency	**Requirements**
Department of Public Safety--Emergency Management 505-476-9620	An immediate telephonic notification is required if the reportable quantity (RQ) of a hazardous substance (as listed in 40 CFR 302.4) or extremely hazardous substance (as listed in Appendix A and B of 40 CFR Part 355.40) is exceeded. A written report must be submitted as soon as practicable. Telephonic and written reports must also be filed with the LEPC.  H_2S is listed in Appendix A and B of 40 CFR Part 355.40 as an extremely hazardous substance and has a RQ of 100 pounds.  MSDS's may be helpful in determining whether a spilled substance is reportable.

CFR §195.402(e)(7)

New Mexico

Albuquerque/Bernalillo County

- **Bernalillo County Sheriff**
  400 Roma NW
  Albuquerque, NM 87102
  505-768-4100

- **Albuquerque Hospital**
  801 Vassar Drive Northeast
  Albuquerque, NM 87106
  (505) 248-4000

- **Bernalillo county LEPC**
  P. O. Box 35067
  Albuquerque, NM 87110
  505-845-8018

Dona Ana County

- **Dona Ana County Sheriff's Office**
  1725 Marquess St.
  Las Cruces, New Mexico 88005
  (505) 526-0795

- **Memorial Medical Center**
  2450 Telshor Boulevard
  Las Cruces, NM 88011
  (505) 522-8641

- **Dona Ana County LEPC**
  1131 Medpark Drive
  Las Cruces, NM 88005
  505-527-8741

Eddy County

- **Eddy Co. Sheriff's Department**
  206 N Canyon St
  Carlsbad, NM 88220
  505-887-7551

- **Nor-Lea Hospital District: Lovington Clinic**
  1600 N Main Ave
  Lovington, NM 88260
  505-396-3529
  505-396-6160

- **Carlsbad Medical Center**
  2430 W Pierce St
  Carlsbad, NM 88220
  505-887-4100

- **Eddy County LEPC**
  101 E. Greene St.
  Carlsbad, NM 88220
  505-887-9511

Lea County

- **Lea County Sheriff's Department**
  505-396-3611
  215 E Central Ave
  Lovington, NM 88260

- **Lea County (Hobbs) Sheriff's Sub Station**
  505-393-2515
  1923 N Dal Paso St
  Hobbs, NM 88240

- **Lea Regional Medical Center**
  5419 N Lovington Hwy
  Hobbs, NM 88240
  505-492-5000
  505- 392-7993
  505-492-5488
  877-492-8001

- **Lea County LEPC**
  300 N. Turner
  Hobbs, NM 88240
  505-397-9231

Sierra County

- **Sierra County Sheriff's Office**
  311 Date St
  Truth or Consequences, New Mexico 87901
  (505) 894-9150
- **Sierra Vista Hospital**
  800 East Ninth Avenue
  Truth or Consequences, NM 87901
  (505) 894-2111
- **Sierra County LEPC**
  100 Date St., Ste. 2
  Truth or Consequences, NM 89701
  505-8945-5080

Socorro County

- **Socorro County Sheriff's Office**
  200 Church St
  Socorro, New Mexico 87801
  (505) 835-0941
- **Socorro General Hospital**
  1202 Highway 60 West
  Socorro, NM 87801
  (505) 835-1140
- **Socorro County LEPC**
  913 Sunset Dr. NW
  Socorro, NM 87801
  505-835-1606

Valencia County

- **Valencia County Sheriff's Office**
  444 Luna Ave
  PO Box 1585
  Los Lunas, New Mexico 87031
  (505) 866-2027
- **Valencia Presbyterian Hospital**
  609 S Christopher Road
  Belen, NM 87002
  (505) 864-1383
- **Los Lunas Community Program**
  1000 Main St NW
  Los Lunas, NM
  (505) 865-9611
- **Valencia County LEPC**
  P.O. Box 1119
  Los Lunas, NM 87031
  505-866-2040

Industry Assistance – New Mexico

Third Party Utility or Pipeline Company Name	Emergency Contact Number
Burlington Northern Santa Fe Railroad	800-832-5452
Canadian Pacific Railway	800-777-4499
Union Pacific Railroad	888-877-7267
El Paso Electric	505-523-7591
Sierra Electric	505-744-5231
Socorro Electric	800-351-7575
ST Services	505 437-7500
Atmos Energy	800 692-4694
Central Valley Electric	505-746-3571
City of Carlsbad	505-885-2111
GTE	800-483-1000
Lea county Electric Co-Op	505-396-3631
Otis Water	505-236-6050
Pateau Telecommunications	505-849-1628
PNM Gas	800-464-7462
US West Communications	800-573-1311
Xcel Energy	800-895-1999

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/27/04,

or cash received on _____ in the amount of $ 1,300.00

from Plains Pipeline

for Lea Pump Station GW-351

(Facility Name) (OP No.)

Submitted by: _____ Date: 8-3-04

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ✓

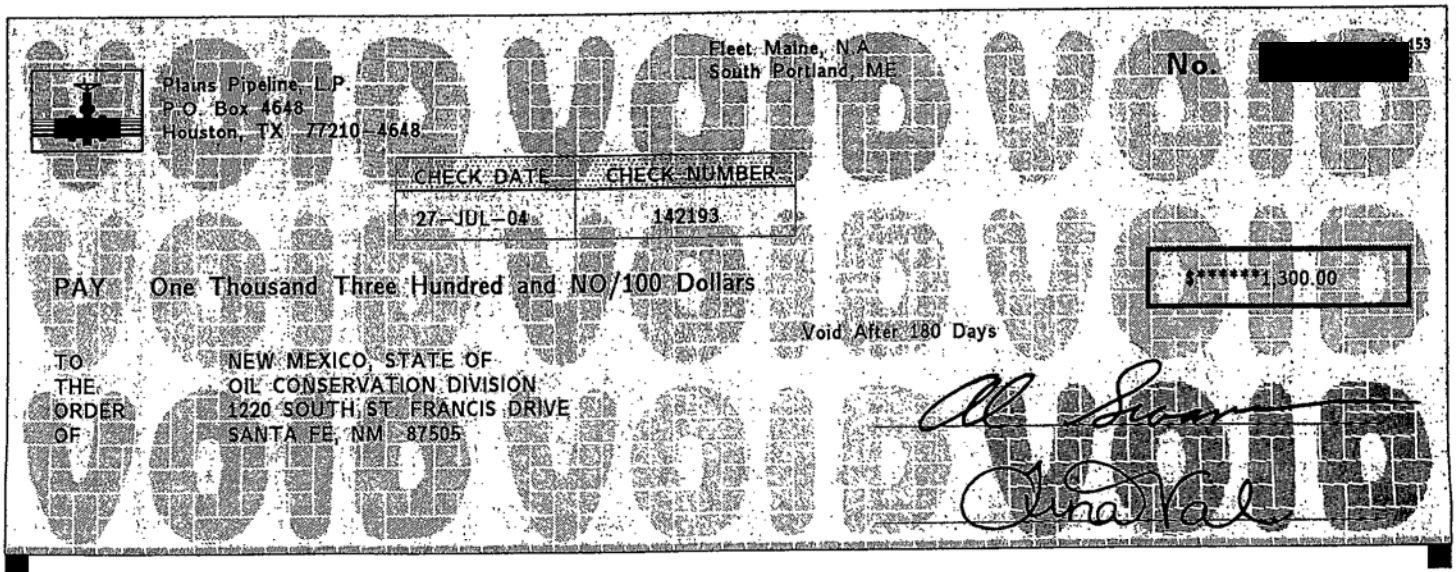
Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___



Plains Pipeline, L.P.
P.O. Box 4648
Houston, TX 77210-4648

Fleet Maine, N.A.
South Portland, ME

No. [redacted]

CHECK DATE	CHECK NUMBER
27-JUL-04	142193

PAY One Thousand Three Hundred and NO/100 Dollars

$******1,300.00

Void After 180 Days

TO THE ORDER OF
NEW MEXICO, STATE OF
OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DRIVE
SANTA FE, NM 87505

[redacted]

P.O. Box 4648
Houston, TX 77210-4648

No. [redacted]

DATE: 27-JUL-04 CUST. ACCT. NO. VENDOR NAME NEW MEXICO, STATE OF VENDOR NO. 6947

INVOICE NO	INVOICE DATE	DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
071904	19-JUL-04	071904 APPLICATION FEE AND FLAT	0.00	1,300.00
			0.00	1,300.00

PLEASE DETACH AND RETAIN THIS STATEMENT AS YOUR RECORD OF PAYMENT

THANK YOU

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

November 12, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Jeffrey P. Dann, C.P.G.
Link Energy Limited Partnership
P.O. Box 4666
Houston, Texas 77210-4666

RE: Landfarm Operation
Lea Station GW-351
Lea County, New Mexico

Dear Mr. Dann:

The New Mexico Oil Conservation Division (OCD) is in receipt of Link Energy Limited Partnership's request, dated October 31, 2003, to establish a landfarm operation at the Lea Station located in the NW/4 Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. Based upon the information received the request for landfarm operations is **hereby approved subject to the following stipulations:**

a. Disposal may occur only when an attendant is on duty. The landfarm facility must be secured when no attendant is present at the site.

b. All contaminated soils received at the facility must be spread and disked within 72 hours of receipt.

c. Soils must be spread on the surface in twelve (12) inch lifts or less.

d. Moisture must be added as necessary to enhance bioremediation and to control blowing dust. There may be no ponding/pooling or run-off of water allowed. Any ponding of precipitation must be removed within twenty-four (24) hours of discovery.

e. Landfarm inspection and maintenance must be conducted on a timely basis or immediately following a consequential rainstorm or windstorm.

f. The facility is authorized to accept only exempt and "non-hazardous" non-exempt oilfield wastes that are generated in the state of New Mexico by Link Energy Limited Partnership on Link Energy Limited Partnership's facilities.

g. At no time may any OCD-permitted surface waste management facility accept wastes that are hazardous by either listing or characteristic testing.

h. No free liquids or soils with free liquids may be accepted at the facility.

i. Soils must be disked a minimum of once every two weeks (biweekly) to enhance biodegradation of contaminants.

j. Landfarm inspection and maintenance must be conducted on a weekly basis or immediately following a consequential rainstorm or windstorm events.

k. Records of all material disposed of at the facility must be maintained by the discharge plan holder.

l. The OCD offices in Santa Fe and Hobbs must be notified when operation of the landfarm is discontinued for a period in excess of six (6) months or if there is a change in the configuration of the landfarm within the property covered by the discharge plan.

Please be advised this approval does not relieve Link Energy Limited Partnership from liability should operations result in contamination to the environment. If you have any questions contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,

Roger C. Anderson,
Environmental Bureau
Oil Conservation Division

RCA/wjf

cc: OCD Hobbs District Office

ATTACHMENT TO THE DISCHARGE PERMIT GW-351
~~EOTT ENERGY LLC~~ Plains Pipeline, LP
~~EOTT~~ LEA STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 1, 2003)

1. Payment of Discharge Permit Fees: The $100.00 filing fee has not been received by the OCD. There is a flat fee assessed for crude pump station facilities equal to $1,200.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. ~~EOTT Energy LLC~~ Plains Pipeline, LP Commitments: ~~EOTT Energy LLC~~ Plains Pipeline LP will abide by all commitments submitted in the discharge permit application dated May 28, 2003 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a Plains Pipeline's ~~EOTT Energy LLC's~~ representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Permit: Plains Pipeline ~~EOTT Energy LLC~~ shall maintain storm water runoff controls. As a result of ~~EOTT Energy~~ PP LLC's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then ~~EOTT~~ PP ~~Energy LLC~~ shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. ~~EOTT Energy LL~~C shall also take immediate corrective actions pursuant to Item 12 of these conditions. PP

16. Closure: The OCD will be notified when operations of the ~~EOTT Lea Station~~ are discontinued for a period in excess of six months. Prior to closure of the ~~EOTT~~ Lea Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

Plains Pipeline, LP

17. Certification: ~~EOTT Energy LLC~~, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. ~~EOTT Energy LLC~~ Plains Pipeline, LP further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:
Plains Pipeline, LP
~~EOTT ENERGY LLC~~

by Rebecca Esparza
Title

Environmental + Regulatory Compliance Specialist

ATTACHMENT TO THE DISCHARGE PERMIT GW-351
EOTT ENERGY LLC
EOTT LEA STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 1, 2003)

1. Payment of Discharge Permit Fees: The $100.00 filing fee has not been received by the OCD. There is a flat fee assessed for crude pump station facilities equal to $1,200.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

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11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

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15. Storm Water Permit: EOTT Energy LLC shall maintain storm water runoff controls. As a result of EOTT Energy LLC's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then EOTT Energy LLC shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. EOTT Energy LLC shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the EOTT Lea Station are discontinued for a period in excess of six months. Prior to closure of the EOTT Lea Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: EOTT Energy LLC, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EOTT Energy LLC further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

EOTT ENERGY LLC

by Rebecca Esparza
Title
Env. + Reg. Compliance Specialist

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

August 1, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Frank Hernandez
EOTT Energy LLC
P.O. Box 1660
5805 East Highway 80
Midland, Texas 79702

RE: Discharge Permit Approval GW-351
EOTT Energy LLC
EOTT Lea Station
Lea County, New Mexico

Dear Mr. Hernandez:

The ground water discharge permit GW-351 for the EOTT Energy LLC EOTT Lea Station located in the NW/4 Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge permit application was submitted on May 28, 2003 and was submitted pursuant to 20 NMAC 6.2.5101.B.3 of the New Mexico Water Quality Control Commission (WQCC) Regulations. Please note 20 NMAC 6.2.3109.G., provides for possible future amendment of the permit. Please be advised that approval of this permit does not relieve EOTT Energy LLC of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that 20 NMAC 6.2.3104 of the regulations provides: "When a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to 20 NMAC 6.2.3107.C., EOTT Energy LLC is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to 20 NMAC 6.2.3109.H.4., this discharge permit is for a period of five years. This permit will expire on **August 1, 2008**, and EOTT Energy LLC should submit an application in ample time before this date. Note that under 20 NMAC 6.2.3106.F. of the regulations, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge permit.

Proposed modifications consisting of a new maintenance facility, office area and cement testing area is herewith approved.

The discharge permit application for the EOTT Energy LLC EOTT Lea Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a non-refundable fee equal to the filing fee of $100. There is a flat fee assessed for crude pump station facilities equal to $1,200.00. The OCD has not received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PERMIT GW-351
EOTT ENERGY LLC
EOTT LEA STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 1, 2003)

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16. Closure: The OCD will be notified when operations of the EOTT Lea Station are discontinued for a period in excess of six months. Prior to closure of the EOTT Lea Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: EOTT Energy LLC, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EOTT Energy LLC further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

EOTT ENERGY LLC

by_____
Title

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

Revised January 24, 2001

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☒ New ☐ Renewal ☐ Modification

1. Type: Crude Oil Pump Station (EOTT Lea Station)

2. Operator: EOTT Energy LLC

   Address: 5805 East Highway 80, Midland, Texas 79701

   Contact Person: Frank Hernandez, District Environmental Supervisor Phone: 505.631.3095

3. Location: NW¼ Section 28 Township 20 South Range 37 East
   Submit large scale topographic map showing exact location. (See Attachment II)

4. Land owner: EOTT Energy LLC, 5805 East Highway 80, Midland, Texas 79701, Telephone: 915-684-3422

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. (See Attached Lea Station Discharge Plan)

6. Attach a description of all materials stored or used at the facility.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. NA

10. Attach a routine inspection and maintenance plan to ensure permit compliance.

11. Attach a contingency plan for reporting and clean-up of spills or releases.

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Pat McCasland (EPI/EOTT) Title: EPI Technical Manager

Signature: Pat McCasland Date: May 28, 2003

EOTT Energy LLC Lea Station Discharge Plan

NW¼ Section 28 Township 20 South Range 37 East
Lea County New Mexico
Latitude: 32°32'51.3"N Longitude: 103°15'37.0"W
Site Elevation: ~3,495'amsl

CONTENTS

1 Type of Operation

The EOTT Lea Station is a crude oil pumping station operated by EOTT Energy LLC with an average daily throughput of 23,700 barrels (bbls) (42 US gallons per barrel). In bound crude oil is received from the Livingston Ridge Gathering System, Loco Hills Gathering System, Lynch Gathering System, Monument Gathering, Eunice Gathering, Anderson Ranch, Denton West Lovington, Saunders, and Lovington Deep. Out bound crude oil is pumped into either the 8" Jal or the 8" Wink mainlines.

2 Facility Description

The facility is located in the NW¼ of Section 28 in Township 20 South and Range 37 East in south-central Lea County New Mexico at Latitude: 32°32'51.3"N and Longitude: 103°15'37.0"W. The facility is enclosed with a 4 wire barbed wire fence to exclude livestock that graze the surrounding area with a single access gate on the east side secured by a lock to prevent public access. The interior consists of four unlined bermed containment areas, i.e., three storage and receiving tank areas and one primary pump area. A single floating top 25,000 bbl crude oil storage tank is located central to the facility with two floating top 80,000 bbl tanks to the west. The pump area is located adjacent to and east of the 25,000 bbl tank.

Several ground water monitor wells and vapor extraction wells have been installed and are being routinely managed by Shell Pipeline Company as a part a New Mexico Oil Conservation Division (NMOCD) approved Rule 19 Stage II Ground Water Pollution Abatement Plan implemented to address a release(s) during the time Shell owned the facility. A single domestic use water well bore is located in the northeast corner of the facility but has not been in use since the late 1960's.

EOTT currently monitors attenuation of an in-situ bio-cell that was constructed east of the facility with approval by the NMOCD.

Located just outside of the exclusionary fence on the northeast corner of the facility are two bermed crude oil storage batteries that receive crude oil transported by truck and are isolated from the Lea Station. Leaks and spills from these facilities can not reasonably affect the interior of the Lea Station. See Attachment I – Maps and Figures and Attachment II – Photographs for reference.

3 Materials Stored or Used at the Facility

New replacement pipe is temporarily stored in the northeast corner of the fenced area.

Crankcase oil, i.e., Spyrex 85-140, for the crude oil pumps is stored in two 55 gallon steel drums in the south end of the East pump area.

Naphtha (UN 1268) is stored in a steel 250 gallon overhead tank and is used for cleaning.

Small volumes of a mixture of Methyl and Isopropyl alcohol are injected continuously from two fiberglass overhead tanks, i.e., 400 and 800 gallon located in the pump area into the outbound pipelines to prevent paraffin buildup and corrosion.

All overhead storage tanks are set inside inert fiberglass catchment basins sized to hold 1.5 times vessel volume in the event of a leak or spill. Material Safety Data Sheets (MSDS) are maintained at the Eunice office for reference by EOTT personnel and contractors. EOTT field personnel also carry a copy of the MSDS library in their pickups.

4 Sources of Effluent and Waste Solids:

Effluent Sources include:

- Small quantities of crude oil collect in concrete basins and pans under the pumps, valves, and sampling points.
- Used pump crankcase oil
- Storm water

- Small quantities of crude oil recovered by Shell Pipeline Company as a part of the on-going ground water remediation project.

There are no restroom facilities requiring sewage management or disposal at the facility.

Waste Solids include:

- Small quantities of domestically generated trash and maintenance and construction waste
- Crude oil contaminated soil,
- Paraffin and grease from pipeline maintenance activities, i.e., "pigging" and "scraping"

Crude oil contains compounds that are inherently "hazardous" and listed in the Resource Conservation and Recovery Act (RCRA) CFR 40 Part 261 Subpart D as promulgated by the U.S. Environmental Protection Agency (EPA), however, crude oil contaminated soil is typically characterized as RCRA "non-hazardous" in accordance with CFR 40 Part 261 Subpart C analytical procedures (TCLP). Refer to Analytical Reports included in Attachment VI.

5 Description of Current Liquid and Solid Waste Collection/Storage/Disposal

Liquid and Solid Waste generated at the Lea Station are collected, stored, and recycled or disposed of in accordance with the waste management regulations governing the facility. Being a no-release facility with no operational processes capable of generating constant waste streams, Lea Station does not currently have any collection and storage "systems," or surface impoundments, leach fields, injection wells, drying beds or pits, solids disposals, or land farms. Satellite containers and bins are used for solid wastes and concrete collection basins are constructed around all pumps. All pumps on site are driven by electric motors. No used engine oil is generated at the facility. Metal pans and/or buckets are located at points in the system where stream sampling occurs to catch spillage. There are six underground crude oil sumps located at the facility.

5.1 Liquid Waste

- Crude oil from pumping or facility operation and maintenance is collected in subsurface pump gallery sumps and pumped back into the system.
    1. LACT #1
    2. LACT #2
    3. Sour Field Suction Pump
    4. North and South Booster Pumps
    5. Mainline Pumps
    6. Junction 34 Line Receiver
- Used crankcase oil is stored in a sealable steel 55 gallon drum and given or sold to a used oil contractor for recycling.
- Storm water that accumulates to unacceptable volumes in the bermed areas or overhead tank catch basins is disposed of at a NMOCD approved facility.
- Crude oil recovered during the Shell Pipeline Company ground water remediation project is managed by Shell Pipeline Company.
- Other than the sump for the East Pump Gallery, Lea Station does not have a common buried drain/collection system.

5.2 Solid Waste

- Domestic and non-metallic construction waste is managed by the individual generator by depositing in the "Waste Management" dumpster located at the entrance to the facility. The dumpster is emptied weekly.
- Metallic construction waste is stored in a bin in the Eunice yard and sold to a metal recycling company.
- Crude oil contaminated soil, with concurrence with the NMOCD, is either remediated on-site or transported to an approved disposal facility, i.e., South Monument SWMF #NM-01-0032, S25 T20S R36E, 834 W. Gold, Hobbs, New Mexico 88240 (505) 391-8391 or Environmental Plus, Inc. #NM-01-0013, S15 T22S R37E, P.O. Box 1558, Eunice, New Mexico 88231 (505)394-3481. Hazardous characteristics, i.e., Reactivity (R), Corrosivity (C), Ignitability (I), and Toxicity are determined in accordance with RCRA 40 CFR Part 261, Subparts C and D. Toxicity of the soil is determined by analyzing the leachate collected during the "Toxicity Characteristic Leaching

Procedure" (TCLP) for Volatiles (EPA method 8260), Semi-Volatiles (EPA method 8270), and Metals. The soil historically has been characterized as RCRA "non-hazardous." Refer to Attachment VI.

- Pipeline "pigging" and "scraping" wastes from routine pipeline maintenance activities are accumulated in the 800 cubic foot steel roll-off storage bin rented from CRI, Hobbs, New Mexico. The waste, consisting primarily of paraffin and grease from pigging and scraping, is collected by the EOTT gauger in sealable 5 gallon steel cans at off site locations, transported to Lea Station, and mechanically transferred into the roll-off bin. Following hazardous characterization according to RCRA 40 CFR Part 261, Subpart D, the "RCRA non-exempt" waste is disposed of at a NMOCD approval disposal facility.

6 Inspection and Maintenance Plan

All pressurized underground piping and valving within the facility is tested for integrity and functionality at least annually and the surface facilities visually inspected twice daily. The level of crude oil accumulated in the basins, pans/buckets, and sumps are noted daily and the crude oil routinely reintroduced to the system via truck. Each EOTT employee is trained and tested in the operation, inspection, and maintenance of Lea Station prior to being allowed to operate the facility.

6.1 Pressure Testing, Valve Operation, and Tank Height

The underground piping within the facility, along with the inbound gathering system lines and outbound mainlines, are pressure tested to 125% of the designed working pressure at least annually. Functionality of the remote operated facility valving system is conducted semi-annually on all facilities including EOTT Department of Transportation (DOT) regulated pipelines. Failures are replaced or repaired immediately and iteratively tested before being placed back in service. Fluid levels are displayed on the "Panel View" system at the station and monitored remotely on a 24 hour basis from the Central Control Room in Midland, Texas.

6.2 Routine Inspection and Maintenance

As a routine order of operation and maintenance, EOTT personnel conduct a visual inspection of the entire facility twice daily.

6.2.1 Mechanical and Instrumentation Inspection and Maintenance

During the operational and maintenance routine the visual inspection identifies pumping equipment and instrumentation issues requiring attention, as well as, determining the need for repair or maintenance of lighting systems, fences, and facility berms and roads, adequacy of the safety equipment and communications, and disposition of satellite container and bin wastes and sump contents. All leaks are mitigated and reported immediately to the "EOTT Central Control Room" personnel in Midland, Texas and the District Environmental Supervisor, consistent with the EOTT Lea Station Spill/Leak Prevention and Reporting Procedures (Contingency Plan).

6.2.2 Tank Fluid Levels

Each storage tank at Lea Station is equipped with a direct read mechanical gauge line manufactured by "VAREC." These gauges lines are read each day and compared to the "Panel View" readouts to ensure consistency and accuracy of the electronic monitoring system. If a discrepancy is observed, the malfunctioning device or system is taken off-line and repaired.

6.2.3 Containment System Inspection and Maintenance

The berms will be visually inspected twice daily, initiating maintenance or repair when berms become eroded or are disturbed. In the event storm water accumulations persist for more than 24 hours, effectively reducing the berm or catch basin storage volume to less than the maximum potential release volume, the water will be immediately removed to an NMOCD approved disposal facility.

6.2.4 Basins, Pans/Buckets, and Sumps Inspection and Maintenance

Crude oil released during normal operation or maintenance is collected in basins, pans/buckets, and sumps. EOTT personnel monitor the levels daily and empty when necessary.

6.2.4.1 Basins

All station pumps are installed inside of concrete basins designed to collect crude oil released from the pumps during operation and maintenance. Some basins drain into a common sump. Basins and drains are cleared of sand debris routinely.

6.2.4.2 Pans/Buckets

Like the Basins, all pans/buckets deployed about the site are inspected daily and, as necessary, collected and reintroduced to the system.

6.2.4.3 Sumps

There are five subsurface sumps installed at Lea Station. These are non-pressurized vessels constructed of ¼" plate steel.

6.2.4.3.1 East Pump Gallery Sump

This sump is located just north of the east pump gallery and receives crude oil from the five basins. This sump has a level actuated pump that will automatically transfer crude oil back into the system. A high level sensor is also installed and will shutdown the station if activated.

6.2.4.3.2 34 Junction LACT Sump

This sump receives crude oil from the 34 Junction LACT skid.

6.2.4.3.3 #1 and #2 LACT Sump

This sump receives crude oil from the #1 and #2 LACT units.

6.2.4.3.4 Tank 808-C Booster Pumps Sump

This sump receives crude oil from the Booster Pumps due east of Tank 808-C located inside the bermed area.

6.2.4.3.5 Lynch Station Receiver and Meter Sump

Crude oil released at the meter skid drains into this sump. Prior to retrieving the pipeline "pig" used during maintenance activities from the receiver, the receiver is isolated and drained into the sump.

7 Contingency Plan; Spill/Leak Prevention and Reporting Procedures

This Contingency Plan identifies hazards associated with the operation of the EOTT Lea Station Crude Oil Pumping Station and identifies administrative and engineered controls designed to minimize and mitigate hazards associated with a spill or release of crude oil at the facility. The "EOTT Oil Spill Response Plan, February 2001" directs EOTT's response to and management of crude oil spills and leaks that occur at the Lea Station.

7.1 Facility Inspection and Remote Monitoring

Twice daily, at a minimum, trained EOTT personnel perform routine maintenance on the pumps and instrumentation daily, as well as, inspect the above ground facilities, i.e., tanks, valving, and piping. The "EOTT Central Control Room" in Midland, Texas remotely monitors the inbound and outbound flow rates, tank levels, and inlet and discharge pump pressures 24 hours per day and can operate the system valving from the Central Control Room or by on site personnel. Aerial surveillance of the entire pipeline gathering and transmission system is conducted at least every 3 weeks under normal conditions to check for leaks.

7.2 Facility Shutdown

If any of the parameters are monitored as being "abnormal" by the "EOTT Central Control Room" personnel, a local EOTT technician is dispatched to verify the problem. If warranted, the facility can be shut down remotely from Midland or by the responding EOTT technician. "Abnormal" conditions would include; pump failure, high levels in the storage tanks or east pump gallery sump, fire, or a major leak or spill. The emergency shutdown is located just inside the east entrance gate and when activated will shut down the pumps and close the system block valves and minimize release volumes. The facility will be shutdown in the event of a fire that cannot be controlled with the handheld fire extinguishers deployed throughout the facility, a catastrophic failure of a tank, pump, or piping that results in an uncontrolled release of crude oil, or at the discretion of EOTT to preempt an imminent spill or release.

7.3 Secondary Containment Systems

Tank areas where large volumes of crude oil accumulate and pump areas with high throughput volumes are enclosed within earthen/caliche berms to prevent major releases from migrating off-site. The overhead storage tanks for pipeline treating chemicals are inside of fiberglass basins. Accumulated storm water in the bermed areas or fiberglass basins persisting for more than 24 hours and reduces the containment system volume appreciably below 1.5 times the maximum release volumes will be tested and disposed of off site at an NMOCD approved facility.

7.3.1 Crude Oil Storage Tank Containment System

Each storage tank is enclosed by an 8 foot high caliche berm designed to contain at least 1.5 times the respective tank volumes. Each berm is approximately 20 feet wide at the base with a 4-5 foot wide flattened top. Below are the calculated containment volumes for the storage tank areas.

- 25,000 bbl tank = 69,902 bbls, berm dimensions – diameter = 250' height = 8'
- 80,000 bbl tanks = 140,158 bbls, berm dimensions – diameter = 354' height = 8'

7.3.2 East Pump Area Containment System

The land surface in the main pump area on the east side of the facility tilts slightly to the southeast causing run-off to flow in that direction. A down gradient berm is in place to contain all run-off from the pump area, whether storm water or crude oil, and has a calculated capacity of 1.5 times the maximum facility throughput, i.e. 25,000 bbls/day x 1.5 = 37,500 bbls (157,890 ft^3). Below are the calculated containment volumes for the East Pump Area Containment System basin.

- Basin volume: 200' X 220' X 5' = 220,000 ft^3
- Maximum crude oil release volume: 25,000 bbls = 140,364 ft^3

7.3.3 Overhead Tanks Containment System:

To prevent an environmental release of treating and cleaning chemicals stored in overhead tanks, each vessel is placed inside of inert fiberglass catch basins capable of holding at least 1.5 times the respective volumes of fluid.

7.4 Fire Suppression

Incipient fires will be extinguished with the six 20 pound fire extinguishers strategically deployed in the areas of the pumps, meters, controls, and valve settings. All fire extinguishers are housed in readily accessible, highly visible (red) weather proof enclosures with NFPA approved signage. The extinguishers are routinely serviced and inspected consistent with the NFPA guidelines, i.e., annually and monthly, respectively. All employees are trained annually in their use and limitations. In the case of a catastrophic fire, local municipal and county Fire and Rescue personnel will be summonsed and will be at the discretion of the initial respondent.

7.5 NMAC 19.15.3.118, Hydrogen Sulfide Gas (H_2S) Contingency Plan

Hydrogen Sulfide is present in a portion of the sour crude oil streams that pass through the EOTT Lea Station. On February 15, 2002, a H_2S survey was conducted at the facility by Callaway Safety Equipment Company with "zero"/"null" results, therefore exempting this facility from the requirements of NMAC 19.15.3.118.D, i.e., Hydrogen Sulfide Contingency Plan. Nevertheless, EOTT employees and contractors are required to wear calibrated and checked personal H_2S monitors when on EOTT property and are required to have been trained in H_2S Safety.

7.6 Response to Spills and Leaks

During a crude oil spill or leak the governing EOTT documents are; **EOTT Oil Spill Response Plan, February 2001, EOTT Emergency Response Manual**, and the **Operations and Maintenance Manual (Procedures)**. Upon discovery and confirmation of a crude oil release at the facility, the EOTT District Environmental Supervisor (DES) will collect the information necessary to document and assess the release;

- Occurrence Date and Time
- Discovery Date and Time
- Crude oil volume Released
- Crude oil volume Recovered
- Effected Surface Area
- Legal Description
- Driving Directions
- Land Owner
- Cause
- Initial response and mitigation activities

7.6.1 Rule 116 Notification

The EOTT District Environmental Supervisor (DES) will notify the NMOCD consistent with NMOCD Rule 116.

7.6.1.1 Releases >25 Barrels

The EOTT DES or his designee will immediately notify the local NMCOD office of leaks >25 bbls, convey the necessary information, and submit a completed NMOCD form C-141 within 15 days of the occurrence.

7.6.1.2 Released <25 Barrels but >5 Barrels

For leaks <25 bbls but >5 bbls, the EOTT DES or his designee will submit a completed NMOCD form C-141 within 15 days of the occurrence.

7.6.1.3 Releases <5 Barrels

Spills <5 bbls do not need to be reported but will be remediated consistent with the NMOCD Guidelines.

7.6.1.4 Releases Capable of Affecting the Public

If the EOTT DES determines that a release is capable of negatively affecting the public as they traverse New Mexico State Road 8 approximately 600 feet east of the east facility perimeter, he will contact the New Mexico State Police, Lea County Sheriff, and the National Response Center.

7.6.2 Initial Response and Mitigation

After the system has been taken out of service, EOTT personnel will recover pooled crude oil and reintroduce into the system and repair or replace the defective equipment or device. Coincident with the repair or replacement activities, crude oil saturated soil will be excavated and placed on a plastic barrier to mitigate vertical migration and minimize impacted soil volume. This process may involve the use of qualified local contractors.

7.6.3 Remediation Procedure

Following mitigation of the spill, the vertical and horizontal extents of the release will be delineated by collecting and analyzing soil samples from the excavation and/or by soil borings. Based on the delineation information, contaminated soil will be disposed of in a NMOCD approved land farm and the excavation backfilled with clean soil or, with NMOCD approval, will be remediated on-site using an acceptable remediation alternative, i.e., bio-treatment, in-situ remediation, blending, or landfarming. All environmental management activities will be implemented consistent with the "New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills, and Releases, August 13, 1993."

8 Employee Training

EOTT implements an extensive employee safety training program. The EOTT Contractor Safety Program requires EOTT contractors to implement a similar program. Each EOTT employee is trained and tested in how to recognize occupational and operational hazards and how they should be managed safely and efficiently.

8.1 Occupational Safety Training

Prior to going into the field, each new EOTT employee receives occupational safety training that provides a discussion of the hazards encountered on the job and specific safety training in how these hazards should be mitigated or managed, consistent with 29CFR 1910 (OSHA). Training is refreshed annually with attendance mandatory and proficiency documented. Topics include HAZWOPER Level III, Benzene, and H_2S.

8.2 Operational Training

EOTT employees are cross trained to perform multiple jobs within the system. Class room and "on the job training" (OJT) of operational procedures are required before an EOTT employee is allowed to work independently in the field. Proficiency must also be documented.

9 Site Characteristics

The EOTT Lea Station facility is located in an area of Lea County New Mexico with no naturally occurring surface water bodies. An EOTT water well was drilled for domestic use in the northeast part of the site during the 1950s and has been abandoned since the mid 1960s but not plugged. No other wells occur within 0.5 miles, notwithstanding, it is a relatively sensitive area because of the occurrence of shallow relatively high quality ground water. For the purposes of this Discharge Plan, the 70 acres of land owned by EOTT located west of the west perimeter fence but not currently utilized is considered to be part of the facility.

9.1 Area Surface Water Bodies

There are no naturally occurring surface water bodies, i.e., streams, distinct drainages or arroyos, or ground water discharge points (springs, seeps, marshes, and swamps) recorded or observed within 1.0 mile of the facility perimeter.

9.2 Area Water Wells

The New Mexico Office of the State Engineer records the on-site water well in Section 28 and two in Section 33 adjacent to the southwest of Section 28 where Lea Station is located. The ground water well location map is included in Attachment I and the New Mexico Office of the State Engineer well report is included in Attachment IV.

New Mexico Office of the State Engineer	Use	Tws	Rng	Sec	q	q	q	Zone	Easting	Northing	Date	Well Depth 'bgs	Water Level 'bgs
L 02402	DOM	20S	37E	28	1	4	1	13	663465	3602173	1/10/1954	60	40
L 07355	SAN	20S	37E	33	1	2	2	13	663687	3600964	7/4/1975		120
L 08157	SAN	20S	37E	33	1	2	2	13	663687	3600964	10/8/1979	395	275

9.3 Geological/hydrological Information

The general reference document for southern Lea County New Mexico is "United States Geological Survey Ground-Water Report 6, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, Alexander Nicholson, Jr. and Alfred Clebsch, Jr., 1961" (Nicholson & Clebsch). Geologic and hydrologic maps are included in Attachment IV.

9.3.1 Geological Description

The EOTT Lea Station is located at the lower end of Laguna Valley as it transitions into Monument Draw. The surface soil consists of tan to reddish sand and consolidates with depth. The Ogallala Formation that mantles the High Plains to the north has been eroded and subsequently filled with Quaternary Alluvium. A study by Theis in 1954 at a location in Monument Draw approximately 4 miles east of Lea Station found, that, at that location, the Triassic Red-Bed Clays underlying the Ogallala Formation have been depressed probably by erosion and suggests that the Quaternary fill washed into the depression from the Ogallala Formation that rims the north side of Monument Draw. Soil borings advanced at Lea Station identified intermittent occurrences of caliche mixed with fine tan sand from the surface to 25 feet below ground surface ('bgs), but no pure indurated caliche interbed, as is typical of lithologies of the High Plains Province to the north where the Ogallala Formation is capped by an intergrade of caliche and siliceous sandstone of varying thicknesses. The confining Triassic Red-Beds occur approximately 35'bgs and are overlain by Quaternary Alluvium and is consistent with the Theis study. Refer to Figure 18 in Attachment IV.

9.3.2 Hydrologic Description

From monitor well records, ground water occurs beneath Lea Station at approximately 30'bgs. Nicholson & Clebsch considered inflow from Laguna Valley as the principle source of saturation encountered in the Monument Draw with minimal contributions from infiltration during precipitation events. At Lea Station the ground water flow follows the depression in Monument Draw to the east. A sample from a Shell Pipeline Company perimeter monitor well located east of Lea Station was analyzed by the Environmental Lab of Texas, Inc. in May 2001. The following table summarizes part of the results. A copy of the Analytical Report is included in Attachment VI. Please note that the Metals were unfiltered.

Parameter	Value (mg/Kg)
Benzene	<0.001
Toluene	<0.001
Ethylbenzene	<0.001
m,p-Xylene	<0.001
o-Xylene	<0.001
Chloride	151

Parameter	Units	Value
Total Dissolved Solids	mg/L	1688
pH	SU	7.09
Conductivity	µS/cm	2000

A potentiometric map from Nicholson & Clebsch is included in Attachment IV.

9.3.3 Site Run-in and Run-off

The topography at Lea Station tilts slightly to the east and is surrounded on all sides by a dunal system of tan to reddish sand. There are no well defined surficial drainages up-gradient to provide "run-in" and the system of containment berms constructed to control run-off will likewise prevent run-in. A "100 year storm event" with >12 inches of rain in 24 hours occurred during the 1980's but did not flood the facility.

10 Facility Closure

At a time in the future when Lea Station is no longer in operation, the facility will be closed and decommissioned consistent with the closure plan requirements described in the New Mexico Water Quality Control Commission (WQCC) Title 20.6.6.2 Section 3107.A.11 regulations. Delineation and remediation will proceed consistent with the "NMOCD

Guidelines for Remediation of Leaks, Spills, and Releases, August 13, 1993" and the NMOCD approved "General Work Plan for Remediation of E.O.T.T. Pipeline Spills, Leaks and Releases in New Mexico, July 2000"

10.1 Site Assessment

After the Lea Station infrastructure is removed, the site subsurface will be delineated to identify levels of the Constituents of Concern (CoCs) that are in excess of the NMOCD remedial goals for the site.

10.1.1 Soil Assessment

The NMOCD site ranking score for the Lea Station is 20, requiring achievement of the following CoC remedial goals;

- Benzene= 10 mg/Kg
- BTEX = 50 mg/Kg (BTEX is the mass sum of Benzene, Toluene, Ethylbenzene, and Xylenes)
- Total Petroleum Hydrocarbon 8015m (TPH^{8015m}) = 100 mg/Kg

10.1.2 Ground Water Assessment

Given that Shell Pipeline Company is implementing a NMOCD approved Rule 19 Stage II Abatement Plan at the site, it is assumed that the ground water pollution abatement processes will continue to be implemented and monitored until compliance is achieved.

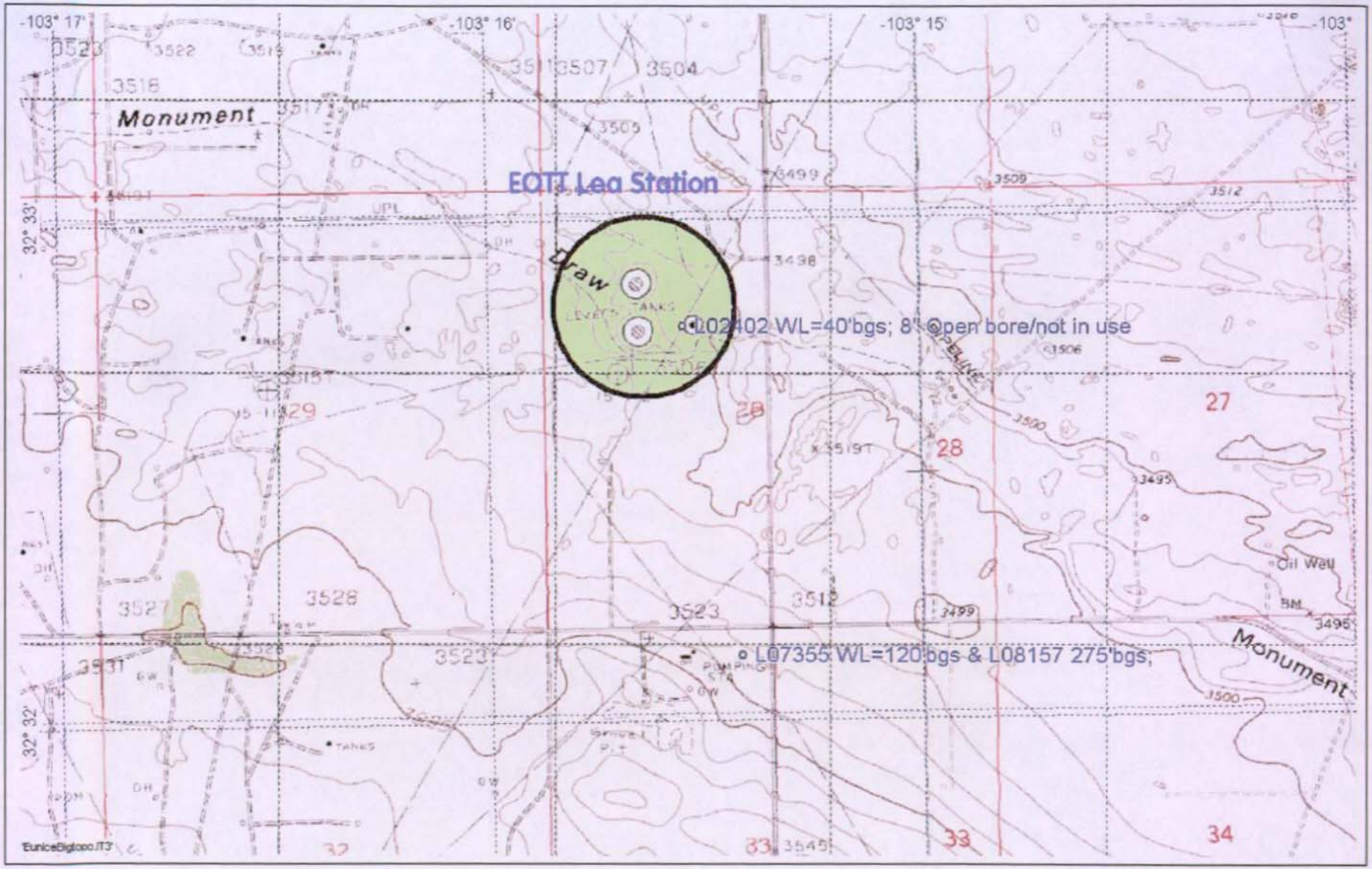
10.2 Site Remediation

CoC concentrations in excess of the NMOCD remedial goals will be remediated to acceptable levels consistent with the NMOCD Guidelines and "General Work Plan for Remediation of E.O.T.T. Pipeline Spills, Leaks and Releases in New Mexico, July 2000." Remediation alternatives that may be proposed will include, disposal, on-site blending, in-situ bio-cell, and risk assessment. Remediation alternatives, other than disposal, require a plan be submitted to the NMOCD for approval.

10.3 Financial Assurance

EOTT Energy LLC will provide the warranted financial assurance to the NMOCD to see that any long term maintenance or monitoring plans are viably implemented. Similarly, Shell Pipeline Company will be responsible financially for assuring that the current Ground Water Pollution Abatement Plan currently being implemented at the site will continue until compliance is achieved.

Attachment I – Maps and Figures


EOTT Lea Station
L02402 WL=40'bgs; 8" Open bore/not in use
L07355 WL=120'bgs & L08157 275'bgs;
Monument
Draw
Oil Well
Monument
-103° 17'
-103° 16'
-103° 15'
-103°
32° 33'
32° 32'
3523
3522
3516
3507
3504
3505
3499
3509
3512
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3506
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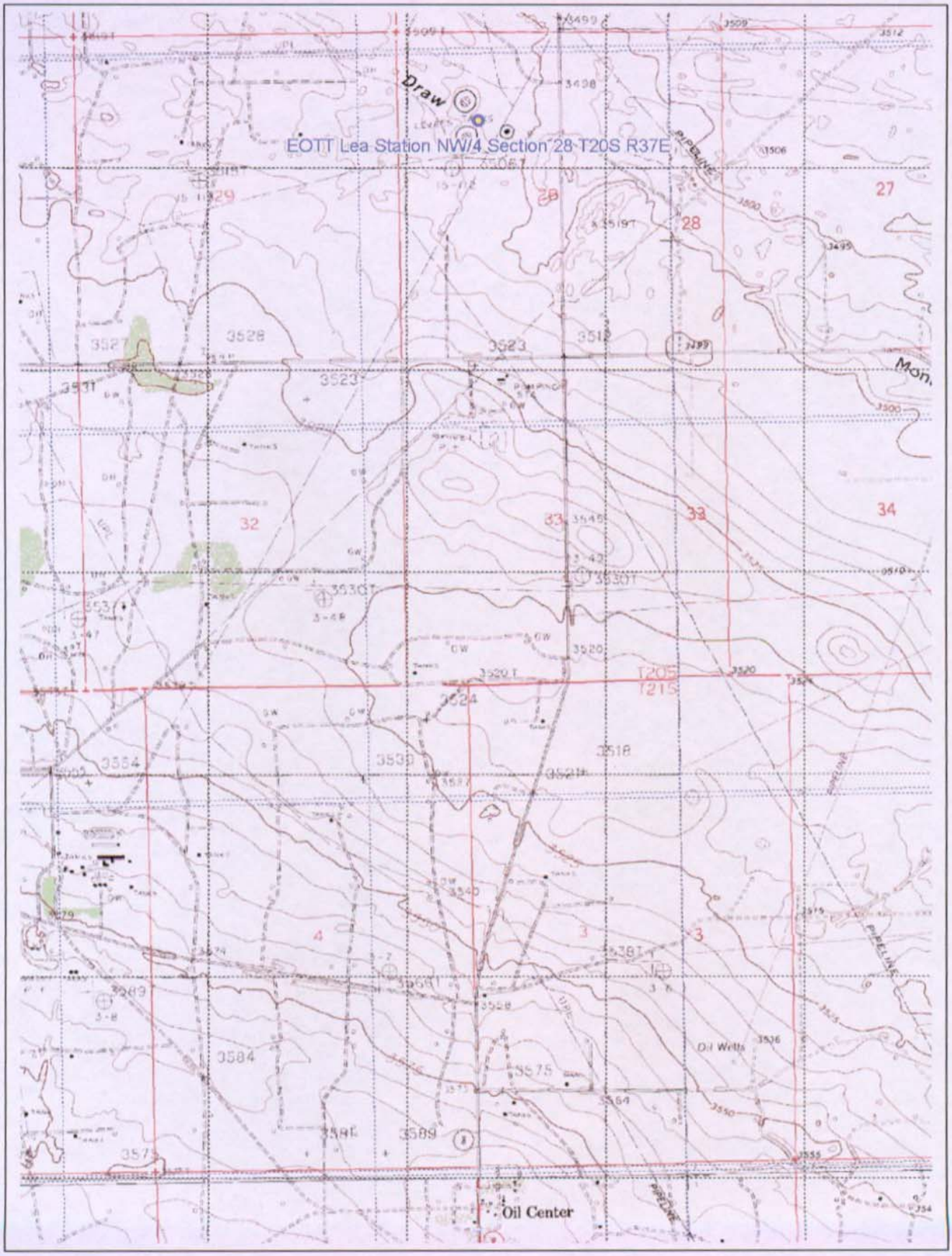
TANKS
PUMPING STA
EuniceDigtopo.IT3


EOTT Lea Station NW/4 Section 28 T20S R37E
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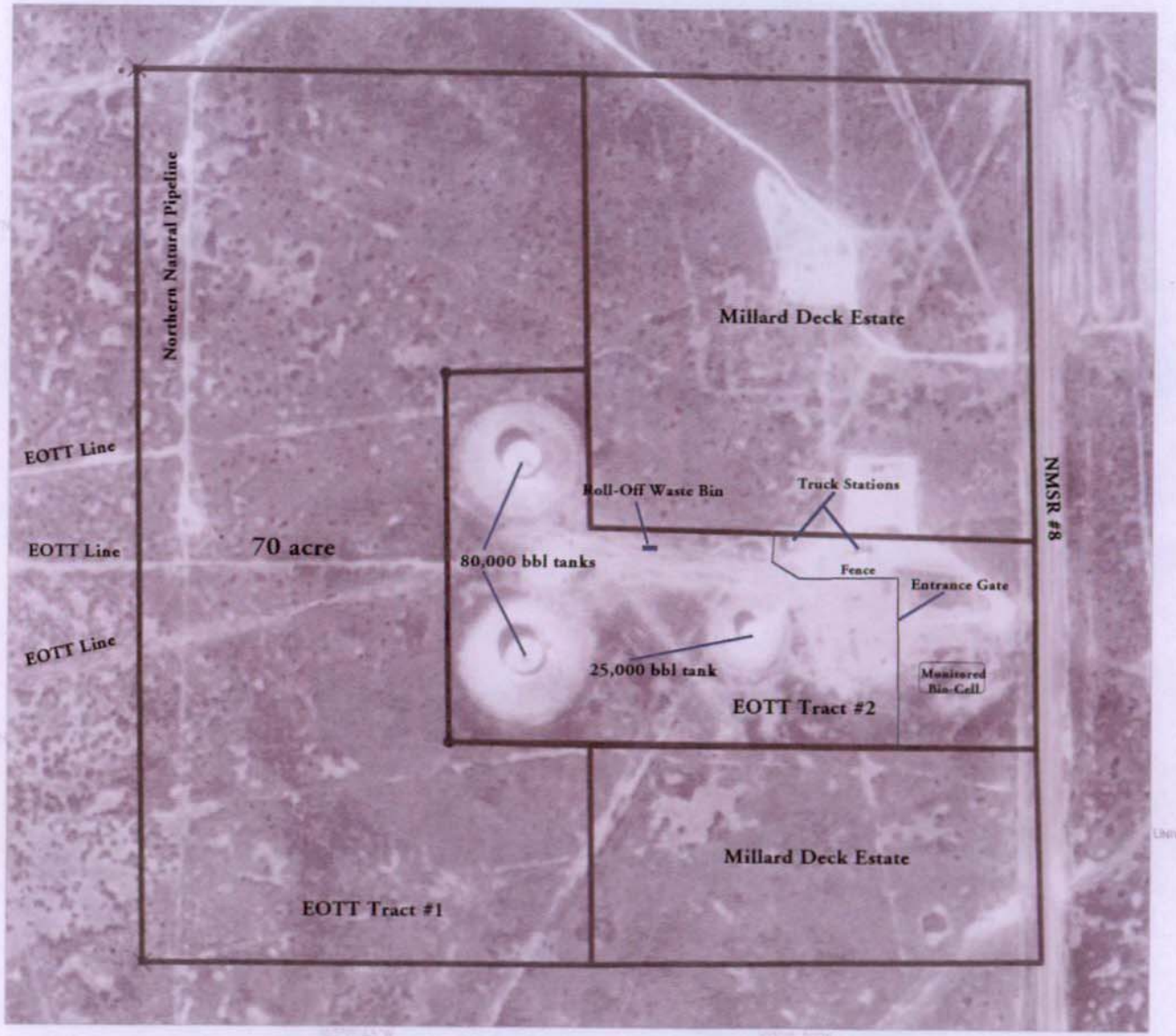
Oil Wells
Oil Center
27
28
32
33
34
4
3
T20S
T21S



EOTT ENERGY
PIPELINE
LEA STATION
NW/4 SEC 28
T20S R37E
LEA COUNTY
NEW MEXICO

N

SCALE 1:6,000

0 600.0

FEET

UNIVERSAL TRANSVERSE MERCATOR
13 NORTH
NAD 1927 (WESTERN US)

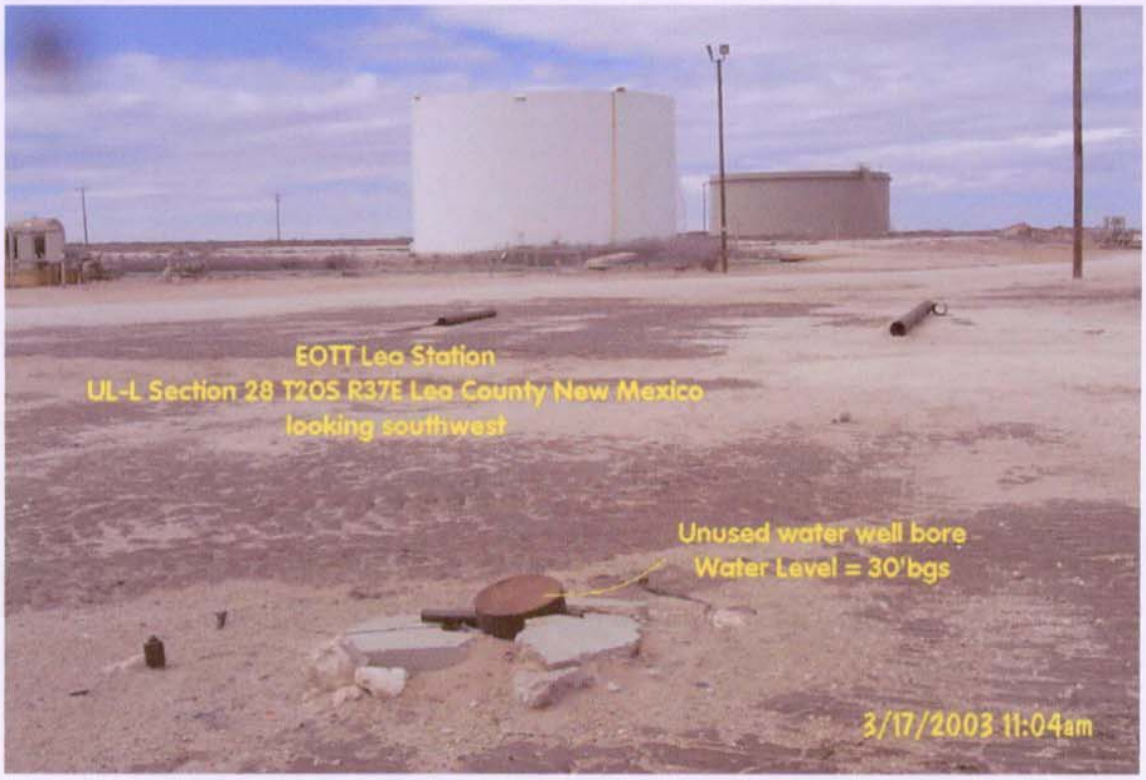
LEASTAPROPERTYLINES.SSF

6/29/2002

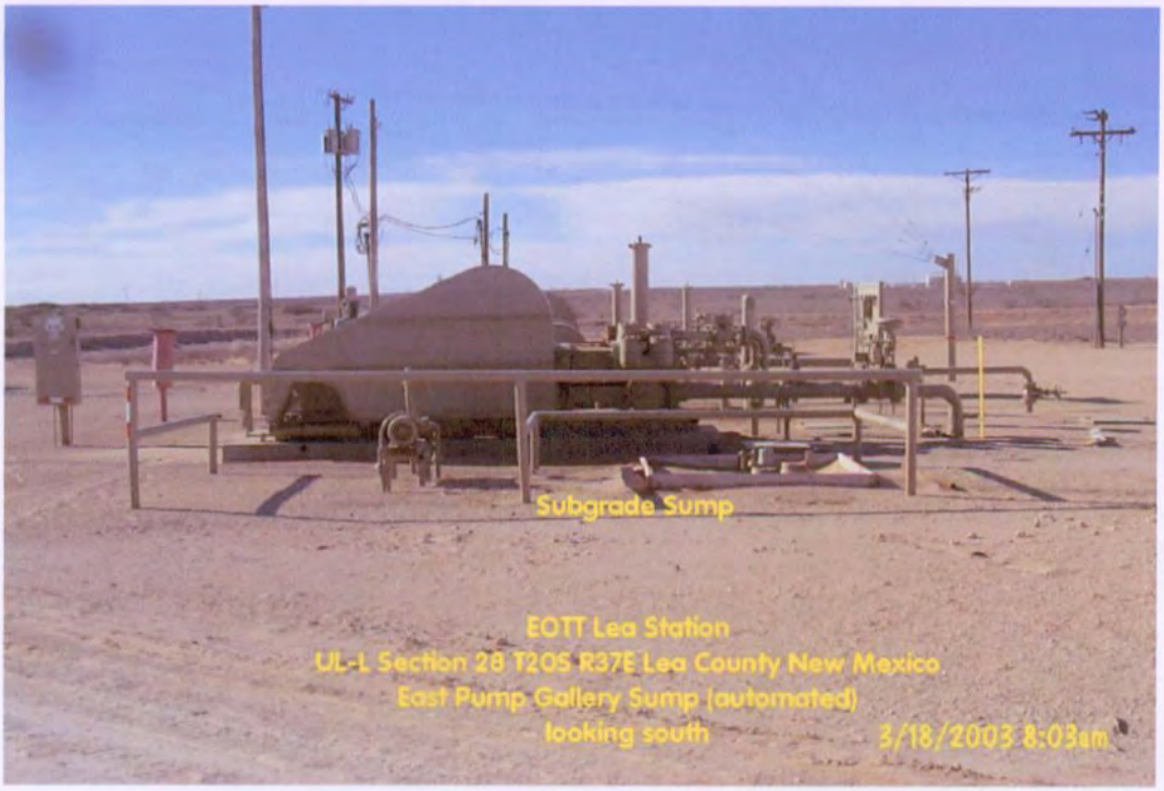
Attachment II – Photographs


E.O.T.T. Energy Pipeline
Lea Station Bio-cell Development
7/26/2000 9:24am


9/7/2000 8:49am


EOTT Lea Station
UL-L Section 28 T20S R37E Lea County New Mexico
looking southwest
Unused water well bore
Water Level = 30'bgs
3/17/2003 11:04am


EOTT Lea Station
UL-L Section 28 T20S R37E Lea County New Mexico
looking west
3/17/2003 11:11am


Subgrade Sump
EOTT Lea Station
UL-L Section 28 T20S R37E Lea County New Mexico
East Pump Gallery Sump (automated)
looking south
3/18/2003 8:03am


treating chemical
fiberglass basin
EOTT Lea Station
UL-L Section 28 T20S R37E Lea County New Mexico
looking southwest
3/18/2003 8:03am

Attachment III - Lea Station Operational Procedures

401 Lea Station

401.1 General

(a) Lea Station is located in Lea County New Mexico approximately 5.8 miles south of Monument on State Highway 8.
GPS 32.32.807 N 15.15.512 W

(b) This station is jurisdictional.

(c) Crude oil is received from a field gathering system. The station is equipped with three tanks. See 400.2 for tank information. The oil from the gathering system is received into tank 808 while truck and field oil is received into 809 and 810. .

(d) The following equipment is installed here:

Unit #	Type	HP	Rate B/H	High Discharge Pressure SD
1	GASO 2652	200	500	850
2	GASO 1742	100	250	850
3	GASO 1742	100	250	850
6	GASO 2652	200	500	850
7	PEERLESS	100	720	190
LACT 7	PEERLESS	100	565	190
LACT 2	GOULD 3656	30	500	37
LACT 3	GOULD 3770	7.5	75 210	37
LACT 4	PEERLESS 8196	30	75 210	134
TANK 808	JENSEN MIXER	25	NA	NA
TANK 809	JENSEN MIXER	25	NA	NA
TANK 810	JENSEN MIXER	25	NA	NA
SOUTH BOOSTER	PEERLESS 8196	50	1400	42
NORTH BOOSTER	PEERLESS 8196	50	1400	42

(e) The station is equipped with high tank level alarms.

401.2 Tanks

The following tanks are located at this facility:

Tank No.	Size	Roof	High Alarm	High High Alarm	Low Alarm	BPF
808	80,000	Ext. Floater	32' 0"	34' 0"	7' 0"	1915
809	80,000	Ext. Floater	32'0"	34' 0"	7' 0"	1915
810	25,000	Ext. Floater	34' 0"	36' 0"	7'5"	630

401.3 Station Alarms

Station alarms are as follows:

Station shutdown
Lockout all pumps
Power fail
Relief flow
Discharge line bypass
Station shutdown lockout
Local control
Booster pump lockout
High tank level
Midland Control gets an On/Off status on pumps
Meter fails alarm
High Sump
Individual Unit Lockout
RTU No Reply
Sweet Station Bypass Flow
Sweet Meter Fail
Sour Meter Fail
Unit Status (Unit #1, #2, #3, #4)
Unit Control (Units #1, #2, #3, #4)
Sweet Station Discharge Pressure
Total Line #2 Flowrate
Total Line #2 Barrel count
Line #1 Station Discharge Pressure
Total Line #1 Barrel Count
Sweet Booster Status
Sour Booster Status
Unit #1 Bypass Valve Status

Local Control Status/Control

401.4 Other Facilities

Catholic protection is provided by an impressed current system.

401.5 Start up procedure

(a) The normal operation for this station is to be remotely controlled from the Control Center.

(b) The control center will align the proper valves to allow receipt of sweet or sour crude oil into tankage. The control center will align the proper valves to deliver whichever ways we are go.

401.6 Shut down procedure

The station is normally shut down via remote control from the Control Center.

401.7 Emergency shut down procedure

(a) Contact the Control Center to make an emergency shut down. Turn the "Off-Auto-Selector" switch located at the control panel to the off position.

(b) The Operations Technician is to perform a Lock Out/Tag Out (LOTO) for each pump and control valve.

(c) The Operations Technician is responsible to ensure that LOTO procedures are performed for any upstream facility as a result of an emergency shut down.

401.8 Emergency Telephone Numbers

Fire	Eunice NM	505-394-3258
LEPC	Eunice NM	505-397-9231
Sheriff	Eunice NM	505-394-2020
Police	Eunice NM	505-394-2112
DPS	Eunice NM	505-392-5588
Hospital	Eunice NM	505-492-5000
Ambulance	Eunice NM	505-394-3258
Local Power Co.	Eunice NM	800-750-2520
Local Gas Co.	Eunice NM	505-392-2142

401.9 Valve Positions - Line 2

The Lea Station Valve Chart shows the general layout of the facilities. The valve chart is located at the end of this section.

Normally Open:

GV2 10" Property Line valve on Junction 34 Line
GV208B 10" Receiving Trap Bypass valve
PV263A Sun truck haul isolation valve
GV261A EOTT Operating truck haul isolating valve
GV262A Conoco truck haul isolation valve
GV221B 8" tank 808 isolation block valve
GV221A 8" block valve used to isolate the pump area from incoming stream and tank 808.
GV222A 8" 500# tank 808 outlet valve
GV222D 10" 150# tank header valve
GV222C 8" 150# valve at tank header line
GV211A 6" 150# Upstream strainer valve
GV211B 6"150# Downstream strainer valve
GV217B 2" 150# Bypass valve
GV216A 2" 600# Bypass gate valve
GV216B 2" 600# Bypass gate valve
GV232A Booster pump suction side isolation valve
GV231A Booster pump 2 suction side isolation valve
GV232B Booster pump 1 discharge side isolation valve
GV231B Booster pump 2 discharge side isolation valve
GV212C Sweet meter 1 (West Side) upstream isolation valve.
PV212A Sweet meter 1 (West Side) downstream isolation valve
GV212A Sweet meter inlet (north side)
GV212B Sweet meter 2 (East Side)
PV212B Sweet meter 2 (East Side)

downstream isolation valve
GV212 Suction header isolation valve
GV201A Unit #1 suctions isolation valve
GV201C 6" 600# Discharge valve
GV201B Unit #1 discharges isolation valve
GV202A Unit #2 suctions isolation valve
GV202B Unit #2 discharges isolation valve
GV203A Unit #3 suctions isolation valve
GV203B Unit #3 discharges isolation valve
GV206A Unit #6 suctions isolation valve
GV206B Unit #6 discharges isolation valve
GV204A Unit #4 suctions isolation valve
GV204B Unit #4 discharges isolation valve
GV209A 6" Lea-McKee property line block valve
GV226A ORIX Akens/Tank 808 suction valve

Normally Closed:
GV208C 10" Junction 34 line receiving trap valve
GV208A Junction 34 kicker valve receiving trap
GV211C Strainer bypass valve
GV222B 4" Tank 808 bypass valve
GV228A Sweet/sour crossover valve
BV212A Sweet meter valves
Normally Closed:
BV212B Sweet meter valves
BV212C Sweet meter valves
PCV216A 2" 600# control valve
GV217A 4" 600# MOV
GV209B 6" 600# Launcher block valve
GV209C 8" 600# Launcher isolation valve

The valves listed below should be closed to isolate the station:
G-1 10" Junction 34 Property Line block valve
CC-1 Sun Truck Haul isolation valve
UP-1 Enron Truck Haul isolation valve
CW-1 Conoco Truck Haul isolation valve
TR808 Tank 808 Isolation valve
P-6 6" Property Line block valve on Lea-McKee Line leaving the station
G-12 Oryx Akens lease line block valve at tie-in on Tank 808 suction header.
GV 222A Tank 808 Isolation valve
GV 226A Oryx Akens lease line block valve at tie in on Tank 808 suction header.

401.10 Station Suction Piping

(a) GV211A & B (8" block valve for isolating pump area from the incoming stream and tank 808) should be closed to isolate the station suction piping from the incoming stream:

(b) The incoming stream can continue to flow into Tank 808 as long as the tank has capacity.

402 LEA LINE #1—Sour System

402.0 Valve Positions - SOUR

The Lea Station Valve Chart shows the general layout of the facilities and can be found at the located at the end of this section.

Normally Open:

GV133A	6" 150# Suction side isolation valve Monument Field pump
GV108H	6" 150# Gate valve on East Side of Eunice receiver trap
GV133B	6" 150# Discharge side isolation valve at monument Field pump
GV321B	12" 200# Tank 809 fill valve
GV321C	8" 500# Tank 809 fill valve
GV131A	4" 150# Charge pump suction valve
GV132A	6" 150# Charge pump suction valve
PV112A	3" 150# Meter skid downstream valve
GV102A	6" 150# Suction valve at pump unit #5
GV102B	4" 600# Discharge valve at pump unit #5
LD1	Lea Dublin Mainline block valve
GV109A	8" 600# Launcher bypass valve
GV121B	6" 150# Tank 810 fill valve

GV121C	6" 150# Tank 810 discharge valve
GV121A	6" 150# 8" Header line valve
GV121D	6" 150# 8" Header line valve

Normally Closed:

GV109B	Kicker valve Lea Dublin launcher
GV109C	8" 600# Lea Dublin launcher block valve
GV228A	6" 150# Cross over block valve
BV112A	3" 150# Prover connection valves
BV112B	3" 150# Prover connection valves
GV221A	8" 150# Tank 808 10" Header line block valve 10" Header line block valve
GV121C	6" 150# Tank 808 10" Header line valve

Attachment IV - New Mexico Office of the State Engineer Well Report and Geology / Hydrology Maps

New Mexico Office of the State Engineer
Well Reports and Downloads

Township: 20S Range: 37E Sections: 20,21,22,27,28,29,32,33,34

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) Non-Domestic Domestic
• All

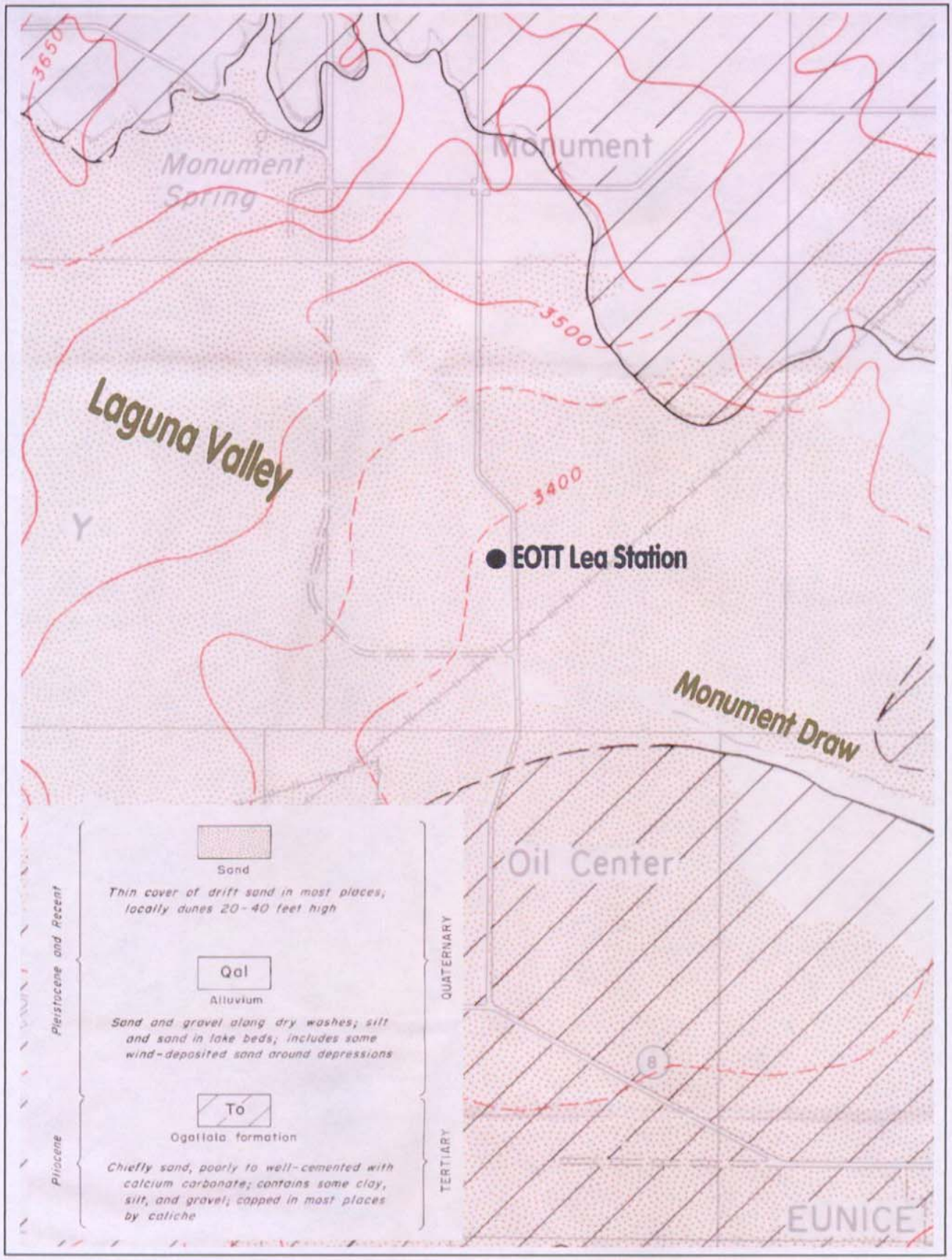
Well / Surface Data Report Avg Depth to Water Report
Water Column Report
Clear Form WATERS Menu Help

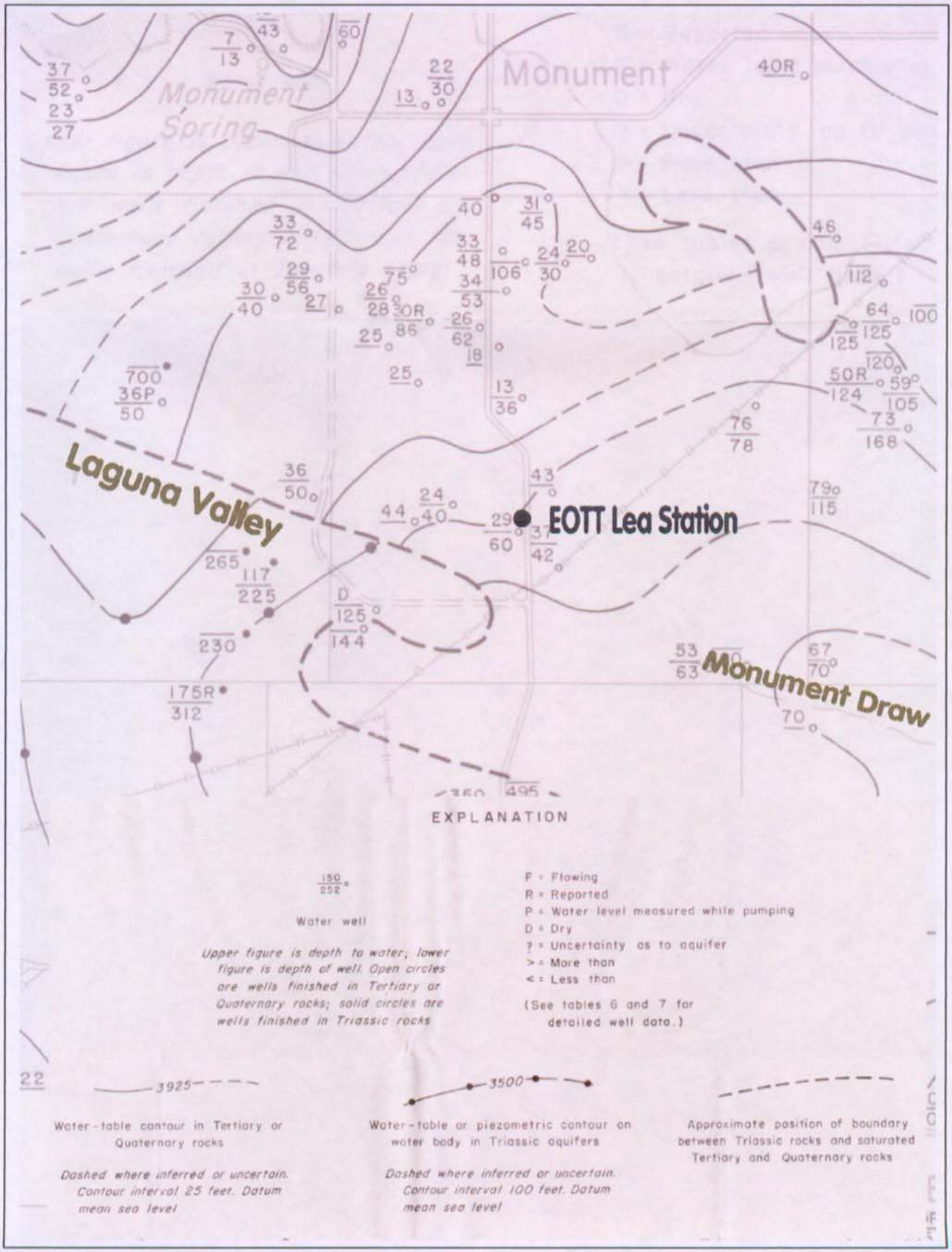
AVERAGE DEPTH OF WATER REPORT 03/15/2003

Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	(Depth Water in Feet) Min	Max	Avg
L	20S	37E	29				2	[illegible]	40	40
L	20S	37E	33				2	120	276	198

Record Count: 4

http://seowaters.ose.state.nm.us/awdProd/awd.html?email_address=enviplus1@aol.com&t... 3/15/2003


3650
Monument Spring
Monument
3500
Laguna Valley
3400
EOTT Lea Station
Monument Draw
Oil Center
EUNICE
Sand
Thin cover of drift sand in most places; locally dunes 20-40 feet high
Qal
Alluvium
Sand and gravel along dry washes; silt and sand in lake beds; includes some wind-deposited sand around depressions
To
Ogallala formation
Chiefly sand, poorly to well-cemented with calcium carbonate; contains some clay, silt, and gravel; capped in most places by caliche
Pleistocene and Recent
Pliocene
QUATERNARY
TERTIARY


Monument
Monument Spring
Laguna Valley
EOTT Lea Station
Monument Draw
EXPLANATION
Water well
Upper figure is depth to water; lower figure is depth of well. Open circles are wells finished in Tertiary or Quaternary rocks; solid circles are wells finished in Triassic rocks
F = Flowing
R = Reported
P = Water level measured while pumping
D = Dry
? = Uncertainty as to aquifer
> = More than
< = Less than
(See tables 6 and 7 for detailed well data.)
Water-table contour in Tertiary or Quaternary rocks
Dashed where inferred or uncertain. Contour interval 25 feet. Datum mean sea level
Water-table or piezometric contour on water body in Triassic aquifers
Dashed where inferred or uncertain. Contour interval 100 feet. Datum mean sea level
Approximate position of boundary between Triassic rocks and saturated Tertiary and Quaternary rocks

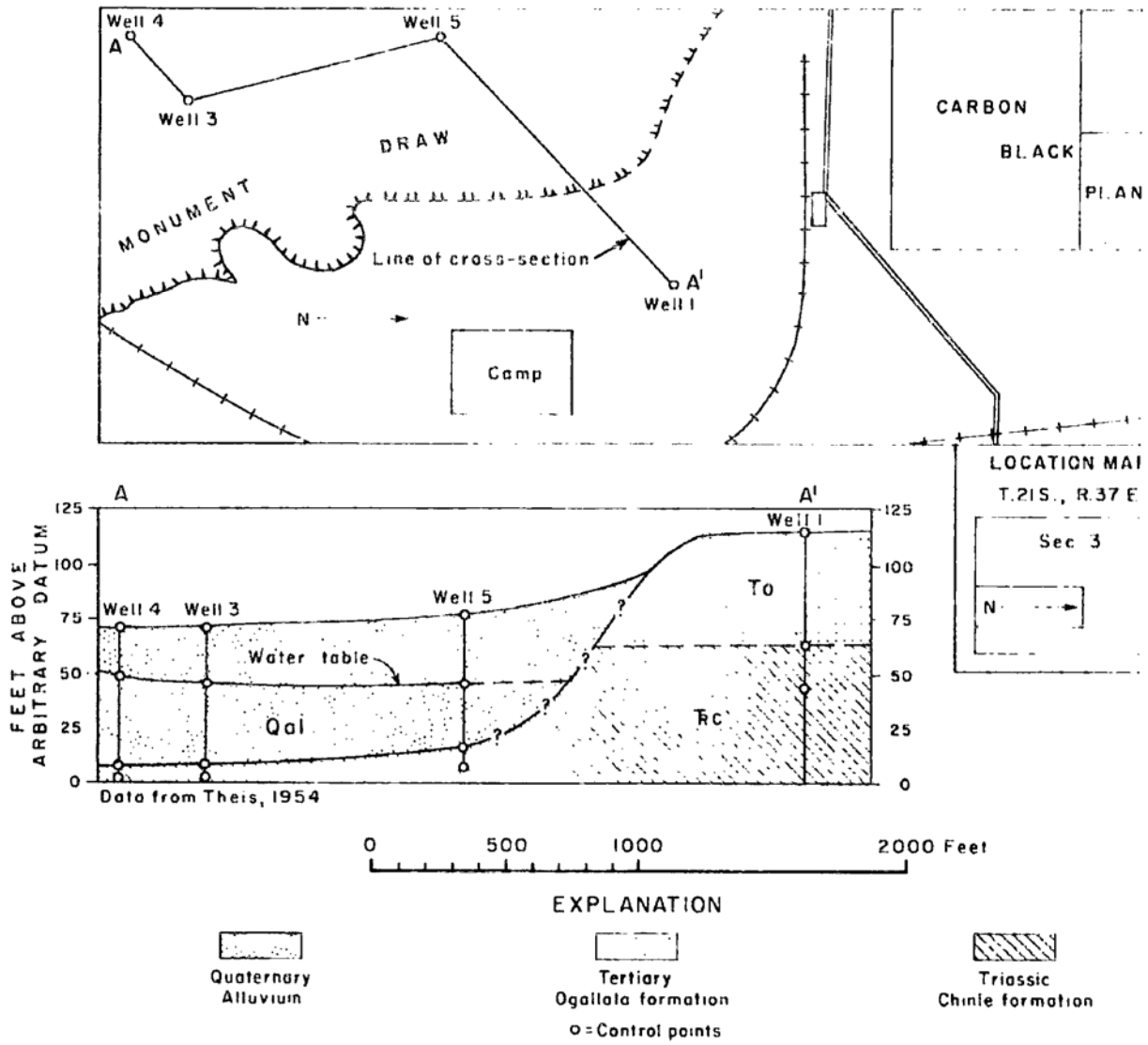
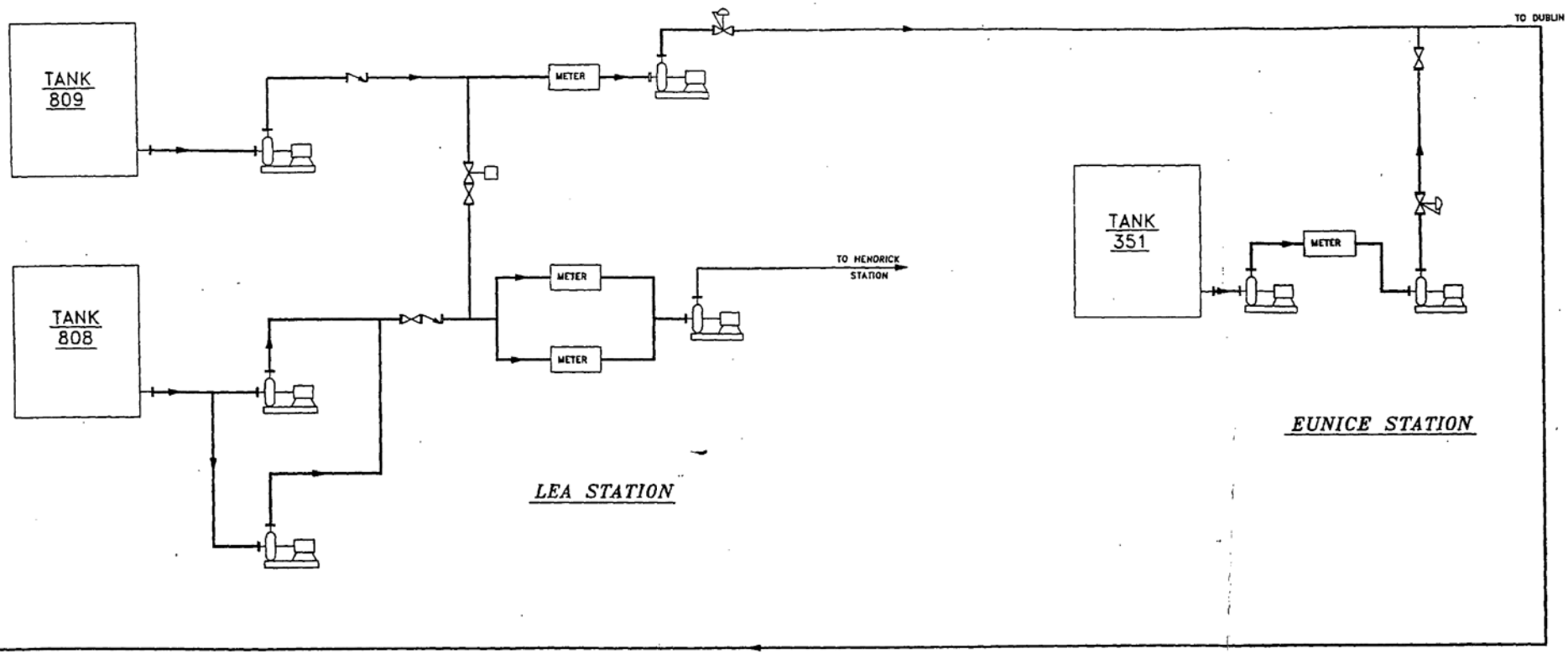


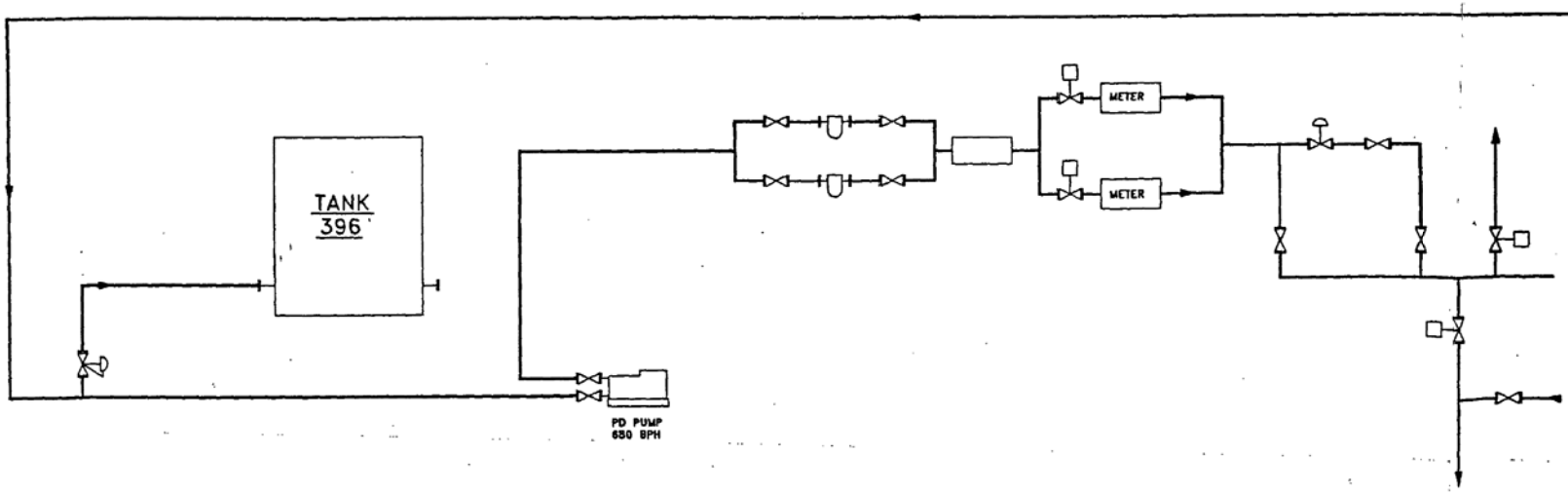
Figure 18

SECTION ACROSS NORTH SIDE OF MONUMENT DRAW, LEA COUNTY, N. M

See also Figure 5.

Attachment V - Facility Drawings





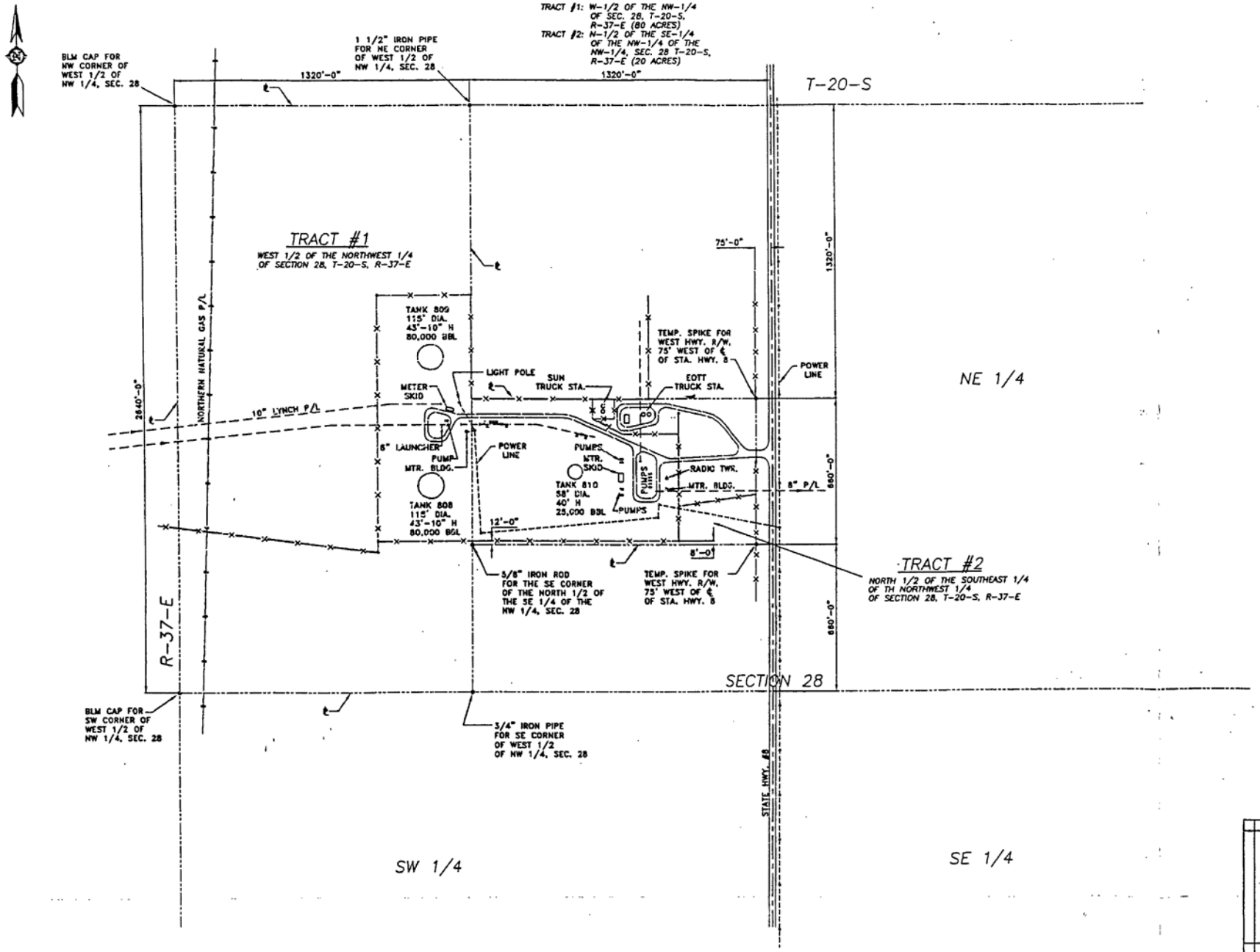
AUG 11 1999

EOTT ENERGY Pipeline Limited Partn

PROCESS FLOW DIAGRAM
LEA BATCH SYSTEM
LEA COUNTY, NEW MEXIC

LEA STATION

2 TRACTS–100.00 ACRES
TRACT #1: W–1/2 OF THE NW–1/4 OF SEC. 28, T–20–S, R–37–E (80 ACRES)
TRACT #2: N–1/2 OF THE SE–1/4 OF THE NW–1/4 OF THE NW–1/4, SEC. 28 T–20–S, R–37–E (20 ACRES)



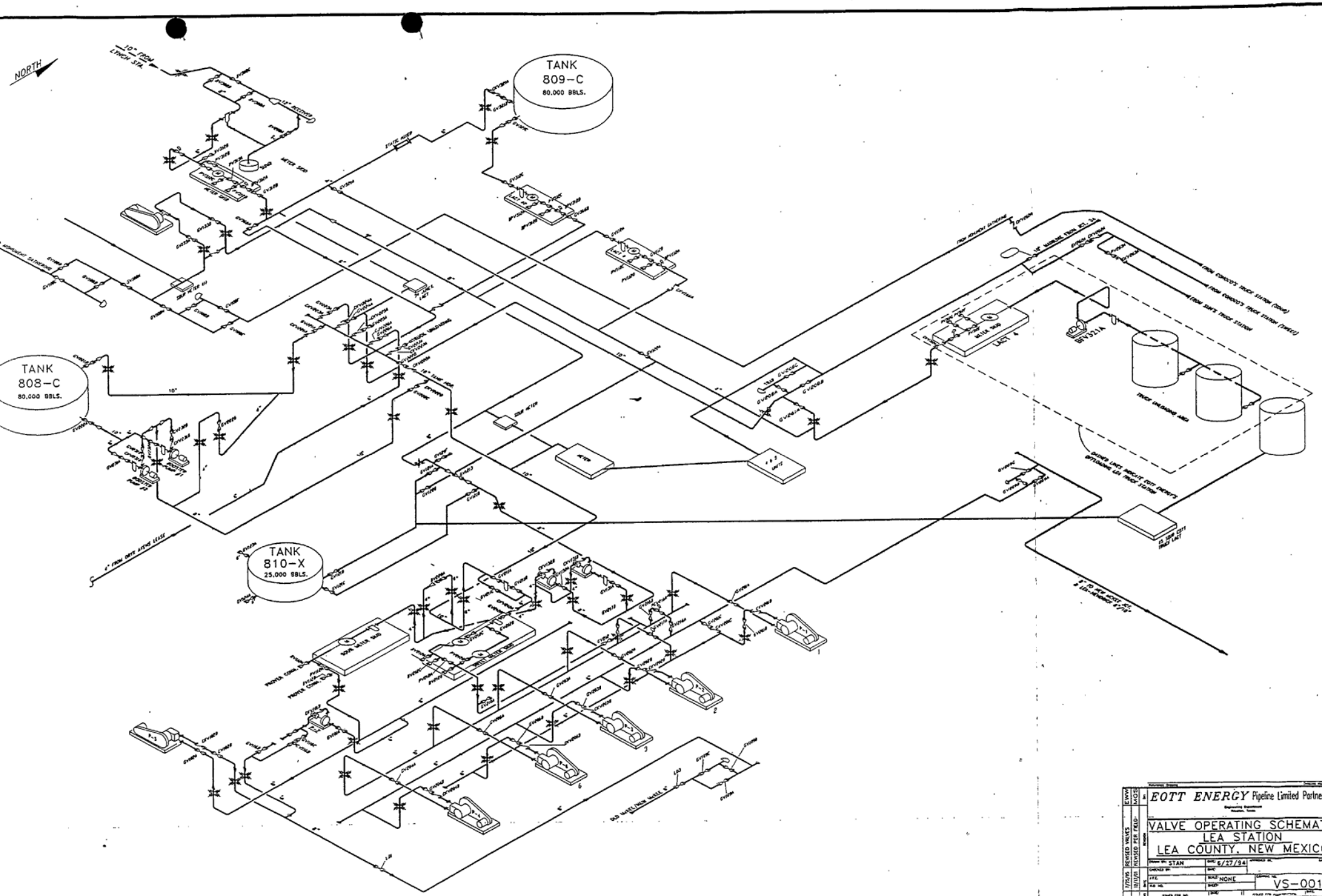
AUG 11 1999

EOTT ENERGY Pipeline Limited Part

PLOT PLAN
LEA STATION
LEA COUNTY, NEW MEXICO

DRAWN BY	STAN	DATE	10/03/94
CHECKED BY		DATE	GIL SCHUTZA 11/7/
APP'D.		SCALE	0"=00'–0"
DWG. NO.		SHEET	1 of 1

M3–00

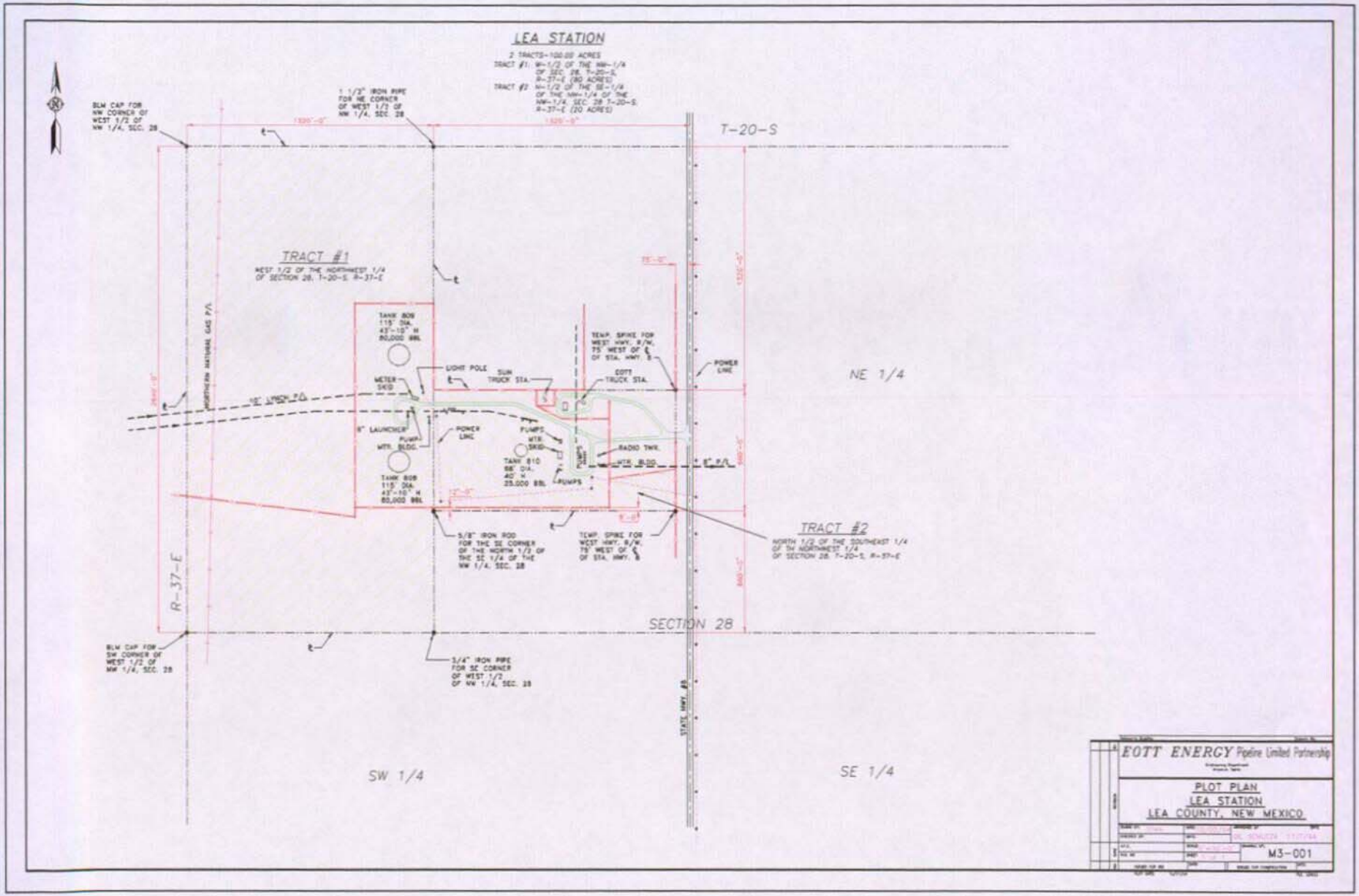


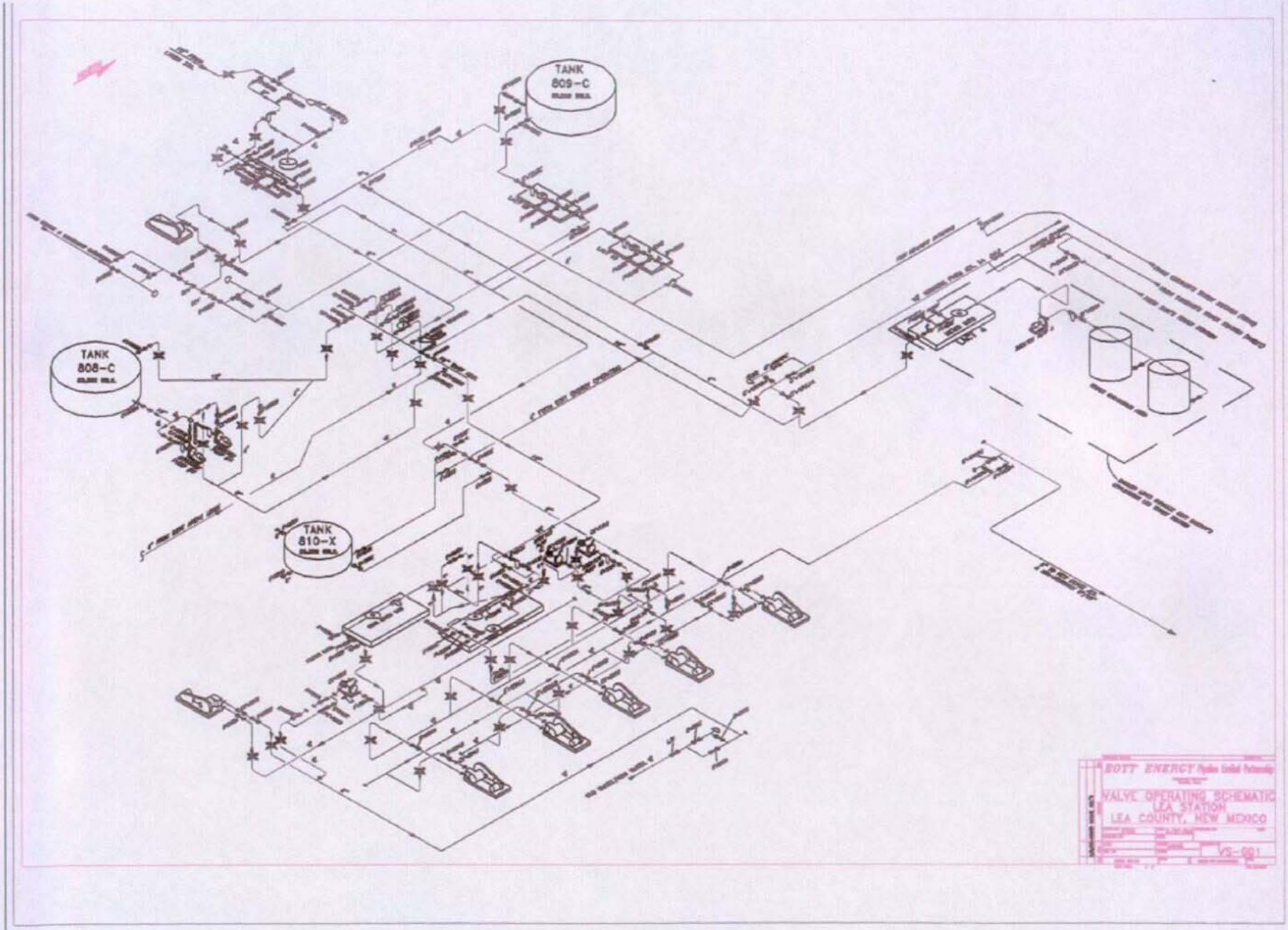
EOTT ENERGY Pipeline Limited Partne

VALVE OPERATING SCHEMA
LEA STATION
LEA COUNTY, NEW MEXIC

Drawn By: STAN
Date: 6/27/94
Scale: NONE
Sheet:
VS-001

1/25/95 REVISED VALVES EWW
10/17/01 REVISED PER FIELD MCS


LEA STATION
2 TRACTS=100.00 ACRES
TRACT #1 W-1/2 OF THE NW-1/4 OF SEC. 28, T-20-S, R-37-E (80 ACRES)
TRACT #2 N-1/2 OF THE SE-1/4 OF THE NW-1/4 OF THE NW-1/4, SEC. 28 T-20-S, R-37-E (20 ACRES)
BLM CAP FOR NW CORNER OF WEST 1/2 OF NW 1/4, SEC. 28
1 1/2" IRON PIPE FOR NE CORNER OF WEST 1/2 OF NW 1/4, SEC. 28
T-20-S
TRACT #1
WEST 1/2 OF THE NORTHWEST 1/4 OF SECTION 28, T-20-S, R-37-E
TANK 808 115' DIA. 43'-10" H 80,000 BBL
LIGHT POLE
SUN TRUCK STA.
TEMP. SPIKE FOR WEST HWY. R/W. 75' WEST OF ℄ OF STA. HWY. 8
EOTT TRUCK STA.
POWER LINE
NE 1/4
METER SKID
16" LINDH P.L.
NORTHERN NATURAL GAS P/L
8" LAUNCHER
PUMP MTR. BLDG.
POWER LINE
PUMPS MTR. SKID
RADIO TWR.
TANK 810 88' DIA. 40' H 25,000 BBL
PUMPS
TANK 808 115' DIA. 43'-10" H 80,000 BBL
TRACT #2
NORTH 1/2 OF THE SOUTHEAST 1/4 OF TH NORTHWEST 1/4 OF SECTION 28, T-20-S, R-37-E
5/8" IRON ROD FOR THE SE CORNER OF THE NORTH 1/2 OF THE SE 1/4 OF THE NW 1/4, SEC. 28
TEMP. SPIKE FOR WEST HWY. R/W. 75' WEST OF ℄ OF STA. HWY. 8
R-37-E
SECTION 28
BLM CAP FOR SW CORNER OF WEST 1/2 OF NW 1/4, SEC. 28
3/4" IRON PIPE FOR SE CORNER OF WEST 1/2 OF NW 1/4, SEC. 28
STATE HWY. #8
SW 1/4
SE 1/4
EOTT ENERGY Pipeline Limited Partnership
PLOT PLAN
LEA STATION
LEA COUNTY, NEW MEXICO
M3-001


TANK
809-C
TANK
808-C
TANK
810-X
EOTT ENERGY
VALVE OPERATING SCHEMATIC
LEA STATION
LEA COUNTY, NEW MEXICO
VS-001

Attachment VI - Laboratory Analytical Reports; Ground Water and Soil RCRA Characterization

ANALYTICAL REPORT

Prepared for:

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Project:	Junction 34
PO#:	2002-10286
Order#:	G0205277
Report Date:	12/27/2002

Certificates
US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706
915-684-3456

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0205277-01	SEJ4121702SP	SOIL	12/17/02 9:00	12/17/02 14:51	L glass	Ice

Lab Testing: Rejected: No Temp: 2.0 C

8260B TCLP
8270C Semivolatile Organics - TCLP
METALS RCRA 7 TCLP
Mercury, TCLP
TPH 418.1 FTIR

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

Lab ID: 0205277-01
Sample ID: SEJ4121702SP

8260B TCLP

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
	12/19/02	12/20/02 16:27	5	1	CK	1311/8260B

Parameter	Result µg/L	RL
Carbon tetrachloride	<1	1.00
Benzene	1.06	1.00
1,2-Dichloroethane	<1	1.00
Chlorobenzene	<1	1.00
1,1-Dichloroethene	<1	1.00
1,4-Dichlorobenzene	<1	1.00
2-Butanone (MEK)	<1	1.00
Chloroform	<1	1.00
Tetrachloroethene	<1	1.00
Trichloroethene	<1	1.00
Vinyl chloride	<1	1.00

Surrogates	% Recovered	QC Limits (%)	
Dibromofluoromethane	115%	53	144
1,2-dichloroethane-d4	94%	57	147
Toluene-d8	102%	64	128
4-Bromofluorobenzene	92%	47	158

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

Lab ID: 0205277-01
Sample ID: SEJ4121702SP

8270C Semivolatile Organics - TCLP

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0004176-02	12/20/02	12/26/02 22:31	1	1	CK	1311/8270C

Parameter	Result µg/L	RL
Pyridine	<5	5.00
1,4-Dichlorobenzene	<5	5.00
2-Methylphenol	<5	5.00
Hexachloroethane	<5	5.00
Nitrobenzene	<5	5.00
Hexachlorobutadiene	<5	5.00
2,4,6-Trichlorophenol	<5	5.00
2,4,5-Trichlorophenol	<5	5.00
2,4-Dinitrotoluene	<5	5.00
Hexachlorobenzene	<5	5.00
Pentachlorophenol	<5	5.00
4-Methylphenol	<5	5.00

Surrogates	% Recovered	QC Limits (%)	
2-Fluorophenol	19%	21	110
Phenol-d5	15%	10	110
Nitrobenzene-d5	52%	35	114
2-Fluorobiphenyl	56%	43	116
2,4,6-Tribromophenol	89%	10	123
p-Terphenyl-d14	56%	33	141

Approval: Celey D. Keene 12/28/02
Date

Raland K. Tuttle, Lab Director, QA Officer
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

FRANK HERNANDEZ
ENRON TRANSPORTATION SYSTEMS
5805 E. HWY. 80
MIDLAND, TX 79706

Order#: G0205277
Project: 2002-10286
Project Name: Junction 34
Location: None Given

Lab ID: 0205277-01
Sample ID: SEJ4121702SP

METALS RCRA 7 TCLP

Parameter	Result	Units	Dilution Factor	RL	Method	Date Prepared	Date Analyzed	Analyst
Arsenic	<0.008	mg/L	1	0.008	1311/6010B	12/21/2002	12/23/02	SM
Barium	0.108	mg/L	1	0.001	1311/6010B	12/21/2002	12/23/02	SM
Cadmium	<0.001	mg/L	1	0.001	1311/6010B	12/21/2002	12/23/02	SM
Chromium	<0.002	mg/L	1	0.002	1311/6010B	12/21/2002	12/23/02	SM
Lead	0.038	mg/L	1	0.011	1311/6010B	12/21/2002	12/23/02	SM
Selenium	<0.004	mg/L	1	0.004	1311/6010B	12/21/2002	12/23/02	SM
Silver	<0.002	mg/L	1	0.002	1311/6010B	12/21/2002	12/23/02	SM

Test Parameters

Parameter	Result	Units	Dilution Factor	RL	Method	Date Prepared	Date Analyzed	Analyst
Mercury, TCLP	< 0.0005	mg/L	1	0.00050	1311 / 7470	12/21/2002	12/23/02	SM

Approval: Celey D. Keene 12/30/02
Date

Raland K. Tuttle, Lab Director, QA Officer
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

Page 1 of 1

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

Environmental Lab of Texas, Inc.

12600 West I-20 East, Phone 915 563-1800
Odessa, Texas 79763 Fax 915 563-1713

Project Manager: FRANK HERNANDEZ
Company Name: EOTT ENERGY PIPELINE
Company Address: 5805 E. HIGHWAY 80
City/State/Zip: MIDLAND TX 79701
Telephone No. 915-556-0190
Sampler Signature:

Project Name: JUNCTION 34
Project #: 2002-10286
Project Loc:
PO#:

Lab I.D.	Sample I.D.	Date Sampled	Time Sampled	No. of Containers	ICE	HNO	HCl	NaOH	HSO	None	Other (Specify)	Water	Sludge	Soil	Other (Specify)	Analyze For: TDS/CL/SAR/EC	TPH 418.1	TPH TX 1005-1006	TPH 8015M GRO/DRO	Metals	Volatiles	Semivolatiles	btex 8021B/5030	RUSH TAT	Standard TAT
				4/3/45												TCLP									
																TOTAL									
	SEJ4121702SP	12/17/2002	9:00	1	X									X			X			X	X	X			

Special Instructions:
FAX RESULTS TO PAT MCCASLAND

Sample Containers Intact: Y N
Temperature Upon Request
Laboratory Comments: Ice 2.0°C

Relinquished:	Date	Time	Received by:	Date	Time
	12/17	1300			
Relinquished:	Date	Time	Received by:	Date	Time
	12/17	1351		12-17-02	1451

ANALYTICAL REPORT

Prepared for:

Frank Hernandez
EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701

Project:	Monument 6" 72202
PO#:	2002-10197
Order#:	G0204002
Report Date:	08/01/2002

Certificates
US EPA Laboratory Code TX00158

The Monument 6" site is in the same system as the Junction 34 to Lea Site

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701
915-684-3456

Order#: G0204002
Project: 2002-10197
Project Name: Monument 6" 72202
Location: UL A Sec 5 T 20S R 36E

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0204002-01	SEM72402SPC	SOIL	7/24/02 14:30	7/25/02 14.20	1. Glass	Ice

Rejected: No Temp: 0.0 c

Lab Testing:

8015M
RCI
TCLP BTEX 8021B,1311

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Frank Hernandez
EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701

Order#: G0204002
Project: 2002-10197
Project Name: Monument 6" 72202
Location: UL A Sec 5 T 20S R 36E

Lab ID: 0204002-01
Sample ID: SEM72402SPC

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
	7/25/02	7/25/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	378	10.0
TOTAL, C6-C35	378	10.0

TCLP BTEX 8021B,1311

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0002649-02	7/26/02	7/29/02 23:54	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Ethylbenzene	<0.001	0.001
Toluene	<0.001	0.001
p/m-Xylene	<0.001	0.001
o-Xylene	<0.001	0.001

Approval: Raland K Tuttle 8-02-02
Raland K. Tuttle, Lab Director, QA Officer — Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Frank Hernandez
EOTT Energy Pipeline
5805 E. Hwy. 80
Midland, TX 79701

Order#: G0204002
Project: 2002-10197
Project Name: Monument 6" 72202
Location: UL A Sec 5 T 20S R 36E

Lab ID: 0204002-01
Sample ID: SEM72402SPC

RCI

Parameter	Result	Units	Dilution Factor	RL	Method	Date Analyzed	Analyst
Ignitability	>100	C	1	NA	1010	7/29/02	SB
pH	7.92	pH Units	1	N/A	9045C	7/26/02	MB
Reactive Cyanide	<0.09	mg/kg	1	0.09	SW846 CH.7	7/27/02	SB
Reactive Sulfide	<5.00	mg/kg	1	5.00	SW846 CH.7	7/30/02	SB

Approval: Roland K Tuttle 8-02-02
Date

Roland K. Tuttle, Lab Director, QA Officer
Celey D Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

RL = Reporting Limit N/A = Not Applicable

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Environmental Lab of Texas, Inc.
12600 West I-20 East Phone: 915-563-1800
Odessa Texas 79763 Fax: 915-563-1713

Project Manager: FRANK HERNANDEZ
Company Name: EOTT ENERGY PIPELINE
Company Address: 5805 E. HIGHWAY 80
City/State/Zip: MIDLAND TX 79701
Telephone No: 915-556-0190
Sampler Signature: Brett Clay

Project Name: Monument 6" 72202
Project #: 2002-10197
Project Loc: UL A Sec 5 T 20S R 36E
PO#:

	Date Sampled	Time Sampled	No. of Containers	ICE	HNO	HCl	NaOH	HSO	None	Other (Specify)	Water	Sludge	Soil	Other (Specify)	Analyze For: TDS/CL/SAR/EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals	Volatiles	Semivolatiles	btex 8021B/5030	Reactivity	Corrosivity	Ignitability	RUSH TAT	Standard TAT
SEM72402SPC	07/24/2002	2:30	1	X									X					X				X	X	X	X		

Analyze For: TCLP / TOTAL — TCLP: btex 8021B/5030 (x)

Special Instructions
FAX RESULTS TO PAT MCCASLAND ASAP

Sample Containers Intact: (Y) N
Temperature Upon Request
Laboratory Comments: 0.0°C

Relinquished:	Date	Time	Received by:	Date	Time
Brett Clay	7-25	0700am	[illegible]	7-25	10:20
Relinquished:	Date	Time	Received by:	Date	Time
Matt Coy	7-26	1420	Jane Mowery	7-25-02	1420

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W1/2 NW 1/4 Sec 28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: 05/21/01

ELT#	FIELD CODE	GRO C6-C10 mg/L	DRO >C10-C28 mg/L
40328	GW51601ELSMW1	<0.5	<0.5
	QUALITY CONTROL	540	541
	TRUE VALUE	500	500
	% INSTRUMENT ACCURACY	108	108
	SPIKED AMOUNT	500	500
	ORIGINAL SAMPLE	<0.5	<0.5
	SPIKE	663	639
	SPIKE DUP	558	544
	% EXTRACTION ACCURACY	112	109
	BLANK	<0.5	<0.5

Methods: EPA SW 846-8015M GRO/DRO

Raland K. Tuttle

5 30 01
Date

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ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W1/2 NW 1/4 Sec28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Extraction Date: 05/21/01
Analysis Date: 05/24/01
Field Code: GW51601ELSMW1

EPA SW846 8270C (mg/L)	REPORT LIMIT	ELT# 10328	RPD	%EA	%DEV
Naphthalene	0.00555	ND			-0.4
Acenaphthylene	0.00555	ND			0.8
Acenaphthene	0.00555	ND	0	103	2.2
Fluorene	0.00555	ND			2.5
Phenanthrene	0.00555	ND			9.0
Anthracene	0.00555	ND			9.4
Fluoranthene	0.00555	ND			-2.1
Pyrene	0.00555	ND	13	105	13.0
Benzo[a]anthracene	0.00555	ND			-16.4
Chrysene	0.00555	ND			-17.4
Benzo[b]fluoranthene	0.00555	ND			-17.2
Benzo[k]fluoranthene	0.00555	ND			4.9
Benzo [a]pyrene	0.00555	ND			-10.5
Indeno[1,2,3-cd]pyrene	0.00555	ND			14.2
Dibenz[a,h]anthracene	0.00555	ND			17.6
Benzo[g,h,i]perylene	0.00555	ND			18.7

	% RECOVERY
Nitrobenzene-d5 SURR	73
2-Fluorobiphenyl SURR	88
p-Terphenyl-d14 SURR	102

ND= not detected at report limit.
Method: EPA SW 846 8270C , 3510

Raland K. Tuttle

5-30-01
Date

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ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition. Intact/ Iced
Project #: TNM-IF-105-Unknown
Project Name: Lea Station
Project Location: W 1/2 NW 1/4 Sec28 T20S R37E

Sampling Date. 05/16/01
Receiving Date: 05/18/01
Analysis Date: See Below

ELT#	FIELD CODE	pH s.u	Conductivity uS/cm	Chloride mg/L	Sulfate mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L
40328	GW51601ELSMW1	7.09	2000	151	444	<2	792	1688
	REPORTING LIMIT	*	*	10	0.5	2	10	10
	Quality Control	7.10	1412	5052	46.5	*	*	*
	True Value	7.00	1413	5000	50.0	*	*	*
	% Instrument Accuracy	101	100	101	93	*	*	*
	Blank	*	*	<10	<0.5	<2	<10	<10
	ANALYSIS DATE	5/18/01	5/18/01	5/18/01	5/30/01	5/18/01	5/18/01	5/21/01

METHODS: SW846-9253, EPA 150.1, 120.1, 375.4, 310.2, 160.1

Raland K. Tuttle

5-30-01
Date

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ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701
FAX: 684-3456
FAX: 505-394-2601 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ HNO3
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W1/2 NW 1/4 Sec 28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: 05/24/01
Analysis Date: Hg 05/25/01

TOTAL METALS (mg/L)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
40328	GW51601ELSMW1	ND	1.592	0.0178	0.0026	0.0189	ND	ND	ND
	REPORT LIMIT	0.002	0.008	0.001	0.001	0.002	0.002	0.011	0.004
	QUALITY CONTROL	4.675	4.976	5.086	5.017	4.925	0.0156	4.996	5.037
	TRUE VALUE	5.000	5.000	5.000	5.000	5.000	0.0150	5.000	5.000
	% INSTRUMENT ACCURACY	94	100	102	100	98	104	100	101
	ORIGINAL SAMPLE	<0.002	<0.008	<0.001	<0.001	<0.002	<0.002	<0.011	<0.004
	SPIKED AMOUNT	1.000	0.2000	1.000	0.2000	1.000	0.0150	1.000	0.2000
	SPIKE	1.315	0.2181	1.129	0.2220	1.067	0.0152	1.046	0.1856
	% EXTRACTION ACCURACY	132	109	113	111	107	101	105	93
	BLANK	<0.002	<0.008	<0.001	<0.001	<0.002	<0.002	<0.011	<0.004
	RPD	15.4	5.36	0.00	0.90	0.00	17.6	0.95	7.25

ND= Not detected at report limit.

METHODS: EPA SW 846- 3015, 7470, 6010B

Raland K. Tuttle

5-30-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES
ATTN: MR. WAYNE BRUNETTE
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79703
FAX: 684-3456
FAX: 505-394-2601

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: TNM-LF-105-Unknown
Project Name: Lea Station
Project Location: W 1/2 NW 1/4 Sec 28 T20S R37E

Sampling Date: 05/16/01
Receiving Date: 05/18/01
Analysis Date: 05/26/01

ELT#	FIELD CODE	Ca mg/L	K mg/L	Mg mg/L	Na mg/L
40328	GW51601ELSMW1	110.2	32.75	122.4	253.1

QUALITY CONTROL	5.278	5.176	5.174	5.243
TRUE VALUE	5.000	5.000	5.000	5.000
% INSTRUMENT ACCURACY	106	104	103	105
SPIKED AMOUNT	1.00	1.00	1.00	1.00
ORIGINAL SAMPLE	<0.01	<0.05	<0.001	<0.002
SPIKE	1.048	0.8516	1.048	0.8560
SPIKE DUP	1.024	0.8582	1.053	0.8600
% EXTRACTION ACCURACY	105	85	105	86
BLANK	<0.01	<0.05	<0.001	<0.002
RPD	2.90	1.17	0.00	0.00

METHODS: SW846-6C10B

Raland K. Tuttle

5-30-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: WAYNE BRUNETTE
Company Name: ENRON TRANSPORTATION SERVICES
Company Address: 5805 East Highway 80
City/State/Zip: Midland, TX 79701
Telephone No: 915.556.0190 or 684.3479 Fax No: 915.684.3456
Sampler Signature:

Project Name: Lea Station
Project #:
Project Loc:
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify)	Analyze For: TCLP: TDS/CCR SAR/EC	TOTAL: TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semi-volatiles	BTEX 8021B/5030							RUSH TAT (Pre-Schedule)	Standard TAT
			1:30	1	✓		✓					✓											✓								✓
40328			1:35	1	✓															✓											✓
			1:40	1																											✓
			1:45	1						✓						✓									✓	✓	✓					✓
			1:50	1																								✓				✓

Special Instructions: CoC requested
FAX TO W. Brunette & Pat McCasland EPI 505.394.2601

Relinquished by:	Date	Time	Received by:	Date	Time
Relinquished by	Date	Time	Received by ELOT:	Date	Time

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments: