

1R - 388

REPORTS

DATE:

2006



**PLAINS
Marketing, L.P.**

March 24, 2006

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

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

Dear Mr. Martin:

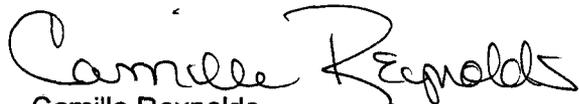
Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico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

TNM 97-17	Section 21, Township 20 South, Range 37 East, Lea County
TNM 97-18	Section 28, Township 20 South, Range 37 East, Lea County
TNM 98-05A	Section 26, Township 21 South, Range 37 East, Lea County
TNM 98-05B	Section 26, Township 21 South, Range 37 East, Lea County
TNM 97-04	Section 11, Township 16 South, Range 35 East, Lea County
Texaco Skelly "F"	Section 21, Township 20 South, Range 37 East, Lea County
Darr Angell #2	Sections 11 and 14, Township 15 South, Range 37 East, Lea County
LF-59	Section 32, Township 19 South, Range 37 East, Lea County
SPS-11	Section 18, Township 18 South, Range 36 East, Lea County
Monument #2	Sections 6 and 7, Township 20 South, Range 37 East, Lea County
Monument #10	Section 32, Township 19 South, Range 37 East, Lea County
Monument #17	Section 29, Township 19 South, Range 37 East, Lea County
Monument #18	Section 7, Township 20 South, Range 37 East, Lea County
Bob Durham	Sections 31 and 32, Township 19 South, Range 37 East, Lea County
Monument Barber 10" Sour	Section 32, Township 19 South, Range 37 East, Lea County
Lea Station to Monument 6"	Section 5, Township 20 South, Range 37 East, Lea County

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

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

Sincerely,

A handwritten signature in cursive script that reads "Camille Reynolds". The signature is written in black ink and is positioned above the printed name and title.

Camille Reynolds
Remediation Coordinator
Plains All American Pipeline

CC: Larry Johnson, NMOCD, Hobbs, New Mexico

Enclosure

2005
ANNUAL MONITORING REPORT

*Report is on
the L-Drive*

MONUMENT BARBER 10-INCH SOUR
SW ¼ SW ¼ SECTION 32, TOWNSHIP 19 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS EMS NUMBER: 2000-10655
NMOCD Reference 1R-0338

388

Prepared For:

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



Prepared By:

NOVA Safety and Environmental
2057 Commerce Street
Midland, Texas 79703

March 2006

Curt D. Stanley
Curt D. Stanley
Project Manager

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

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Figure 3A – Groundwater Concentration and Inferred PSH Extent Map – March 10, 2005

3B – Groundwater Concentration and Inferred PSH Extent Map – June 13, 2005

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APPENDICES

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

ENCLOSED ON DATA DISK

2005 Annual Monitoring Report

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

2005 Figures 1, 2A-2D, and 3A-3D

Electronic Copies of Laboratory Reports

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

INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. Beginning on May 29, 2004, project management responsibilities were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The Monument Barber 10-Inch Sour site (the site), which was formerly operated by Enron Oil Trading and Transportation (EOTT), is now owned and operated by Plains. This report is intended to be viewed as a complete document with text, figures, tables, and appendices. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2005 only. However, historic data tables as well as 2005 laboratory analytical reports are provided on the enclosed data disk. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each quarter of 2005 to assess the levels and extent of dissolved phase constituents and Phase Separated Hydrocarbon (PSH). Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH on the water column, and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 feet were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is SW/4 of the SW/4, Section 32, Township 19 South, Range 37 East, Lea County, New Mexico. The Monument Barber 10-Inch Sour release was discovered by EOTT employees and reported on August 7, 2000. The Release Notification and Corrective Action Form (C-141) is provided as Appendix A. An estimated 1,600 barrels of crude oil were released and 1,300 barrels were recovered. The release resulted in a surface stain measuring approximately 100 feet in length by eight feet in width. The excavated soil was transported to a NMOCD approved disposal facility. Thirty four soil borings were installed by a previous consultant to characterize the horizontal and vertical crude oil impact,

Four (4) groundwater monitor wells (MW-1 through MW-4) and two (2) product recovery wells (RW-1 and RW-2) are currently on-site. An excavation measuring approximately forty feet wide by seventy feet long by 6 feet in depth (40' x 70' x 6') remains from the initial response and site investigation activities.

As indicated on Figures 2A-2D and 3A-3D, there is an off-site third party (Equilon) release located approximately 150 feet upgradient of the site. The presence of product in this area is documented by gauging data from monitor well MW-3. Historic data tables are provided on the enclosed data disk. The NMOCD has been notified of this off-site, up-gradient source area. The NMOCD has stated the Equilon release site, which is up-gradient of the Monument Barber 10-Inch Sour site, is considered a potential contributing source area for the groundwater impact present at the Monument Barber 10-Inch Sour site.

FIELD ACTIVITIES

Throughout the 2005 reporting period, a sheen was reported in recovery well RW-2 and monitor well MW-3. A measurable PSH thickness of 0.01* feet was detected in these well locations during the third quarter sampling event of the 2005 reporting period. Evidence suggests and is supported by the NMOCD, that the sheen reported in monitor well MW-3 may be the result of a previous (date unknown) Equilon Pipeline release. The Equilon release is depicted in Figures 2A-2D and 3A-3D.

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

NMOCD Approved Sampling Schedule	
MW-1	Quarterly
MW-2	Quarterly
MW-3	Quarterly
MW-4	Quarterly
RW-1	Quarterly
RW-2	Quarterly

The site monitor wells were gauged and sampled on March 10, June 13, September 13, and December 21. During each sampling event, sampled monitor wells were purged of approximately three well volumes of water or until the wells failed to produce water using a PVC bailer or electric Grundfos Pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Key Energy of Hobbs, New Mexico utilizing a licensed disposal facility (NMOCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed from measurements collected during the four (4) quarterly monitoring events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2005 is provided as Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.002 feet/foot to the southeast as measured between groundwater recovery well RW-1 and monitor well MW-2. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3536.45 and 3537.51 feet above mean sea level, in MW-2 on December 6, 2005 and RW-2 on September 28, 2005, respectively.

** Gauging data collected on September 13, 2005 for monitor well MW-3 and recovery well RW-2 indicates a PSH thickness of 0.01 feet, this data appears to be incongruous based on prior and subsequent data and historical trends.*

LABORATORY RESULTS

Groundwater samples collected during 2005 monitoring events were delivered to Trace Analysis, Inc., Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8021b. A listing of BTEX constituent concentrations for 2005 is summarized in Table 2 and copies of the 2005 laboratory reports are provided on the enclosed disk. The inferred extent of PSH on site and quarterly groundwater sampling results for benzene and total BTEX constituent concentrations are depicted on Figures 3A through 3D.

Review of the laboratory analytical results of groundwater samples obtained during the 2005 monitoring period indicate that the benzene and total BTEX constituent concentrations are below applicable NMOCD regulatory standards for monitor wells MW-1, MW-2, MW-4 and RW-1. Analytical results for monitor well MW-3 indicate benzene concentrations were above the regulatory standard during the first and second quarterly sampling events, but below the regulatory standard during the fourth quarter of the 2005 reporting period. Analytical results from recovery well RW-2 indicate benzene concentration were above the regulatory standard during the first quarter, concentrations were at the regulatory standard of 0.01 mg/Kg during the second quarter and below the regulatory standard during the fourth quarter of the 2005 reporting period. Analytical results indicate total BTEX constituent concentrations were below the NMOCD regulatory standard for all sampled monitor and recovery wells at the close of the 2005 reporting period.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of groundwater monitoring activities for the 2005 annual monitoring period. Four (4) groundwater monitor wells (MW-1 through MW-4) and two (2) product recovery wells (RW-1 and RW-2) are currently on-site. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.002 feet/foot to the southeast.

As indicated on Figures 2A-2D and 3A-3D, there was an apparent off-site third party release located approximately 150 feet upgradient of the Monument Barber 10-inch Sour leak location. The presence of product in the area of the Equilon Pipeline release is documented by gauging data from monitor well MW-3. The NMOCD has been notified of this off site, upgradient source area. The NMOCD has stated the Equilon release site is considered a potential contributing source area for the groundwater contamination present at the Monument Barber 10-Inch Sour site.

Throughout the 2005 reporting period, a sheen was reported in recovery well RW-2 and monitor well MW-3. A measurable PSH thickness of 0.01* feet was detected in these monitor well locations during the third quarter sampling event of the 2005 reporting period. No measurable amounts of PSH were recovered from the site during the 2005 reporting period. As indicated on Figures 2A-2D and 3A-3D, there is an Equilon Pipeline Company release site approximately 150 feet up-gradient of this site. PSH thicknesses in all monitor and recovery wells have been decreasing since project inception.

A review of the laboratory analytical results for monitor well MW-3 indicate benzene concentrations were above the regulatory standard during the first and second quarterly sampling events, but below the regulatory standard during the fourth quarter of the 2005 reporting period. Analytical results for recovery well RW-2 indicate benzene concentration were above the regulatory standard during the first quarter, concentrations were at the regulatory standard of 0.01 mg/Kg during the second quarter and below the regulatory standard during the fourth quarter of the 2005 reporting period. Benzene and total BTEX constituent concentrations are below the appropriate NMOCD regulatory standards in monitor wells MW-1, MW-2, MW-4 and RW-1.

** Gauging data collected on September 13, 2005 for monitor well MW-3 and recovery well RW-2 indicates a PSH thickness of 0.01 feet, this data appears to be incongruous based on prior and subsequent data and historical trends.*

ANTICIPATED ACTIONS

Groundwater monitoring and gauging will continue through 2006. Monitor wells not containing PSH will be sampled on a quarterly basis. Considering the limited soil contamination remaining at the site, remediation of the Monument Barber 10-Inch Sour site to closure could be achievable in the near-term. A work plan will be submitted in 2006 which will include further excavation of the sidewalls of the existing excavation if indicated by sidewall soil samples. This work plan will address the need to protect the high pressure natural gas transmission line which is currently exposed by the existing excavation.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

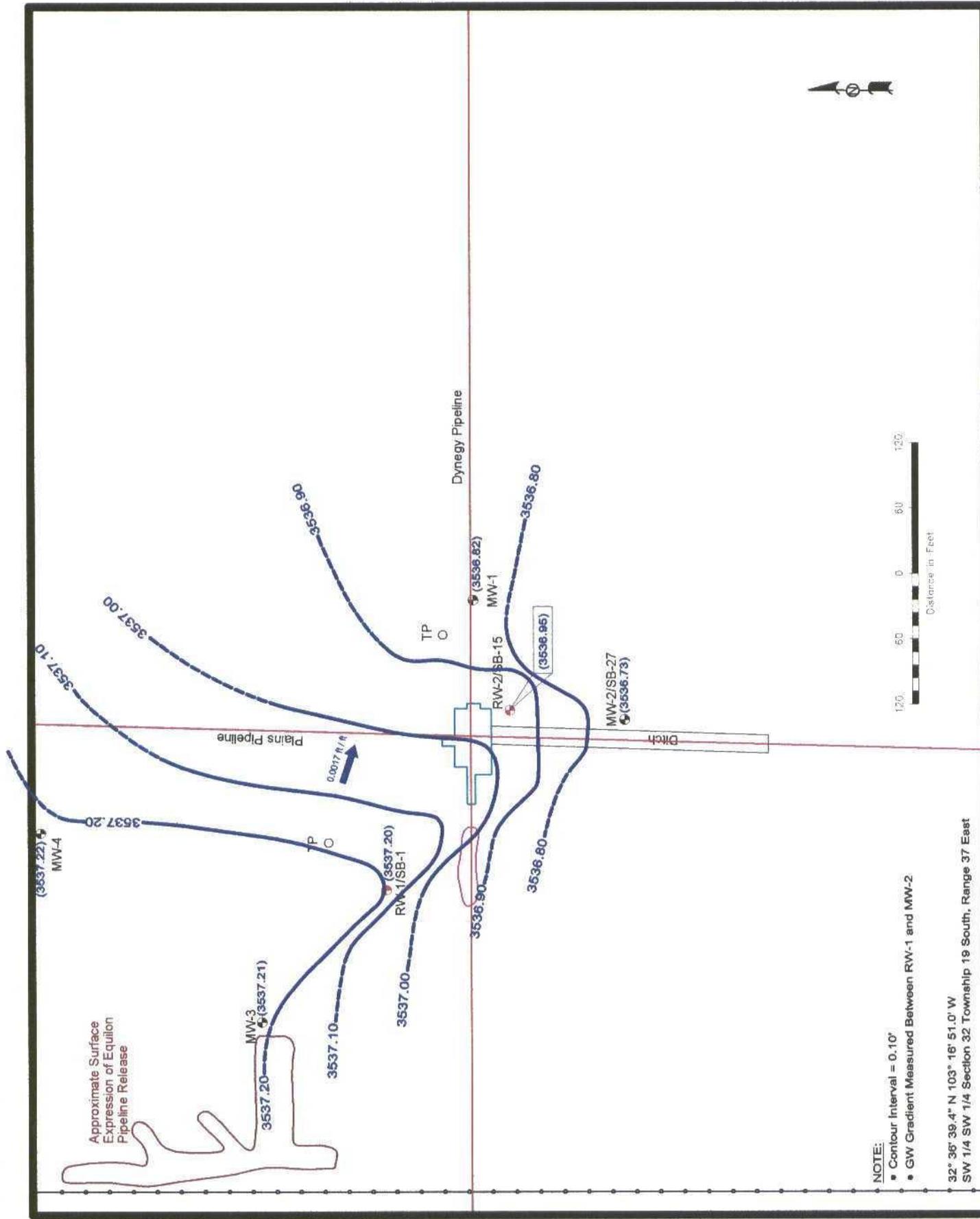
NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of NOVA and/or Plains.

DISTRIBUTION

- Copy 1 Ed Martin
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505
- Copy 2: Larry Johnson and Paul Sheeley
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240
- Copy 3: Camille Reynolds
Plains Marketing, L.P.
3112 Highway 82
Lovington, NM
cjreynolds@paalp.com
- Copy 4: Jeff Dann
Plains Marketing, L.P.
333 Clay Street
Suite 1600
Houston, TX 77002
jpdann@paalp.com
- Copy 5: NOVA Safety and Environmental
2057 Commerce Street
Midland, TX 79703
cstanley@novatraining.cc

Figures



NOTE:
 Contour Interval = 0.10'
 GW Gradient Measured Between RW-1 and MW-2

32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

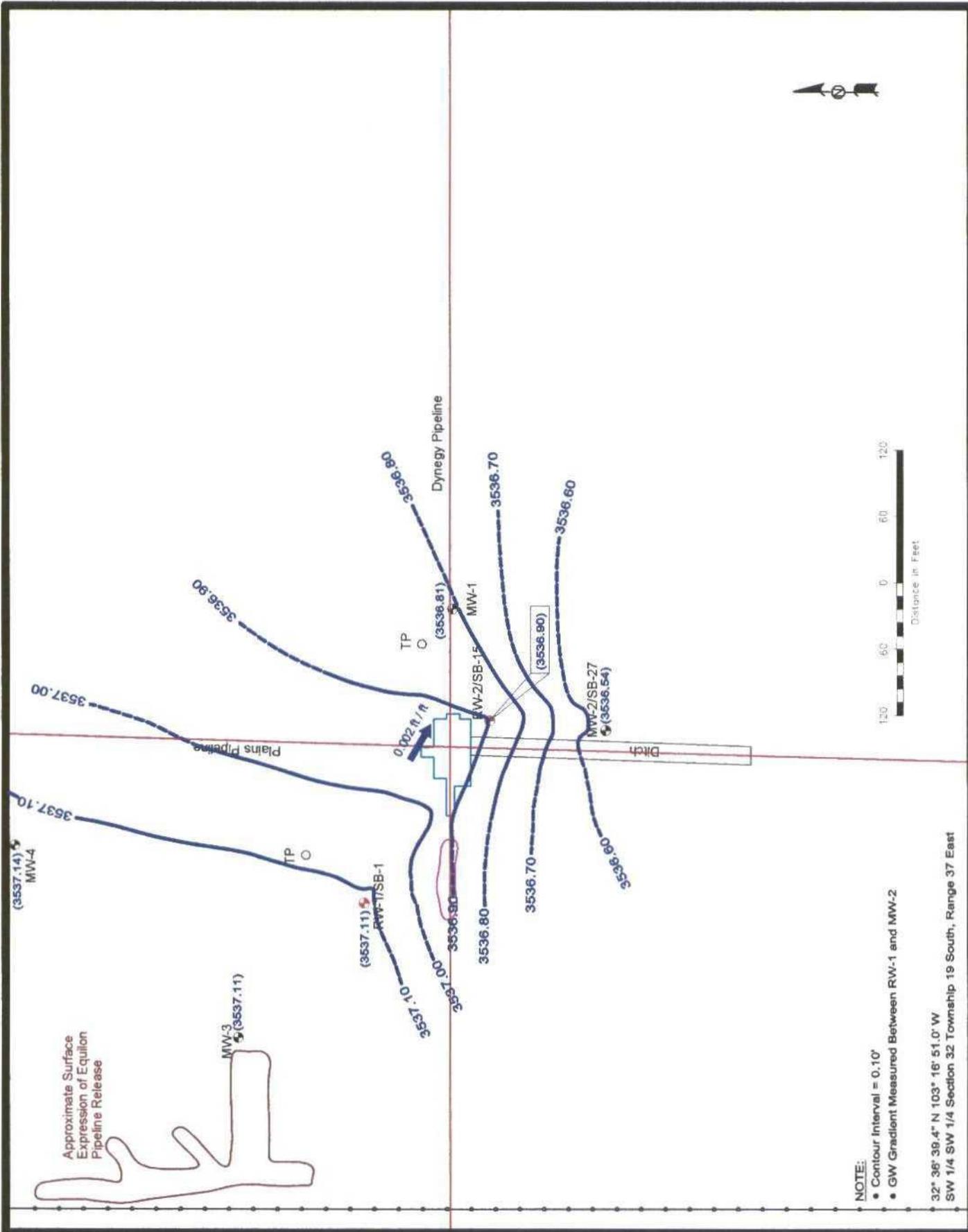
- LEGEND:**
- Utility Pole
 - Monitoring Well Location
 - Recovery Well Location
 - Soil Boring Location
 - Fence
 - Extent of Excavation
 - Extent of Stockpile
 - Groundwater Elevation (feet)
 - Groundwater Elevation Contour Line
 - Groundwater Gradient Direction & Magnitude

Figure 2A
 Inferred Groundwater
 Gradient Map (3/10/05)
 Plains Marketing, L.P.
 Monument Barber
 10-Inch Sour
 Monument, NM



NOVA Safety and Environmental

Scale: 1" = 120' | Prep By: DPM | Checked By: CPS
 May 17, 2005



NOTE:

- Contour Interval = 0.10'
- GW Gradient Measured Between RW-1 and MW-2

32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

LEGEND

- Utility Pole
- Extent of Stockpile
- Monitoring Well Location
- Recovery Well Location
- Soil Boring Location
- Fence
- Extent of Excavation
- (3537.00) Groundwater Elevation (feet)
- Groundwater Elevation Contour Line
- Groundwater Gradient Direction & Magnitude

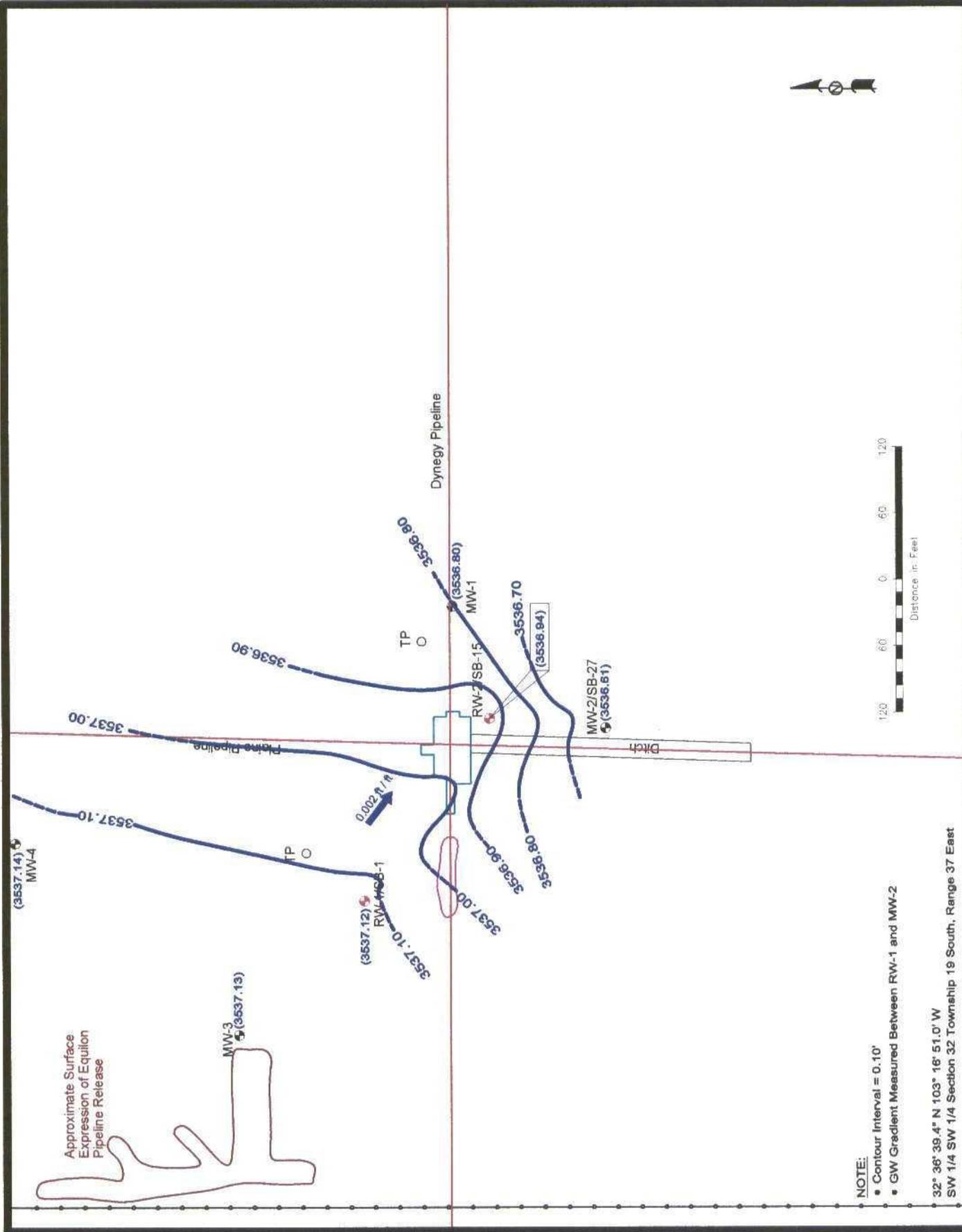


Figure 2B
 Inferred Groundwater
 Gradient Map (8/13/05)
 Plains Marketing, L.P.
 Monument Barber
 10-inch Sour
 Monument, NM



NOVA Safety and Environmental

Scale: 1" = 120'
 Prep By: DPM
 Checked By: CDS
 June 22, 2005



NOTE:
 • Contour Interval = 0.10'
 • GW Gradient Measured Between RW-1 and MW-2

32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

Figure 2C
 Inferred Groundwater Gradient Map (9/13/05)
 Plains Marketing, L.P.
 Monument Barber 10-Inch South Monument, NM

Scale: 1" = 120' Prep By: DPM Checked By: CDS
 October 03, 2005

NOVA
 safety and environmental

LEGEND:
 ○ TP Utility Pole
 ● Monitoring Well Location
 ● Recovery Well Location
 ● Soil Boring Location
 — Fence
 — Extent of Excavation
 — Extent of Stockpile
 (3536.80) Groundwater Elevation (feet)
 — Groundwater Elevation Contour Line
 — Groundwater Gradient Direction & Magnitude

Approximate Surface Expression of Equilon Pipeline Release

MW-3 (3537.13)

(3537.14) MW-4

(3537.12) RW-1

(3536.80) MW-1

MW-2/SB-27 (3536.61)

(3536.94)

(3536.80)

3536.90

3536.90

3537.00

3537.10

3537.10

3537.00

3536.90

3536.80

3536.70

TP

TP

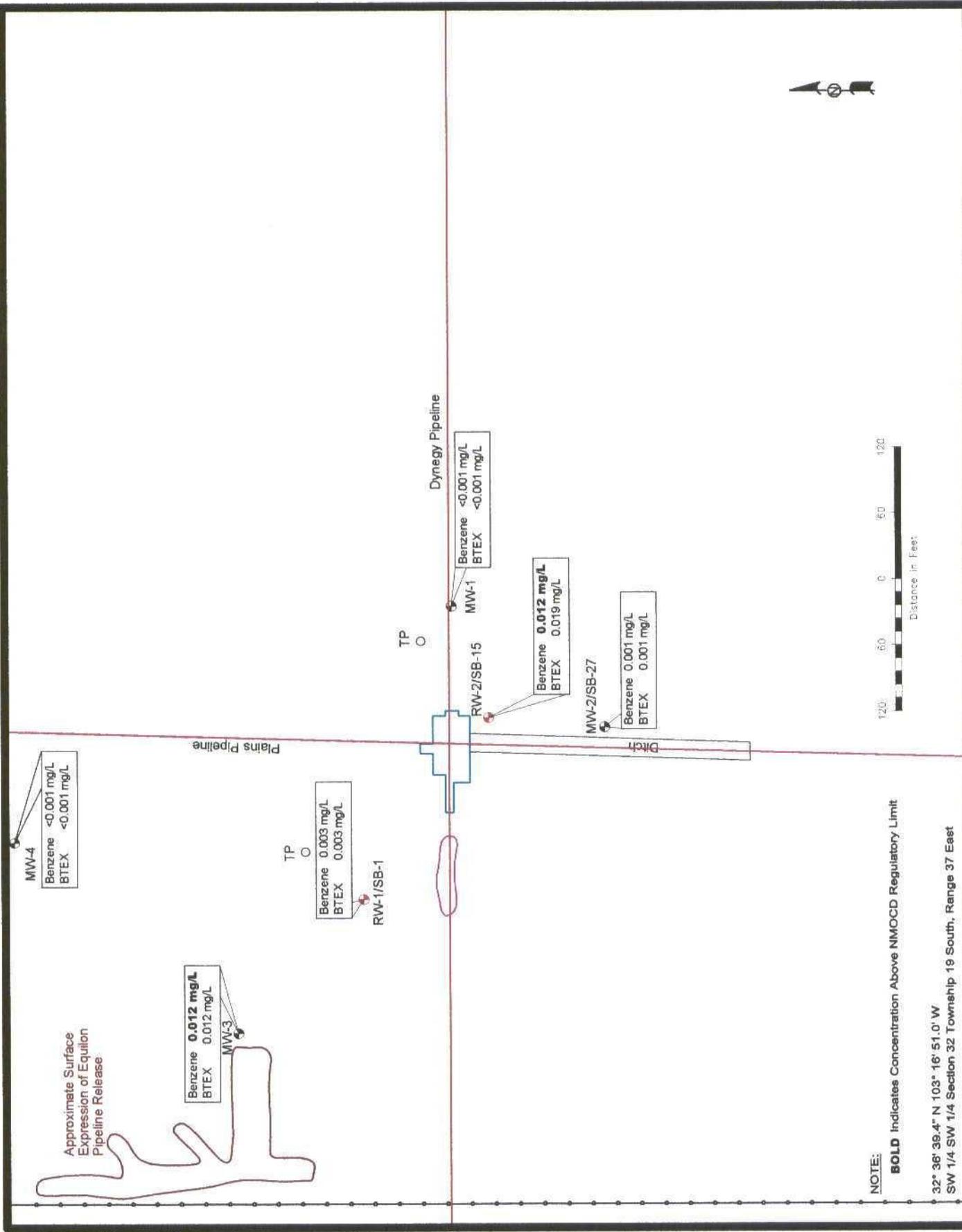
Dynergy Pipeline

Pipeline

Ditch

0.002 ft/ft



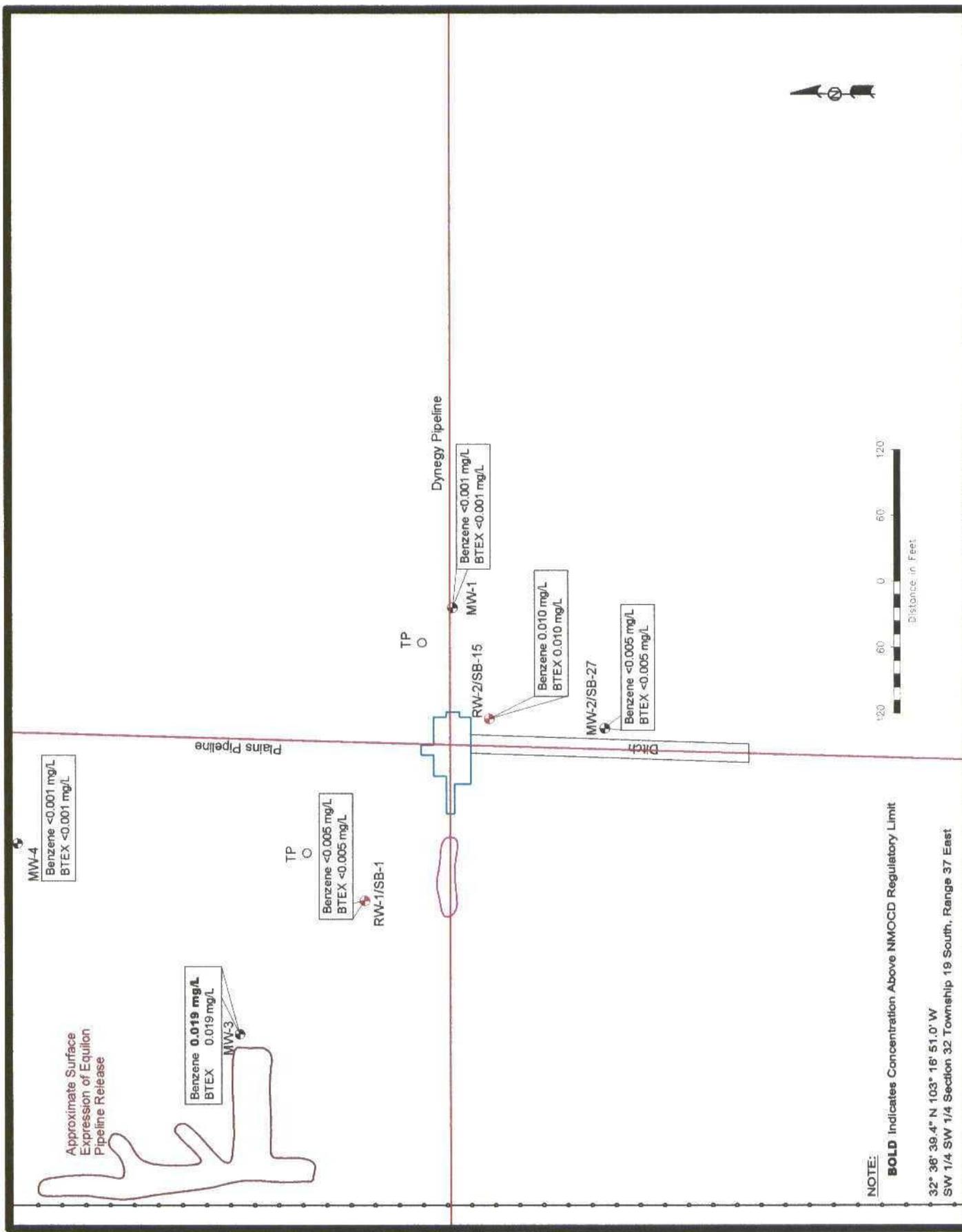


NOVA
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NOVA Safety and Environmental

Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (3/10/05)
Plains Marketing, L.P.
Monument Barber
10-Inch Sour
Monument, NM

Scale: 1" = 120' | Prep By: DPM | Checked By: CDS
May 16, 2006



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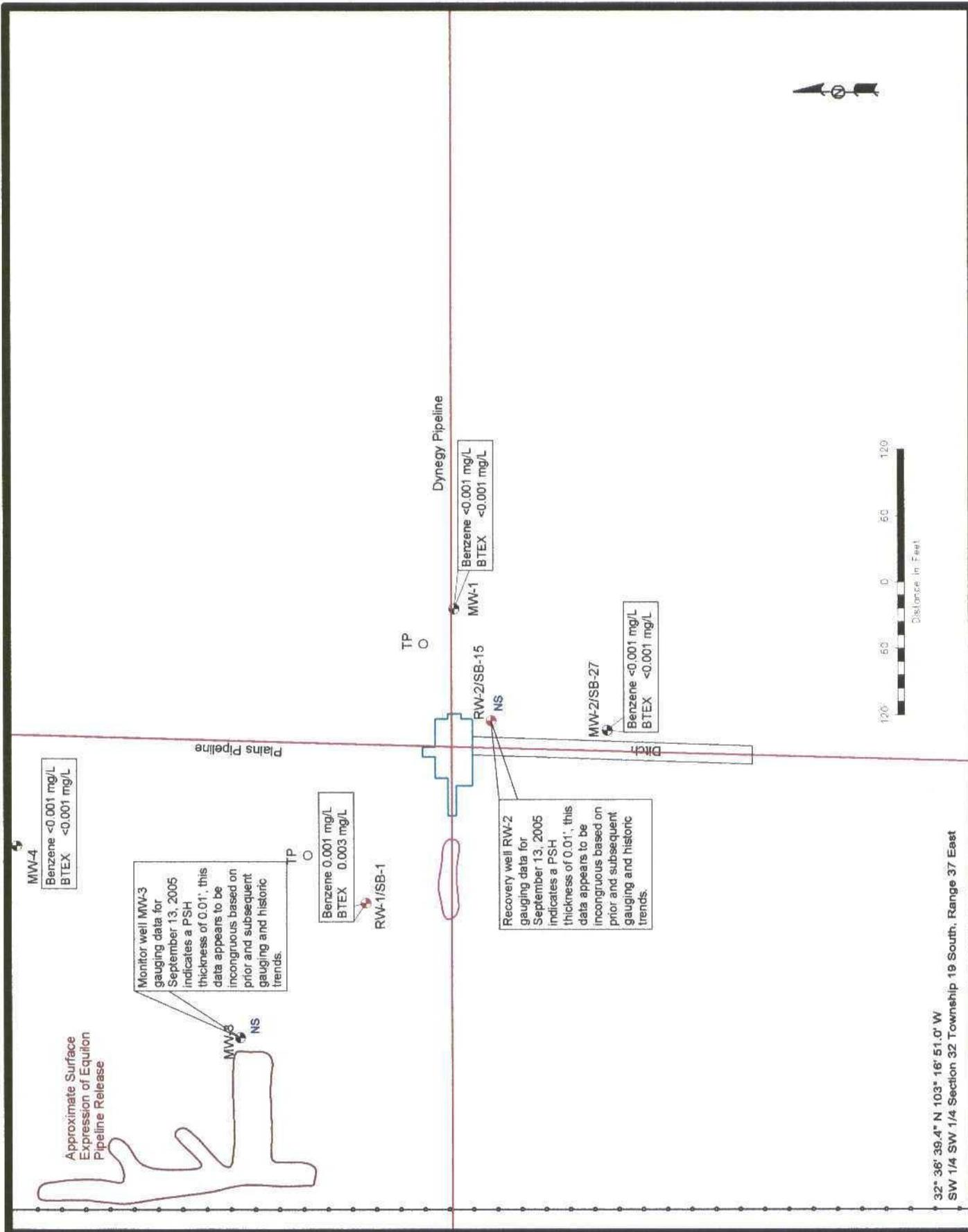
NOVA Safety and Environmental

Figure 3B
Groundwater Concentration
and Inferred PSH Extent
Map (6/13/05)
Plains Marketing, L.P.
Monument Barber
10-Inch Sour
Monument, NM

Scale: 1" = 120' Prep. By: DPM Checked By: CDS
November 3, 2005

Utility Pole
Monitoring Well Location
Recovery Well Location
Soil Boring Location
Fence
Extent of Excavation

Extent of Stockpile
Constituent Concentration (mg/L)
<0.001



LEGEND

- Utility Pole
- Monitoring Well Location
- Recovery Well Location
- Soil Boring Location
- Fence
- Extent of Excavation

Extent of Subsoil

- <0.001
- 0.01
- NS

Equilon Pipeline Release

Constituent Concentration (mg/L)

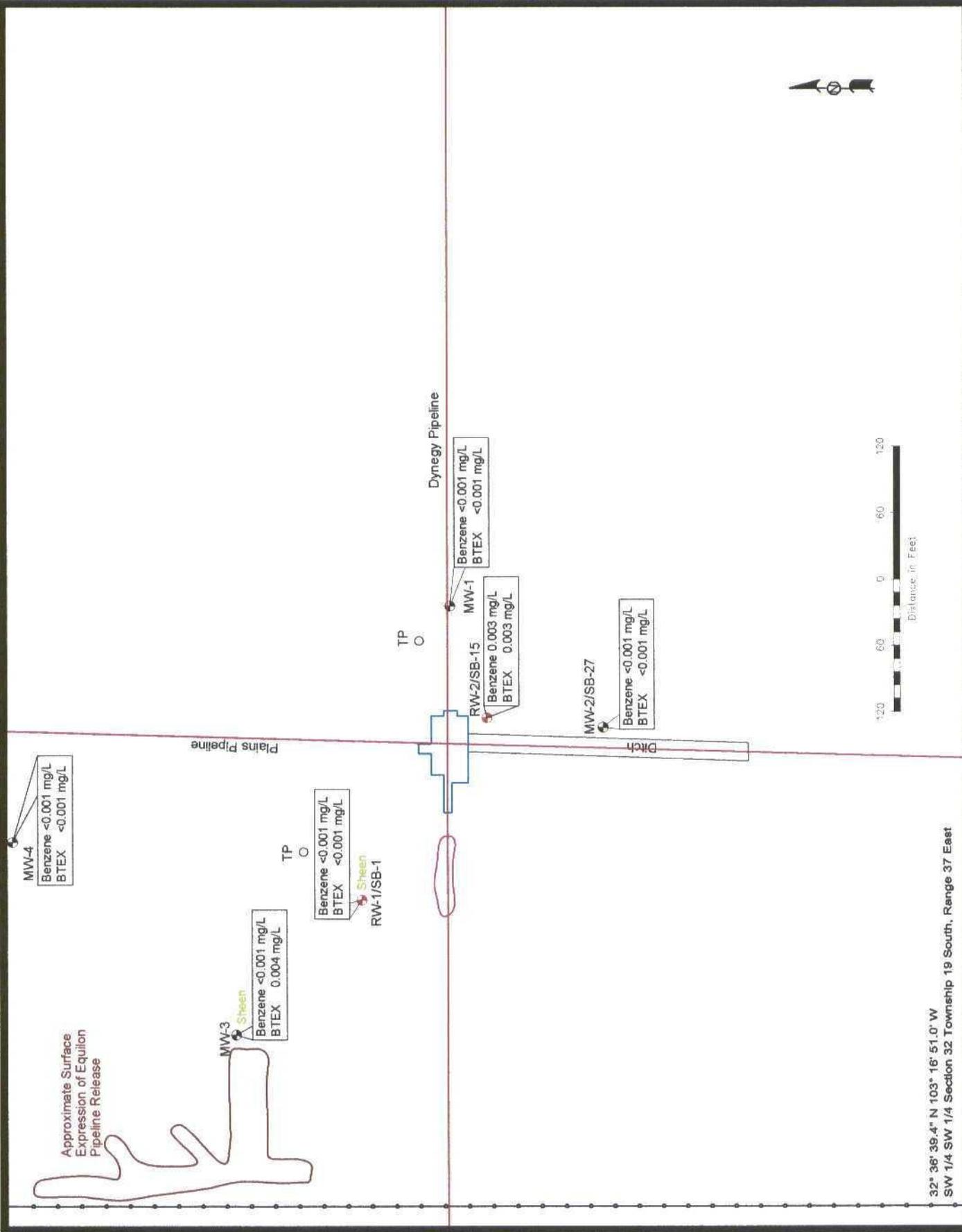
- Thickness of PSH (feet)
- Not Sampled

Figure 3C
Groundwater Concentration and Inferred PSH Extent Map (9/13/05)
Plains Marketing, L.P.
Monument Barber
10-Inch Sour
Monument, NM

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safety and environmental

NOVA Safety and Environmental

Scale: 1" = 120' | Prep By: DPM | Checked By: CDS
July 27, 2006



32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East



- LEGEND:
- Utility Pole
 - Monitoring Well Location
 - Recovery Well Location
 - Spill Boring Location
 - Fence
 - Extent of Excavation
 - Extent of Stockpile
 - Constituent Concentration (mg/L)
 - <0.001
 - Equilon Pipeline Release



Figure 3D
 Groundwater Concentration
 and Inferred PSH Extent
 Map (12/21/05)
 Plains Marketing, L.P.
 Monument Barber
 10-Inch Sour
 Monument, NM

NOVA Safety and Environmental

Scale: 1" = 120'
 January 25, 2006
 Prepared By: DPM
 Checked By: MRE

Tables

TABLE 1

2005 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
 MONUMENT BARBER 10-INCH SOUR
 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW-1	03/10/05	3,565.64	-	28.82	0.00	3536.82
	06/13/05	3,565.64	-	28.83	0.00	3536.81
	09/13/05	3,565.64	-	28.84	0.00	3536.80
	12/06/05	3,565.64	-	28.85	0.00	3536.79
	12/21/05	3,565.64	-	28.84	0.00	3536.80
MW-2	03/10/05	3,565.58	-	28.85	0.00	3536.73
	06/13/05	3,565.58	-	29.04	0.00	3536.54
	09/13/05	3,565.58	-	28.97	0.00	3536.61
	12/06/05	3,565.58	-	29.13	0.00	3536.45
	12/21/05	3,565.58	-	29.13	0.00	3536.45
MW-3	01/05/05	3,567.44	29.95	29.96	0.01	3537.49
	01/13/05	3,567.44	29.97	29.98	0.01	3537.47
	01/20/05	3,567.44	sheen	30.12	0.00	3537.32
	01/27/05	3,567.44	sheen	30.14	0.00	3537.30
	02/04/05	3,567.44	sheen	30.25	0.00	3537.19
	02/10/05	3,567.44	sheen	30.24	0.00	3537.20
	02/17/05	3,567.44	sheen	30.29	0.00	3537.15
	02/24/05	3,567.44	sheen	30.25	0.00	3537.19
	03/03/05	3,567.44	sheen	30.33	0.00	3537.11
	03/10/05	3,567.44	-	30.23	0.00	3537.21
	03/10/05	3,567.44	sheen	30.23	0.00	3537.21
	03/18/05	3,567.44	sheen	30.20	0.00	3537.24
	03/24/05	3,567.44	sheen	30.24	0.00	3537.20
	03/31/05	3,567.44	sheen	30.30	0.00	3537.14
	04/07/05	3,567.44	sheen	30.25	0.00	3537.19
	04/14/05	3,567.44	sheen	30.35	0.00	3537.09
	05/24/05	3,567.44	sheen	30.38	0.00	3537.06
	06/13/05	3,567.44	-	30.33	0.00	3537.11
	06/23/05	3,567.44	sheen	30.33	0.00	3537.11
	07/27/05	3,567.44	sheen	30.43	0.00	3537.01
08/26/05	3,567.44	sheen	30.33	0.00	3537.11	
*	09/13/05	3,567.44	30.31	30.32	0.01	3537.13
	09/28/05	3,567.44	sheen	30.07	0.00	3537.37
	10/24/05	3,567.44	sheen	29.97	0.00	3537.47
	11/16/05	3,567.44	sheen	30.42	0.00	3537.02
	12/06/05	3,567.44	-	30.39	0.00	3537.05
	12/21/05	3,567.44	sheen	30.37	0.00	3537.07
	12/29/05	3,567.44	sheen	30.35	0.00	3537.09
MW-4	03/10/05	3,567.27	-	30.05	0.00	3537.22
	06/13/05	3,567.27	-	30.13	0.00	3537.14
	09/13/05	3,567.27	-	30.13	0.00	3537.14
	12/06/05	3,567.27	-	30.17	0.00	3537.10
	12/21/05	3,567.27	-	30.17	0.00	3537.10

TABLE 1
2005 GROUNDWATER ELEVATION DATA
PLAINS MARKETING, L.P.
MONUMENT BARBER 10-INCH SOUR
LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
RW-1	03/10/05	3,566.48	-	29.28	0.00	3537.20
	06/13/05	3,566.48	-	29.37	0.00	3537.11
	09/13/05	3,566.48	-	29.36	0.00	3537.12
	12/06/05	3,566.48	-	29.41	0.00	3537.07
	12/21/05	3,566.48	-	29.39	0.00	3537.09
RW-2	01/05/05	3,566.09	28.86	28.88	0.02	3537.23
	01/13/05	3,566.09	sheen	28.85	0.00	3537.24
	01/20/05	3,566.09	sheen	28.99	0.00	3537.10
	01/27/05	3,566.09	sheen	29.03	0.00	3537.06
	02/04/05	3,566.09	sheen	29.08	0.00	3537.01
	02/10/05	3,566.09	sheen	29.05	0.00	3537.04
	02/17/05	3,566.09	sheen	29.13	0.00	3536.96
	02/24/05	3,566.09	sheen	29.09	0.00	3537.00
	03/03/05	3,566.09	sheen	29.13	0.00	3536.96
	03/10/05	3,566.09	-	29.14	0.00	3536.95
	03/10/05	3,566.09	sheen	29.14	0.00	3536.95
	03/18/05	3,566.09	sheen	29.10	0.00	3536.99
	03/24/05	3,566.09	sheen	29.17	0.00	3536.92
	03/31/05	3,566.09	sheen	29.24	0.00	3536.85
	04/07/05	3,566.09	sheen	29.22	0.00	3536.87
	04/14/05	3,566.09	sheen	29.15	0.00	3536.94
	05/24/05	3,566.09	sheen	29.20	0.00	3536.89
	06/13/05	3,566.09	-	29.19	0.00	3536.90
	06/23/05	3,566.09	sheen	29.14	0.00	3536.95
	07/27/05	3,566.09	sheen	29.27	0.00	3536.82
	08/26/05	3,566.09	sheen	29.20	0.00	3536.89
*	09/13/05	3,566.09	29.15	29.16	0.01	3536.94
	09/28/05	3,566.09	sheen	28.58	0.00	3537.51
	10/24/05	3,566.09	sheen	28.89	0.00	3537.20
	11/16/05	3,566.09	sheen	29.23	0.00	3536.86
	12/06/05	3,566.09	-	29.21	0.00	3536.88
	12/21/05	3,566.09	sheen	29.21	0.00	3536.88
	12/29/05	3,566.09	sheen	29.20	0.00	3536.89

Note: Unable to complete gauging or sampling on 3/5/03, ordered off-site by landowner representative.
Elevations based on the 1929 North American Vertical Datum.

* Monitor well MW-3 and recovery well RW-2 gauging data collected on September 13, 2005, indicates a PSH thickness of 0.01 feet, this data appears to be incongruous based on prior and subsequent data and historical trends

TABLE 2

2005 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
 MONUMENT BARBER 10-INCH SOUR
 LEA COUNTY, NEW MEXICO

Results are reported in mg/L.

SAMPLE LOCATION	SAMPLE DATE	Method: SW 846-8021B, 5030					
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	
NMOCD Regulatory Limit		0.01	0.75	0.75	Total XYLENES 0.62		
MW-1	03/10/05	<0.001	<0.001	<0.001	<0.001		
	06/13/05	<0.001	<0.001	<0.001	<0.001		
	09/13/05	<0.001	<0.001	<0.001	<0.001		
	12/21/05	<0.001	<0.001	<0.001	<0.001		
MW-2	03/10/05	0.001	<0.001	<0.001	<0.001		
	06/13/05	<0.005	<0.005	<0.005	<0.005		
	09/13/05	<0.001	<0.001	<0.001	<0.001		
	12/21/05	<0.001	<0.001	<0.001	<0.001		
MW-3	03/10/05	0.012	<0.005	<0.005	<0.005		
	06/13/05	0.019	<0.005	<0.005	<0.005		
	09/13/05	Not Sampled					
	12/21/05	<0.001	<0.001	<0.001	0.004		
MW-4	03/10/05	<0.001	<0.001	<0.001	<0.001		
	06/13/05	<0.001	<0.001	<0.001	<0.001		
	09/13/05	<0.001	<0.001	<0.001	<0.001		
	12/21/05	<0.001	<0.001	<0.001	<0.001		
RW-1	03/10/05	0.003	<0.001	<0.001	<0.001		
	06/13/05	<0.005	<0.005	<0.005	<0.005		
	09/13/05	0.001	<0.001	<0.001	0.002		
	12/21/05	<0.001	<0.001	<0.001	<0.001		
RW-2	03/10/05	0.012	<0.001	0.002	0.005		
	06/13/05	0.010	<0.005	<0.005	<0.005		
	09/13/05	Not Sampled					
	12/21/05	0.003	<0.001	<0.001	<0.001		

Appendices

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

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Aztec, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company EOTT Energy Pipeline Limited Partnership		Contact Glenn Waldrop
Address P.O. Box 1660, Midland, TX 79702		Telephone No. 915/684-3453
Facility Name Monument 10" Sour (6")		Facility Type Pipeline
Surface Owner Barber Estate	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section 32	Township 19S	Range 37E	Feet from the	North/South Line	Feet from the	East/West Line	County Lee
-------------	---------------	-----------------	--------------	---------------	------------------	---------------	----------------	---------------

NATURE OF RELEASE

Type of Release Sour Crude Oil	Volume of Release 1,600 bbls	Volume Recovered 1,350 bbls
Source of Release Pipeline valve flange.	Date and Hour of Occurrence August 8, 2000	Date and Hour of Discovery August 8, 2000 at 10 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Donna Williams - NMOCD, Hobbs District Office	
By Whom? Wayne Bragetta	Date and Hour August 8, 2000	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.
N/A

Describe Cause of Problem and Remedial Action Taken.*

Poly weld broke on the west end of valve flange. Released oil was contained in a bell hole and ditch. Bellhole (35'x45'x10'deep) filled to top and oil flowed into a ditch 100 yards long. Oil was recovered with a vacuum truck.

Describe Area Affected and Cleanup Action Taken.*

Heavily impacted soil, from the ditch only, was excavated and hauled to a landfarm for treatment. Soils in the bellhole could not be excavated due to the presence of pipelines. ETGI has begun delineating the site and will prepare a remediation workplan

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Glenn Waldrop</i>	OIL CONSERVATION DIVISION	
Printed Name: Glenn Waldrop	Approved by District Supervisor:	
Title: District Manager	Approval Date:	Expiration Date:
Date: 8/17/00 Phone: 915/684-3453	Conditions of Approval:	Attached <input type="checkbox"/>

Attach Additional Sheets if Necessary

MONUMENT BARBER
MONUMENT 10" SOUR



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

June 22, 2005

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

Re: 2004 Annual Monitoring Report
Monument Barber 10-Inch Sour Release Site
SW/4 SW/4 of Section 32, Township 19 South, Range 37 East
Lea County, New Mexico
Plains Marketing EMS Number: 2000-10655
NMOCD Reference 1R-0388

Dear Ms. Reynolds:

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

1. Quarterly sampling and annual reporting will continue throughout 2005.
2. Passive recovery of product will continue throughout 2005.
3. A work plan will be submitted by Plains in 2005 for further excavation at the site, with the possibility that soil closure and backfilling could be accomplished at the site.
4. No backfilling is to take place until the plan shown in item #3 above has been received by the NMOCD Santa Fe office and approved.

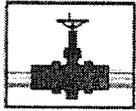
NMOCD acceptance does not relieve Plains of responsibility should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other federal, state, or local governmental entity.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Cc: NMOCD, Hobbs



PLAINS ALL AMERICAN

March 29, 2005

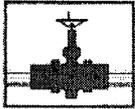
Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

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

Dear Mr. Martin:

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

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



**PLAINS
ALL AMERICAN**

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

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

Sincerely,

Camille Reynolds for CR

Camille Reynolds
Remediation Coordinator
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

2004
ANNUAL MONITORING REPORT

IR-388

MONUMENT BARBER 10-INCH SOUR
SW ¼ SW ¼ SECTION 32, TOWNSHIP 19 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS EMS NUMBER: 2000-10655

Prepared For:

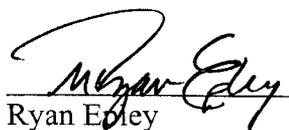
PLAINS MARKETING, L.P.
333 CLAY STREET, SUITE 1600
HOUSTON, TEXAS 77002



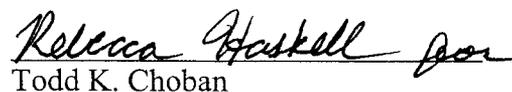
Prepared By:

NOVA Safety and Environmental
2057 Commerce Street
Midland, Texas 79703

April, 2005



Ryan Eley
Geologist / Project Manager



Todd K. Choban
Vice President Technical Services

TABLE OF CONTENTS

INTRODUCTION	1
SITE DESCRIPTION AND BACKGROUND INFORMATION.....	1
FIELD ACTIVITIES	2
LABORATORY RESULTS	2
SUMMARY	3
ANTICIPATED ACTIONS	4
LIMITATIONS	4
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FIGURES

Figure 1 – Site Location Map

Figure 2A – Inferred Groundwater Gradient Map – February 26, 2004

2B – Inferred Groundwater Gradient Map – May 18, 2004

2C – Inferred Groundwater Gradient Map – September 8, 2004

2D – Inferred Groundwater Gradient Map – December 14, 2004

Figure 3A – Groundwater Concentration and Inferred PSH Extent Map – February 26, 2004

3B – Groundwater Concentration and Inferred PSH Extent Map – May 18, 2004

3C – Groundwater Concentration and Inferred PSH Extent Map – September 8, 2004

3D – Groundwater Concentrations and Inferred PSH Extent Map – December 14, 2004

TABLES

Table 1 – Groundwater Elevation Data

Table 2 – Concentrations of Benzene and BTEX in Groundwater

APPENDICES

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

TABLE OF CONTENTS, Continued

ENCLOSED ON DATA DISK

2004 Annual Monitoring Report

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

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

Electronic Copies of Laboratory Reports

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

INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. Beginning on May 29, 2004, project management responsibilities were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The Monument Barber 10-Inch Sour site (the site), which was formerly operated by Enron Oil Trading and Transportation (EOTT), is now owned and operated by Plains. This report is intended to be viewed as a complete document with text, figures, tables, and appendices. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2004 only. However, historic data tables as well as 2004 laboratory analytical reports are enclosed electronically. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each of four (4) quarters during 2004 to assess the levels and extent of dissolved phase and phase separated hydrocarbon (PSH) constituents. Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH atop the water column, and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The Monument Barber 10-Inch Sour release was discovered by Link Energy (formerly EOTT) employees and reported on August 7, 2000. An estimated 1,600 barrels of crude oil were released and 1,300 barrels were recovered. The release resulted in a pool of crude oil in the previously excavated area surrounding the release point and a surface stain measuring approximately 100 feet in length by eight feet in width to the west of the release point. Excavated, saturated soil was transported to a NMOCD approved disposal facility. Thirty four soil borings were advanced to characterize the horizontal and vertical crude oil impacts on-site.

Four (4) groundwater monitor wells (MW-1 through MW-4) and two (2) product recovery wells (RW-1 and RW-2) are currently on-site, as is a forty foot by seventy foot (40'x 70') excavation remaining from the initial response and site investigation activities. Absorbent socks are installed in monitor well MW-3 and recovery well RW-2 for passive product recovery.

As indicated on Figures 2A-2D and 3A-3D, there is an off-site release located approximately 150 feet upgradient of the site. The presence of product in this area is documented by gauging data from monitor well MW-3. The NMOCD has been notified of this off-site, up-gradient source area. The NMOCD has stated the Equilon release site, which is up-gradient of the Monument Barber 10-Inch Sour site, is considered a potential contributing source area for the groundwater impact present at the Monument Barber 10 Inch Sour site.

FIELD ACTIVITIES

Sampling events for the reporting period were performed quarterly while monitoring of those wells displaying measurable thicknesses of PSH occurred weekly. The site monitor wells were gauged and sampled on February 26th, May 18th, September 8th, and December 14th, 2004. During each sampling event, sampled monitor wells were purged of approximately three well volumes of water or until the wells failed to produce water using a PVC bailer or electric Grundfos Pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Key Energy of Hobbs, New Mexico utilizing a licensed disposal facility (NMOCD AO SWD-730).

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

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.0007 ft./ft. to the southeast as measured between groundwater monitor wells MW-2 and MW-4. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3535.98 and 3537.69 feet above mean sea level, in MW-2 on February 26, 2004 and MW-3 on December 14, 2004, respectively.

A measurable thickness of PSH, ranging from 0.27 feet on February 26, 2004 to a sheen on September 14, 2004, was detected in recovery well RW-2 during each monitoring event of the 2004 annual monitoring period. Additionally, a measurable thickness of PSH was detected in monitor well MW-3 during the reporting period; however, this is attributed to the Equilon Pipeline release. Limited measurable amounts of PSH were recovered from the site during the 2004 reporting period. As indicated on Figures 2A-2D and 3A-3D, there is an Equilon Pipeline Company release site approximately 150 feet up-gradient of this site.

LABORATORY RESULTS

Groundwater samples collected during the first three (3) monitoring events of 2004 were delivered to AnalySys Inc., Austin, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8260b. Fourth quarter sample analysis was performed by Trace Analysis, Inc., Lubbock, Texas for determination of BTEX constituent concentrations by EPA Method SW846-8021b. A listing of BTEX constituent concentrations for 2004 is summarized in Table 2 and a copy of the laboratory reports generated during this reporting period is provided on the enclosed disk. The inferred extent of PSH on-site

and quarterly groundwater sampling results for benzene and total BTEX concentrations are depicted on Figures 3A through 3D.

Review of the laboratory analytical results of groundwater samples obtained during the 2004 monitoring period indicate that the benzene and total BTEX concentrations are below applicable NMOCD regulatory standards for monitor well MW-4. Analytical results from monitor wells MW-1, MW-2, MW-3 and recovery well RW-1 indicate benzene concentrations above the regulatory standard during at least one quarterly event of the reporting period. Analytical results for the reporting period indicate total BTEX concentrations are below the applicable NMOCD regulatory standard for all sampled monitor and recovery wells. However, at some time during the reporting period, monitor wells MW-2, MW-3 and recovery well RW-2 displayed measurable thicknesses of PSH and were not sampled.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of groundwater monitoring activities for the 2004 annual monitoring period. Four (4) groundwater monitor wells (MW-1 through MW-4) and two (2) product recovery wells (RW-1 and RW-2) are currently on-site. Absorbent socks are installed in monitor well MW-3 and recovery well RW-2 for passive product recovery. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.0007 ft./ft. to the southeast

As indicated on Figures 2A-2D and 3A-3D, there is an off-site release located approximately 150 feet upgradient of the site. The presence of product in the area of the Equilon Pipeline release is documented by gauging data from monitor well MW-3. The NMOCD has been notified of this off-site, up-gradient source area. The NMOCD has stated the Equilon release site, which is up-gradient of the Monument Barber 10-Inch Sour site, is considered a potential contributing source area for the groundwater contamination present at the Monument Barber 10-Inch Sour site.

As discussed above, a measurable thickness of PSH, ranging from 0.27 feet on February 26, 2004 to a sheen on September 14, 2004, was detected in recovery well RW-2 during each monitoring event of the 2004 annual monitoring period. A measurable thickness of PSH (0.03 feet) was detected in monitor well MW-3 during the reporting period; however, this is attributed to the Equilon Pipeline release. Furthermore, a measurable thickness of PSH of 0.05 feet was also detected in monitor well MW-2 during the reporting period. A limited measurable amount of PSH was recovered from the site in 2004.

A review of the laboratory analytical results groundwater samples obtained during the reporting period indicate benzene concentrations were above applicable NMOCD regulatory standards in monitor wells MW-1, MW-2, MW-3 and recovery well RW-1. The remaining sample location, MW-4, displayed a benzene concentration below the applicable NMOCD regulatory standard for

the reporting period. No samples analyzed during the reporting period indicated BTEX constituent concentrations above the applicable NMOCD regulatory standard.

PSH impact appears to be limited to three (3) of the six (6) monitor or recovery wells on-site. Gauging information collected from recovery well RW-2 during the reporting period suggests that PSH impact is currently decreasing. Dissolved phase impact above the applicable NMOCD regulatory limit was found in samples collected from MW-1, MW-2, MW-3 and recovery well RW-2 during the reporting period. From 2000 to 2002, groundwater samples collected from monitor well MW-2 displayed concentrations of benzene and BTEX constituents above the NMOCD regulatory standard. However, since 2002, MW-2 has typically exhibited constituent concentrations below the NMOCD standard. This appears to indicate a diminishing dissolved phase impact in the area of monitor well MW-2.

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

ANTICIPATED ACTIONS

Monitor and gauging will continue through 2005. Monitor wells not containing PSH will be sampled on a quarterly basis. Due to the limited thicknesses of PSH displayed by monitor well MW-3 and recovery well RW-2, absorbent socks will continue to be used for passive product recovery. Considering the limited soil contamination remaining at the site and the understanding by the NMOCD that the groundwater contamination beneath the site is associated with an up-gradient, off-site source, remediation of the Monument Barber 10-Inch Sour site to closure could be achievable in the short-term. A work plan will be submitted in early 2005 which will include further excavation of the sidewalls of the existing excavation if indicated by sidewall soil samples. This work plan will address the need to protect the high pressure natural gas transmission line which is currently exposed by the existing excavation. If it is determined that the site cannot progress in the short-term, backfilling the existing excavation should be requested due to safety concerns regarding the high pressure gas line.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of NOVA and/or Plains.

DISTRIBUTION

- Copy 1 Ed Martin
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505
- Copy 2: Paul Sheeley and Larry Johnson
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240
- Copy 3: Camille Reynolds
Plains Marketing, L.P.
3112 Highway 82
Lovington, NM
cjreynolds@paalp.com
- Copy 4: Jeff Dann
Plains Marketing, L.P.
333 Clay Street
Suite 1600
Houston, TX 77002
jpdann@paalp.com
- Copy 5: NOVA Safety and Environmental
2057 Commerce Street
Midland, TX 79703
repley@novatraining.cc

Copy Number:

Figures

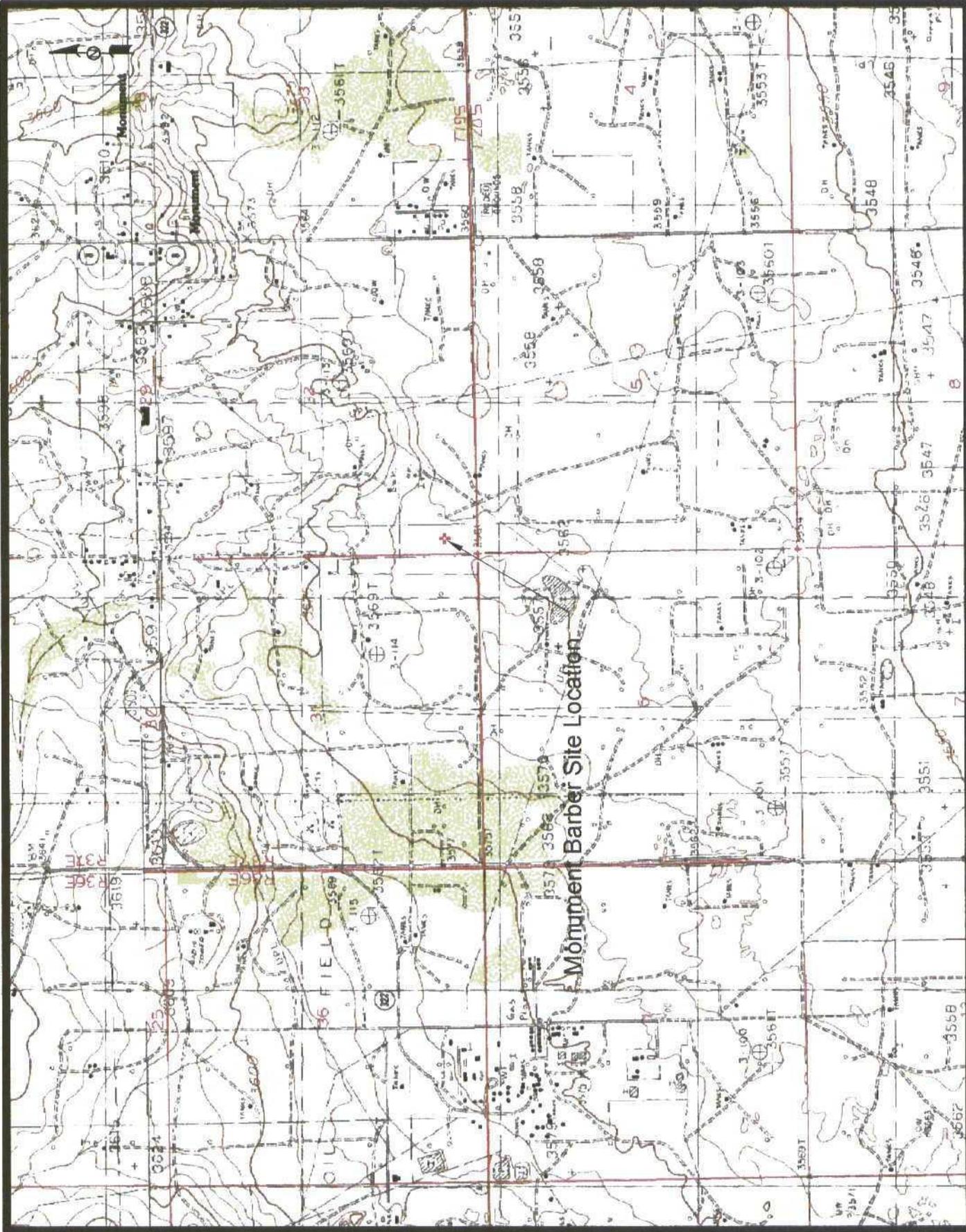


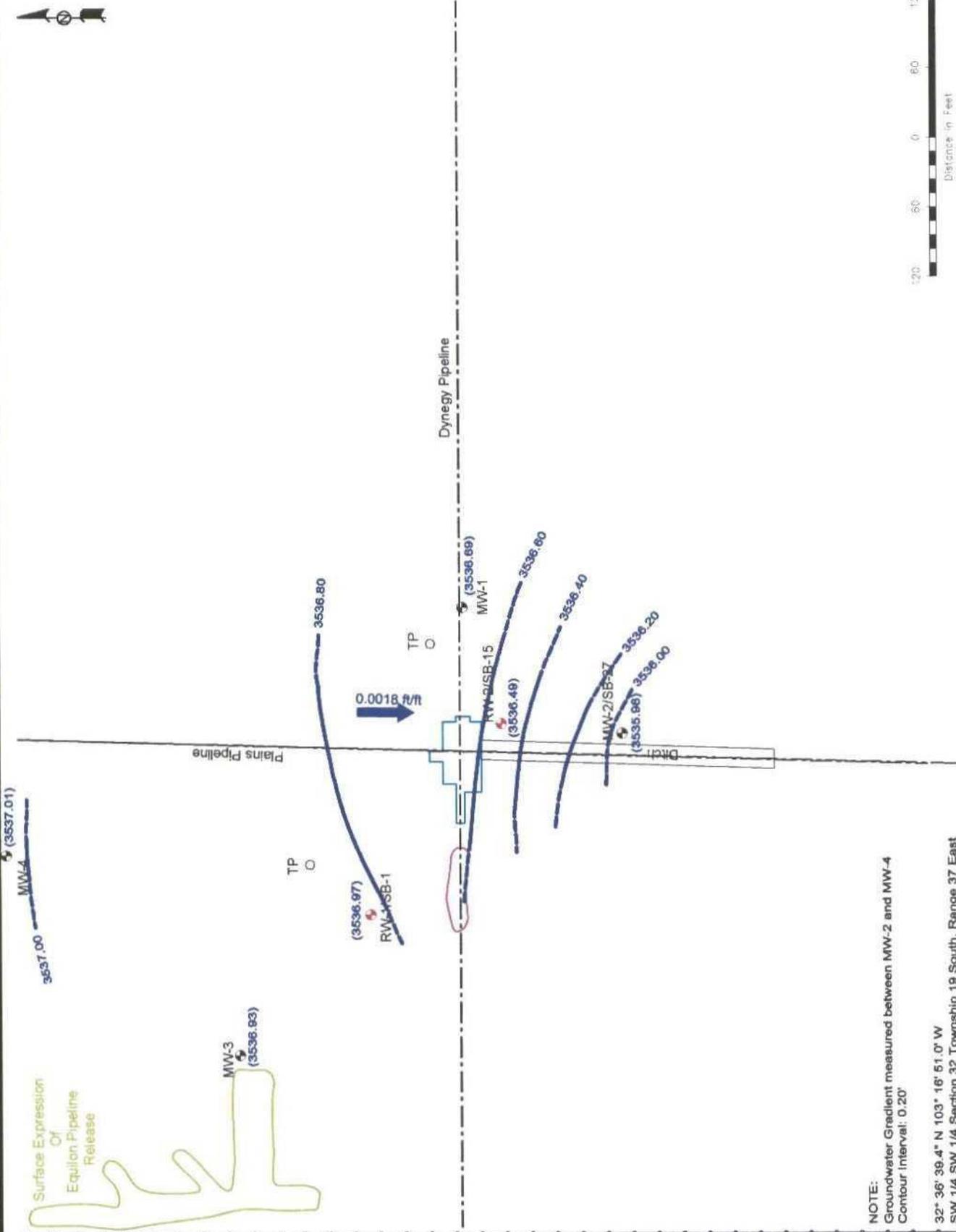
Figure 1
Site Location Map

Plains Marketing, L.P.
Monument 10" Sour
Monument, NM

NOVA Safety and Environmental

SW 1/4 SW1/4 Sec 32, T19S R37E 32° 36' 39" N 102° 16' 51" W
Scale: NTS
Prep By: CDS
Checked By: TKC
February 16, 2005





NOTE:
 Groundwater Gradient measured between MW-2 and MW-4
 Contour Interval: 0.20'

32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

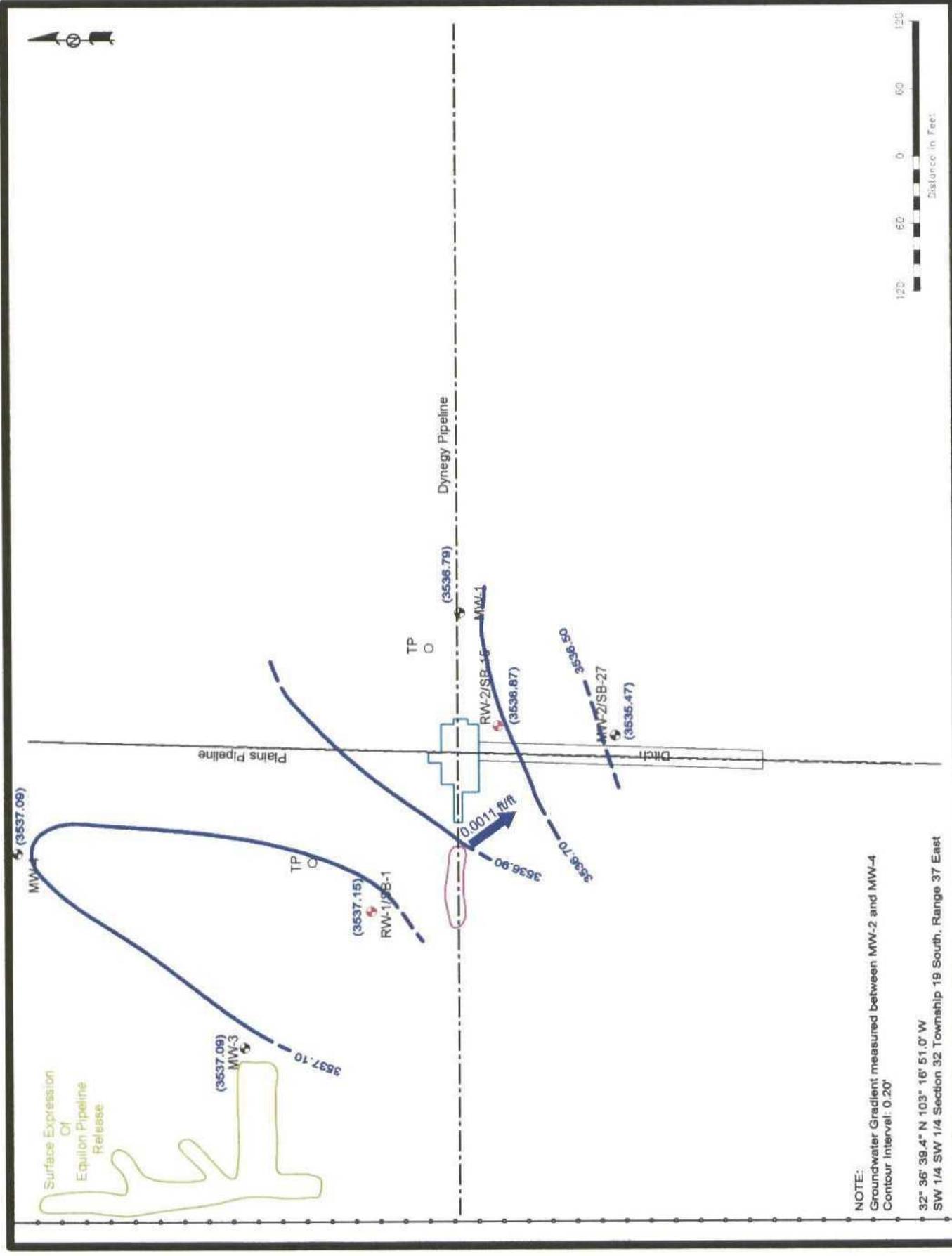
- LEGEND:**
- TP Utility Pole
 - Monitoring Well Location (3536.14)
 - Recovery Well Location
 - Groundwater Elevation in Feet
 - Groundwater Gradient Line
 - Groundwater Gradient Direction & Magnitude
 - Extent of Excavation
 - Extent of Stockpile

Figure 2A
 Inferred
 Groundwater Gradient
 Map (2/26/04)
 Plains Marketing, L.P.
 Monument 10" Sour
 Monument, NM

NOVA Safety and Environmental



Scale: 1" = 120'
 March 16, 2005
 Prep By: COS
 Checked By: MRE

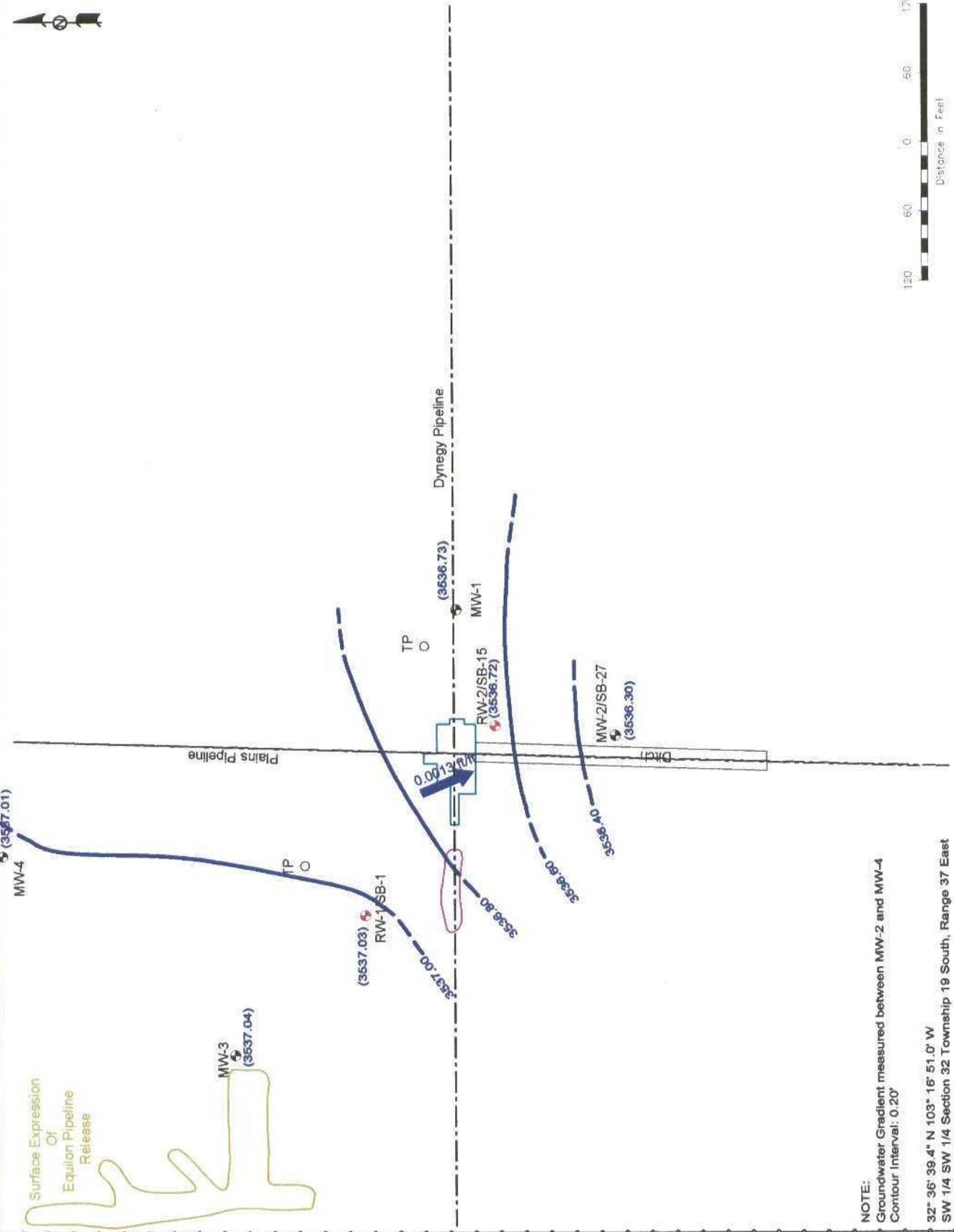


NOTE:
 Groundwater Gradient measured between MW-2 and MW-4
 Contour Interval: 0.20'

32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

- LEGEND:
- TP Utility Pole
 - Monitoring Well Location (3536.14) Groundwater Elevation in Feet
 - Recovery Well Location
 - Groundwater Gradient Line
 - 0.0011 ft/ft Groundwater Gradient Direction & Magnitude
 - Extent of Excavation
 - Extent of Stockpile

Figure 2B
 Inferred
 Groundwater Gradient
 Map (3/18/04)
 Plains Marketing, L.P.,
 Monument 10" Sour
 Monument, NM



NOTE:
 Groundwater Gradient measured between MW-2 and MW-4
 Contour Interval: 0.20'

32° 36' 39.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

LEGEND:

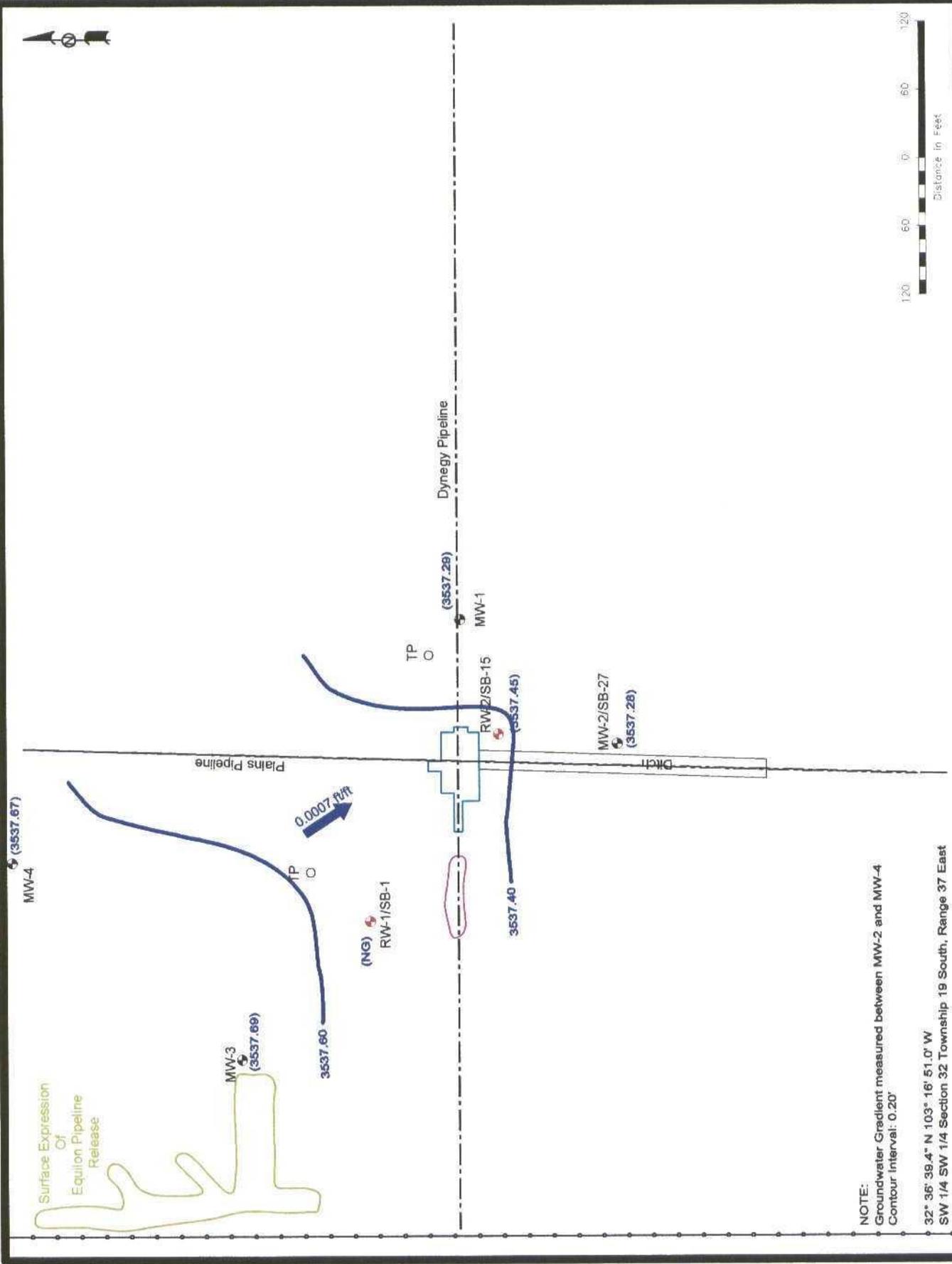
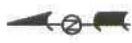
- TP Utility Pole
- Monitoring Well Location (3536.14)
- Recovery Well Location
- Fence
- Extent of Excavation
- Extent of Stockpile
- Groundwater Elevation in Feet
- Groundwater Gradient Line
- 0.0013 ft/ft Groundwater Gradient Direction & Magnitude

Figure 2C
 Inferred
 Groundwater Gradient
 Map (9/8/04)
 Plains Marked, L.P.
 Monument 10° Sour
 Monument, NM

NOVA Safety and Environmental



Scale: 1" = 120'
 Prep By: CDS
 Checked By: MRE
 March 16, 2005



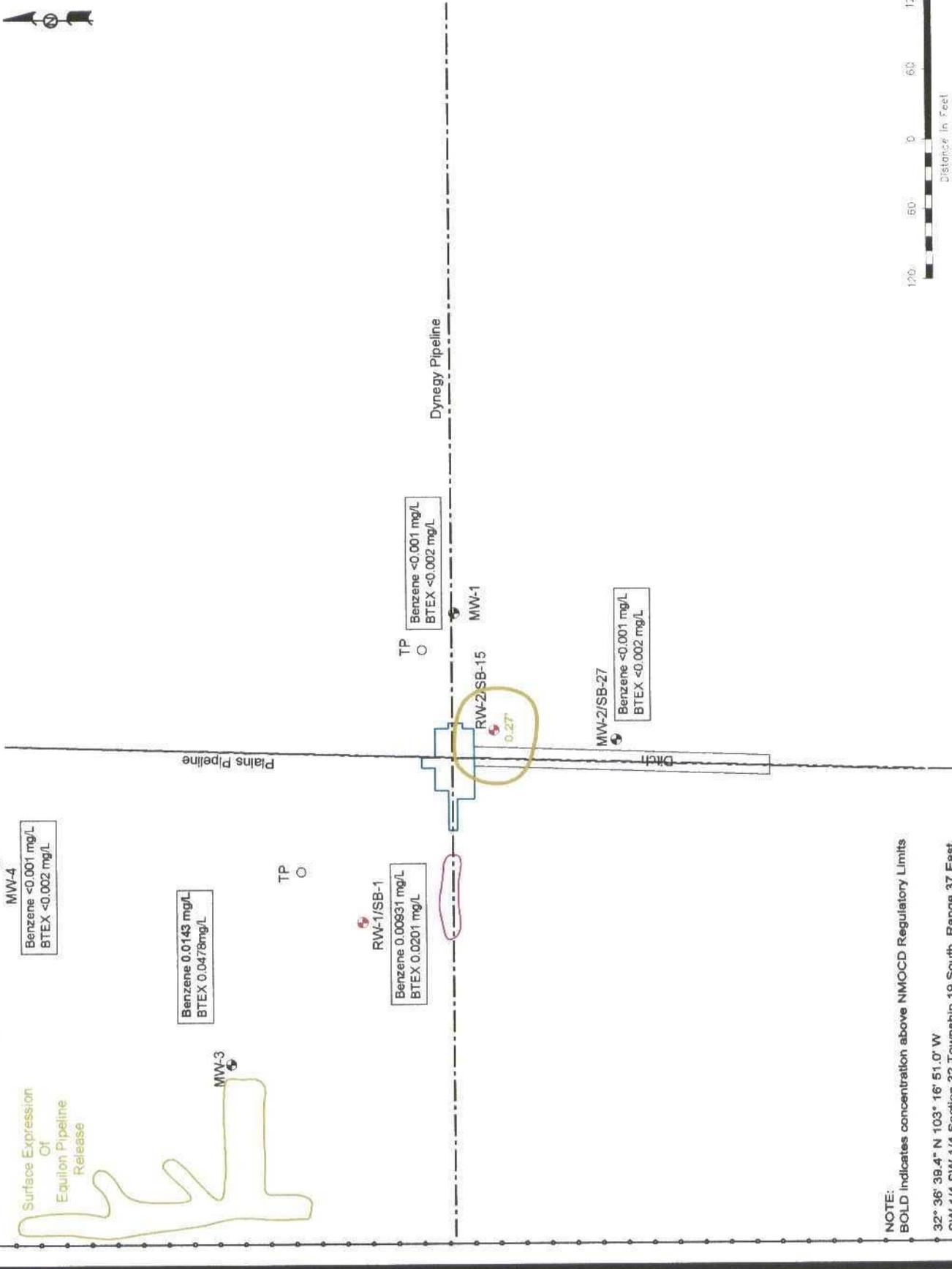
NOTE:
 Groundwater Gradient measured between MW-2 and MW-4
 Contour Interval: 0.20'

32° 36' 38.4" N 103° 16' 51.0" W
 SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

LEGEND:

- TP Utility Pole
- ⊕ Monitoring Well Location (3538.14) Groundwater Elevation in Feet
- ⊕ Recovery Well Location
- Fence
- Extent of Excavation
- Extent of Stockpile
- Groundwater Gradient Line
- 0.0007 ft/ft Groundwater Gradient Direction & Magnitude

Figure 2D
 Inferred
 Groundwater Gradient
 Map (12/14/04)
 Plains Marketing, L.P.
 Monument 10th Sour
 Monument, NM



MW-4
Benzene <0.001 mg/L
BTEX <0.002 mg/L

MW-3
Benzene 0.0143 mg/L
BTEX 0.0478 mg/L

RW-1/SB-1
Benzene 0.00831 mg/L
BTEX 0.0201 mg/L

MW-1
Benzene <0.001 mg/L
BTEX <0.002 mg/L

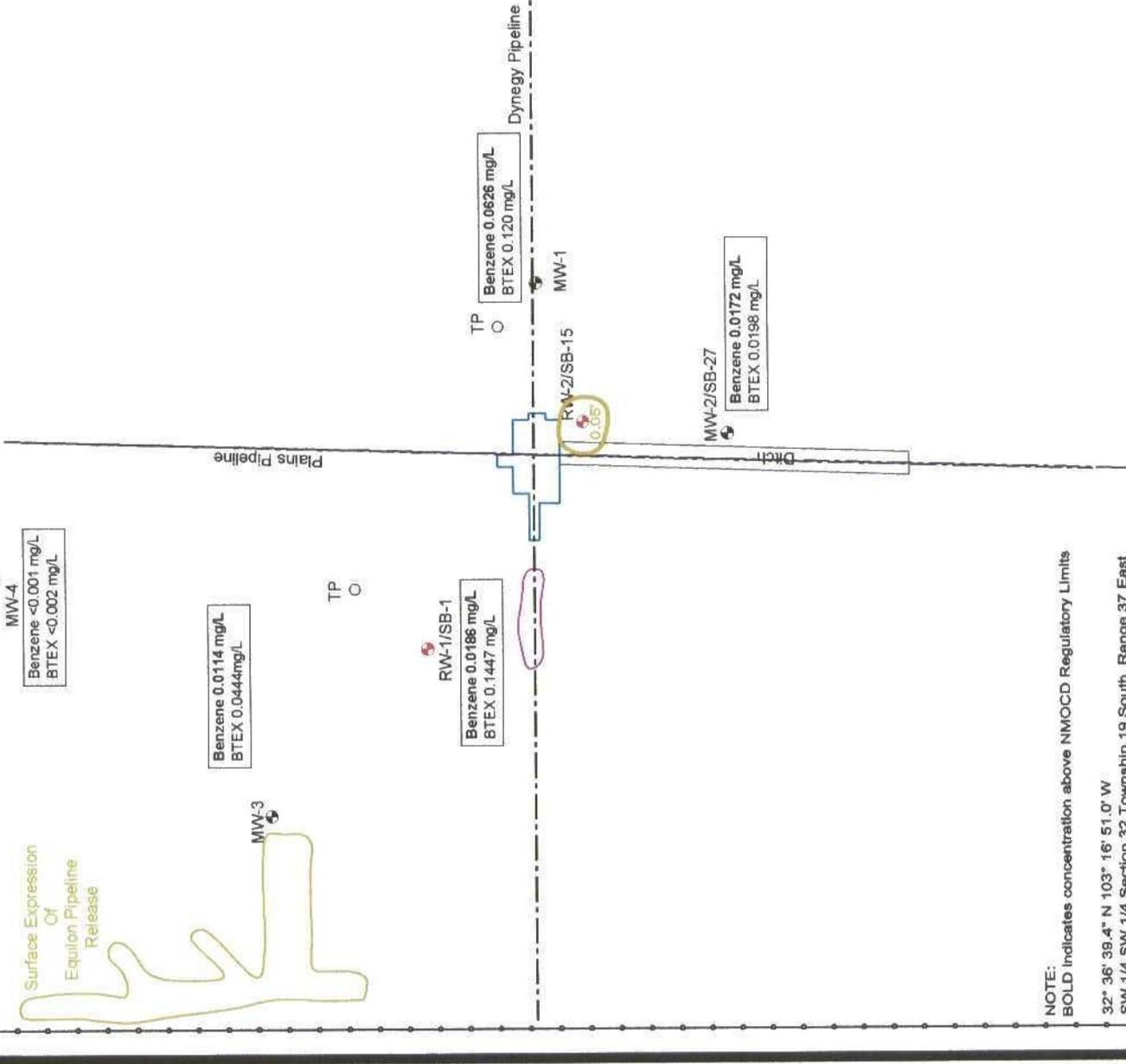
MW-2/SB-27
Benzene <0.001 mg/L
BTEX <0.002 mg/L

NOTE:
BOLD indicates concentration above NMOC Regulatory Limits
32° 36' 39.4" N 103° 16' 51.0" W
SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

LEGEND

- Utility Pole
- Monitoring Well Location
- Recovery Well Location
- Fence
- Extent of Excavation
- Extent of Stockpile
- Constituent Concentration mg/L
- Thickness of PSH (feet)
- Inferred PSH Extent
- Note: PSH Thickness in Feet

Figure 3A
Groundwater Concentration
and Inferred PSH Extent
Map (2/26/04)
Plains Marketing, L.P.
Monument 10" Sour
Monument, NM

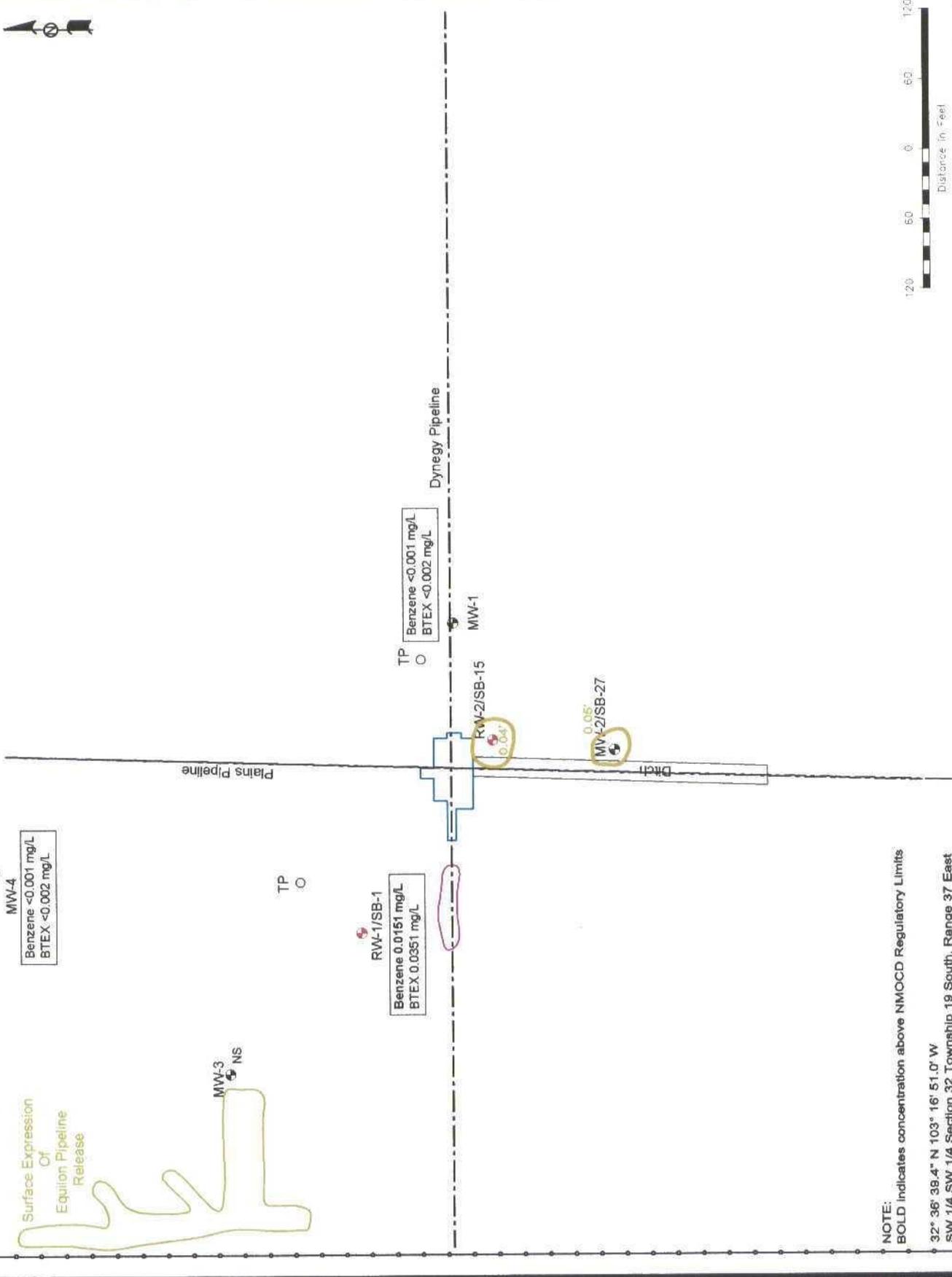


NOTE:
BOLD indicates concentration above NMOCDC Regulatory Limits

32° 36' 39.4" N 103° 16' 51.0" W
SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

LEGEND:
 ○ TP
 ● Utility Pole
 ● Monitoring Well Location
 ● Recovery Well Location
 ● Fence
 --- Extent of Excavation
 --- Extent of Stockpile

● Constituent Concentration mg/L
 0.001
 0.005
 --- Inferred PSH Extent
 --- Note: PSH Thickness in Feet



MW-4
Benzene <0.001 mg/L
BTEX <0.002 mg/L

TP

RW-1/SB-1
Benzene 0.0151 mg/L
BTEX 0.0351 mg/L

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

MW-1

RW-2/SB-15
0.04

MW-2/SB-27
0.06

Surface Expression
Of
Equilon Pipeline
Release

MW-3
NS

NOTE:
BOLD indicates concentration above NMOC Regulatory Limits

32° 36' 39.4" N 103° 16' 51.0" W
SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

LEGEND
○ TP
○ Utility Pole
○ Monitoring Well Location
○ Recovery Well Location
○ Fence
○ Extent of Excavation
○ Extent of Stockpile

<0.001
0.04
0.06
Constituent Concentration mg/L
Thickness of PSH (feet)
Inferred PSH Extent
Note: PSH Thickness in Feet.

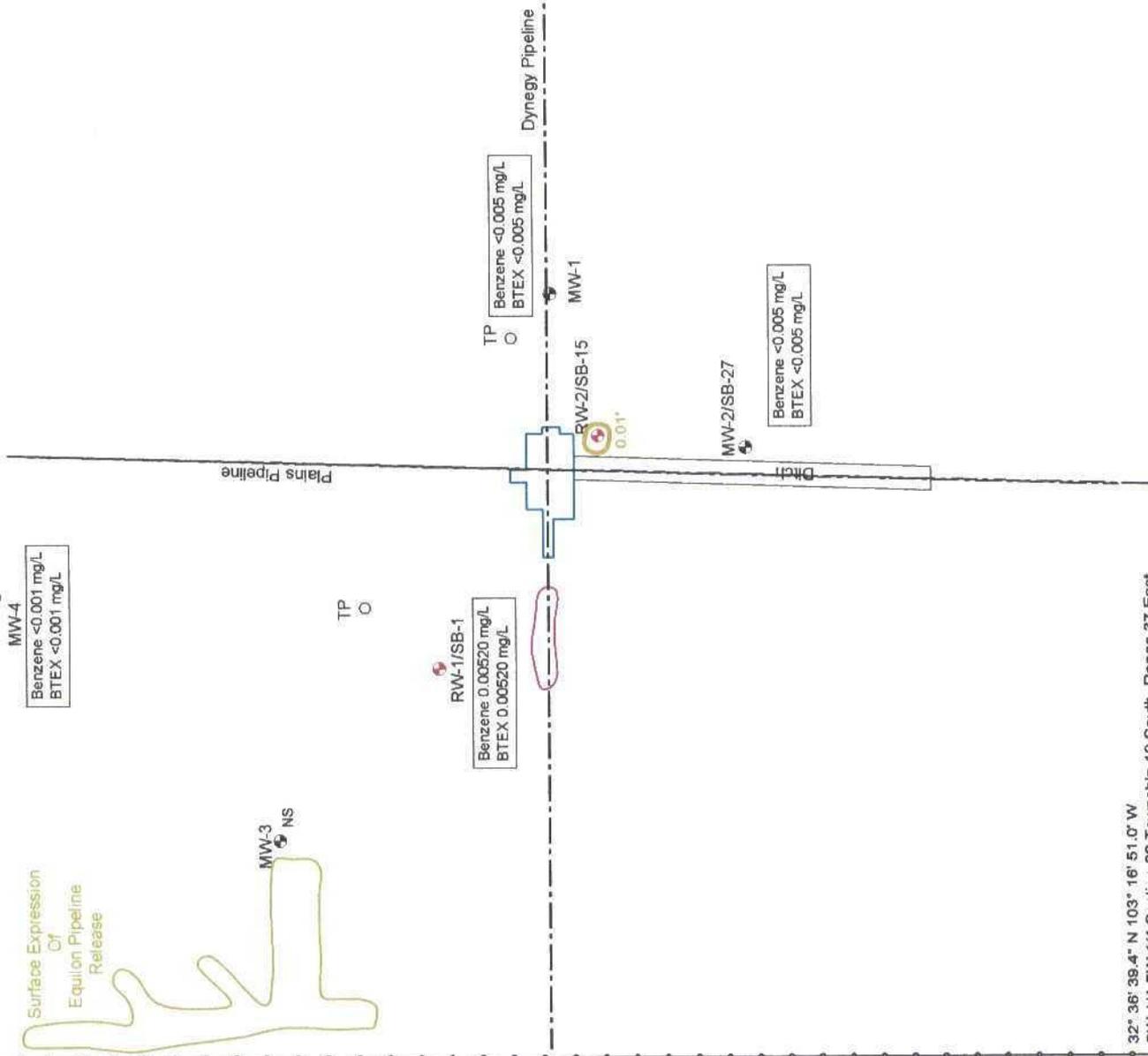
NS Not Sampled

Figure 3C
Groundwater Concentration
and Inferred PSH Extent
Map (9/08/04)
Plains Marketing, L.P.
Monument 10" Sour
Monument, NM

NOVA Safety and Environmental



Scale: 1" = 120'
Prep By: CDS
Checked By: MRE
March 16, 2004



32° 36' 39.4" N 103° 16' 51.0" W
SW 1/4 SW 1/4 Section 32 Township 19 South, Range 37 East

- LEGEND
- TP
 - Utility Pole
 - Monitoring Well Location
 - Recovery Well Location
 - Fence
 - Extent of Excavation
 - Extent of Stockpile
 - Constituent Concentration mg/L
 - Thickness of PSH (feet)
 - Inferred PSH Extent
 - Note: PSH Thickness in Feet
 - NS Not Sampled

Figure 3D
Groundwater Concentration
and Inferred PSH Extent
Map (12/14/04)
Plains Marketing, L.P.
Monument 10" Sour
Monument, NM

NOVA Safety and Environmental



Scale: 1" = 120'
March 16, 2004
Prep By: COS
Checked By: MRE

Tables

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P.
 MONUMENT BARBER ESTATE 10" SOUR
 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	02/26/04	3,565.64	-	28.95	0.00	3,536.69
	05/18/04	3,565.64	-	28.85	0.00	3,536.79
	12/14/04	3,565.64	-	28.35	0.00	3,537.29
MW - 2	02/26/04	3,565.58	-	29.60	0.00	3,535.98
	05/18/04	3,565.58	-	29.11	0.00	3,536.47
	09/08/04	3,565.58	29.27	29.32	0.05	3,536.30
	09/14/04	3,565.58	sheen	29.40	0.00	3,536.18
	09/21/04	3,565.58	sheen	29.40	0.00	3,536.18
	10/08/04	3,565.58	sheen	29.38	0.00	3,536.20
	10/14/04	3,565.58	sheen	28.93	0.00	3,536.65
	10/20/04	3,565.58	sheen	29.10	0.00	3,536.48
	11/11/04	3,565.58	sheen	28.87	0.00	3,536.71
	11/19/04	3,565.58	sheen	28.67	0.00	3,536.91
	12/01/04	3,565.58	sheen	28.40	0.00	3,537.18
	12/14/04	3,565.58	-	28.30	0.00	3,537.28
	MW - 3	02/26/04	3,567.44	-	30.51	0.01
05/14/04		3,567.44	-	30.35	0.00	3,537.09
06/07/04		3,567.44	sheen	30.36	0.00	3,537.08
06/15/04		3,567.44	sheen	30.34	0.00	3,537.10
06/21/04		3,567.44	sheen	30.37	0.00	3,537.07
06/28/04		3,567.44	sheen	30.40	0.00	3,537.04
07/15/04		3,567.44	sheen	30.38	0.00	3,537.06
08/03/04		3,567.44	sheen	30.37	0.00	3,537.07
08/11/04		3,567.44	sheen	30.39	0.00	3,537.05
08/17/04		3,567.44	-	30.38	0.00	3,537.06
09/08/04		3,567.44	-	30.40	0.00	3,537.04
12/14/04		3,567.44	29.75	29.77	0.02	3,537.69
MW - 4		02/26/04	3,567.27	-	30.26	0.00
	05/14/04	3,567.27	-	30.18	0.00	3,537.09
	09/08/04	3,567.27	-	30.26	0.00	3,537.01
	12/14/04	3,567.27	-	29.60	0.00	3,537.67

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P.
 MONUMENT BARBER ESTATE 10" SOUR
 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
RW - 1	02/26/04	3,566.48	-	29.51	0.00	3,536.97
	05/14/04	3,566.48	-	29.33	0.00	3,537.15
	09/08/04	3,566.48	-	29.45	0.00	3,537.03
RW - 2	02/26/04	3,566.09	29.56	29.83	0.27	3,536.49
	05/14/04	3,566.09	29.21	29.26	0.05	3,536.87
	06/07/04	3,566.09	29.19	29.27	0.08	3,536.89
	06/15/04	3,566.09	29.2	29.25	0.05	3,536.88
	06/21/04	3,566.09	29.23	29.31	0.08	3,536.85
	06/28/04	3,566.09	29.25	29.31	0.06	3,536.83
	07/15/04	3,566.09	29.2	29.25	0.05	3,536.88
	08/03/04	3,566.09	29.21	29.26	0.05	3,536.87
	08/11/04	3,566.09	29.24	29.29	0.05	3,536.84
	08/17/04	3,566.09	29.25	29.32	0.07	3,536.83
	09/08/04	3,566.09	29.36	29.4	0.04	3,536.72
	09/14/04	3,566.09	sheen	29.15	0.00	3,536.94
	09/21/04	3,566.09	sheen	29.41	0.00	3,536.68
	10/08/04	3,566.09	sheen	29.4	0.00	3,536.69
	10/14/04	3,566.09	sheen	28.99	0.00	3,537.10
10/20/04	3,566.09	sheen	29.13	0.00	3,536.96	
11/11/04	3,566.09	sheen	29.01	0.00	3,537.08	
11/19/04	3,566.09	sheen	28.82	0.00	3,537.27	
12/01/04	3,566.09	sheen	28.84	0.00	3,537.25	
12/14/04	3,566.09	28.64	28.65	0.01	3,537.45	

Note: Unable to complete gauging or sampling on 3/5/03, ordered off-site by landowner.
 Elevations based on the 1929 North American Vertical Datum.

TABLE 2

CONCENTRATIONS OF BTEX IN GROUNDWATER FOR 2004

PLAINS MARKETING, L.P.
 MONUMENT 10" SOUR
 LEA COUNTY, NEW MEXICO

Results are reported in mg/L.

SAMPLE LOCATION	SAMPLE DATE	Method: SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE
NMOCD Regulatory Limit		0.01	0.75	0.75	Total XYLENES 0.67	
MW-1	02/26/04	<0.001	<0.001	<0.001	<0.002	<0.001
	05/18/04	0.0626	<0.001	0.0203	0.0332	0.00421
	09/08/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/14/04	<0.005	<0.005	<0.005	<0.005	
MW-2	02/26/04	<0.001	<0.001	<0.001	<0.002	<0.001
	05/18/04	0.0172	<0.001	0.00264	<0.002	<0.001
	12/14/04	<0.005	<0.005	<0.005	<0.005	
MW - 3	02/26/04	0.0143	<0.001	0.030	.00349	<0.001
	05/18/04	0.0114	<0.001	0.0319	<0.002	<0.001
MW - 4	02/26/04	<0.001	<0.001	<0.001	<0.002	<0.001
	05/18/04	<0.001	<0.001	<0.001	<0.002	<0.001
	09/08/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/14/04	<0.001	<0.001	<0.001	<0.001	
RW - 1	02/26/04	0.00931	<0.001	0.0108	<0.002	<0.001
	05/18/04	0.0186	<0.001	0.0407	0.0854	<0.001
	09/08/04	0.0151	<0.001	0.0109	0.00911	<0.001
	12/14/04	0.00520	<0.005	<0.005	<0.005	

Note: EB-1 denotes equipment blank collected on sampling date.

Concentrations in **BOLD** are above the applicable NMOCD Regulatory Standard.

Appendices

Appendix A
Notification of Release and Corrective
Action

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company EOTT Energy Pipeline Limited Partnership	Contact Glenn Waldrop
Address P.O. Box 1660, Midland, TX 79702	Telephone No. 915/684-3453
Facility Name Monument 10" Sour (6")	Facility Type Pipeline

Surface Owner Barber Estate	Mineral Owner	Lease No.
---------------------------------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	32	19S	37E					Lea

NATURE OF RELEASE

Type of Release Sour Crude Oil	Volume of Release 1,600 bbls	Volume Recovered 1,390 bbls
Source of Release Pipeline valve flange	Date and Hour of Occurrence August 8, 2000	Date and Hour of Discovery August 8, 2000 at 10 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Donna Williams - NMOCD, Hobbs District Office	
By Whom? Wayne Brunetta	Date and Hour August 8, 2000	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

N/A

Describe Cause of Problem and Remedial Action Taken.*

Weld broke on the west end of valve flange. Released oil was contained in a bell hole and ditch. Bellhole (35'x45'x10'deep) filled to top and oil flowed into a ditch 100 yards long. Oil was recovered with a vacuum truck.

Describe Area Affected and Cleanup Action Taken.*

Heavily impacted soil, from the ditch only, was excavated and hauled to a landfarm for treatment. Soils in the bellhole could not be excavated due to the presence of pipelines. ETGI has begun delineating the site and will prepare a remediation workplan.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Glenn Waldrop</i>	OIL CONSERVATION DIVISION	
Printed Name: Glenn Waldrop	Approved by District Supervisor:	
Title: District Manager	Approval Date:	Expiration Date:
Date: 8/17/00 Phone: 915/684-3453	Conditions of Approval:	Attached <input type="checkbox"/>

Attach Additional Sheets if Necessary

MONUMENT BARBER
MONUMENT 10" SOUR