

AP - 013

APPROVALS

YEAR(S):

2006-1999



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 19, 2006

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

RE: 2005 Annual Monitoring Report
Plains TNM 97-18 Site
SW/4 NE/4 Section 28, Township 20 South, Range 37 East
Lea County, New Mexico
Plains EMS Number: TNM 97-18-Known
NMOCD File Number: AP-0013

Dear Ms. Reynolds:

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

1. Plains will prepare and submit a Site Restoration Work Plan and Proposed Soil Closure Strategy for this site.
2. NMOCD approval of such strategy is required prior to excavation or backfilling activities at the site.
3. Plains will continue to monitor the groundwater at the site and report the associated activities during 2006 on the 2006 Annual Monitoring Report due to be submitted to this office by April 1, 2007.

NMOCD approval does not relieve Plains of liability should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other governmental agency.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Copy: NMOCD, Hobbs
Curt Stanley, NOVA



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 28, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-669

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: TNM-97-18 GROUND WATER ABATEMENT PLAN (AP-13)

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) May 21, 1999 "TNM-97-18 GROUND WATER ABATEMENT PLAN (AP-13)". This document contains EOTT's request to install a monitoring well at the source of the leak area to determine the exact impact on ground water from the TNM-97-18 crude oil pipeline spill site.

The above referenced request is approved with the following conditions:

1. Approval of the above request does not negate the OCD's May 14, 1999 requirement for submission of an abatement plan by July 19, 1999.
2. The proposed source monitor well shall be installed downgradient and directly adjacent to the source of the leak.
3. EOTT shall complete the new monitor wells as follows:
 - a. A minimum of 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be installed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.

4. No less than 48 hours after the well is developed, ground water from the monitor well shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene, polycyclic aromatic hydrocarbons (PAH), total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
5. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
6. EOTT shall submit the results of the investigation to the OCD Santa Fe Office by July 19, 1999 with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
 - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table potentiometric map showing the location of the spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - d. Isopleth maps for contaminants of concern which were observed during the investigations.
 - e. Summary tables of all ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. The disposition of all wastes generated.

Please be advised that OCD approval does not relieve EOTT of liability should the investigation actions fail to adequately define the extent of contamination related to EOTT's pipeline, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any comments or questions, please contact me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

Z 274 520 669

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PS Form 3800, April 1995