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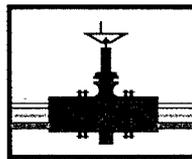
REPORTS

DATE:

5/2006

REMEDIATION PLAN
D.S. HUGH
PLAINS EMS NO. 2000-10807
UL-A, SECTION 26, T21S, R37E
Lea County, New Mexico
NMOCD NO. IR-0463

PREPARED FOR



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May 2006

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DISCLAIMER

Premier has examined and relied upon the file information provided by Plains. Premier has not conducted an independent examination of the information contained in the Plains files; furthermore, we assume the genuineness of the documents reviewed and that the information provided in these documents to be true and accurate. Premier has prepared this report using the level of care and professionalism in the industry for similar projects under similar conditions. Premier will not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time this report was prepared. Premier believes the conclusions stated herein are factual, but no guarantee is made or implied.

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EXECUTIVE SUMMARY

Premier Environmental Services, Inc. (Premier) has prepared this *Remediation Plan (Plan)* on behalf of Plains Marketing, L.P. (Plains) for the D. S. Hugh 4" Gathering line (Site), located in T21S, R37E, Section 26 of Lea County, New Mexico, approximately 2 miles east of Eunice, New Mexico (Figure 1, Appendix A). Hydrocarbon impact at the Site is the result of a 20-barrel crude oil release, described in previous reports. The pipeline was owned by EOTT Energy, LLC (EOTT) at the time of the release, and is currently owned by Plains.

Upon review and approval of this *Plan* by the New Mexico Oil Conservation Division (NMOCD), remediation will be initiated.

Details regarding investigations conducted in 2005 were submitted in a March 2006 report entitled 2005 Annual Report, and are summarized in this *Remediation Plan* for convenience. The flow path of the release runs roughly parallel to the pipeline for approximately 230 feet in a west-southwesterly direction with a width ranging from eight to 27 feet. Two areas in which hydrocarbon product appears to have pooled were identified; one at the approximate midpoint of the flow path (soil boring SB-2 area) and one at the western end of the flow path (soil boring SB-1 area). In areas of hydrocarbon accumulation, total petroleum hydrocarbon (TPH) and/or benzene, toluene, ethyl benzene and total xylenes (BTEX) concentrations in excess of New Mexico Oil Conservation Division (NMOCD) guidelines were detected in soil at depths in select samples to 45 feet bgs.

Groundwater impact is currently limited to phase separated hydrocarbons (PSH) in MW-1 and dissolved phase BTEX in MW-4.

Remedial objectives are to isolate and control contaminants of concern (COCs) in the soil and to prevent further groundwater impact. This will be accomplished by:

- Additional delineation of soil impact through the installation of six soil borings around the flow path.
- Management of surface soil impact by excavating soil containing the highest COC concentrations, and transporting the most heavily impacted soils off-site for land farm treatment.
- Management of potential additional or future groundwater impact by placing an impermeable plastic liner at the base of the excavation. This will prevent precipitation from migrating down through any residual hydrocarbons in the soil column, and possibly transporting COCs to groundwater. This approach is proposed as COCs are present in the subsurface at depths that are below the maximum extent of practicable excavation.
- Additional delineation of groundwater and on-going groundwater remediation and monitoring.

Excavation activities will include removal of affected soils along the release flow path to the extent where soil impacts can be remediated to below NMOCD criteria and to where practicable, where deeper impacted soils (i.e. 30 to 40 feet bgs) are present. The depth of

the excavation is limited at D.S. Hugh Site by unstable unconsolidated wind blown sand deposits at the surface and near surface.

Based on field screening, side wall confirmation samples will be collected every 50 linear feet for analyses of TPH Diesel Range Organics (DRO) and Gas Range Organics (GRO) by EPA Method 8015M, and for BTEX by EPA Method 8021B. Upon receipt of analytical results confirming remediation goals have been attained, an additional over-excavation of three (3) feet around the perimeter will be completed to provide a buffer zone. The central area of the excavation will be graded to facilitate run-off of infiltrated surface water. A 20-mil impermeable plastic liner will be placed at the base of the excavation to prevent infiltration of surface water through residual hydrocarbon to groundwater. The excavated soil will be treated via blending with clean fill. The blended/treated soil will be sampled to meet the site specific cleanup levels of less than 1,000 mg/kg TPH, and placed back into the excavation over the 20 mil liner. The excavation will be backfilled with a combination of treated soil and clean soil, graded, and seeded or restored as negotiated with the landowner. The most heavily impacted soil will be transported to Lea Station Land Farm for treatment.

The sheen present in one groundwater monitor well, MW-1 will be removed using an absorbent sock and bailed every two weeks. Two additional monitor wells will be constructed to complete the groundwater delineation. Groundwater monitoring at the site for TPH and BTEX will continue on a quarterly and/or semiannual basis in the remaining monitor wells to evaluate the effectiveness of the soil remediation.

1.0 INTRODUCTION AND SITE HISTORY

Premier Environmental Services, Inc. (Premier) was retained by Plains Marketing, L.P. (Plains) to complete delineation and remediation at the D.S. Hugh Gathering 4" line (Site) (EMS Nos. 2000-10807). The hydrocarbon release, which occurred on November 10, 2000, was due to external corrosion of the pipeline and was reported by EOTT Energy, LLC (EOTT) to Ms. Donna Williams at the New Mexico Oil Conservation Division (NMOCD) on November 10, 2000. The Site is located in T21S, R37E, Section 26 of Lea County, New Mexico, approximately 2 miles east of Eunice, New Mexico (Figure 1, Appendix A). At the time of the release, the pipeline was owned by EOTT. Plains Marketing, L.P. (Plains) currently owns the pipeline.

Approximately 5 barrels of product was reported as recovered. During repair of the pipeline, less than five cubic yards of soil was excavated, placed on a plastic liner surrounded by fencing, and stored onsite. No remedial activities have been conducted to date along the flow path or in the pooling areas.

An assessment of impact from the release was completed in September and December 2005 through the installation of ten soil borings, five of which were converted to groundwater monitor wells. A summary of these investigations is provided in Section 4.0.

2.0 ENVIRONMENTAL CHARACTERIZATION

2.1 Geological Description

In Lea County, bedrock frequently crop out or are thinly veneered with alluvium and eolian dune sands. The bedrock outcrops range from Triassic age strata rocks to Pleistocene age sediments. The Recent Age Mescalero sands cover 80% of Lea County, and are described as fine to medium-grained and reddish brown in color. Lea County lies in the Pecos Valley Section of the Great Plains Province, very near the Southern High Plains to the east. The Tertiary Age Ogallala Formation underlies all of the High Plains and mantles several ridges in Lea County.

The uppermost sediments at the Site are largely unstable sands. Wind generated sand dunes, somewhat stabilized with vegetation including mesquite and shinnery oak are found in the general area. One to four feet of aeolian sands overlie silty to sandy caliche with minor clay lenses present near the groundwater interface. The relatively flat topographic surface slopes very gently to the southeast and Monument Draw bisects the area east of the site.

2.2 Land Use

Land use in the area is primarily livestock rangeland and oil and gas production. Several gas compressor stations are located in the vicinity of the Site and several major oil and gas transmission lines bisect the region. The area in the immediate vicinity of the Site is sparsely populated. There is a railroad track located to the south of the Site.

2.3 Groundwater

The New Mexico Office of the State Engineer database lists three water wells in Section 26, T21S R37E (Appendix D). Total depth of two of these private use water wells reported to be 85 feet below ground surface (bgs) and one is 100 feet bgs feet. The average depth to water

is approximately 43 feet bgs, based on gauging conducted in the five monitor wells located on the Site. There are no municipal water wells within 1000 feet of the Site.

2.4 Surface Water

There are no surface water bodies within 1000 feet of the Site.

3.0 REGULATORY FRAMEWORK

In New Mexico, the NMOCD oversees and regulates oil, gas and geothermal activities, including compliance with environmental regulations. Guidance for cleanup of crude oil releases is provided in the NMOCD Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993) document. Primary contaminants, or COCs, associated with crude oil releases include TPH and BTEX. Guidelines for these COCs in soil are evaluated based on a Site ranking system. The ranking system estimates the likelihood of exposures to the COCs and is based on the following three parameters to protect groundwater and surface water resources:

- Depth to groundwater
- Wellhead protection area
- Distance to surface water body

3.1 NMOCD Site Ranking

Based on the proximity of the Site to area water wells, surface water bodies, and depth to groundwater, the Site has a NMOCD ranking score of **20 points**, with the soil remedial goals highlighted below in the Site Ranking Matrix.

Table 1 - Site Ranking Matrix

1. Groundwater		2. Wellhead Protection Area	3. Distance to Surface Water Body
If Depth to GW <50 feet: <i>20 points</i>		If <1000' from water source, or, <200' from private domestic water source: <i>20 points</i> If >1000' from water source, or, >200' from private domestic water source: <i>0 points</i>	<200 horizontal feet: 20 points
If Depth to GW 50 to 99 feet: <i>10 points</i>			200-100 horizontal feet: 10 points
If Depth to GW >100 feet: <i>0 points</i>			>1000 horizontal feet: 0 points
<i>Groundwater Score: 20</i>		<i>Wellhead Protection Area Score: 0</i>	<i>Surface Water Score: 0</i>
Site Rank (1+2+3) = 20+0+0=20			
Total Site Ranking Score and Initial Guidance Cleanup Concentrations			
Parameter	20 or >	10	0
Benzene	10 ppm	10 ppm	10 ppm
BTEX	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

4.0 SITE INVESTIGATIONS AND RESULTS

4.1 Pipeline Repair Activities

According to information provided by Plains, the area impacted by hydrocarbons was approximately 230 feet long by 10 feet wide, and product flowed within the pipeline right-of-way. Impacted soil surrounding the source leak was excavated and the line was repaired. Impacted soil from the repair excavation was temporarily placed on a plastic liner. A site visit by Premier personnel in April 2005 confirmed that impacted soil remains stockpiled onsite.

4.2 2005 Investigation Activities

Investigation of the release was completed in September and December 2005 through the installation of ten soil borings, with five borings converted to groundwater monitor wells. Soil samples were collected at intervals between 2 feet to 45 feet bgs and based on field screening using photo ionization detector (PID). Selected soil samples were submitted to Accutest Laboratories in Houston, TX for analyses of TPH-DRO and TPH-GRO by EPA method 8015M, and for BTEX by EPA method 8260B. Details of the initial investigation can be found in the letter report submitted to Plains dated December 28, 2005. Boring logs and monitor well construction logs are provided in Appendix A.

TPH or BTEX were generally not detected in soil in excess of NMOCD guidelines towards the west, north and east away from the flow path. Select soil samples collected in the central area of the release flow path and pooling areas had the highest concentrations of TPH at depths ranging from about 10 feet bgs up to about 40 feet bgs, and BTEX concentrations exceeding 50 mg/kg to 35 feet bgs. A soil sample collected at a depth of 45 feet bgs from the soil boring completed for monitoring well MW-2 detected TPH concentrations at 214 mg/kg. This sample was collected from the soil/groundwater interface and indicated potential contaminant movement in groundwater after the spill. Groundwater samples collected from MW-2 in December 2005 and again in March 2006 both showed no detections of TPH or BTEX above the method detection limit. A site plan showing soil boring and monitor well locations is found in Figure 2, Appendix A. Analytical results are summarized on Table 2 for soil and Table 3 for groundwater, Appendix B.

Analytical results from 2005 investigations show that the site has been laterally and vertically delineated to the north, east and west for COC in soil as depicted in Figure 3. Some additional delineation may be needed to the south for groundwater. If necessary, it will be completed as part of this soil remediation.

Groundwater impact is currently limited to phase separated hydrocarbons (PSH) in MW-1 and based on recent sampling, dissolved phase BTEX above regulatory limits (Table 3) in MW-4.

5.0 PROPOSED REMEDIATION APPROACH

5.1 Objectives

The objectives of the remediation approach are to isolate and control COCs in the soil and to prevent further impact to groundwater. To accomplish these goals, the proposed remediation approach will include the following:

1. Additional delineation of soil impact through the installation of six soil borings around the flow path to further define soils requiring remediation.
2. Management of surface soil impact by excavating soil containing the highest COC concentrations, and transporting the most heavily impacted soils off-site for land farm treatment.
3. Management of potential additional groundwater impact by placing an impermeable plastic liner at the base of the excavation. This will prevent precipitation from migrating down through any residual hydrocarbons in the soil column, and possibly transporting COCs to groundwater. This approach is proposed as COCs are present in the subsurface at depths that are below the maximum extent of practicable excavation.
4. Additional delineation of groundwater and on-going groundwater remediation and monitoring.

5.2 Remedial Approach

Additional horizontal delineation of soil around the flow path will be conducted by installing six soil borings as shown on Figure 4. Two soil samples will be collected from each soil boring for the laboratory analysis. One sample will be collected from an interval between 5 to 10 feet bgs and one soil sample will be collected from the bottom of each soil boring. The soil samples will be analyzed for TPH-DRO and TPH-GRO using EPA method SW 846 8015M and BTEX using EPA method SW 846-8021B.

To remove surface soil with the highest COC concentrations, excavation along the entire length of the release, approximately 230 feet and 20 to 30 feet wide will be completed down to a depth of 15 feet bgs (less in areas that cleanup to NMOCD COC criteria prior to 15 feet bgs). Two additional areas where the crude oil pooled on the surface will also be excavated to the same depths. These proposed dimensions are based on data that can be found in the 2005 Annual Report. The excavated soil will be segregated and the most impacted soils will be transported to Lea Station Land Farm for off-site treatment.

To isolate and control the COCs, an impermeable plastic liner (liner) will be placed at the base of the excavation. This will prevent infiltration and migration of surface water through residual hydrocarbons in soil, preventing migration to groundwater.

5.3 Remedial Plan Details

The three most highly impacted areas will be excavated, as specified in Table 4, Appendix B. Excavation of surface soil from the flow path is anticipated to be approximately 230 feet long by 20 to 30 feet wide and up to 10 feet deep. Excavation of the two areas in which hydrocarbon appears to have pooled is anticipated to be 35 feet by 45 feet wide and 45 feet by 50 feet, both to depths between 10 to 15 feet. Sidewalls of each excavation will be visually inspected and screened using a PID for stained soil or areas with PID readings greater than 100 parts per million (ppm). Areas that are heavily stained or having PID readings of greater than 100 ppm will be further excavated, until PID readings are below 100 ppm. The estimated volume of excavated soil, based on a depth of 15 feet, is approximately 6000 cubic yards.

Soil confirmation samples will be collected to verify that COC concentrations in the excavation sidewalls meet remediation goals. A buffer zone will be created in soil to minimize potential groundwater impact by over-excavating three feet (laterally and to the vertical depth of the excavation) beyond the remediated sidewalls.

Soil at the D.S. Hugh Site is Class C, based on OSHA safe trenching defined in 29 OSHA 1926, Subpart P. The excavation of class C soil requires 34 percent slope, or 1.5 feet width for every one foot of depth. As the surface at D.S. Hugh Site is unstable wind blown sand, an excavation of approximately 5 feet below ground surface will require two stages. Benching will be done in the lower section of the excavation. If benching cannot be completed due to unstable sidewalls, sidewall slopes will be constructed.

A 20-mil, high-density polyurethane impermeable liner will be placed at the base of the excavation. If possible, the liner will be placed as a single continuous barrier which may require some sealing (or welding). The base of the excavation will be graded with a high central area to create a drainage gradient. This will allow water that infiltrates from the surface to flow off the liner, away from residual hydrocarbons.

5.4 Operating and Performance Monitoring Details

Hydrocarbon impacted soil will be excavated and stockpiled on a plastic liner. The most highly impacted soil will be transported offsite for land farm treatment. Clean overburden will be set aside for use as backfill and for use as blending material. Treated/blended soil that contains less than 1,000 mg/kg TPH will be placed back into the excavation over the 20 mil liner. Confirmation samples will be collected from the walls of the excavation and treated/blended soils. Confirmation samples will be collected based on the following protocol:

- Wall samples – one sample every 50 linear feet.
- Treated stockpile sample for on-site reuse – one sample every 250 cubic yards.
- Each wall sample will be analyzed for TPH-DRO and TPH-GRO by EPA method SW 846 8015M and BTEX by EPA method SW 846 8021B.
- Each treated stockpile sample will be analyzed for TPH-DRO and TPH-GRO by EPA method SW-846 8015M, BTEX by EPA method SW 846 8021B.
- Wall sample analytical results will be compared to Site cleanup standards.

- If one or more of the wall samples exceed the Site cleanup standards, additional excavation will be completed following the above confirmation sampling protocol.

As removal of impacted soil is being completed, confirmation samples will be collected from the excavation sidewalls based on PID readings. Performance or remediation standards for excavation sidewalls and treated/blended stockpiles materials will be met when the total TPH concentrations are below 100 mg/Kg, benzene is below 10 mg/kg and total BTEX are below 50 mg/kg.

Excavated areas will be graded to a limited extent and then secured with temporary fencing. Upon approval by NMOCD, the impermeable liner will be placed into the excavation and secured with 6 inches of non-impacted soil. The excavation will then be backfilled with treated/blended soil which has met the NMOCD risk-based standards set for the site. The surface vegetation will be restored by reseeded or as negotiated with the landowner.

In the vicinity of MW-1, special precaution will be taken to ensure a seal. Bentonite will be placed beneath the liner and again above the liner immediately around the monitor well. Groundwater remediation is ongoing in groundwater monitor well MW-1. Groundwater monitoring at the site for TPH and BTEX will continue on a quarterly and/or semiannual basis.

5.5 Schedule

Remediation will be initiated upon receipt of written approval from the NMOCD. Excavation and creation of a soil blending area can be completed within fifteen (15) working days. Sidewall confirmation samples will be submitted for analysis with a rapid turnaround schedule. Upon receipt of analytical results confirming that remediation standards have been met, these data will be submitted to the NMOCD for approval to backfill the excavation. Within four (4) weeks of backfilling the excavation, and grading the site to the original slopes, a final report will be submitted to Plains and the NMOCD.

Appendix A

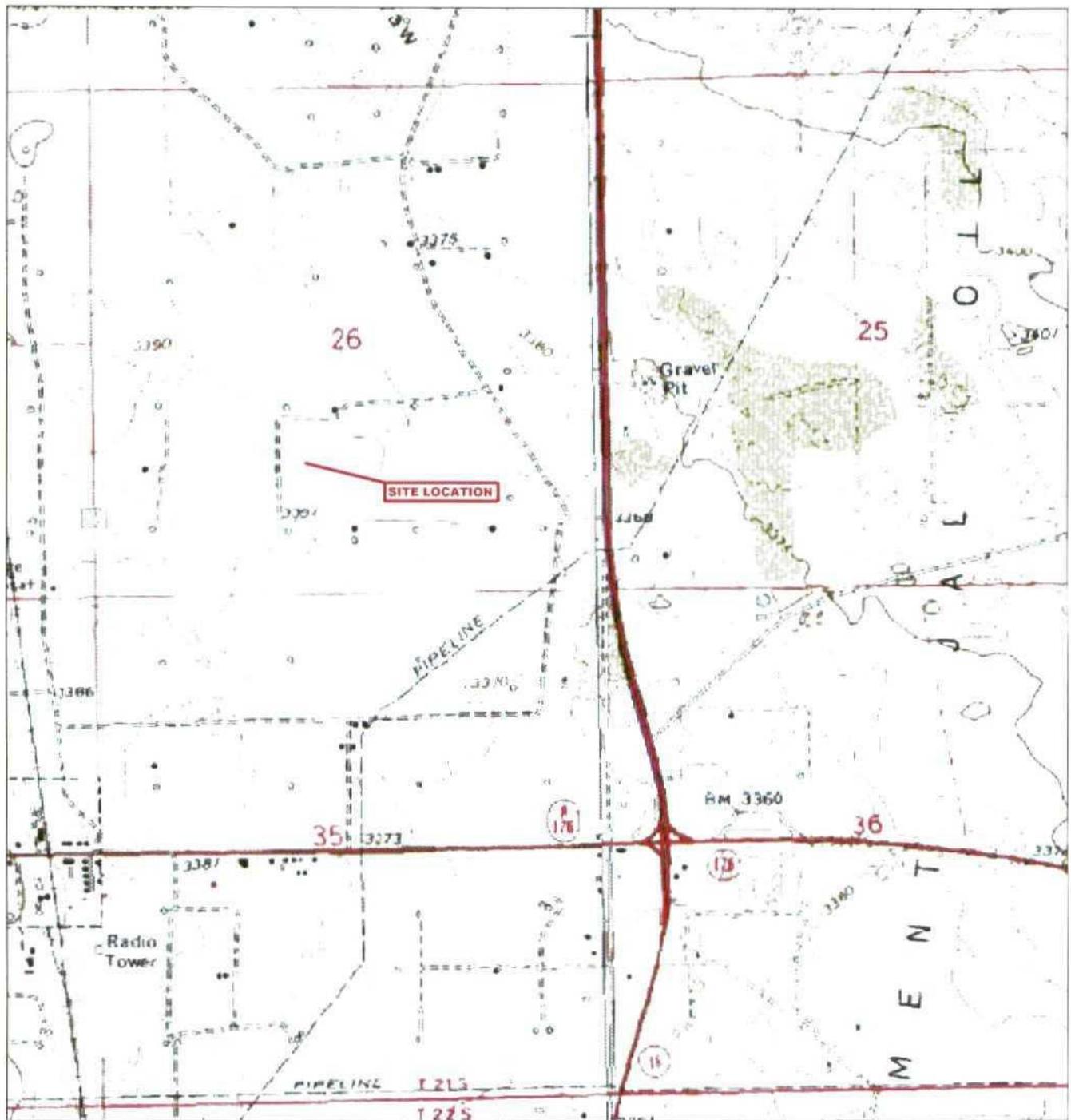
Figures

Figure 1 - Site Location Map

Figure 2 - Site Map with Soil Borings and Monitor Well Locations

Figure 3 - 2005 Soil and Groundwater Analytical Results

**Figure 4 - Proposed Soil Boring Location and Planned Excavation Limits
Boring Logs**



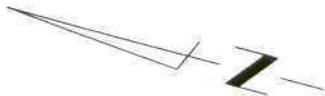
Eunice Quadrangle
32°26'48"N Latitude & 103°08'07"W Longitude



PREMIER
ENVIRONMENTAL SERVICES, INC.

Figure 1
 Site Location Map
 Plains Marketing L.P.
 D.S. Hugh Gathering 4" Line
 EMS. No.: 2000-10807
 Lea County, New Mexico

PROJ. NO: 205071.00 CK: DATE: 5/06



MW-3

HYDRAULIC GRADIENT



SB-5

SB-2

SB-3

SB-1

MW-1

SB-4

REPAIR CLAMP

DELROSE SCOTT
HUGHES 4"
GATHERING LINE

MW-5

SOIL STOCK PILE FROM
REPAIR EXCAVATION

MW-4

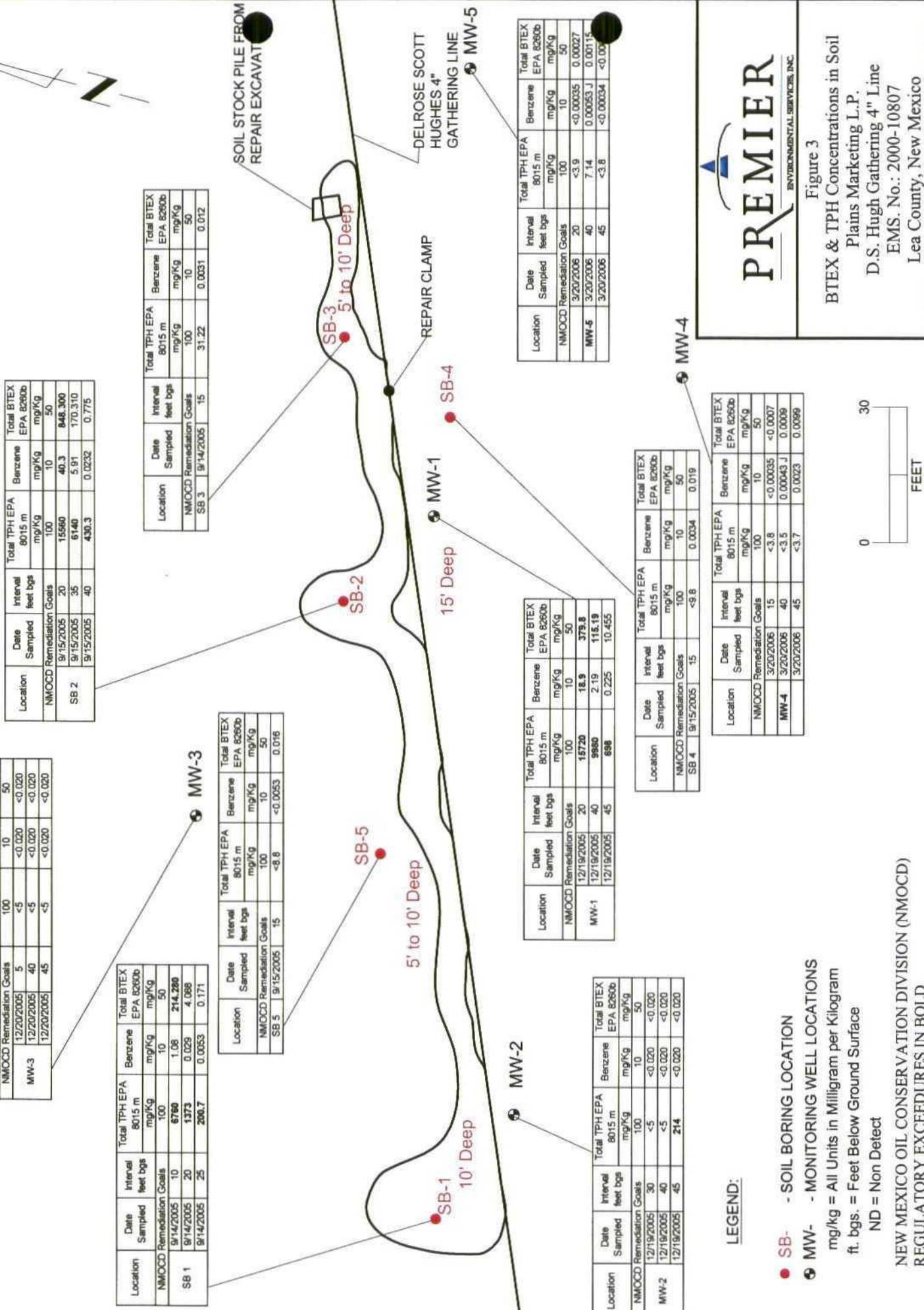
LEGEND:

- SB- - SOIL BORING LOCATIONS
- ⊕ MW- - MONITORING WELL LOCATIONS



Figure 2
Site Map with Soil Boring & Monitor Well
Locations
Plains Marketing L.P.
D.S. Hugh Gathering 4" Line
EMS. No.: 2000-10807
Lea County, New Mexico

PROJ. NO: 205071.00 CK: WM DATE: 5/06



Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
MW-3	12/20/2005	5	<5	<0.020	<0.020
	12/20/2005	40	<5	<0.020	<0.020
	12/20/2005	45	<5	<0.020	<0.020

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
SB 1	9/14/2005	10	6760	1.06	214.260
	9/14/2005	20	1373	0.029	4.068
	9/14/2005	25	200.7	0.0053	0.171

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
SB 5	9/15/2005	15	<8.8	<0.0053	0.016

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
SB 2	9/15/2005	20	15560	40.3	848.300
	9/15/2005	35	6140	5.91	170.310
	9/15/2005	40	430.3	0.0232	0.775

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
SB 3	9/14/2005	15	31.22	0.0031	0.012

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
MW-1	12/19/2005	20	15720	18.9	379.8
	12/19/2005	40	9980	2.19	115.19
	12/19/2005	45	898	0.225	10.455

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
MW-2	12/19/2005	30	<5	<0.020	<0.020
	12/19/2005	40	<5	<0.020	<0.020
	12/19/2005	45	214	<0.020	<0.020

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
SB 4	9/15/2005	15	<9.8	0.0034	0.019

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
MW-4	3/20/2006	15	<3.8	<0.00035	<0.0007
	3/20/2006	40	<3.5	0.00043 J	0.0009
	3/20/2006	45	<3.7	0.0023	0.0099

Location	Date Sampled	Interval feet bgs	Total TPH EPA 8015 m mg/Kg	Benzene mg/Kg	Total BTEX EPA 8260b mg/Kg
MW-5	3/20/2006	20	<3.9	<0.00035	0.00027
	3/20/2006	40	7.14	0.00053 J	0.00115
	3/20/2006	45	<3.8	<0.00034	<0.0006

LEGEND:

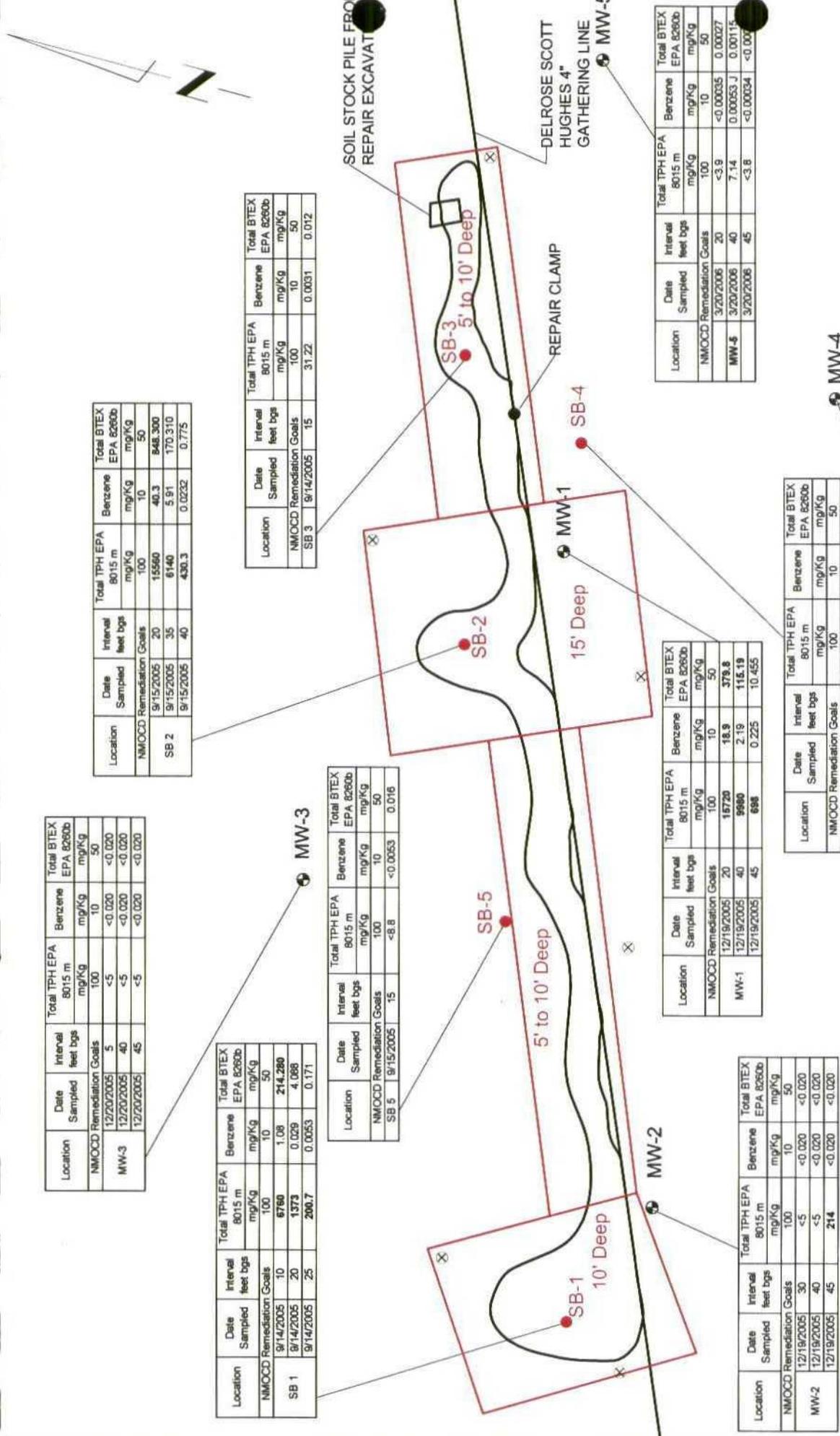
- SB- SOIL BORING LOCATION
 - ⊙ MW- MONITORING WELL LOCATIONS
- mg/kg = All Units in Milligram per Kilogram
 ft. bgs. = Feet Below Ground Surface
 ND = Non Detect

NEW MEXICO OIL CONSERVATION DIVISION (NMOCD)
 REGULATORY EXCEEDURES IN BOLD



Figure 3

BTEX & TPH Concentrations in Soil
 Plains Marketing L.P.
 D.S. Hugh Gathering 4" Line
 EMS. No.: 2000-10807
 Lea County, New Mexico



Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
MW-3	12/20/2005	5	<5	<0.020	10	<0.020
	12/20/2005	40	<5	<0.020	<0.020	<0.020
	12/20/2005	45	<5	<0.020	<0.020	<0.020

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
SB 1	9/14/2005	10	6760	1.08	214.280	
	9/14/2005	20	1373	0.029	4.068	
	9/14/2005	25	200.7	0.0053	0.171	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
SB 5	9/15/2005	15	<8.8	<0.0053	0.016	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
SB 2	9/15/2005	20	15560	40.3	848.300	
	9/15/2005	35	6140	5.91	170.310	
	9/15/2005	40	430.3	0.0232	0.775	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
SB 3	9/14/2005	15	31.22	0.0031	0.012	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
MW-1	12/19/2005	20	18720	18.9	379.8	
	12/19/2005	40	9680	2.19	116.19	
	12/19/2005	45	698	0.225	10.455	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
SB 4	9/15/2005	15	<9.8	0.0034	0.019	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
MW-4	3/20/2006	15	<3.8	<0.00035	<0.0007	
	3/20/2006	40	<3.5	0.00043 J	0.0009	
	3/20/2006	45	<3.7	0.0023	0.0069	

Location	Total TPH EPA 8015 m		Benzene mg/Kg		Total BTEX EPA 8260b mg/Kg	
	Interval	Remediation Goals	Interval	Remediation Goals	Interval	Remediation Goals
MW-5	3/20/2006	20	<3.9	<0.00035	0.0027	
	3/20/2006	40	7.14	0.00053 J	0.0115	
	3/20/2006	45	<3.8	<0.00034	<0.006	

LEGEND:

- PLANNED EXCAVATION LIMITS
- SB- SOIL BORING LOCATION
- ⊕ MW- MONITORING WELL LOCATIONS
- ⊗ - PROPOSED BORING LOCATIONS

mg/kg = All Units in Milligram per Kilogram
 ft. bgs. = Feet Below Ground Surface
 ND = Non Detect

**NEW MEXICO OIL CONSERVATION DIVISION (NMOCD)
 REGULATORY EXCEEDURES IN BOLD**

PREMIER
ENVIRONMENTAL SERVICES, INC.

Figure 4
 Proposed Soil Boring Location and Planned Excavation Limits
 Plains Marketing L.P.
 D.S. Hugh Gathering 4" Line
 EMS. No.: 2000-10807
 Lea County, New Mexico

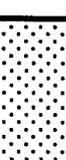
PROJ. NO: 205071.00 | CK: WM | DATE: 5/06



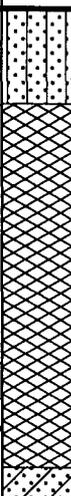
STATION ID SB-1
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL DEPTH 25' BOREHOLE DIA (in) 5"
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 9/14/05

DEPTH	GRAPHIC LOG	PID (ppm)	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS
0			Silty Sand, dark reddish brown, stained to 4'.	
2				
4				
6		165	Caliche, reddish brown, firm, damp, no plasticity, very fine grained, poorly sorted.	Strong odor to 11'
8				
10		276	Caliche, light greyish green, firm, dry, low plasticity, very fine grained, poorly sorted.	Moderate odor to 16'
12				
14				
16		145	Caliche and 1" gravel, light reddish brown, firm, damp, low plasticity, very fine to coarse grained, poorly sorted, subrounded.	Slight odor to 22'
18				
20		72	Caliche, light reddish brown, firm, dry, low plasticity, very fine to coarse grained, poorly sorted, subrounded.	
22				
24		26	Clayey Sand, reddish brown, loose, dry, very fine to coarse grained, poorly sorted, subrounded.	No odor @ 23'
26			TD= 25'	
28				
30				
32				
34				
36				
38				
40				
42				

STATION ID SB-2
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL DEPTH 40' BOREHOLE DIA (in) 5"
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 9/15/05

DEPTH	GRAPHIC LOG	PID (ppm)	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS
0			Sand, dark reddish brown, loose, damp, very fine to medium grained, poorly sorted, subangular, stained to 3'.	Strong odor 0 to 16'
2				
4		331	Caliche, light greyish green, firm, damp, low plasticity, very fine grained, fairly sorted, subangular.	Moderate odor to 28'
6				
8				
10		253	Caliche, light greyish green, firm, dry, low plasticity, very fine grained, fairly sorted, subangular.	
12				
14				
16		230	Caliche, light greyish orange, firm, dry, low plasticity, very fine grained, fairly sorted, subangular. Red sand @ 17'.	Slight odor to 37'
18				
20		152	Silty Sand, reddish brown, firm, dry, very fine to fine grained, poorly sorted, subangular.	
22				
24		113	Sandy Caliche, dark reddish brown, firm to loose, dry, very fine to coarse grained, poorly sorted, subangular.	No odor to 40'
26				
28				
30		94	Sandy Caliche, light reddish brown, firm to loose, dry, very fine to fine grained, poorly sorted, subangular.	
32				
34		145	Sandy Caliche, light reddish brown, firm to loose, dry, very fine to medium grained, poorly sorted, subangular.	No odor to 40'
36				
38				
40		17	Sandy Caliche, light grey, firm to loose, dry, very fine grained, fairly sorted, subrounded.	
			TD= 40'	
42				

STATION ID SB-3
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL DEPTH 15' BOREHOLE DIA (in) 5"
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 9/15/05

DEPTH	GRAPHIC LOG	PID (ppm)	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS
0			Silty Sand, reddish brown, loose, stained to 2', caliche at 3'.	Fair odor to 7'
2				
4		265	Caliche, light greyish green, stiff, dry, moderate plasticity, very fine grained, fairly sorted.	
6				
8				
10		182	Caliche, light greyish red, loose, dry, low plasticity, very fine grained, fairly sorted.	
12				No odor to 15'
14		6.2	Clayey Sand, light reddish grey, loose, dry, very fine grained, fairly sorted, subangular.	
16			TD= 15'	
18				
20				
22				
24				
26				
28				
30				
32				
34				
36				
38				
40				
42				



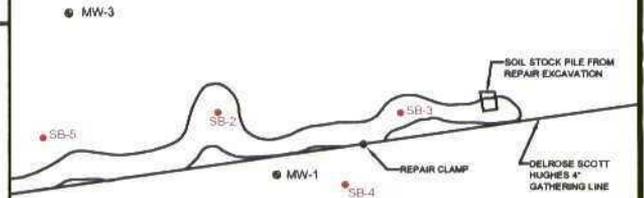
STATION ID SB-4
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL DEPTH 15' BOREHOLE DIA (in) 5"
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 9/15/05

DEPTH	GRAPHIC LOG	PID (ppm)	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS
0				
2			Silty Sand, light reddish brown, loose, dry, very fine to fine grained, poorly sorted, subangular.	
4		3.6	Sandy Caliche, light reddish grey, firm to loose, dry, very fine grained, fairly sorted, subangular.	
6				
8				
10		1.3	Sandy Caliche, light grey, firm to loose, dry, very fine grained, fairly sorted, subangular.	
12				
14				
16			TD= 15'	
18				
20				
22				
24				
26				
28				
30				
32				
34				
36				
38				
40				
42				

STATION ID SB-5
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL DEPTH 15' BOREHOLE DIA (in) 5"
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 9/15/05

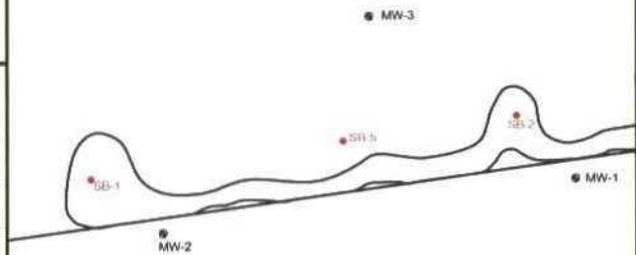
DEPTH	GRAPHIC LOG	PID (ppm)	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS
0			Silty Sand, reddish brown, loose, dry, very fine to fine grained, poorly sorted, subangular.	
2				
4		7.8	Sandy Caliche, light grey, loose to firm, low plasticity, very fine grained, poorly sorted, subangular.	
6				
8				
10		0.9	Sandy Caliche, light grey, loose, low plasticity, very fine grained, poorly sorted, subangular.	
12				
14		0.0	Sandy Caliche, light grey, loose to firm, low plasticity, very fine grained, poorly sorted, subangular.	
16			TD= 15'	
18				
20				
22				
24				
26				
28				
30				
32				
34				
36				
38				
40				
42				

WELL NUMBER MW-1
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL WELL DEPTH 55 BOREHOLE DIA (in) 7 7/8 STICKUP (ft) --
 CASING DIA (in) 4 TYPE PVC SCREEN LENGTH 20 SLOT SIZE (in) 0.020
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 12/19/05
 TOP OF CASING ELEV. (ft) 3389.00' GROUND SURFACE ELEV. (ft)



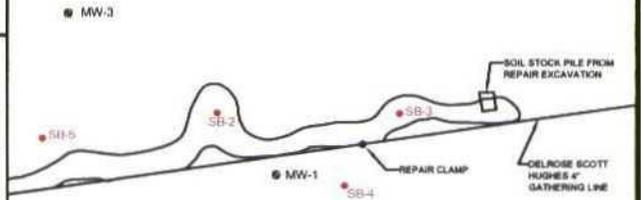
DEPTH	INTERVAL	RECOVERY %	LOG	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS	WELL CONSTRUCTION
40								
42						water @ 44', PSH on tool @ 45'		
44		100		154	Caliche	Caliche, clayey, gravelly, light yellowish grey, poorly indurated, wet, very fine to coarse grained, poorly sorted, subangular.	MW1-45'	
46						Increase in Clay.		
48						No Sample - PSH		
50								
52								
54								
56								
58								
60								
62								
64								
66								
68								
70								
72								
74								
76								
78								
80								

WELL NUMBER MW-2
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL WELL DEPTH 55 BOREHOLE DIA (in) 7 7/8 STICKUP (ft) --
 CASING DIA (in) 4 TYPE PVC SCREEN LENGTH 20 SLOT SIZE (in) 0.020
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 12/19/05
 TOP OF CASING ELEV. (ft) 3388.38' GROUND SURFACE ELV. (ft)

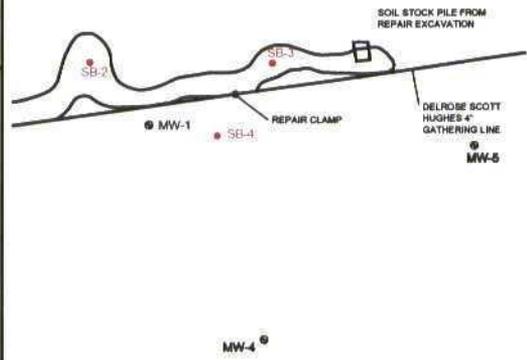


DEPTH	INTERVAL	RECOVERY %	LOG	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS	WELL CONSTRUCTION
40						water @ 41' no odor		
42								
44		100		0.0	Caliche	Caliche, medium reddish brown, sandy, poorly indurated, wet, very fine to fine grained, fair sorting, subangular.	MW2-45'	
46								
48								
50						No Sample - water		
52								
54								
56								
58								
60								
62								
64								
66								
68								
70								
72								
74								
76								
78								
80								

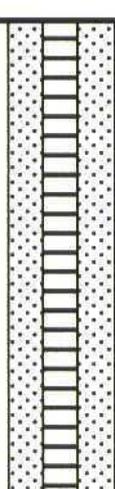
WELL NUMBER MW-3
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL WELL DEPTH 55 BOREHOLE DIA (in) 7 7/8 STICKUP (ft) --
 CASING DIA (in) 4 TYPE PVC SCREEN LENGTH 20 SLOT SIZE (in) 0.020
 DRILLING CO. Straub DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 12/20/05
 TOP OF CASING ELEV. (ft) 3388.62' GROUND SURFACE ELEV. (ft)

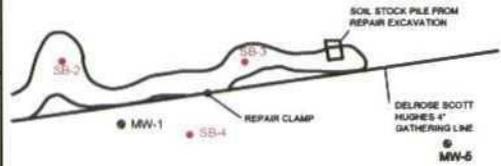


DEPTH	INTERVAL	RECOVERY %	LOG	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS	WELL CONSTRUCTION
40								
42						water @ 43' no odor		
44		100		0.0	Caliche	Caliche, clayey, gravelly, light reddish grey, poor to well indurated, wet, very fine to coarse grained, poorly sorted, subangular.	MW3-45'	
46								
48								
50						No Sample - water		
52								
54								
56								
58								
60								
62								
64								
66								
68								
70								
72								
74								
76								
78								
80								



WELL NUMBER MW-4
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL WELL DEPTH 55 BOREHOLE DIA (in) 5 STICKUP (ft) --
 CASING DIA (in) 2 TYPE PVC SCREEN LENGTH 20 SLOT SIZE (in) 0.010
 DRILLING CO. Straub Corp. DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 03/20/06 1058
 TOP OF CASING ELEV. (ft) _____ GROUND SURFACE ELEV. (ft) _____

DEPTH	INTERVAL	RECOVERY %	LOG	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS	WELL CONSTRUCTION
40				0	CAL	Caliche, light grey, fair strength, damp, very fine to fine grained, fairly sorted, subangular.	MW4-40'	
42								
44	X			0	GC	Water @ 44' Gravel, light grey, loose, wet, very fine to coarse grained, poorly sorted, rounded.	MW4-45'	
46								
48								
50	X				CAL	Caliche, light reddish brown, poor strength, wet, very fine to fine grained, poorly sorted, rounded.		
52								
54	X							
56						T.D. 55'		
58								
60								
62								
64								
66								
68								
70								
72								
74								
76								
78								
80								



WELL NUMBER MW-5
 PROJECT D.S. Hugh Gathering 4" Line LOCATION Lea County, New Mexico
 TOTAL WELL DEPTH 55 BOREHOLE DIA (in) 5 STICKUP (ft) --
 CASING DIA (in) 2 TYPE PVC SCREEN LENGTH 20 SLOT SIZE (in) 0.010
 DRILLING CO. Straub Corp. DRILLING METHOD Air Rotary
 GEOLOGIST Will Murley DATE DRILLED 03/20/06 1425
 TOP OF CASING ELEV. (ft) _____ GROUND SURFACE ELV. (ft) _____

MW-5

DEPTH	INTERVAL	RECOVERY %	LOG	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION/COMMENTS	REMARKS	WELL CONSTRUCTION
40				0	CAL	Caliche, light grey, well strength, damp, very fine grained, well sorted, subangular.	MW5-40'	
42								
44				1.0	GC	Water @ 44' Gravel, light reddish brown, loose, well strength, very fine to coarse grained, poorly sorted, subangular.	MW5-45'	
46								
48								
50					SC	Sandstone, loose, very fine to fine grained.		
52								
54								
56						T.D. 55'		
58								
60								
62								
64								
66								
68								
70								
72								
74								
76								
78								
80								

Appendix B Tables

Table 1	Site Ranking Matrix- provided in Section 3.1
Table 2	2005 Soil Analytical Results
Table 3	2005 Groundwater Analytical Results
Table 4	Estimated Volume of Excavated Soil

Table 2
 Soil Analytical Results
 Plains Marketing, L.P.
 Plains EMS No. 2000-10807
 D S Hugh
 Lea County, New Mexico

Location	Date Sampled	Interval feet bgs	Laboratory Sample ID	GRO mg/Kg (C6-C10)	DRO mg/Kg (C10-C28)	Total TPH mg/Kg EPA 8015 m	Benzene mg/Kg	Toluene mg/Kg	Ethylbenzene mg/Kg	Total Xylene mg/Kg	Total BTEX EPA 8021b mg/Kg	
												10
	NMOCD Remediation Goals											
	9/14/2005	10	T11458-1	2460	4300	6760	1.08	20.6	56.6	136	214.280	
SB 1	9/14/2005	20	T11458-2	203	1170	1373	0.029	0.168	0.681	3.21	4.088	
	9/14/2005	25	T11458-3	16.7	184	200.7	0.0038	0.0038	0.0392	0.123	0.171	
SB 2	9/15/2005	20	T11458-4	5260	10300	15560	40.3	264	152	392	848.300	
	9/15/2005	35	T11458-5	2070	4070	6140	5.91	102	33.8	28.6	170.310	
	9/15/2005	40	T11458-6	57.3	373	430.3	0.0232	0.091	0.0839	0.577	0.775	
SB 3	9/14/2005	15	T-11458-7	4.32	26.9	31.22	0.0031	<0.0062	0.0029	0.0061	0.012	
SB 4	9/15/2005	15	T-11458-8	<6.6	<9.8	<9.8	0.0034	0.0053	0.0016	0.0086	0.019	
SB 5	9/15/2005	15	T-11458-9	<5.6	<8.8	<8.8	<0.0053	<0.0053	<0.0053	0.016	0.016	
	BGS - Below Ground Surface											
MW-1	12/19/2005	20	MW1-20	9070	6650	15720	18.9	99.5	81.4	180	379.8	
	12/19/2005	40	MW1-40	7380	2600	9980	2.19	20.9	15.2	76.9	115.19	
MW-2	12/19/2005	45	MW1-45	344	354	698	0.225	1.23	2.42	6.58	10.455	
	12/19/2005	30	MW2-30	<5	<5	<5	<0.020	<0.020	<0.020	<0.020	<0.020	
	12/19/2005	40	MW2-40	<5	<5	<5	<0.020	<0.020	<0.020	<0.020	<0.020	
MW-3	12/19/2005	45	MW2-45	214	<5	214	<0.020	<0.020	<0.020	<0.020	<0.020	
	12/20/2005	5	MW3-5	<5	<5	<5	<0.020	<0.020	<0.020	<0.020	<0.020	
	12/20/2005	40	MW3-40	<5	<5	<5	<0.020	<0.020	<0.020	<0.020	<0.020	
MW-4	12/20/2005	45	MW3-45	<5	<5	<5	<0.020	<0.020	<0.020	<0.020	<0.020	
	3/20/2006	15	MW4-15	<3.3	<3.8	<3.8	<0.00035	<0.00023	<0.00035	<0.0007	<0.0007	
	3/20/2006	40	MW4-40	<2.7	<3.5	<3.5	0.00043 J	0.00047 J	<0.0003	<0.00061	0.0009	
MW-5	3/20/2006	45	MW4-45	<3.1	<3.7	<3.7	0.0023	0.0015	0.0013	0.0048	0.0069	
	3/20/2006	20	MW5-20	<3.9	<3.9	<3.9	<0.00035	<0.00027 J	<0.00035	<0.0007	0.0027	
	3/20/2006	40	MW5-40	<2.7	7.14 J	7.14	0.00053 J	0.00062 J	<0.00031	<0.00115	0.00115	
	3/20/2006	45	MW5-45	<3.3	<3.8	<3.8	<0.00034	<0.00023	<0.00034	<0.00069	<0.00069	

BGS - Below Ground Surface
 DRO - Diesel Range Organics
 GRO - Gasoline Range Organics
 Concentrations in bold exceed NMOCD Remediation Goals
 J = Indicates an estimated value

Table 3
2005 Groundwater Sample Analytical Results
Plains Marketing L.P.
EMS No. 2000-10807
D. S. Hugh
Lea County, New Mexico

Well	Sample ID	Sampling Date	Benzene mg/L	Toluene mg/L	Ethylbenzene mg/L	Total Xylenes mg/L
NMOCD Remediation Criteria			0.01	0.750	0.750	0.620
MW-1		12/21/2005	NS	NS	NS	NS
MW-1		3/28/2006	NS	NS	NS	NS
MW-2	T12186-2	12/21/2005	<0.002	<0.002	<0.002	<0.006
MW-2	T13038-1	3/28/2006	<0.00038	<0.00036	<0.00035	<0.00072
MW-3	T12186-3	12/21/2005	<0.002	<0.002	<0.002	<0.006
MW-3	T13038-2	3/28/2006	<0.00038	<0.00036	<0.00035	<0.00072
MW-4	T13038-3	3/28/2006	0.2	0.0535	0.0384	0.115
MW-5	T13038-4	3/28/2006	<0.00038	<0.00036	<0.00035	<0.00072

Data is from Run 2 with a 5 fold dilution

Note: MW-1 not sampled due to presence of hydrocarbon sheen (NS)

TABLE 4
EXCAVATION VOLUME ESTIMATES
D. S. Hugh Site
 Lea County, New Mexico
 Plains EMS No.: 2000-10807

Areas Requiring Excavation	Length (feet)	Width (feet)	Depth (feet)	Surface Area (square feet)	Volume (y3)
Area 1 flow path	230	30 (5-10)	10	6900	2555.56
Area 2 - Pooled Area 1	35	45	10	1575	583.33
Area 3 - Pooled Area 2	45	50	15	2250	1250.00
Sub Totals				10725	4388.89

Appendix C
C-141 Release Notification Form

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Plains Marketing, LP	Contact Daniel Bryant
Address 5805 East Hwy. 80, Midland, TX 79706	Telephone No. 432-686-1769
Facility Name D. S. Hugh Gathering	Facility Type Steel Pipeline

Surface Owner Delrose Scott	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
K	26	21S	37E					Lea

Latitude 32° 26' 48" Longitude 103° 08' 07"

NATURE OF RELEASE

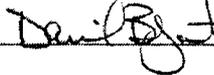
Type of Release Crude Oil	Volume of Release 20 barrels	Volume Recovered 5 barrels
Source of Release Steel Pipeline	Date and Hour of Occurrence 11/10/2000	Date and Hour of Discovery 11/10/2000 13:20
Was Immediate Notice Given? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required <input type="checkbox"/>	If YES, To Whom? Donna Williams	
By Whom? Wayne Brunette	Date and Hour 11/10/2000 14:25	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Pipeline was clamped to mitigate the release during initial response activities.

Describe Area Affected and Cleanup Action Taken.*
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: Daniel Bryant	Approved by District Supervisor:	
Title: Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: dmbryant@paalp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 4/7/2006 Phone: 432-686-1769		

* Attach Additional Sheets If Necessary