1R - 404

REPORTS

DATE:

3/2006

2005
ANNUAL MONITORING REPORT

Report is on the L-Drive

LEA STATION TO MONUMENT 6 INCH

NE ¼ SE ¼ of SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS EMS NUMBER: 2001-11056
NMOCD File Number 1R-0404

PREPARED FOR:

PLAINS MARKETING, L.P.
333 CLAY STREET SUITE 1600
HOUSTON, TEXAS 77022

NOVA
safety and environmental

PREPARED BY:

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Midland, Texas 79703

March 2006

Curt D. Stanley
Project Manager

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

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ENCLOSED ON DATA DISK

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Historic Groundwater Elevation Tables
Historic 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, having previously been managed by Environmental Technology Group, Inc. (ETGI). The Lea Station to Monument 6-Inch site, formally the responsibility of Enron Oil Trading and Transportation (EOTT) is now the responsibility of Plains. This report is intended to be viewed as a complete document with figures, attachments, tables and text. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2005 only. 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). The groundwater monitoring events consisted of measuring static water levels in the monitor wells, checking for the presence of PSH, and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is NE ¼ of the SE ¼ of Section 5, Township 20 South, Range 37 East, Lea County, New Mexico. A three-barrel release, with no recovery occurred on August 3, 2001. The surface expression of the release resulted in an irregularly shaped stained surface area measuring approximately 175 feet in length by 30 feet in width. EOTT conducted emergency response actions by excavating impacted soil from around the pipeline, locating the release point and repairing the pipeline. The Release Notification and Corrective Action (Form C-141) is provided as Appendix A

Monitor wells MW-1 through MW-6 were installed by a previous consultant. Monitor wells MW-7 through MW-9 were installed under the direction of NOVA in November, 2004. Currently, there are nine (9) monitor wells (MW-1 through MW-9) on site.

FIELD ACTIVITIES

During the 2005 reporting period, measurable PSH was not observed in any of the site monitor wells. The quantity of product steadily decreased since June 2004 to a sheen in December 2005. Monitor wells MW-2 and MW-3 exhibited a sheen throughout most of 2005, while monitor well MW-5 exhibited a sheen when gauged during third quarter sampling activities. The 2005 gauging data is provided in Table 1.

The site monitor wells were gauged and sampled on March 9, June 10, September 12, and December 06, 2005. The table below lists the sampling schedule for each monitor well. During each sampling event, the monitor wells were purged of approximately three well volumes of water or until the wells were dry using a disposable polyethylene bailer or electrical 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 utilizing a licensed disposal facility (NMOCD AO SWD-730).

In previous correspondence dated April 28, 2004, the NMOCD approved the current sampling schedule. The table below illustrates the current schedule.

NMOCD APPROVED SAMPLING SCHEDULE	
Sample Location	**Sampling Schedule**
MW-1	Annually
MW-2	Quarterly
MW-3	Annually
MW-4	Annually
MW-5	Quarterly
MW-6	Semi-Annually
MW-7	Quarterly
MW-8	Quarterly
MW-9	Quarterly

Locations of the monitor wells and the inferred groundwater gradient, constructed from measurements collected during quarterly sampling events, are depicted on Figures 2A-2D, the Inferred Groundwater Gradient Maps. The 2005 groundwater elevation data is provided as Table 1. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.007 feet/foot to the southeast as measured between MW-3 and MW-8. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevations ranged between 3527.55 to 3529.18 feet above mean sea level, in MW-3 on January 5, 2005 and in MW-3 on October 25, 2005, respectively.

LABORATORY RESULTS

Groundwater samples obtained during 2005 groundwater sampling events were delivered to Trace Analysis of Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW 846-8021b. A listing of BTEX constituent concentrations for 2005 is summarized in Table 2 and electronic copies of the laboratory reports from this reporting period are provided on the enclosed data disk. The quarterly groundwater sample results for benzene and BTEX constituent concentrations are depicted on Figures 3A-3D.

Review of laboratory analytical results of the groundwater samples obtained during the 2005 monitoring period indicate that benzene and BTEX constituent concentrations are below NMOCD regulatory standards in all monitor wells, with the exception of monitor wells MW-5 and MW-9. Monitor wells MW-5 and MW-9 exhibited benzene concentrations above the NMOCD regulatory standard for benzene, but below the BTEX constituent standard, in the second quarter of 2005 only.

SUMMARY

This report presents the results of groundwater monitoring activities for the annual monitoring period 2005. As discussed, above none of the site monitor wells exhibited measurable PSH during the reporting period.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.007 feet/foot to the southeast as measured between monitor wells MW-3 and MW-8.

As discussed above, benzene and BTEX constituent concentrations were below NMOCD regulatory standards in seven (7) monitor wells during 2005. Monitor wells MW-5 and MW-9 were below NMOCD regulatory standards for benzene and BTEX constituent concentrations when sampled during the first, third and fourth quarters but contained benzene concentrations just above the NMOCD regulatory standard in the second quarter of 2005.

ANTICIPATED ACTIONS

Quarterly monitoring and sampling will continue in 2006. Gauging will continue on a monthly schedule and will be adjusted according to site conditions.

Additional soil investigation/remediation will be proposed to address any remaining soil impact issues and will be addressed under separate cover from this report.

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

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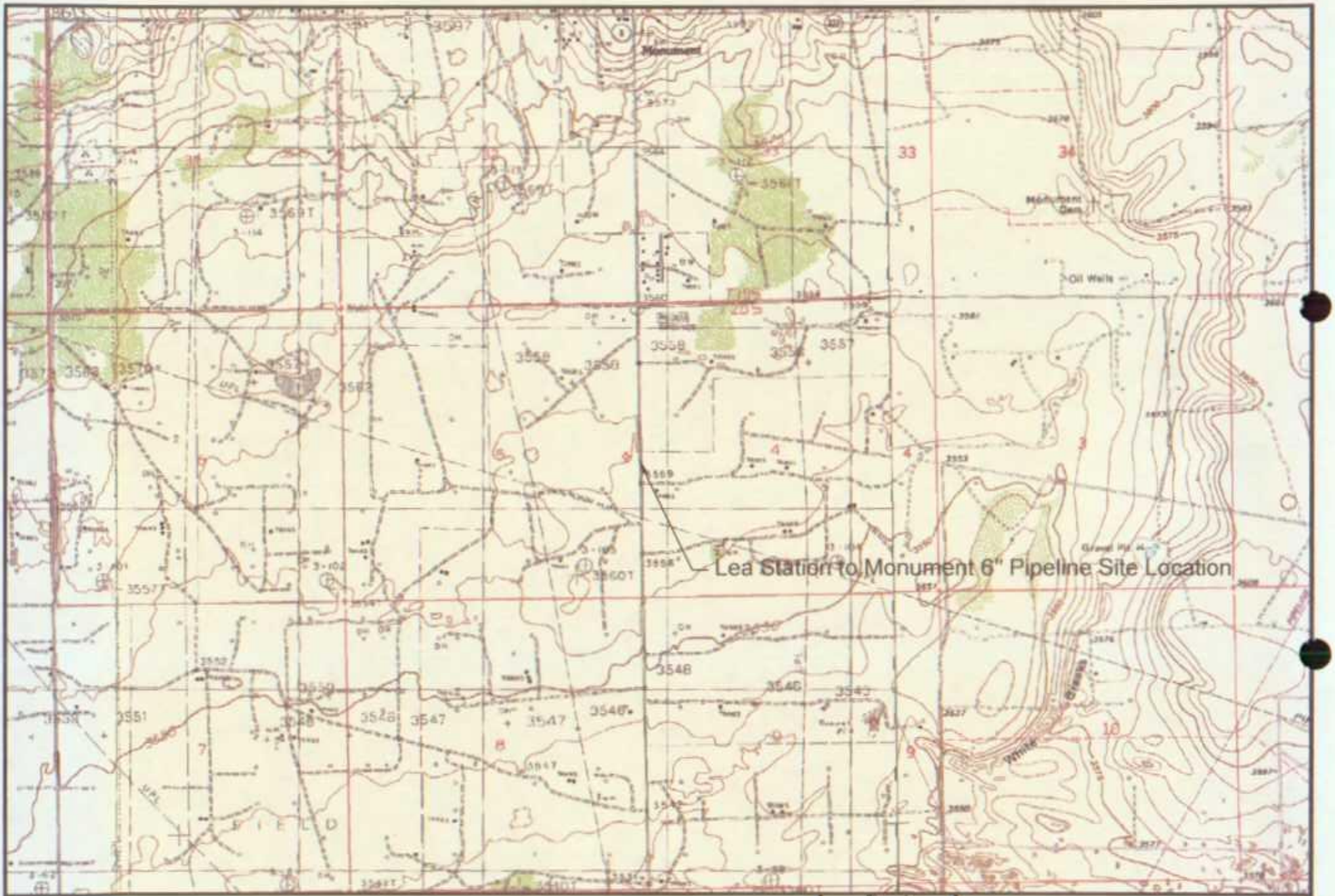
Figures



NE 1/4, SE 1/4, Sec. 5 T20S, R37E

Figure 1
Site Location
Map
Plains Marketing, L.P.
Lea Station to
Monument 6" Pipeline
Lea County, NM

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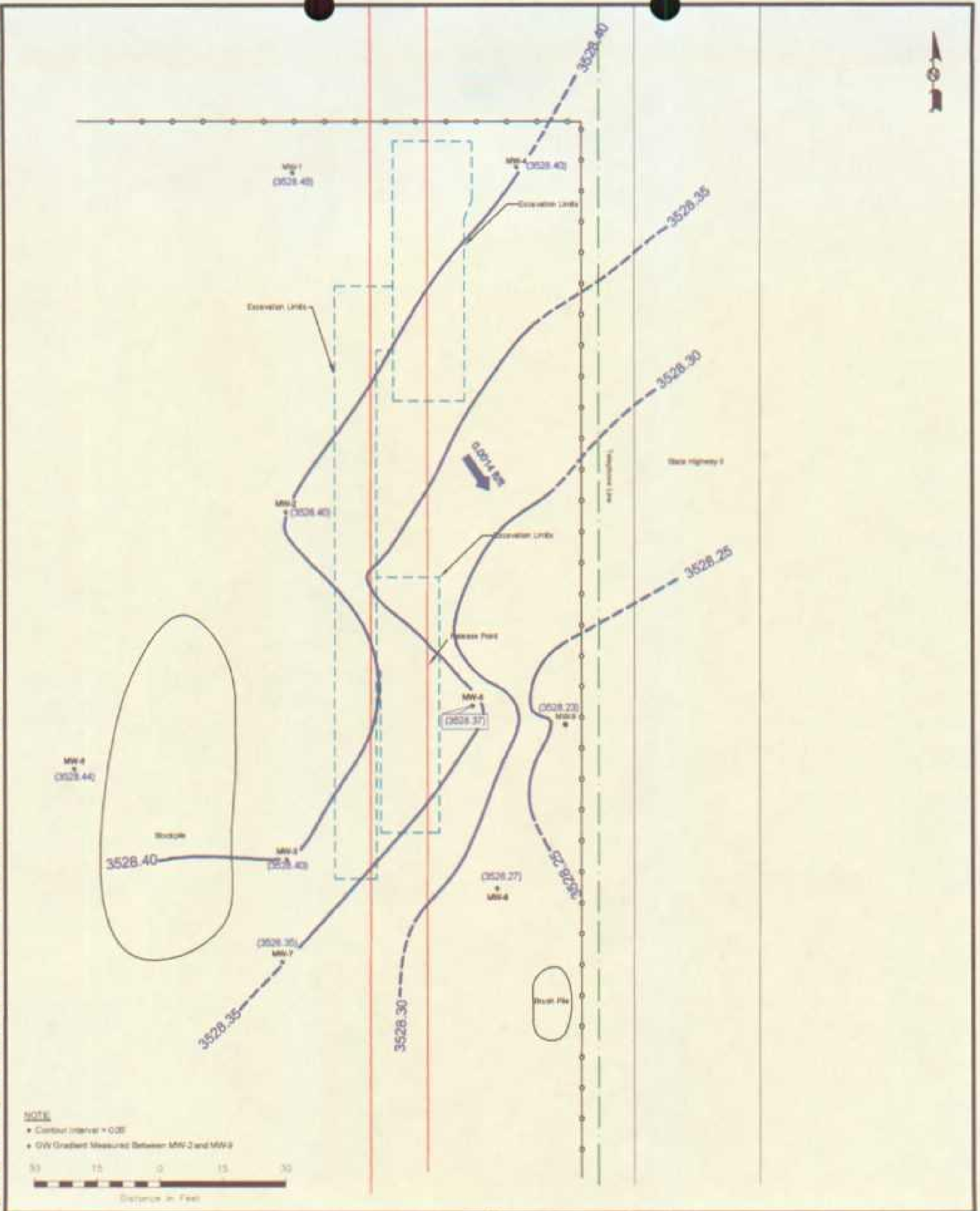
NOVA

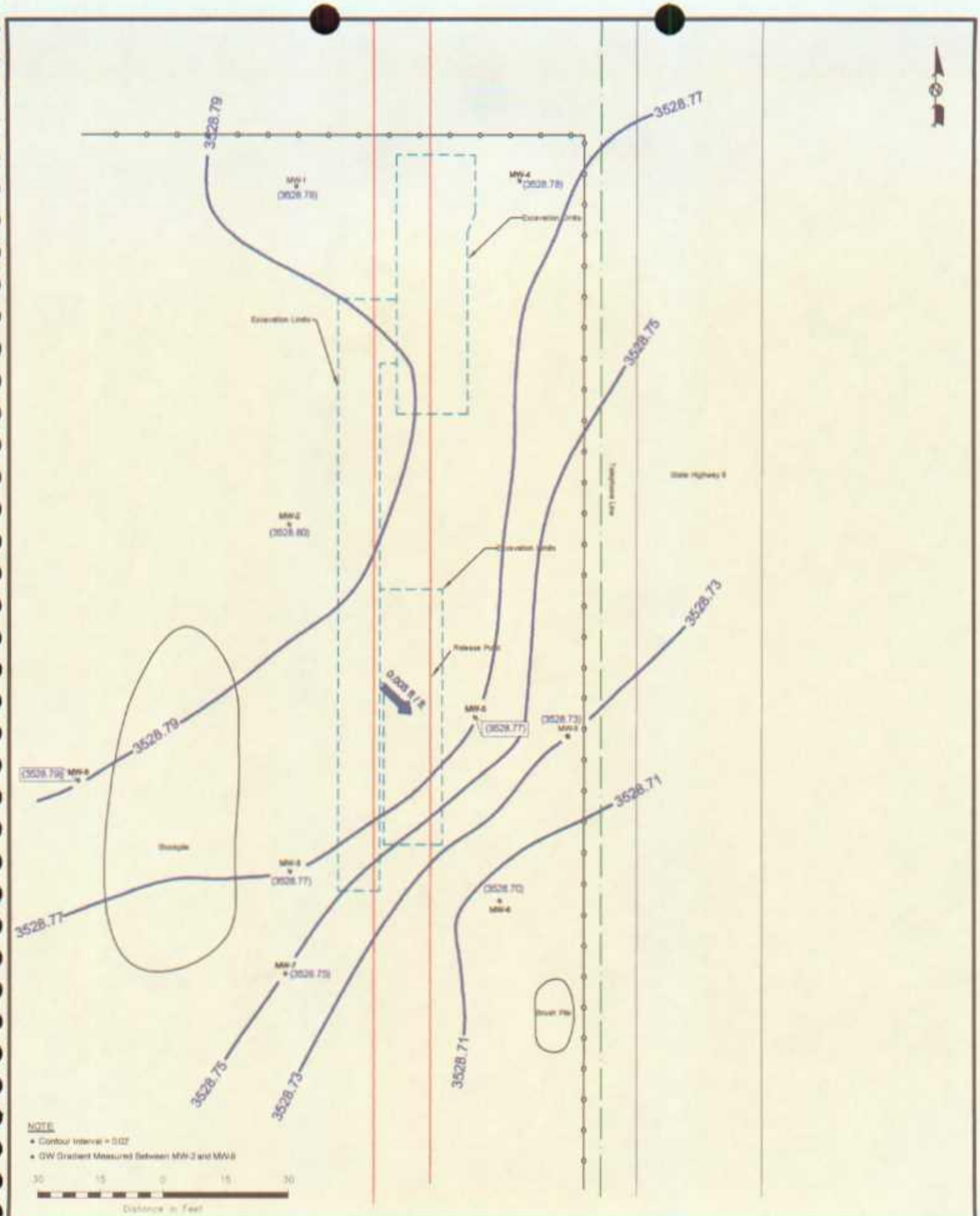


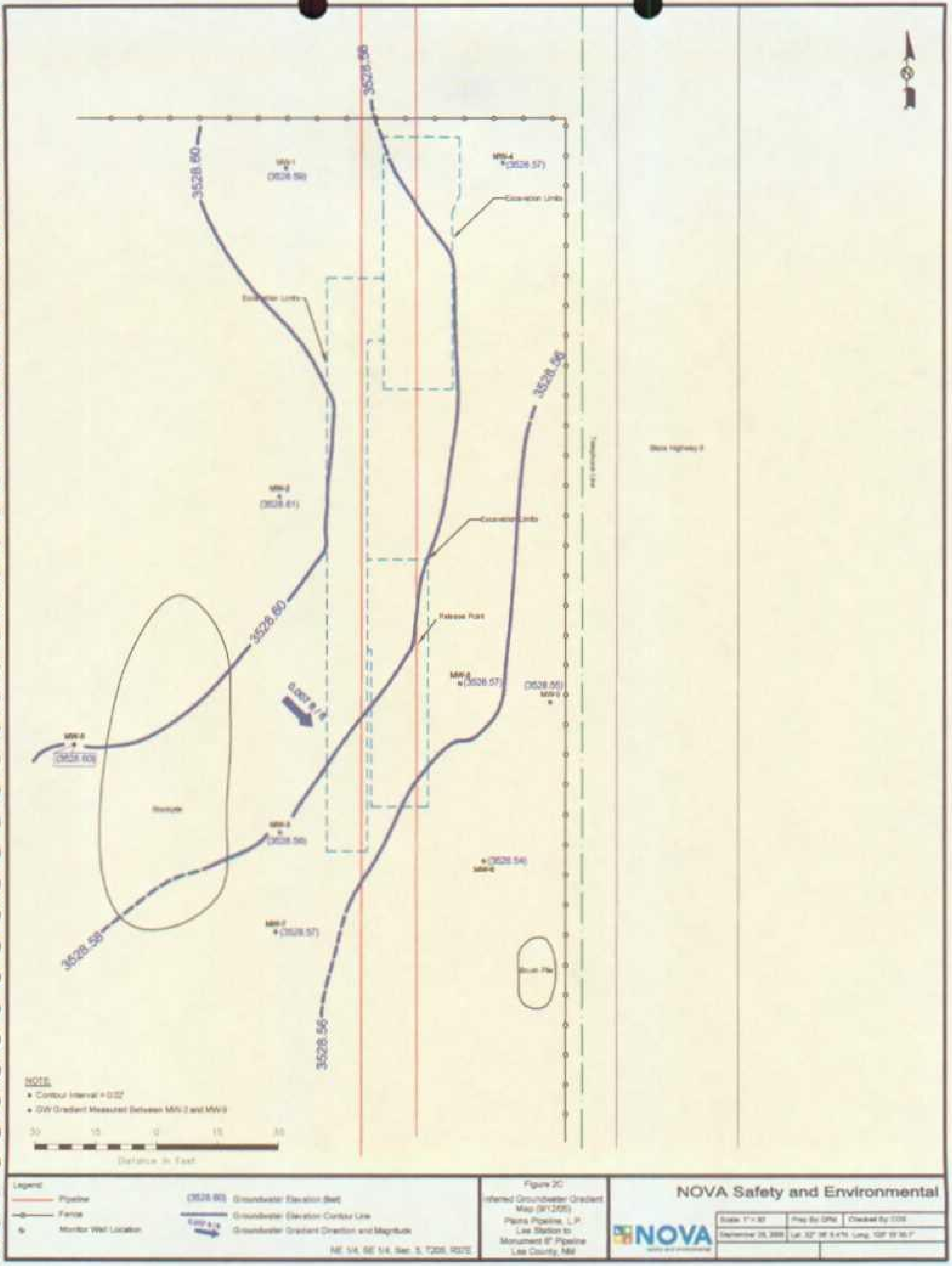
Legend			
GeoProbe Sample Location	(3523.35) Groundwater Elevation (feet)		
Pipeline	Groundwater Elevation Contour Line		
Fence	Groundwater Gradient Direction and Magnitude		
Monitor Well Location		NE 1/4, SE 1/4, Sec. 5, T20S, R37E	

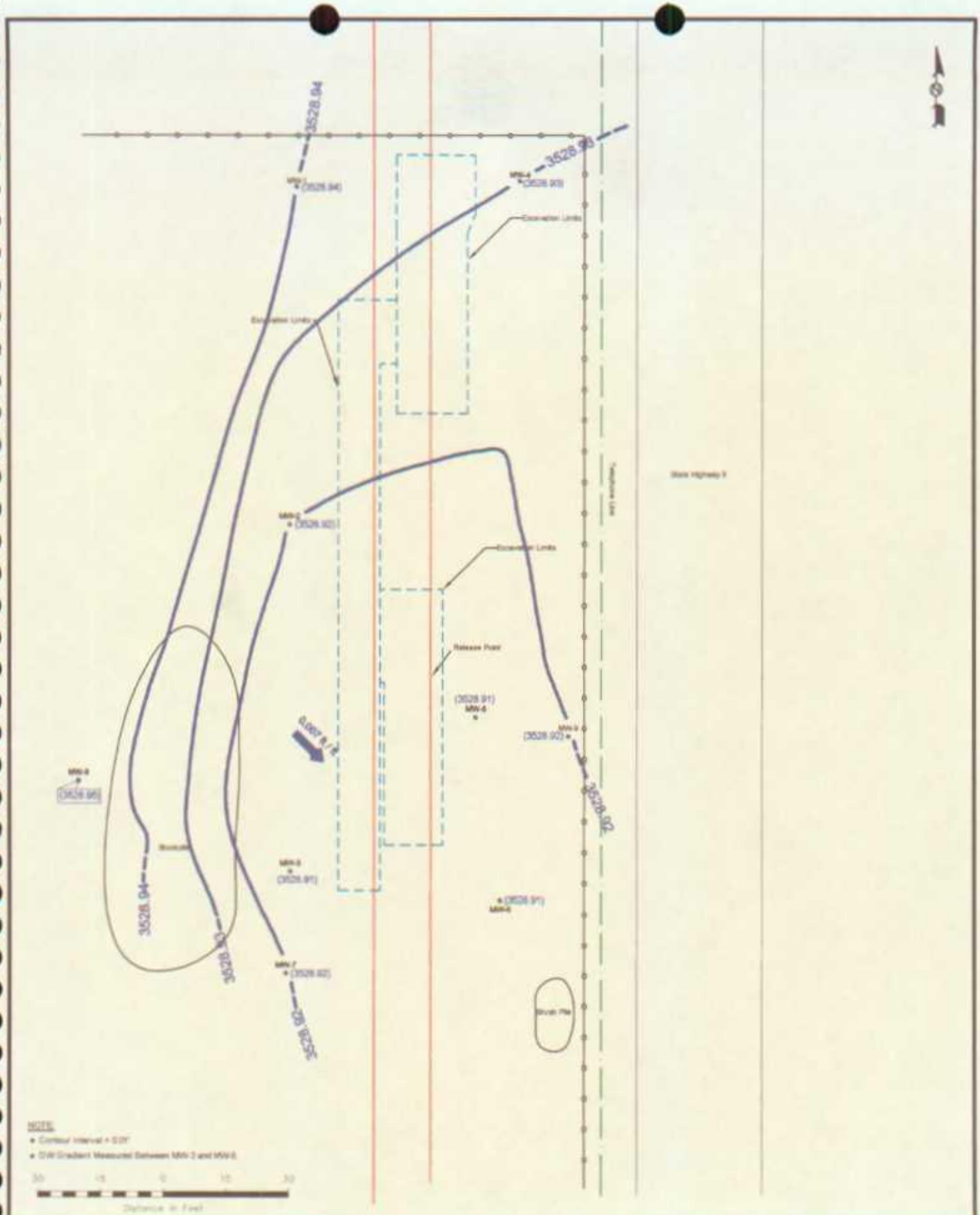
Figure 2A
Inferred Groundwater Gradient Map (03/09/05)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM

NOVA Safety and Environmental

Scale: 1" = 30'	Prep By: DPM	Checked By: CCB
May 9, 2005	Lat. 32° 36' 8.4"N	Long. 103° 15' 55.7"


3528.79
3528.77
3528.75
3528.73
3528.71
MW-1
(3528.78)
MW-4
(3528.78)
MW-2
(3528.80)
MW-5
(3528.77)
MW-6
(3528.79)
MW-3
(3528.73)
MW-7
(3528.79)
(3528.70)
Excavation Limits
Release Point
Stockpile
Brush Pile
State Highway 8
Telephone Line
NOTE:
• Contour Interval = 0.02'
• GW Gradient Measured Between MW-3 and MW-5
30 15 0 15 30
Distance in Feet
Legend:
Pipeline
Fence
Monitor Well Location
(3528.77) Groundwater Elevation (feet)
Groundwater Elevation Contour Line
Groundwater Gradient Direction and Magnitude
NE 1/4, SE 1/4, Sec. 5, T20S, R37E
Figure 2B
Inferred Groundwater Gradient Map (6/10/05)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM
NOVA Safety and Environmental
NOVA
Scale: 1" = 30'
Prep By: DPM
Checked By: CDS
June 21, 2005
Lat. 32° 36' 8.41" Long. 103° 15' 35.1"


3528.56
3528.60
MW-1
(3528.59)
MW-4
(3528.57)
Excavation Limits
MW-2
(3528.61)
3528.56
Release Point
3528.60
MW-6
(3528.57)
(3528.55)
0.007 ft/ft
MW-8
(3528.60)
MW-3
(3528.56)
(3528.54)
MW-7
(3528.57)
3528.58
3528.56
NOTE:
Contour Interval = 0.02'
GW Gradient Measured Between MW-2 and MW-9
Distance In Feet
Legend
Pipeline
Fence
Monitor Well Location
Groundwater Elevation (feet)
Groundwater Elevation Contour Line
Groundwater Gradient Direction and Magnitude
Figure 2C
NOVA Safety and Environmental
NOVA



Legend

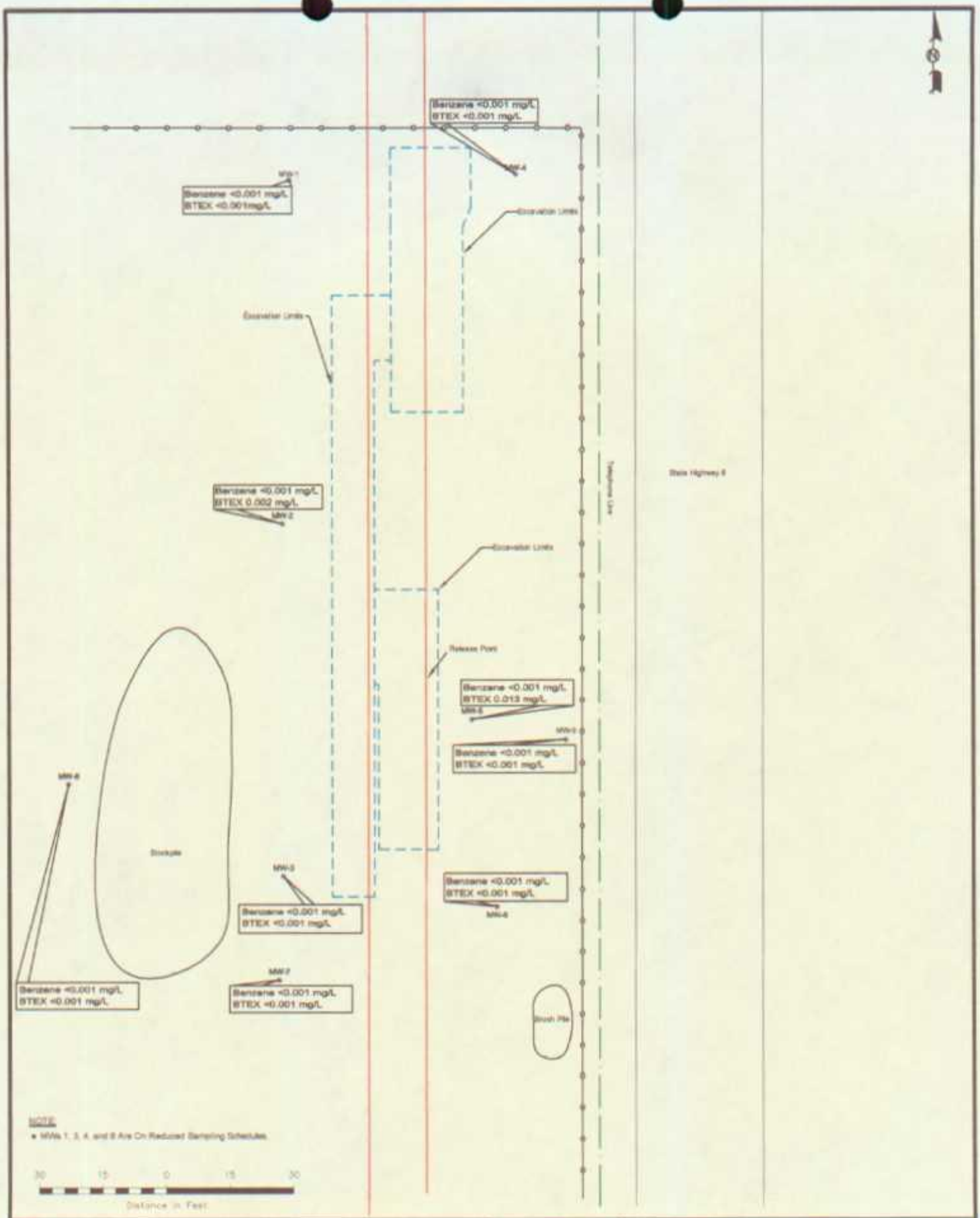
- Pipeline
- Fence
- Monitor Well Location
- (3528.93) Groundwater Elevation (feet)
- Groundwater Elevation Contour Line
- Groundwater Gradient Direction and Magnitude

NE 1/4, SE 1/4, Sec. 5, T20S, R37E

Figure 2D
Inferred Groundwater Gradient Map (12/09/05)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM

NOVA Safety and Environmental

Scale: 1" = 30'	Prep By: DRM	Checked By: KRE
January 21, 2009	Lat: 32° 36' 6.4"N Long: 103° 16' 55.1"	



Legend

GeoProbe Sample Location
Monitor Well Location
Pipeline
<0.001 Constituent Concentration (mg/L)
Fence

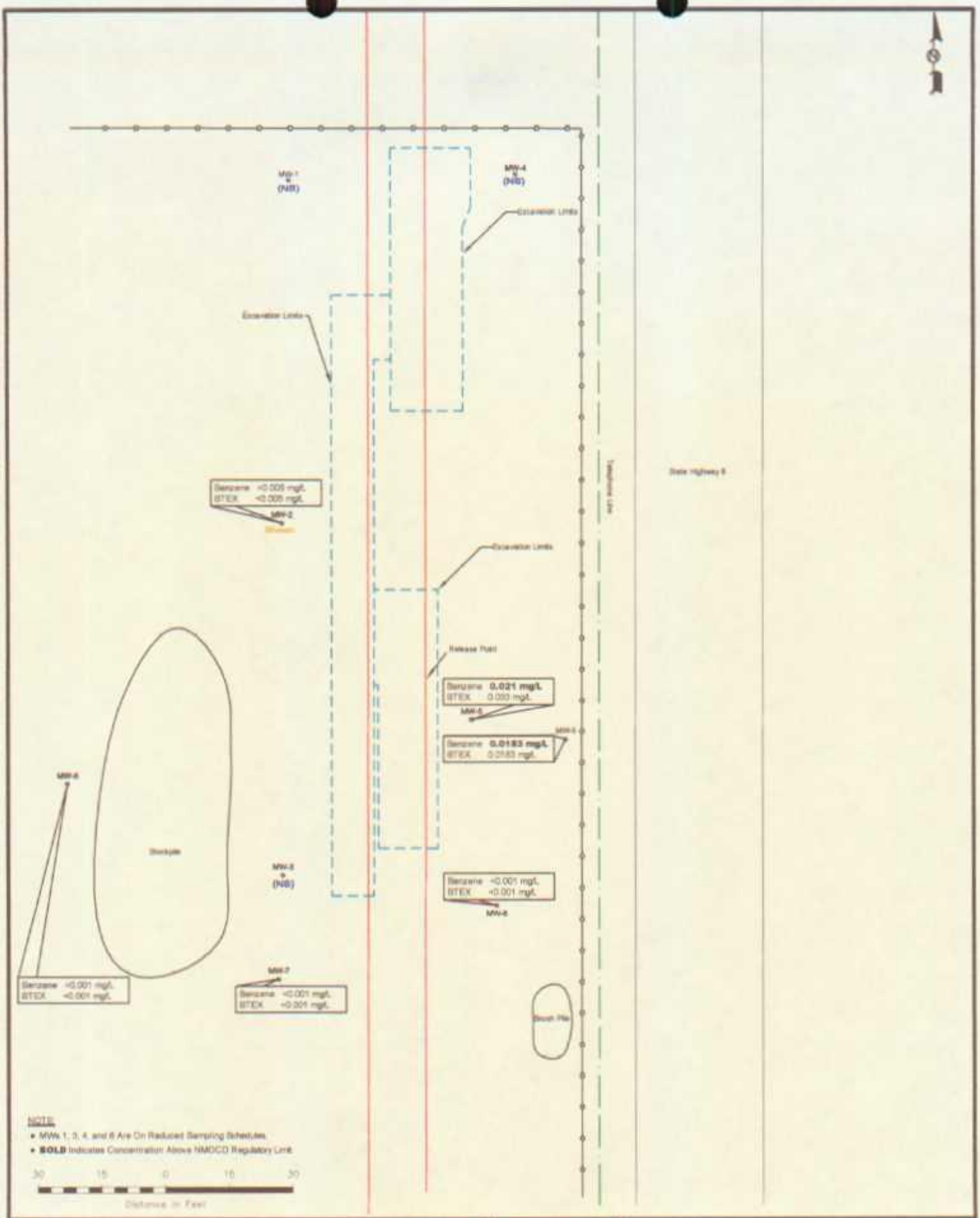
NE 1/4, SE 1/4, Sec. 5, T20S, R37E

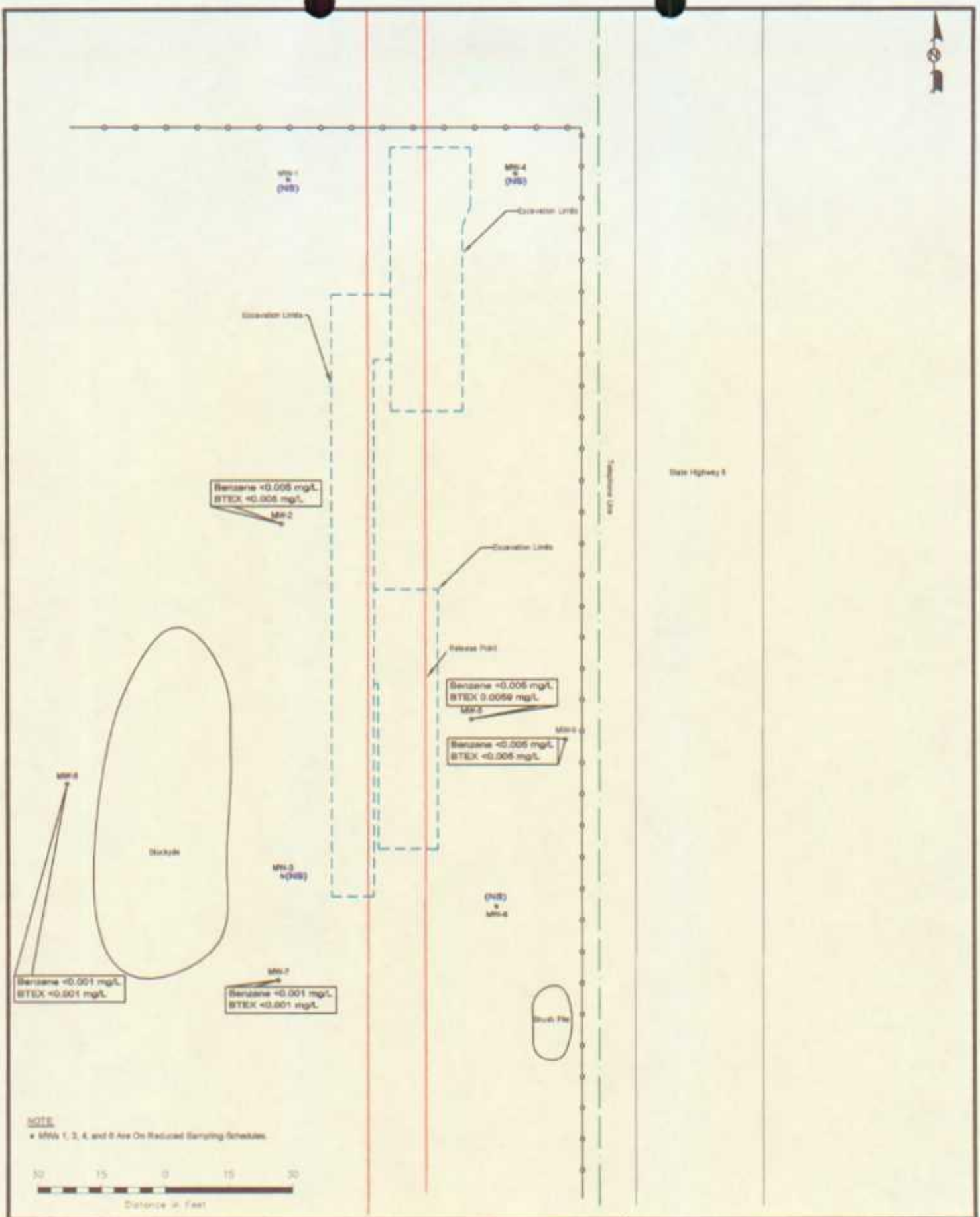
Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (09/05)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM

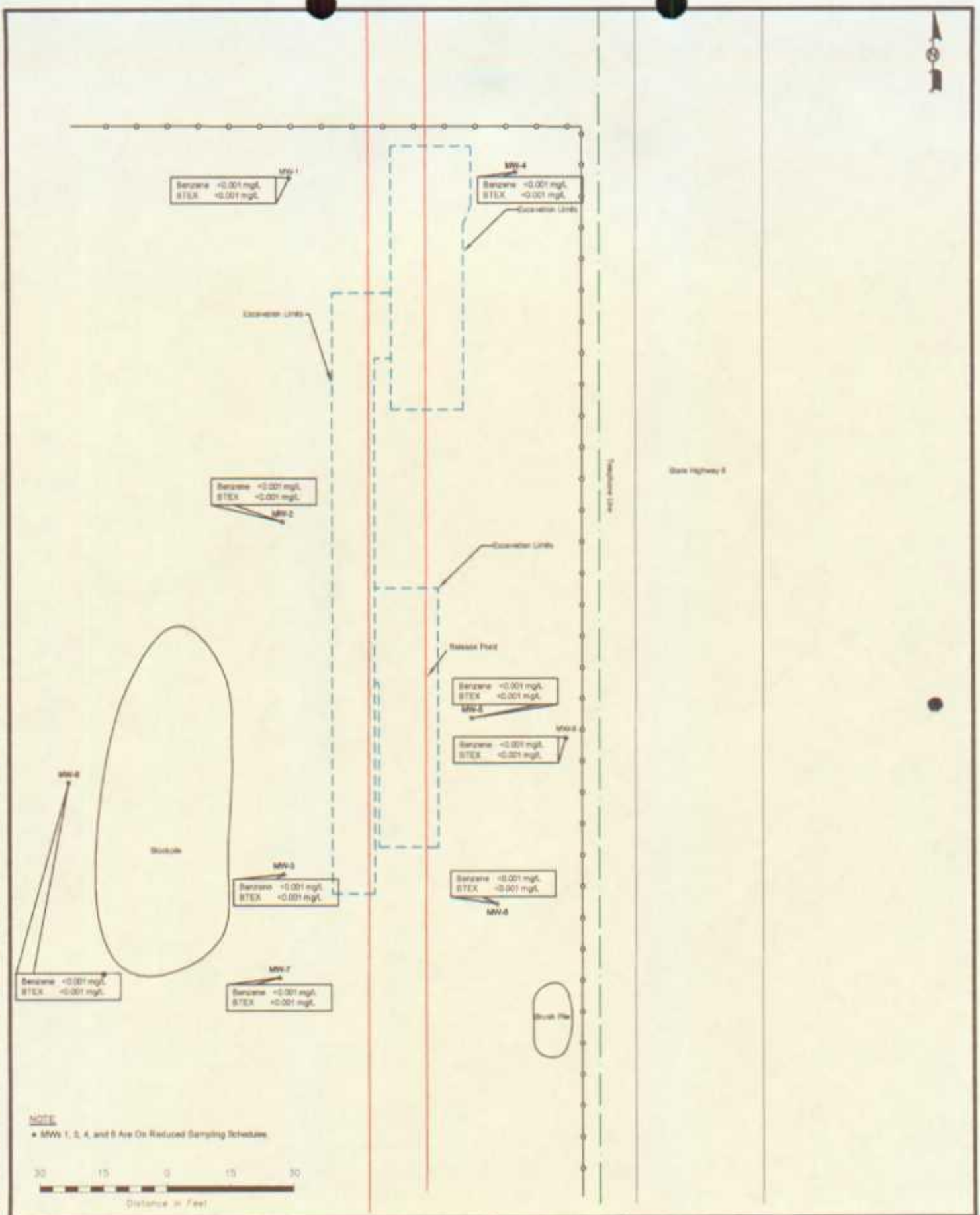
NOVA Safety and Environmental

NOVA

Scale: 1" = 30'	Prep By: DRM	Checked By: CDS
May 10, 2005	Lat. 32° 35' 5.4"N Long. 103° 15' 55.1"	


MW-1
(NB)
MW-4
(NB)
Excavation Limits
Excavation Limits
Benzene <0.005 mg/L
BTEX <0.005 mg/L
MW-2
Excavation Limits
Release Point
Benzene 0.021 mg/L
BTEX 0.033 mg/L
MW-5
Benzene 0.0183 mg/L
BTEX 0.0183 mg/L
MW-6
Stockpile
MW-3
(NB)
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-6
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-7
Benzene <0.001 mg/L
BTEX <0.001 mg/L
Brush Pile
Telephone Line
State Highway 8
NOTE:
• MWs 1, 3, 4, and 6 Are On Reduced Sampling Schedules.
• BOLD Indicates Concentration Above NMOCD Regulatory Limit
30 15 0 15 30
Distance in Feet
Legend:
GeoProbe Sample Location
Monitor Well Location
Pipeline
(NS) Not Sampled
Fence
NE 1/4, SE 1/4, Sec. 3, T20S, R37E
Figure 3B
Groundwater Concentration and Inferred Plan Extent Map (6/13/06)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM
NOVA Safety and Environmental
NOVA
Scale: 1" = 30'
Prep By: DRM
Checked By: CDE
June 23, 2006
Lat. 32° 36' 6.4"N Long. 103° 15' 58.1"


MW-1
(NB)
MW-4
(NB)
Excavation Limits
Excavation Limits
Benzene <0.005 mg/L
BTEX <0.005 mg/L
MW-2
Excavation Limits
Release Point
Benzene <0.005 mg/L
BTEX 0.0059 mg/L
MW-5
MW-6
Benzene <0.005 mg/L
BTEX <0.005 mg/L
MW-8
Stockpile
MW-3
(NB)
(NB)
MW-4
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-7
Benzene <0.001 mg/L
BTEX <0.001 mg/L
Brush Pile
State Highway 8
Telephone Line
NOTE:
• MWs 1, 3, 4, and 8 Are On Reduced Sampling Schedules
30 15 0 15 30
Distance in Feet
Legend
Monitor Well Location
Pipeline
Fence
<0.001 Constituent Concentration (mg/L)
(NB) Not Sampled
NE 1/4, SE 1/4, Sec. 3, T20S, R37E
Figure 3C
Groundwater Concentration and Inferred TPH Extent Map (9/12/05)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM
NOVA Safety and Environmental
NOVA
Scale: 1" = 30'
Prep By: DRM
Checked By: MRB
September 29, 2005
Lat. 32° 36' 6.4"N Long. 103° 15' 55.1"


MW-1
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-4
Benzene <0.001 mg/L
BTEX <0.001 mg/L
Excavation Limits
Excavation Limits
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-2
Excavation Limits
Release Point
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-5
MW-8
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-9
Stockpile
MW-3
Benzene <0.001 mg/L
BTEX <0.001 mg/L
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-6
Benzene <0.001 mg/L
BTEX <0.001 mg/L
MW-7
Benzene <0.001 mg/L
BTEX <0.001 mg/L
Brush Pile
Pipeline Line
State Highway 8
NOTE:
• MWs 1, 3, 4, and 8 Are On Reduced Sampling Schedules
30 15 0 15 30
Distance in Feet
Legend:
Monitor Well Location
<0.001 Constituent Concentration (mg/L)
Pipeline
Fence
NE 1/4, SE 1/4, Sec. 5, T20S, R37E
Figure 3D
Groundwater Concentration and Inferred PSH Extent Map (12/06/05)
Plains Pipeline, L.P.
Lea Station to Monument #7 Pipeline
Lea County, NM
NOVA Safety and Environmental
NOVA
Scale: 1" = 30'
Prep By: DPM
Checked By: MRS
January 27, 2006
Lat. 32° 38' 6.4"N, Long. 103° 15' 55.1"

Tables

TABLE 1

2005 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	*03/09/05*	3562.67	-	34.22	0.00	3528.45
	06/10/05	3562.67	-	33.89	0.00	3528.78
	09/12/05	3562.67	-	34.08	0.00	3528.59
	12/06/05	3562.67	-	33.73	0.00	3528.94
MW-2	01/05/05	3563.00	Sheen	35.44	0.00	3527.56
	02/04/05	3563.00	Sheen	34.88	0.00	3528.12
	03/03/05	3563.00	Sheen	34.60	0.00	3528.40
	03/09/05	3563.00	-	34.60	0.00	3528.40
	04/07/05	3563.00	Sheen	34.41	0.00	3528.59
	05/24/05	3563.00	Sheen	34.22	0.00	3528.78
	06/10/05	3563.00	Sheen	34.20	0.00	3528.80
	06/23/05	3563.00	Sheen	34.27	0.00	3528.73
	07/27/05	3563.00	Sheen	34.49	0.00	3528.51
	08/26/05	3563.00	Sheen	34.55	0.00	3528.45
	09/12/05	3563.00	Sheen	34.39	0.00	3528.61
	09/28/05	3563.00	Sheen	34.33	0.00	3528.67
	10/25/05	3563.00	Sheen	34.24	0.00	3528.76
	11/16/05	3563.00	Sheen	34.14	0.00	3528.86
	12/06/05	3563.00	Sheen	34.08	0.00	3528.92
	12/29/05	3563.00	Sheen	34.02	0.00	3528.98
MW-3	01/05/05	3562.60	Sheen	35.05	0.00	3527.55
	02/04/05	3562.60	Sheen	34.53	0.00	3528.07
	03/03/05	3562.60	Sheen	34.25	0.00	3528.35
	03/09/05	3562.60	-	34.20	0.00	3528.40
	04/07/05	3562.60	Sheen	34.05	0.00	3528.55
	05/24/05	3562.60	Sheen	33.42	0.00	3529.18
	06/10/05	3562.60	-	33.83	0.00	3528.77
	06/23/05	3562.60	Sheen	33.89	0.00	3528.71
	07/27/05	3562.60	Sheen	34.10	0.00	3528.50
	08/26/05	3562.60	Sheen	34.17	0.00	3528.43
	09/12/05	3562.60	-	34.02	0.00	3528.58
	09/28/05	3562.60	Sheen	33.95	0.00	3528.65
	10/25/05	3562.60	Sheen	33.35	0.00	3529.25
	11/16/05	3562.60	Sheen	33.75	0.00	3528.85
	12/06/05	3562.60	-	33.69	0.00	3528.91
	12/29/05	3562.60	Sheen	33.64	0.00	3528.96

TABLE 1

2005 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-4	*03/09/05*	3562.85	-	34.45	0.00	3528.40
	06/10/05	3562.85	-	34.07	0.00	3528.78
	09/12/05	3562.85	-	34.28	0.00	3528.57
	12/06/05	3562.85	-	33.92	0.00	3528.93
MW-5	*03/09/05*	3564.21	-	35.84	0.00	3528.37
	06/10/05	3564.21	-	35.44	0.00	3528.77
	09/12/05	3564.21	Sheen	35.64	0.00	3528.57
	12/06/05	3564.21	-	35.30	0.00	3528.91
MW-6	*03/09/05*	3563.29	-	35.02	0.00	3528.27
	06/10/05	3563.29	-	34.59	0.00	3528.70
	09/12/05	3563.29	-	34.75	0.00	3528.54
	12/06/05	3563.29	-	34.38	0.00	3528.91
MW-7	*03/09/05*	3562.79	-	34.44	0.00	3528.35
	06/10/05	3562.79	-	34.04	0.00	3528.75
	09/12/05	3562.79	-	34.22	0.00	3528.57
	12/06/05	3562.79	-	33.87	0.00	3528.92
MW-8	*03/09/05*	3563.79	-	35.35	0.00	3528.44
	06/10/05	3563.79	-	35.00	0.00	3528.79
	09/12/05	3563.79	-	35.19	0.00	3528.60
	12/06/05	3563.79	-	34.84	0.00	3528.95
MW-9	*03/09/05*	3563.91	-	35.68	0.00	3528.23
	06/10/05	3563.91	-	35.18	0.00	3528.73
	09/12/05	3563.91	-	35.36	0.00	3528.55
	12/06/05	3563.91	-	34.99	0.00	3528.92

Note: ND denotes no product detected during well gauging activity.
Elevations based on the North American Vertical Datum of 1929.

TABLE 2

2005 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE
NMOCD REGULATORY LIMIT		0.01	0.75	0.75	0.62	
MW-1	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	Not Sampled Due to Sample Reduction				
	09/12/05	Not Sampled Due to Sample Reduction				
	12/06/05	<0.001	<0.001	<0.001	<0.001	
MW-2	03/09/05	<0.001	<0.001	<0.001	0.0019	
	06/10/05	<0.005	<0.005	<0.005	<0.005	
	09/12/05	<0.005	<0.005	<0.005	<0.005	
	12/06/05	<0.001	<0.001	<0.001	<0.001	
MW-3	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	Not Sampled Due to Sample Reduction				
	09/12/05	Not Sampled Due to Sample Reduction				
	12/06/05	<0.001	<0.001	<0.001	<0.001	
MW-4	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	Not Sampled Due to Sample Reduction				
	09/12/05	Not Sampled Due to Sample Reduction				
	12/06/05	<0.001	<0.001	<0.001	<0.001	
MW-5	03/09/05	<0.001	<0.001	<0.001	0.0128	
	06/10/05	**0.021**	<0.01	<0.01	0.0119	
	09/12/05	<0.005	<0.005	<0.005	0.0059	
	12/06/05	<0.001	<0.001	<0.001	0.0014	
MW-6	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	<0.001	<0.001	<0.001	<0.001	
	09/12/05	Not Sampled Due to Sample Reduction				
	12/06/05	<0.001	<0.001	<0.001	<0.001	
MW-7	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	<0.001	<0.001	<0.001	<0.001	
	09/12/05	<0.001	<0.001	<0.001	<0.001	
	12/06/05	<0.001	<0.001	<0.001	<0.001	

TABLE 2

2005 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE
NMOCD REGULATORY LIMIT		0.01	0.75	0.75	0.62	
MW-8	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	<0.001	<0.001	<0.001	<0.001	
	09/12/05	<0.001	<0.001	<0.001	<0.001	
	12/06/05	<0.001	<0.001	<0.001	<0.001	
MW-9	03/09/05	<0.001	<0.001	<0.001	<0.001	
	06/10/05	**0.0183**	<0.01	<0.01	<0.01	
	09/12/05	<0.005	<0.005	<0.005	<0.005	
	12/06/05	<0.001	<0.001	<0.001	<0.001	

Note: EB denotes Equipment Blank collected during sampling event.

Appendices

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

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

x Initial Report ☐ Final Report

Name of Company	Plains Pipeline, LP	Contact:	Camille Reynolds
Address:	3705 E. Hwy 158, Midland, TX 79706	Telephone No.	505-441-0965
Facility Name	Lea to Monument 6"	Facility Type:	6" Steel Pipeline

Surface Owner:	Mineral Owner	Lease No.
Laughlin Estate		

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	5	20S	37E					Lea

Latitude 32 degrees 36' 06.4" **Longitude** 103 degrees 15' 56.1"

NATURE OF RELEASE

Type of Release: Crude Oil	Volume of Release: 3 barrels	Volume Recovered 0 barrels
Source of Release: 6" Steel Pipeline	Date and Hour of Occurrence 8/03/01	Date and Hour of Discovery 14:00
Was Immediate Notice Given? Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of 6" steel pipeline. A clamp was installed on the line to mitigate the release.

Describe Area Affected and Cleanup Action Taken.* A clamp was installed on the line to mitigate the release. The aerial extent of surface impact was approximately 10' x 80'.
NOTE: This information was obtained from historical EOTT files, Plains acquired EOTT/Link on April 1, 2004 and Plains assumes this information to be correct.

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

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

* Attach Additional Sheets If Necessary

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

July 7, 2005

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

Re: 2004 Annual Monitoring Report
Lea Station to Monument 6 Inch
NE/4 SE/4 of Section 5, Township 20 South, Range 37 East
Lea County, New Mexico
Plains Marketing, L.P. EMS Number 2001-11056
NMOCD File Number 1R-0404

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the report shown above, and it is accepted with the following understandings and conditions:

1. Quarterly and annual monitoring and sampling will continue throughout 2005.
2. Passive product recovery and gauging will continue on a monthly schedule that may be adjusted according to site conditions.
3. Plains Marketing, L.P. (Plains) is preparing a plan to address any remaining soil impact issues and will forward it under separate cover.

NMOCD acceptance of the subject report does not relieve Plains of responsibility should its operations at this site prove to have been detrimental 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.

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin

Edwin E. Martin
Environmental Bureau

cc: NMOCD, Hobbs

PLAINS
ALL AMERICAN

March 29, 2005

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

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

Dear Mr. Martin:

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

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

3112 West Highway 82 • Lovington, NM 88260 • (505) 396-3341

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,

David Byrd for CR

Camille Reynolds
Remediation Coordinator
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

2004
ANNUAL MONITORING REPORT

1R-404

LEA STATION TO MONUMENT 6 INCH
NE ¼ SE ¼ of SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS MARKETING, L.P. EMS NUMBER: 2001-11056

PREPARED FOR:

PLAINS MARKETING, L.P.
333 CLAY STREET SUITE 1600
HOUSTON, TEXAS 77022

NOVA
safety and environmental

PREPARED BY:

NOVA Safety and Environmental
2057 Commerce
Midland, Texas 79703

April 2005

Rebecca Haskell
Project Manager

for: Todd K. Choban
Vice-President Technical Services

TABLE OF CONTENTS

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, having previously been managed by Environmental Technology Group, Inc. (ETGI). The Lea Station to Monument 6-Inch site, formally the responsibility of Enron Oil Trading and Transportation (EOTT) is now the responsibility of Plains. This report is intended to be viewed as a complete document with figures, attachments, tables and text. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2004 only. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during five monitoring events in calendar year 2004 to assess the levels and extent of dissolved phase and Phase Separated Hydrocarbon (PSH) constituents. The groundwater monitoring events consisted of measuring static water levels in the monitor wells, checking for the presence of PSH, and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is NE ¼ of the SE ¼ of Section 5, Township 20 South, Range 37 East, Lea County, New Mexico. The site subsurface is composed primarily of unconsolidated sands, which vary in color from brown to tan with minor amounts of red. The sands are very fine grained, poorly sorted and contain calcareous nodules or caliche debris at depth. A limited amount of caliche, common in the area, is also present at the site.

A three-barrel release occurred on August 3, 2001. It resulted in an irregularly shaped stained area measuring approximately 175 feet in length by 30 feet in width. EOTT conducted emergency response actions by excavating impacted soil from around the pipeline, locating the leak point and repairing the line.

FIELD ACTIVITIES

The site monitor wells were gauged and sampled on February 23, May 13, September 7, and December 15, 2004. Monitor wells MW-7, MW-8, and MW-9 were drilled on November 7, 2004 and sampled on November 11, 2004. There was a reduction in sampling during 2004 for monitor wells MW-1, MW-3, MW-4, and MW-6 as per NMOCD approval. The table below lists the sampling schedule for each monitor well. During each sampling event the monitor wells were purged of approximately three well volumes of water or until the wells were dry using a new rope and disposable polyethylene bailer or electrical 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 utilizing a licensed disposal facility (NMOCD AO SWD-730).

In previous correspondence dated April 28, 2004, the NMOCD approved the current sampling schedule. The table below illustrates the current schedule.

NMOCD APPROVED SAMPLING SCHEDULE	
Sample Location	**Sampling Schedule**
MW-1	Annually
MW-2	Quarterly
MW-3	Annually
MW-4	Annually
MW-5	Quarterly
MW-6	Semi-Annually
MW-7	Quarterly
MW-8	Quarterly
MW-9	Quarterly

Locations of the monitor wells and the inferred groundwater gradient, constructed from measurements collected during quarterly sampling events are depicted on Figures 2A-2D, the Inferred Groundwater Gradient Maps. Cumulative groundwater elevation data is provided as Table 1. Groundwater elevation contours generated from water level measurements acquired during the first three quarterly sampling events of 2004, indicate that the groundwater gradient is flat within the tolerance of the measuring instrument and the fourth quarter groundwater elevation contours indicated a general gradient of approximately 0.002 ft/ft to the southeast. The corrected groundwater elevations ranged between 3515.81 to 3526.62 feet above mean sea level, in MW-5 on June 23, 2004 and in MW-1 on December 14, 2004, respectively. Newly installed monitor wells MW-7 through MW-9 were not gauged during the fourth quarter sampling event due to a recent sampling event, which occurred after well development.

During the second quarter sampling event, PSH was detected in monitor wells MW-2 and MW-3, both of which had previously been free of PSH. In monitor well MW-2, a measurable quantity of PSH was detected 11 times out of 13 gauging events with an average of 0.24 feet. The amount of product has steadily decreased since June 2004 to a sheen in December 2004. Monitor well MW-3 had measurable PSH three out of 12 gauging events with an average of 0.02 feet of PSH. The last gauging event for MW-3 in which a measurable amount of PSH was detected was on June 30, 2004. Monitor well MW-5 has had a sheen throughout most of 2004 with one occurrence of measurable PSH. Recovery of PSH at the site is achieved using passive recovery and is monitored on a weekly basis. The 2004 gauging data is provided in Table 1.

LABORATORY RESULTS

Groundwater samples obtained during the February 23, May 13, and September 07, 2004 monitoring events were delivered to AnalySys Inc. in Austin, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW 846-8260b. Groundwater samples obtained during the November 11 and December 15,

2004 sampling events were sent to TraceAnaysis, Inc. in Lubbock, Texas for BTEX using EPA Method SW 846-8021B. A listing of BTEX constituent concentrations for 2004 is summarized in Table 2 and electronic copies of the laboratory reports from this reporting period are provided on the enclosed data disk. The inferred extent of PSH and quarterly groundwater sample results for benzene and BTEX constituent concentrations are depicted on Figures 3A-3D.

Review of laboratory analytical results of the groundwater samples obtained during the 2004 monitoring period indicate that benzene and BTEX constituent concentrations are below NMOCD regulatory standards in monitor wells MW-1, MW-4, MW-5, MW-6, MW-7, MW-8, and MW-9. Groundwater samples collected from monitor well MW-2 were below NMOCD regulatory standards for benzene and BTEX when it was sampled during the first and fourth quarters but contained limited PSH during the second and third quarters. Groundwater samples collected from monitor well MW-3 was below NMOCD regulatory standards for benzene and BTEX during the first, third, and fourth quarter sampling events. Monitor well MW-3 was mistakenly only sampled three times during 2004 even though it is on an annual schedule.

SUMMARY

This report presents the results of groundwater monitoring activities for the annual monitoring period 2004. As discussed above, three monitor wells (MW-2, MW-3 and MW-5) contained measurable PSH thicknesses and/or sheen in 2004.

Groundwater elevation contours generated from water level measurements acquired during the quarterly sampling events of 2004, indicate that the groundwater gradient is flat within the tolerance of the measuring instrument.

As discussed above, benzene and BTEX constituent concentrations were below NMOCD regulatory standards in eight monitor wells during 2004. Monitor well MW-2 was below NMOCD regulatory standards for benzene and BTEX when it was sampled during the first and fourth quarters but contained PSH during the second and third quarters.

ANTICIPATED ACTIONS

Quarterly monitoring and sampling will continue in 2005. Passive product recovery and gauging will continue on a monthly schedule and will be adjusted according to site conditions.

Additional soil investigation/remediation will be proposed to address any remaining soil impact issues and will be addressed under separate cover from this report.

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
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cjreynolds@paalp.com

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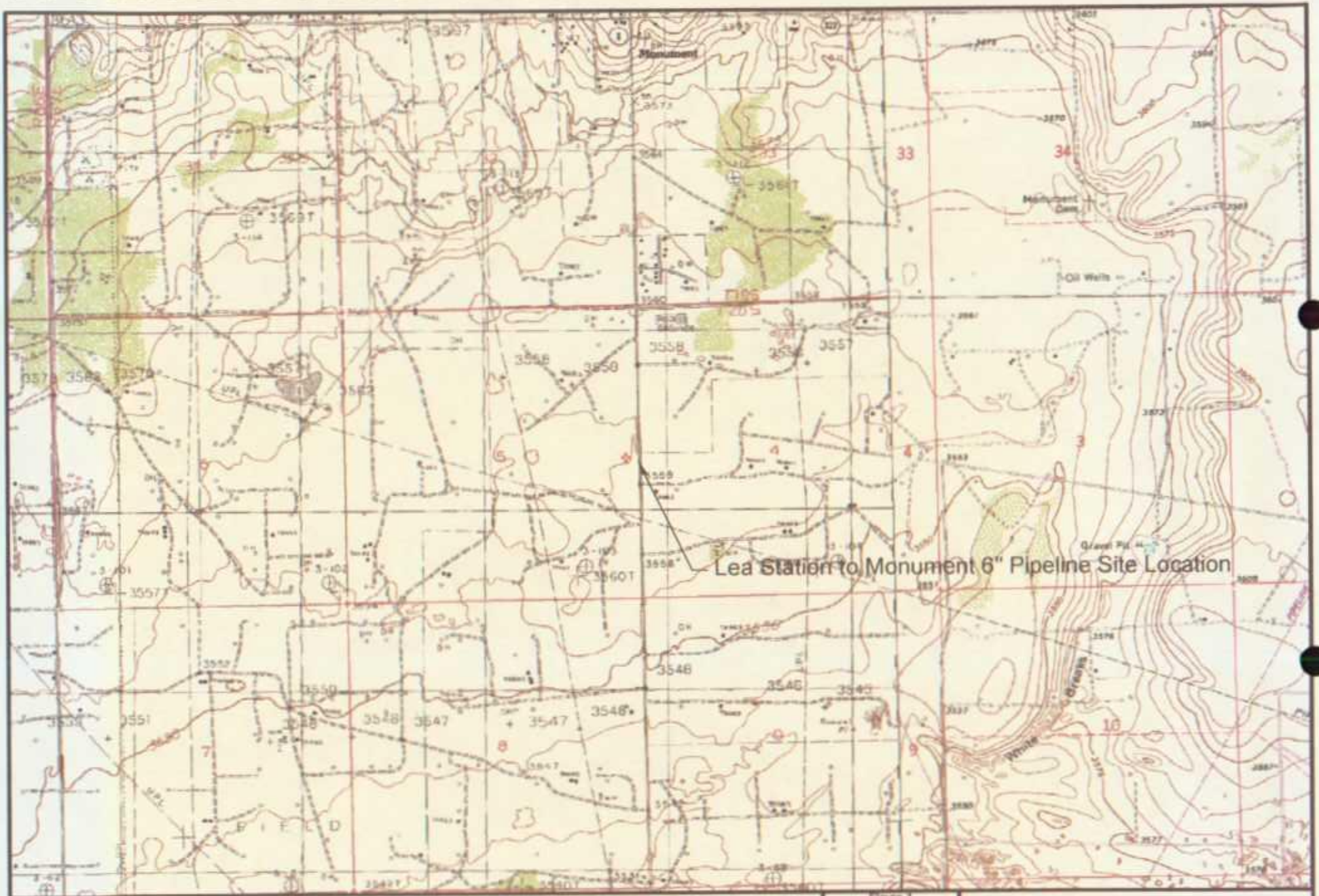
333 Clay Street
Suite 1600
Houston, TX 77002
jpdann@paalp.com

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

Copy Number:

Figures



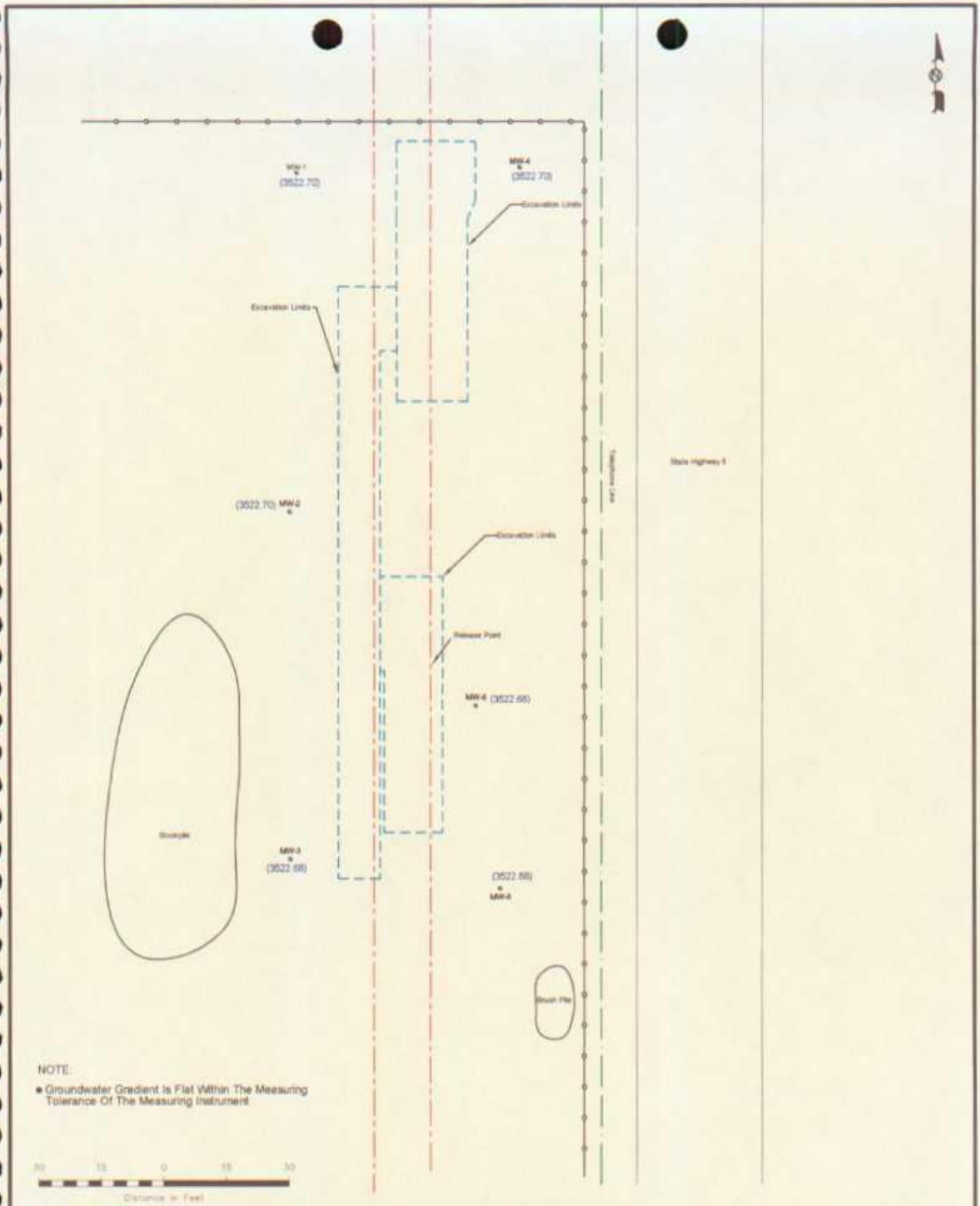
NE 1/4, SE 1/4, Sec. 5 T20S, R37E

Figure 1
Site Location Map
Plains Marketing, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM

NOVA Safety and Environmemntal

NOVA

Scale: NTS	Prep By: CDS	Checked By: TKC
February 10, 2005	Lat: 32° 36' 6.4"N Long: 103° 15' 55.1"	



Legend

GeoProbe Sample Location

Pipeline

Monitor Well Location

Fence

(3523.35) Groundwater Elevation (in Feet)

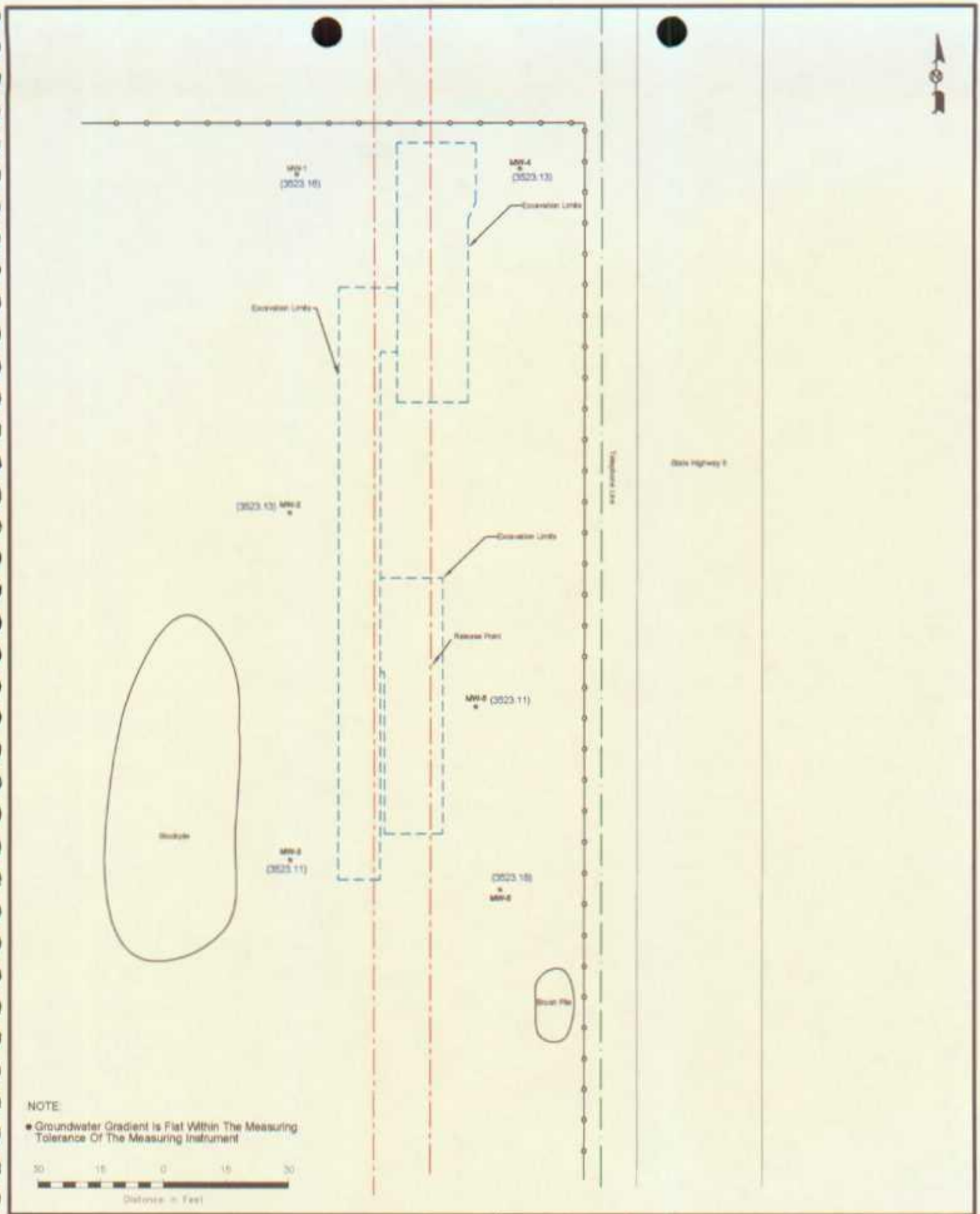
NE 1/4, SE 1/4, Sec. 5, T20S, R37E

Figure 2A
Inferred Groundwater Gradient Map (2/23/04)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM

NOVA Safety and Environmental

NOVA

Scale: 1"= 30'	Prep By: DPM	Checked By: RWH
March 17, 2004	Lat. 32° 36' 6.4"N Long. 103° 15' 55.1"	



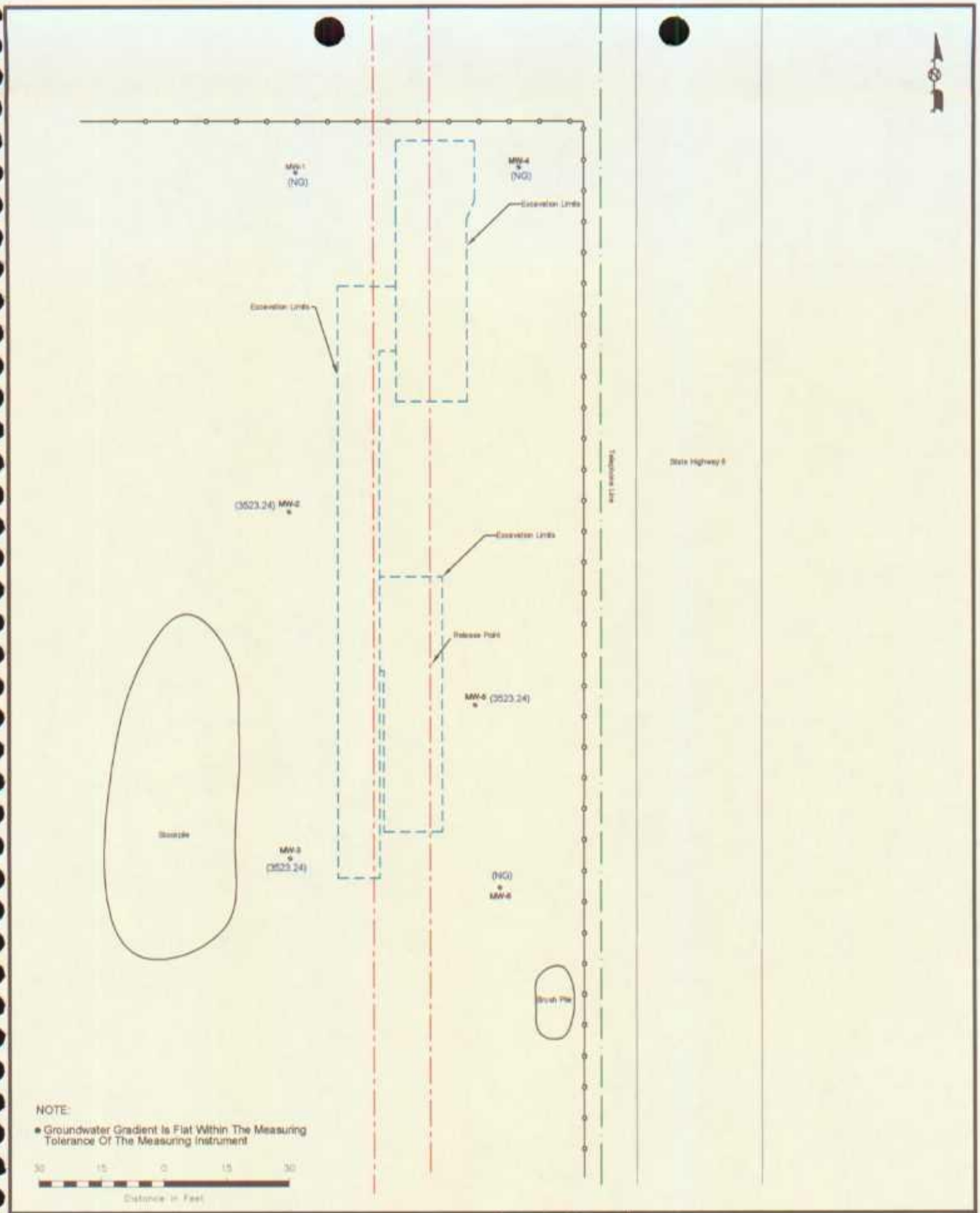
Legend:
Geo/Probe Sample Location
Pipeline
Fence
Monitor Well Location
(3523.35) Groundwater Elevation (in Feet)

NE 1/4, SE 1/4, Sec. 5, T20S, R37E

Figure 2B
Inferred Groundwater Gradient Map (5/13/04)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM

NOVA Safety and Environmental

Scale: 1" = 30'	Prep By: DRM	Checked By: RAH
March 17, 2005	Lat. 32° 36' 8.4"N Long. 103° 15' 55.1"	



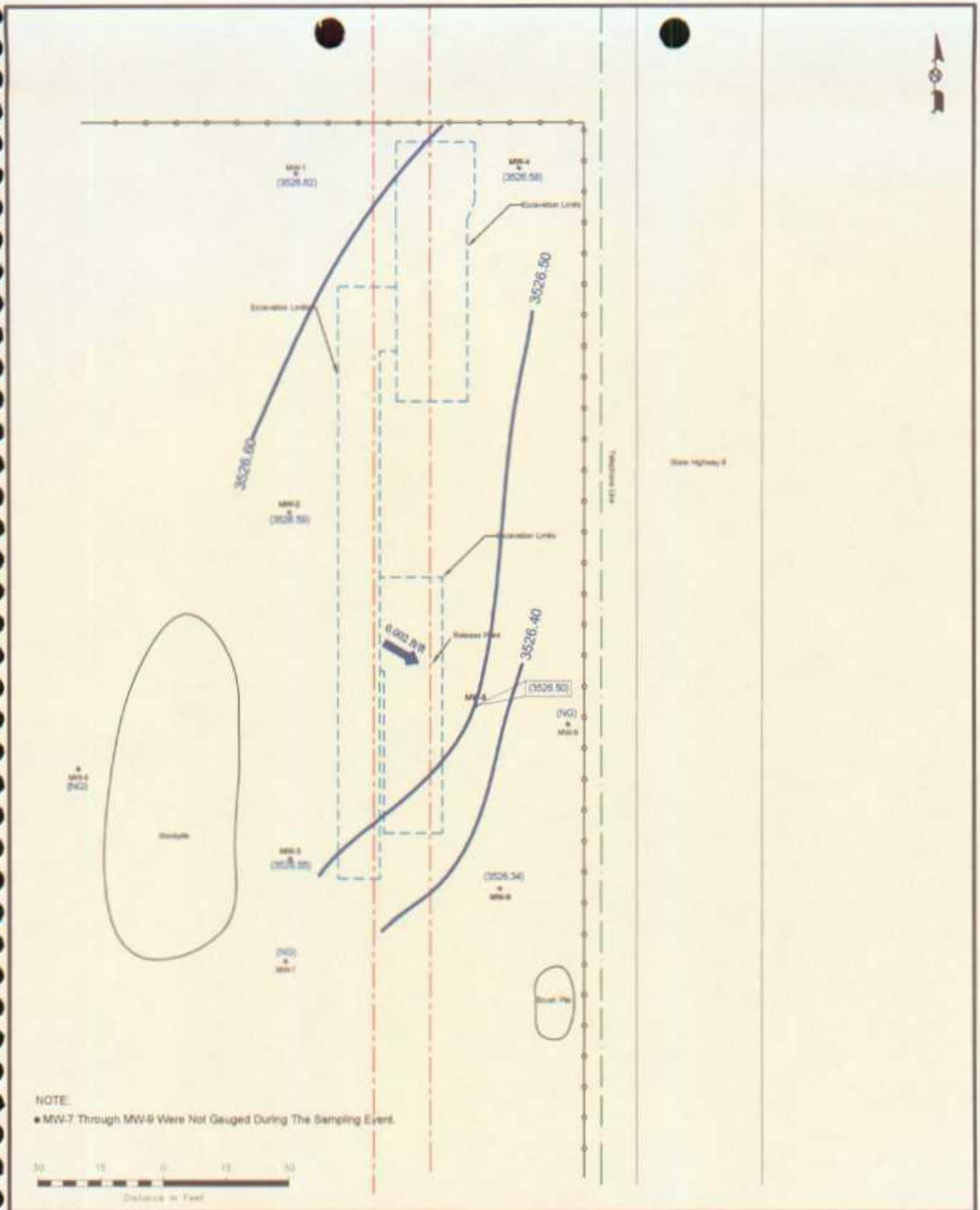
Legend:
GeoProbe Sample Location
Pipeline
Fence
Monitor Well Location
NG Not Gauged
(3523.35) Groundwater Elevation (in Feet)

NE 1/4, SE 1/4, Sec. 5, T20S, R37E

Figure 2C
Inferred Groundwater Gradient Map (9/7/04)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM

NOVA Safety and Environmental

Scale: 1" = 30'	Prep By: DPM	Checked By: RAH
March 17, 2005	Lat. 32° 34' 8.4"N Long. 103° 15' 09.1"	



NOTE:

• MW-7 Through MW-9 Were Not Gauged During The Sampling Event.

Legend:

GeoProbe Sample Location
Monitor Well Location
Pipeline
NG Not Gauged
Fence
(3523.35) Groundwater Elevation (in Feet)

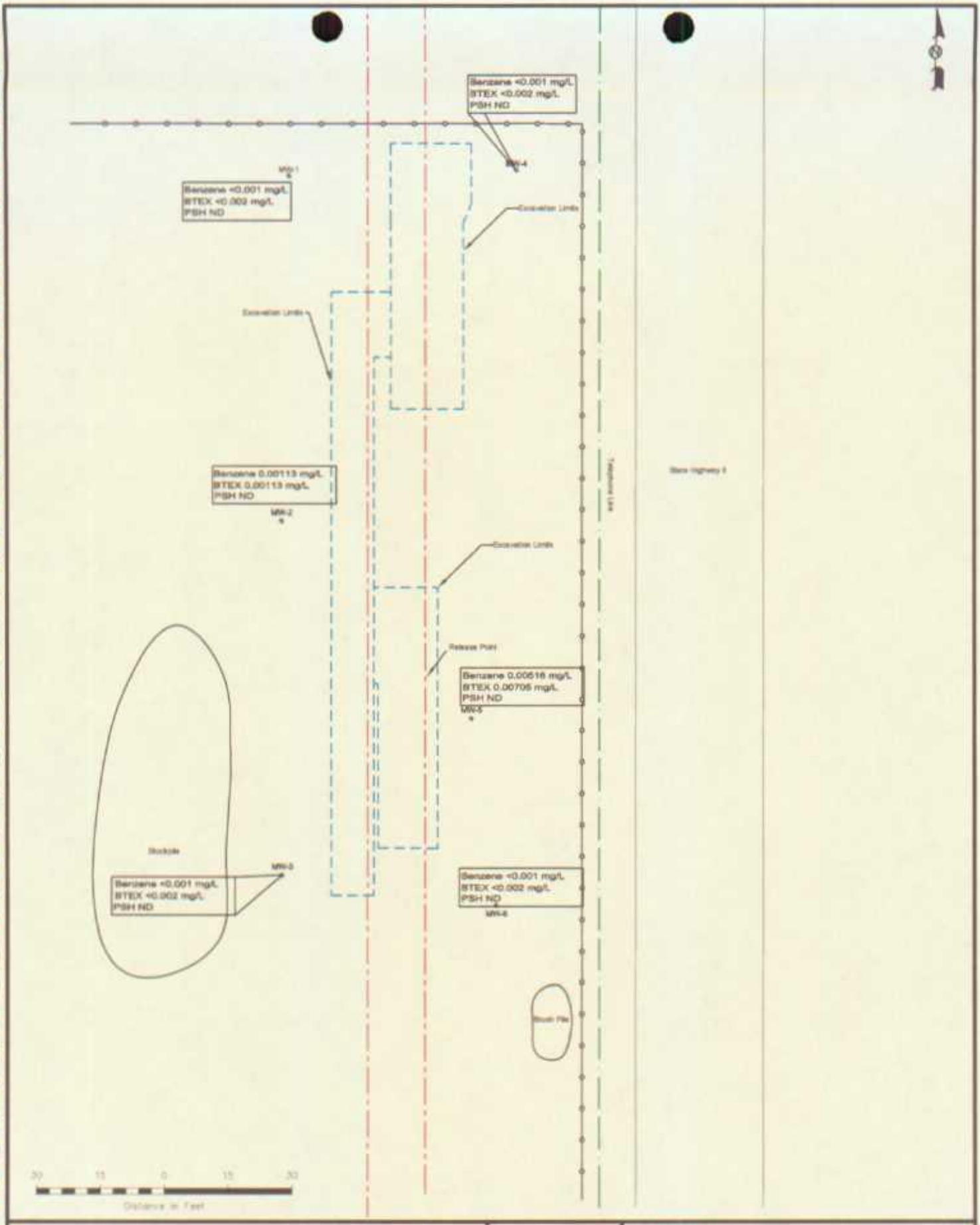
NE 1/4, SE 1/4, Sec. 5, T20S, R37E

Figure 2D
Inferred Groundwater Gradient Map (12/15/04)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM

NOVA Safety and Environmental

NOVA

Scale: 1" = 30'	Prep By: DPM	Checked By: KWH
March 17, 2005	Lat: 32° 36' 5.474 Long: 103° 16' 55.1"	



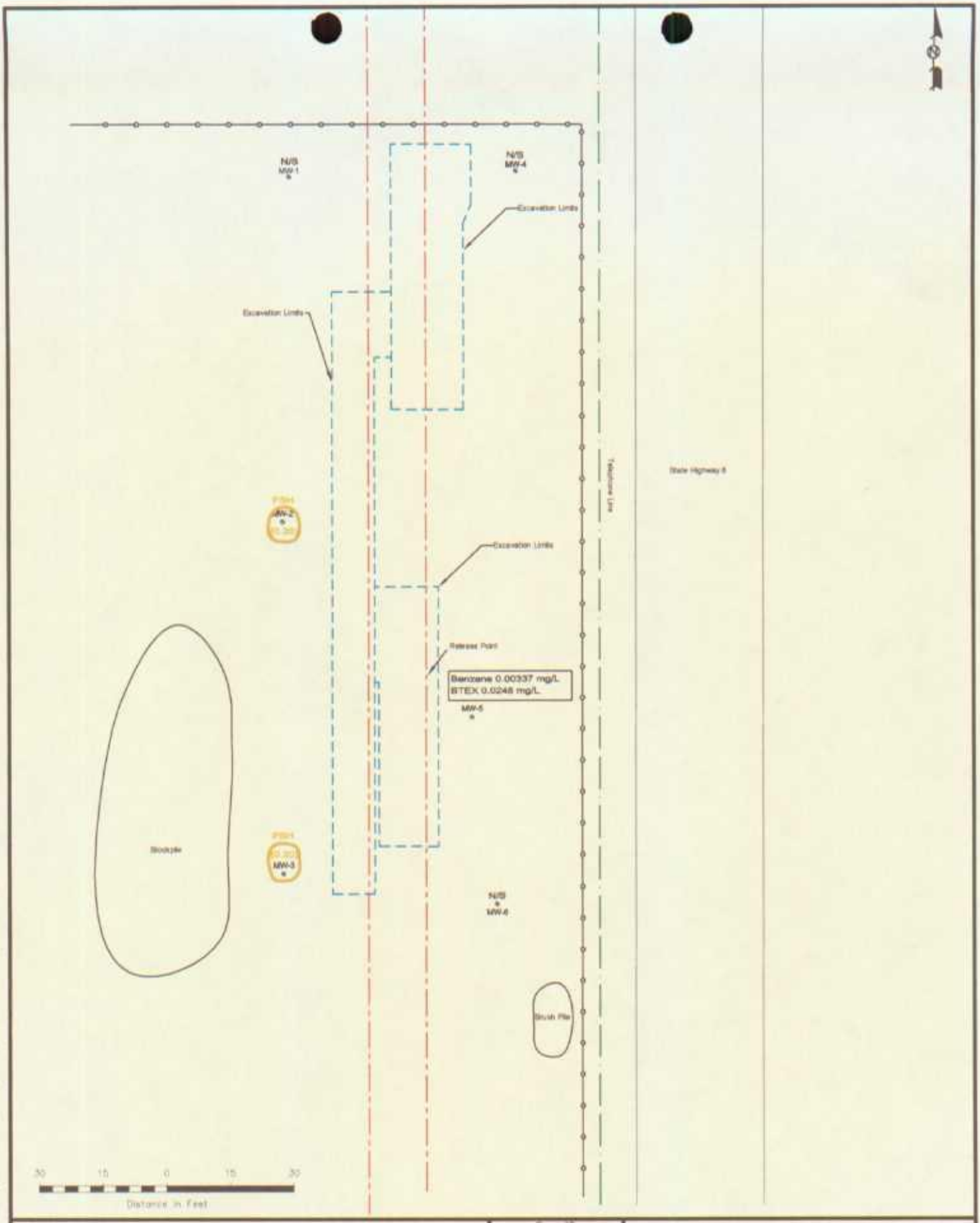
Legend
- Gas/Probe Sample Location
- Pipeline
- Fence
- ND Not Detected
- Monitor Well Location

NE 1/4, SE 1/4, Sec. 5, T20S, R37E

Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (2/23/04)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM

NOVA Safety and Environmental

Scale: 1" = 30'	Prep By: DRM	Checked By: RMH
March 17, 2005	Lat. 32° 36' 8.47"N Long. 103° 18' 56.1"	



Legend

GeoProbe Sample Location

Pipeline

Fence

NS Not Sampled

Monitor Well Location

PSH Extent

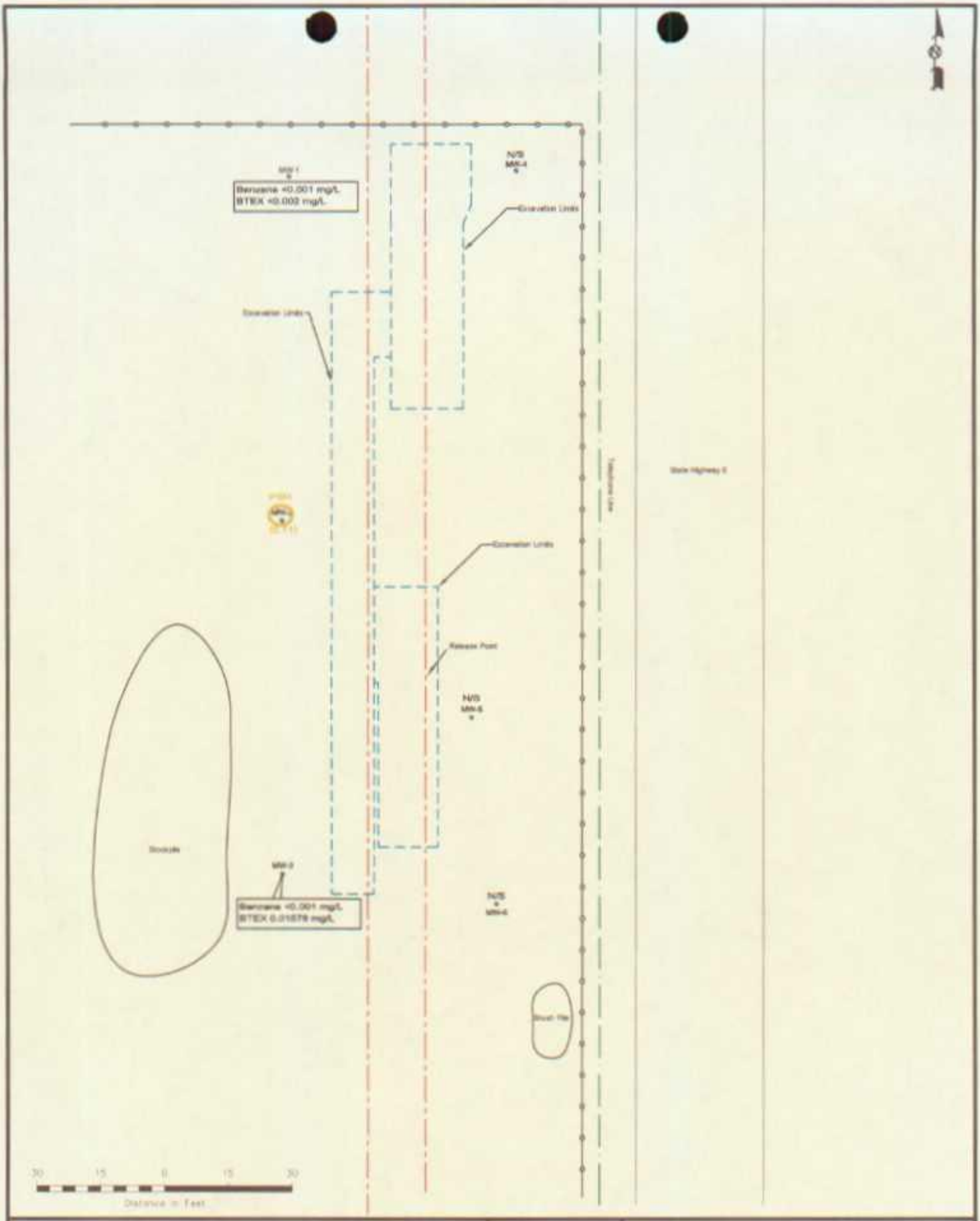
NE 1/4, SE 1/4, Sec. 5, T20S, R37E

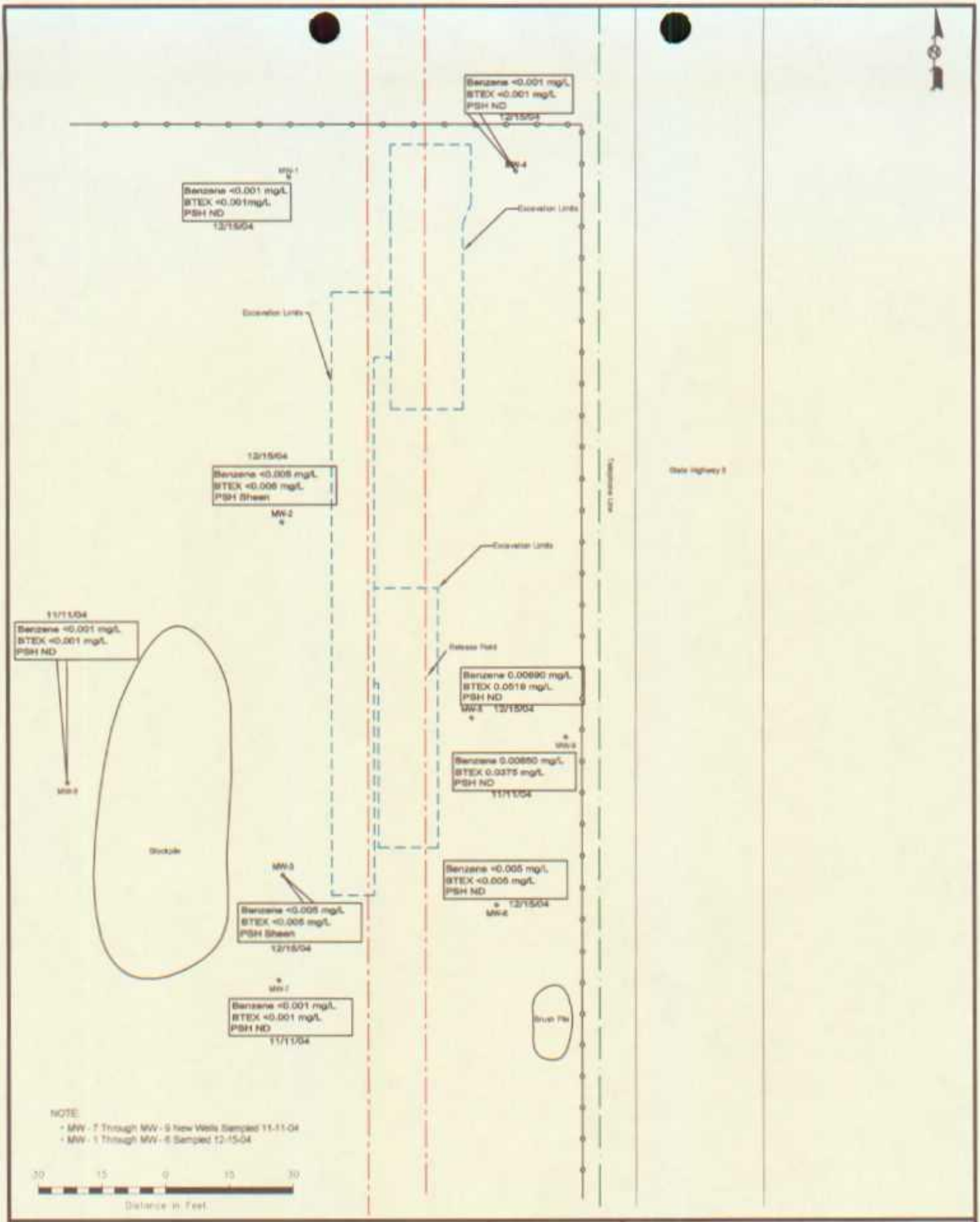
Figure 3B
Groundwater Concentration and Inferred PSH Extent Map (5/13/04)
Plains Pipeline, L.P.
Lea Station to Monument 8" Pipeline
Lea County, NM

NOVA Safety and Environmental

NOVA

Scale: 1" = 30'	Prep By: DRM	Checked By: RNH
March 17, 2005	Lat. 32° 36' 8.4"N Long. 103° 15' 55.1"	


MW-1
Benzene <0.001 mg/L
BTEX <0.002 mg/L
N/S
MW-4
Excavation Limits
Excavation Limits
Excavation Limits
Release Point
N/S
MW-5
Stockpile
MW-3
Benzene <0.001 mg/L
BTEX 0.01678 mg/L
N/S
MW-6
Brush Pile
State Highway 8
Pipeline Line
30
15
0
15
30
Distance in Feet
Legend
GeoProbe Sample Location
Pipeline
Fence
N/S Not Sampled
Monitor Well Location
PSH Extent
NE 1/4, SE 1/4, Sec. 5, T20S, R37E
Figure 3C
Groundwater Concentration and Inferred PSH Extent Map (9/7/04)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM
NOVA Safety and Environmental
NOVA
Scale: 1" = 30'
Prep By: DRM
Checked By: RAH
March 17, 2005
Lat: 32° 36' 4.4"N Long: 103° 18' 05.1"


Benzene <0.001 mg/L
BTEX <0.001 mg/L
PSH ND
12/15/04
MW-4
Benzene <0.001 mg/L
BTEX <0.001mg/L
PSH ND
12/15/04
Excavation Limits
Excavation Limits
12/15/04
Benzene <0.005 mg/L
BTEX <0.005 mg/L
PSH Sheen
MW-2
Excavation Limits
11/11/04
Benzene <0.001 mg/L
BTEX <0.001 mg/L
PSH ND
Release Point
Benzene 0.00690 mg/L
BTEX 0.0518 mg/L
PSH ND
MW-8 12/15/04
MW-9
Benzene 0.00850 mg/L
BTEX 0.0375 mg/L
PSH ND
11/11/04
MW-8
Stockpile
MW-3
Benzene <0.005 mg/L
BTEX <0.005 mg/L
PSH ND
12/15/04
MW-6
Benzene <0.005 mg/L
BTEX <0.005 mg/L
PSH Sheen
12/15/04
MW-7
Benzene <0.001 mg/L
BTEX <0.001 mg/L
PSH ND
11/11/04
Brush Pile
State Highway 8
NOTE:
- MW - 7 Through MW - 9 New Wells Sampled 11-11-04
- MW - 1 Through MW - 6 Sampled 12-15-04
30 15 0 15 30
Distance in Feet
Legend
GeoProbe Sample Location
Monitor Well Location
Pipeline
Fence
ND Not Detected
NE 1/4, SE 1/4, Sec. 5, T20S, R37E
Figure 3D
Groundwater Concentration and Inferred PSH Extent Map (11/11/04 and 12/15/04)
Plains Pipeline, L.P.
Lea Station to Monument 6" Pipeline
Lea County, NM
NOVA Safety and Environmental
NOVA
Scale: 1"= 30'
Prep By: DRM
Checked By: RWH
March 17, 2005
Lat. 32° 36' 9.4"N Long. 103° 15' 50.7"

Tables

TABLE 1

GROUNDWATER ELEVATION DATA
FOR 2004

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW - 1	02/23/04	3562.67	ND	39.97	0.00	3522.70
	05/13/04	3562.67	ND	39.51	0.00	3523.16
	12/14/04	3562.67	ND	36.05	0.00	3526.62
MW - 2	02/23/04	3563.00	ND	40.30	0.00	3522.70
	05/13/04	3563.00	39.84	40.04	0.20	3523.13
	06/10/04	3563.00	39.6	39.73	0.13	3523.38
	06/23/04	3563.00	37.71	39.60	1.89	3525.01
	06/30/04	3563.00	39.57	39.73	0.16	3523.41
	07/15/04	3563.00	39.58	39.71	0.13	3523.40
	09/07/04	3563.00	39.74	39.85	0.11	3523.24
	09/14/04	3563.00	39.76	39.95	0.19	3523.21
	09/21/04	3563.00	39.8	39.91	0.11	3523.18
	10/13/04	3563.00	39.63	39.76	0.13	3523.35
	11/11/04	3563.00	37.99	38.07	0.08	3525.00
	12/08/04	3563.00	37.07	37.09	0.02	3525.93
	12/14/04	3563.00	Sheen	36.41	0.00	3526.59
MW - 3	02/23/04	3562.60	ND	39.92	0.00	3522.68
	05/13/04	3562.60	39.46	39.66	0.20	3523.11
	06/23/04	3562.60	39.22	39.23	0.01	3523.38
	06/30/04	3562.60	39.19	39.20	0.01	3523.41
	07/15/04	3562.60	ND	39.22	0.00	3523.38
	09/07/04	3562.60	Sheen	39.36	0.00	3523.24
	09/14/04	3562.60	Sheen	39.40	0.00	3523.20
	09/21/04	3562.60	Sheen	39.42	0.00	3523.18
	10/13/04	3562.60	Sheen	39.29	0.00	3523.31
	11/11/04	3562.60	Sheen	37.61	0.00	3524.99
	12/08/04	3562.60	Sheen	36.72	0.00	3525.88
	12/14/04	3562.60	Sheen	36.05	0.00	3526.55
MW - 4	02/23/04	3562.85	ND	40.15	0.00	3522.70
	05/13/04	3562.85	ND	39.72	0.00	3523.13
	12/14/04	3562.85	ND	36.27	0.00	3526.58
MW - 5	01/24/04	3564.21	ND	42.01	0.00	3522.20
	02/18/04	3564.21	ND	41.67	0.00	3522.54
	02/23/04	3564.21	ND	41.53	0.00	3522.68
	04/09/04	3564.21	ND	42.00	0.00	3522.21
	05/13/04	3564.21	ND	41.10	0.00	3523.11

TABLE 1

GROUNDWATER ELEVATION DATA
FOR 2004

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
	06/10/04	3564.21	40.83	40.84	0.01	3523.38
	06/23/04	3564.21	ND	48.40	0.00	3515.81
	06/30/04	3564.21	Sheen	48.37	0.00	3515.84
	07/15/04	3564.21	Sheen	40.83	0.00	3523.38
	09/07/04	3564.21	ND	40.97	0.00	3523.24
	12/14/04	3564.21	ND	37.71	0.00	3526.50
MW - 6	02/23/04	3563.29	ND	40.61	0.00	3522.68
	05/13/04	3563.29	ND	40.11	0.00	3523.18
	12/14/04	3563.29	ND	36.95	0.00	3526.34
MW-7	11/09/04		ND	37.87	0.00	
	11/11/04		ND	37.81	0.00	
MW-8	11/09/04		ND	38.82	0.00	
	11/11/04		ND	38.76	0.00	
MW-9	11/09/04		ND	39.03	0.00	
	11/11/04		ND	39.00	0.00	

Note: ND denotes no product detected during well gauging activity.
Elevations based on the North American Vertical Datum of 1929.

TABLE 2

CONCENTRATIONS OF BTEX IN GROUNDWATER
FOR 2004

PLAINS MARKETING, L.P.
LEA STATION TO MONUMENT 6" PIPELINE
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE
Regulatory limit		**0.01 mg/L**	**0.75 mg/L**	**0.75mg/L**	**0.62 mg/L**	
MW-1	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	09/07/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/15/04	<0.001	<0.001	<0.001	<0.001	
MW-2	02/23/04	0.00113	0.001	<0.001	<0.002	<0.001
	12/15/04	<0.005	<0.005	<0.005	<0.005	
MW-3	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	09/07/04	<0.001	<0.001	0.00377	0.0098	0.00219
	12/16/04	<0.005	<0.005	<0.005	<0.005	
MW-4	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/15/04	<0.001	<0.001	<0.001	<0.001	
MW-5	02/23/04	0.005	<0.001	0.00189	<0.002	<0.001
	05/13/04	0.003	<0.001	0.00637	0.0132	0.00186
	12/15/04	0.009	<0.005	0.013	0.03	
MW-6	02/23/04	<0.001	<0.001	<0.001	<0.002	<0.001
	12/15/04	<0.005	<0.005	<0.005	<0.005	
MW-7	11/11/04	<0.001	<0.001	<0.001	<0.001	
MW-8	11/11/04	<0.001	<0.001	<0.001	<0.001	
MW-9	11/11/04	0.0065	<0.005	0.008	0.023	

Appendices

Appendix A
Notification of Release and Corrective Action

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

x Initial Report ☐ Final Report

Name of Company	Plains Pipeline, LP	Contact:	Camille Reynolds
Address:	3705 E. Hwy 158, Midland, TX 79706	Telephone No.	505-441-0965
Facility Name	Lea to Monument 6"	Facility Type:	6" Steel Pipeline

Surface Owner:	Mineral Owner	Lease No.
Laughlin Estate		

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	5	20S	37E					Lea

Latitude 32 degrees 36' 06.4" **Longitude** 103 degrees 15' 56.1"

NATURE OF RELEASE

Type of Release: Crude Oil	Volume of Release: 3 barrels	Volume Recovered 0 barrels
Source of Release: 6" Steel Pipeline	Date and Hour of Occurrence 8/03/01	Date and Hour of Discovery 14:00
Was Immediate Notice Given? Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of 6" steel pipeline. A clamp was installed on the line to mitigate the release.

Describe Area Affected and Cleanup Action Taken.* A clamp was installed on the line to mitigate the release. The aerial extent of surface impact was approximately 10' x 80'.
NOTE: This information was obtained from historical EOTT files, Plains acquired EOTT/Link on April 1, 2004 and Plains assumes this information to be correct.

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

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

* Attach Additional Sheets If Necessary