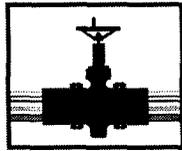


AP - 41

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
2006-1997





**PLAINS**  
**ALL AMERICAN**

October 18, 2005

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

RECEIVED  
OCT 24 2005  
OIL CONSERVATION  
DIVISION

IR-78

Re: Notifications for Stage 1 and 2 Abatement Plan  
Hugh Gathering 909402 (ref. #2002-10235), dated May 2005  
Unit Letter M, S12 and Unit Letter P S11, T 21S, R37E  
Lea County, New Mexico

Dear Mr. Martin:

Enclosed please find copies of the required notification letters and newspaper advertisements for the Stage 1 and Stage 2 Abatement Plan for Plains Pipeline's Hugh Gathering release site in Lea County, NM. If you have any questions or comments about this information, please do not hesitate to call me at 713-646-4625.

Sincerely,

Rebecca E. Esparza  
Environmental and Regulatory Compliance Specialist

Cc: Camille Reynolds  
Jeff Dann

Enclosures



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

June 16, 2005

Ms. Camille Reynolds  
Plains All American Pipeline, L.P.  
3112 West Hwy 82  
Lovington, NM 88260

**RE: Stage 1 and Stage 2 Abatement Plan (Revised)**  
**Hugh Gathering 909402 (ref. #2002-10235), dated May 2005**  
**Unit Letters M of Section 12 and P of Section 11, Township 21 South, Range 37 East**  
**Lea County, New Mexico**

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Plains All American Pipeline's (Plains) report as shown above.

The OCD has determined that the above referenced Stage 1 and Stage 2 Abatement Plan is **administratively complete**. Before the OCD can complete a technical review of the Stage 1 and Stage 2 proposals, the OCD requires that:

1. Plains issue, by July 18, 2005, a notice of publication in the Albuquerque Journal and Hobbs News-Sun pursuant to OCD Rule 19.G.(2), using the format attached.
2. Prior to issuing public notice, Plains shall issue written notice of the plan pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1)(d) can be found at [www.emnrd.state.nm.us/oed/Bureaus/environm.htm](http://www.emnrd.state.nm.us/oed/Bureaus/environm.htm).
3. Plains shall notify, in writing, the individuals and organizations listed in part 4.6 of the plan.
4. Plains provide the OCD with proof of publication and proof of written notice by July 22, 2005. Proof of notice shall include a map of the surface owners of record within one (1) mile of the perimeter of the site and shall identify compliance with each of the provisions of OCD Rule 19.G.

If you have any questions, please contact Ed Martin at (505) 476-3492.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson".

Roger C. Anderson  
Environmental Bureau Chief

cc: Larry Johnson, Hobbs OCD District Office

Plains All American Pipeline, L.P.  
Stage 1 and Stage 2 Abatement Plan  
Hugh Gathering Site  
July 16, 2005  
Page 2 of 2

## NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 and Stage 2 Abatement Plan Proposals have been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico 87260, has submitted a Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit M of Section 12, and Unit P of Section 11 of Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of New Mexico Water Quality Control Commission standards has been observed in ground water at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designates a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigations, characterizes the site as to geology and hydrogeology, determined vertical and horizontal extent and magnitude of vadose-zone and groundwater contamination, determined rate and direction of contaminant migration, provided inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

Any interested person may obtain further information from the Oil Conservation Division and may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that include reasons why a hearing should be held. The Stage 1 and Stage 2 Abatement Plan Proposals may be viewed at the above address or at the Oil Conservation Division Hobbs District Office, 1925 N. French Dr., Hobbs, New Mexico 88240, Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 and Stage 2 Abatement Plan Proposals, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments or a written request for a hearing may be submitted.

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 1

weeks.

Beginning with the issue dated

September 11 2005

and ending with the issue dated

September 11 2005

*Kathi Bearden*

Publisher

Sworn and subscribed to before

me this 12th day of

September 2005

*Ana Montz*  
Notary Public.

My Commission expires  
February 07, 2009  
(Seal)



OFFICIAL SEAL  
DORA MONTZ  
NOTARY PUBLIC  
STATE OF NEW MEXICO

My Commission Expires: \_\_\_\_\_

LEGAL NOTICE  
September 11, 2005

NOTICE OF PUBLICATION

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

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#21794

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

02106111000 67533222  
PLAINS ALL AMERICAN  
PO BOX 4648  
HOUSTON, TX 77210

# Advertising Receipt

**Hobbs Daily News-Sun**  
 201 N Thorp  
 P O Box 850  
 Hobbs, NM 88241-0850  
 Phone: (505) 393-2123  
 Fax: (505) 397-0610

PLAINS ALL AMERICAN  
 PO BOX 4648  
 HOUSTON, TX 77210

**Cust#:** 02106111-000  
**Ad#:** 67533222  
**Phone:** (713)646-4625  
**Date:** 09/09/05

**Ad taker:** C2      **Salesperson:** 06      **Classification:** 673

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	09/11/05	09/11/05	1	91.13		91.13
Bold						1.00
Affidavit for legals						3.00

**Payment Reference:**

LEGAL NOTICE  
 September 11, 2005

NOTICE OF PUBLICATION

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

**Total:** 95.13  
**Tax:** 6.36  
**Net:** 101.49  
**Prepaid:** 0.00

<b>Total Due</b>	<b>101.49</b>
------------------	---------------

Notice is hereby given that pursuant to New Mexico Conservation Division Regulations, the following Stage 1 and Stage 2 Abatement Plan Proposals have been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico, 87260, has

APC

STATE OF NEW MEXICO  
County of Bernalillo SS

Bill Tafoya, being duly sworn, declares and says that he is Classified Advertising Manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 14 day of Sept., 2004, and the subsequent consecutive publications on \_\_\_\_\_, 20\_\_\_\_\_.

*[Handwritten Signature]*

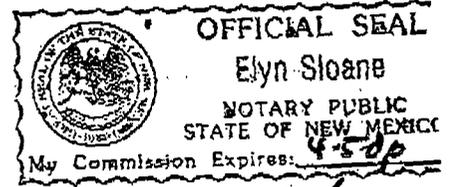
Sworn and subscribed to before me, a Notary Public, in and for the County of Bernalillo and State of New Mexico this 18 day of Oct. of 2005

PRICE \$46.03

Statement to come at end of month.

ACCOUNT NUMBER C 81371

CLA-22-A (R-1/93)



*[Handwritten Signature]*

**\*\*\* Proof \*\*\***

**Albuquerque Publishing Company**  
7777 Jefferson NE  
Albuquerque, NM 87109  
(505)823-7777

**Account Information**

**Phone:** (713) 646-4625  
**Name:** PLAINS ALL AMER  
**Account #:** C81371  
**Address:** PO BOX 4648  
  
HOUSTON, TX 77210  
**Client:**  
**Placed by:** REBECCA E ESPARZA  
**Fax #:**

**Ad Information**

**Classification:** 0001-Legals - Non - Government  
**Size:** 1 x 98.000  
**Start date:** 09-14-05  
**Stop date:** 09-14-05  
**Insertions:** 1  
**Rate code:** Non-Government  
**Publications:** Journal Daily (AM)  
**Billed size:** 98.00 lines-6.5pt  
**Ad #:** 2237367  
**Ad type:** Liner Ad

**Ad Cost:** \$ 43.12  
**Tax @ 6.7500 %:** \$  
**Tax @ 7.3125 %:** \$  
**Tax @ 7.0625 %:** \$  
**Total:** \$ 46.03

**Ad Copy:**

**NOTICE OF PUBLICATION**

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

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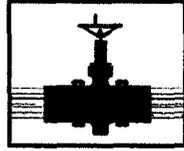
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Albuquerque Publishing Company  
7777 Jefferson NE  
Albuquerque, NM 87109  
(505)823-7777

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Journal: September 14, 2005



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Wayne Stephens and William Stephens  
Po Box 115  
Eunice, NM 88231

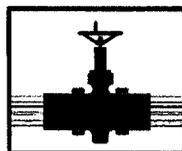
Dear Sir or Madam:

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Sincerely,

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# PLAINS

PIPELINE, L.P.

September 9, 2005

Charles A Bettis  
612 Cedar Drive  
Buchanan, TX 78609

Dear Sir or Madam:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico, 87260, has submitted Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit Letter M of Section 12, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of the New Mexico Water Quality Control Commission standards has been observed in groundwater at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designate a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigation, characterizes the site as to geology and hydrogeology; determines vertical and horizontal extent and magnitude of vadose zone and groundwater contamination, determines rate and direction of contamination migration, provides inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

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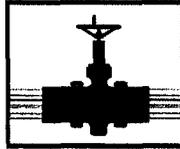
Sincerely,

  
for

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

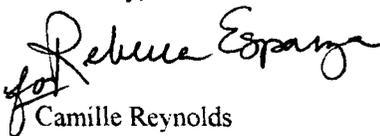
N.B. Bunin Trust  
PO Box 65  
Lincoln City, OR 97367

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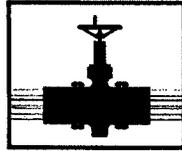
Sincerely,

*for* 

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

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## PIPELINE, L.P.

September 9, 2005

Evan May Toussaint et al  
PO Box 115  
Eunice, NM 88231

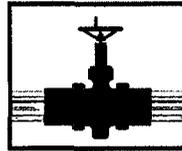
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Sincerely,

*Yes*  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

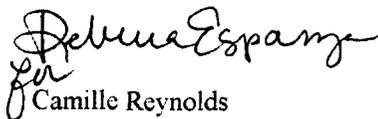
State of New Mexico Land Office  
PO Box 1148  
Santa Fe, NM 87504

Dear Sir or Madam:

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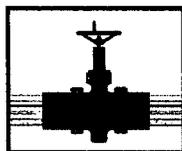
Sincerely,



Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

PIPELINE, L.P.

September 9, 2005

William McNeill et al  
PO Box 339  
Bridger, MT 59014

Dear Sir or Madam:

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Sincerely,



Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# PLAINS PIPELINE, L.P.

September 9, 2005

James A. Bryant  
8204 Indigo Court NE  
Albuquerque, NM 87122

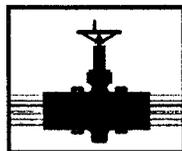
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Sincerely,

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# PLAINS

## PIPELINE, L.P.

September 9, 2005

Darrold Stephenson  
Lea County Commissioner, District 5  
PO Box NN  
Jal, NM 88252

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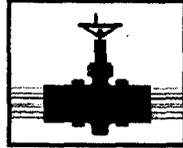
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Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

PIPELINE, L.P.

September 9, 2005

Lynn Brandvold  
NM Bureau of Mines & Mineral Resources  
NM Institute of Mining & Tech.  
Socorro, NM 87801

Dear Sir or Madam:

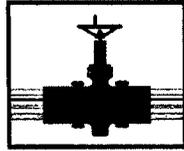
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*for*  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

September 9, 2005



**PLAINS**  
**PIPELINE, L.P.**

Ned Kendrick  
Attorney at Law  
325 Paseo de Peralta  
Santa Fe, NM 87501

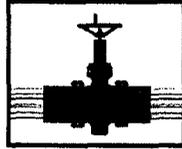
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Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# PLAINS PIPELINE, L.P.

September 9, 2005

NM Oil & Gas Association  
P. O. Box 1864  
Santa Fe, NM 87504

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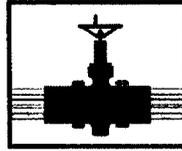
Sincerely,

  
for  
Camille Reynolds

Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Attorney General's Office  
P. O. Box 1508  
Santa Fe, NM 87504

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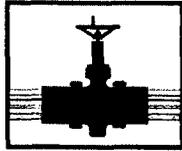
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Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing CP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

---

## PIPELINE, L.P.

September 9, 2005

Elmo Baca  
State Historic Preservation Officer  
228 E Palace Ave, Villa Rivera Room 101  
Santa Fe, NM 87503

Dear Sir or Madam:

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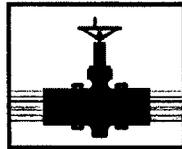
*Rebecca Esparza*  
for

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



**PLAINS**  
PIPELINE, L.P.

Chief  
Hazardous Waste Bureau  
Runnels Building  
Santa Fe, NM 87504

Dear Sir or Madam:

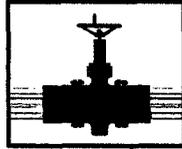
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*Rebecca Espinoza*  
*for*

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# PLAINS

PIPELINE, L.P.

September 9, 2005

Chief  
Groundwater Bureau  
Runnels Building  
Santa Fe, NM 87504

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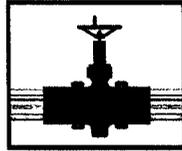
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Lovington, NM 87260

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333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Bruce S. Garber  
Attorney at Law  
P. O. Box 0850  
Santa Fe, NM 87504

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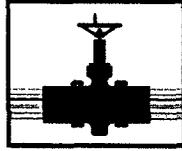
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**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Jay Lazarus  
P. O. Box 5727  
Santa Fe, NM 87502

Dear Sir or Madam:

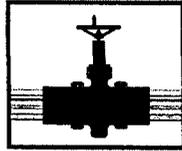
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Sincerely,

*Rebecca Espinoza*  
for

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# PLAINS

PIPELINE, L.P.

September 9, 2005

State Director  
Bureau of Land Management  
P. O. Box 27115  
Santa Fe, NM 87502

Dear Sir or Madam:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico, 87260, has submitted Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit Letter M of Section 12, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of the New Mexico Water Quality Control Commission standards has been observed in groundwater at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designate a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigation, characterizes the site as to geology and hydrogeology; determines vertical and horizontal extent and magnitude of vadose zone and groundwater contamination, determines rate and direction of contamination migration, provides inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

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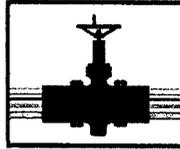
*Rebecca Espanza*  
for  
Camille Reynolds

Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



**PLAINS**  
**PIPELINE, L.P.**

State Engineer  
Water Resources Division  
Bataan Building  
Santa Fe, NM 87503

Dear Sir or Madam:

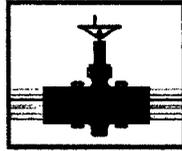
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Sincerely,

*Rebena Espanza*  
*for*

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Director  
NM Department of Game & Fish  
Villagra Building  
Santa Fe, NM 87503

Dear Sir or Madam:

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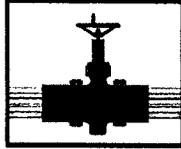
Sincerely,

  
Camille Reynolds

Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

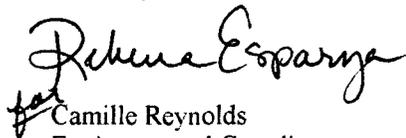
Secretary  
New Mexico Environment Department  
P. O. Box 26110  
Santa Fe, NM 87504

Dear Sir or Madam:

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Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

## PIPELINE, L.P.

September 9, 2005

Lee Wilson & Associates  
P. O. Box 931  
Santa Fe, NM 87501

Dear Sir or Madam:

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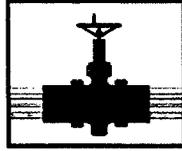
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Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☐ P.O. Box 4648 ☐ Houston, Texas 77210-4648 ☐ 713/646-4100



# PLAINS

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## PIPELINE, L.P.

September 9, 2005

Director  
State Parks & Recreation  
1220 S. St. Francis  
Santa Fe, NM 87505

Dear Sir or Madam:

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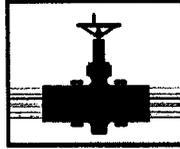
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*for*  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Soil and Water Conservation Bureau  
New Mexico Agriculture Department  
Ag Programs and Resources Division  
Box 30005/APR  
Las Cruces, NM 88003

Dear Sir or Madam:

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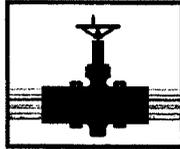
Sincerely,

*Debbie Esparza*  
for  
Camille Reynolds

Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Gerald R. Zimmerman  
Colorado River Board of California  
770 Fairmont Ave., Ste. 100  
Glendale, CA 91203-1035

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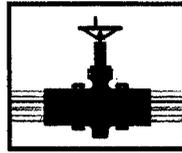
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Sincerely,

*Rebecca Espanza*

*for*  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

September 9, 2005



**PLAINS**  
PIPELINE, L.P.

Dr. Harry Bishara  
P. O. Box 748  
Cuba, NM 87013

Dear Sir or Madam:

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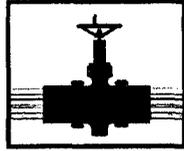
Sincerely,

*Rebecca Espanza*  
for

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☐ P.O. Box 4648 ☐ Houston, Texas 77210-4648 ☐ 713/646-4100



# PLAINS PIPELINE, L.P.

September 9, 2005

Jack A. Barnett  
Colorado River Basin Ctrl. Forum  
106 West 500 South, Suite 101  
Bountiful, UT 84010

Dear Sir or Madam:

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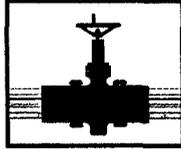
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Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

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## PIPELINE, L.P.

September 9, 2005

Ron Dutton  
Southwestern Public Service  
P. O. Box 1261  
Amarillo, TX 79170

Dear Sir or Madam:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico, 87260, has submitted Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit Letter M of Section 12, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of the New Mexico Water Quality Control Commission standards has been observed in groundwater at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designate a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigation, characterizes the site as to geology and hydrogeology; determines vertical and horizontal extent and magnitude of vadose zone and groundwater contamination, determines rate and direction of contamination migration, provides inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

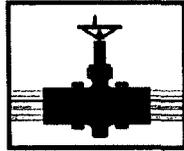
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Sincerely,

for  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



# PLAINS

PIPELINE, L.P.

September 9, 2005

William Turner  
New Mexico Trustee for Natural Resources  
c/o American Ground Water Consultants  
610 Gold St. SW, Suite 111  
Albuquerque, NM 87102

Dear Sir or Madam:

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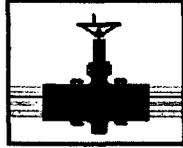
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Sincerely,

*CR*  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100



**PLAINS**  
**PIPELINE, L.P.**

September 9, 2005

Mike Schulz  
International Technology Corp.  
5301 Central Avenue, N.E., Ste 700  
Albuquerque, NM 87108

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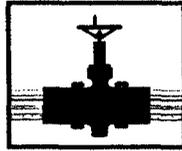
Sincerely,

  
for

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☒ P.O. Box 4648 ☒ Houston, Texas 77210-4648 ☒ 713/646-4100



# PLAINS

## PIPELINE, L.P.

September 9, 2005

Colin Adams  
Environmental Counsel  
Public Service Co. of New Mexico  
414 Silver, Southwest  
Albuquerque, NM 87158

Dear Sir or Madam:

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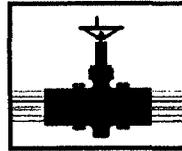
Sincerely,

*for*  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



**PLAINS**  
**PIPELINE, L.P.**

Regional Forester  
USFS Regional Office  
517 Gold Avenue SW  
Albuquerque, NM 87102

Dear Sir or Madam:

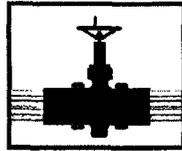
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Sincerely,

Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260

September 9, 2005



**PLAINS**  
**PIPELINE, L.P.**

Field Supervisor  
US Fish & Wildlife Service  
2105 Osuna Road, Northeast  
Albuquerque, NM 87113

Dear Sir or Madam:

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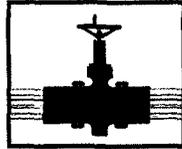
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Telephone (505) 396-3441  
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Lovington, NM 87260

Plains Marketing GP Inc., General Partner

333 Clay Street, Suite 1600 (77002) ☎ P.O. Box 4648 ☎ Houston, Texas 77210-4648 ☎ 713/646-4100

September 9, 2005



**PLAINS**  
PIPELINE, L.P.

Chris Shuey  
Southwest Research & Information Center  
P. O. Box 4524  
Albuquerque, NM 87106

Dear Sir or Madam:

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Sincerely,

for  
Camille Reynolds  
Environmental Coordinator  
Plains All American Pipeline  
Telephone (505) 396-3441  
3112 West Hwy 82  
Lovington, NM 87260



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

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

June 16, 2005

Ms. Camille Reynolds  
Plains All American Pipeline, L.P.  
3112 West Hwy 82  
Lovington, NM 88260

**RE: Stage 1 and Stage 2 Abatement Plan (Revised)**  
**Hugh Gathering 909402 (ref. #2002-10235), dated May 2005**  
**Unit Letters M of Section 12 and P of Section 11, Township 21 South, Range 37 East**  
**Lea County, New Mexico**

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Plains All American Pipeline's (Plains) report as shown above.

The OCD has determined that the above referenced Stage 1 and Stage 2 Abatement Plan is **administratively complete**. Before the OCD can complete a technical review of the Stage 1 and Stage 2 proposals, the OCD requires that:

1. Plains issue, by July 18, 2005, a notice of publication in the Albuquerque Journal and Hobbs News-Sun pursuant to OCD Rule 19.G.(2), using the format attached.
2. Prior to issuing public notice, Plains shall issue written notice of the plan pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1)(d) can be found at [www.emnrd.state.nm.us/ocd/Bureaus/environm.htm](http://www.emnrd.state.nm.us/ocd/Bureaus/environm.htm).
3. Plains shall notify, in writing, the individuals and organizations listed in part 4.6 of the plan.
4. Plains provide the OCD with proof of publication and proof of written notice by July 22, 2005. Proof of notice shall include a map of the surface owners of record within one (1) mile of the perimeter of the site and shall identify compliance with each of the provisions of OCD Rule 19.G.

If you have any questions, please contact Ed Martin at (505) 476-3492.

Sincerely,

Roger C. Anderson  
Environmental Bureau Chief

cc: Larry Johnson, Hobbs OCD District Office

Plains All American Pipeline, L.P.  
Stage 1 and Stage 2 Abatement Plan  
Hugh Gathering Site  
July 16, 2005  
Page 2 of 2

## NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 and Stage 2 Abatement Plan Proposals have been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Plains All American Pipeline, L.P., Camille Reynolds, Environmental Coordinator, Telephone (505) 441-0965, 3112 West Hwy 82, Lovington, New Mexico 87260, has submitted a Stage 1 and Stage 2 Abatement Plan Proposal for the Hugh Gathering pipeline leak site, located in Unit M of Section 12, and Unit P of Section 11 of Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Plains All American Pipeline, L.P. operates a crude oil pipeline at the site. Crude oil and benzene contamination in excess of New Mexico Water Quality Control Commission standards has been observed in ground water at the site. The Stage 1 and Stage 2 Abatement Plan Proposal presents the following activities: designates a responsible person relative to plan submittal, describes and maps the site, provides historical information including previous investigations, characterizes the site as to geology and hydrogeology, determined vertical and horizontal extent and magnitude of vadose-zone and groundwater contamination, determined rate and direction of contaminant migration, provided inventory of water wells in the vicinity, provided location and number of wells actually or potentially affected by the pollution, defined surface water hydrology, determined seasonal stream flow characteristics, determined groundwater/surface water relationships, determined the vertical and horizontal extent and magnitude of contamination, establishes a monitoring program, establishes a Quality Assurance Plan, soil and groundwater remediation strategies, and surface restoration strategies.

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**PLAINS  
PIPELINE**

May 16, 2005

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

IR-078

Re: Plains All American Pipeline Revised Stage 1 and 2  
Abatement Plan  
Hugh Gathering Site  
Sections 11 and 12, T21S, R37E  
Lea County, New Mexico

Dear Mr. Martin:

Please find attached for your approval the Revised Stage 1 and 2 Abatement Plan, dated May 2005, for the Hugh Gathering site located in Sections 11 and 12 of Township 21 South, and Range 37 East of Lea County, New Mexico. The Revised Stage 1 and 2 Abatement Plan details site activities conducted to date and future activities for remediation and closure of the site.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds  
Remediation Coordinator  
Plains All American Pipeline

Cc: Larry Johnson, NMOCD, Hobbs Office  
Mr. James Bryant, 8204 Indigo Ct., Albuquerque, NM

Enclosure

# **EOTT ENERGY Pipeline Limited Partnership**

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 687-2040

June 10, 1997

State of New Mexico  
Oil Conservation Division - Hobbs District Office  
P.O. Box 1980  
Hobbs, NM 88241-1980  
Attn: Wayne Price

RE: Closure Report - Hugh Gathering System  
Sec. 26, T-21-S, R-37-E  
Lea County, NM

Dear Wayne:

EOTT Energy Pipeline has completed remediation of crude oil contaminated soil at the above captioned leak site. Nickell Environmental Corporation conducted the remediation activities using their Deep Remediation Injection System.

Attached is a copy of the lab analysis of remediated soil from the site. Note that the TPH level is well below the 1,000 ppm level proposed in our January 30, 1997 letter to the OCD outlining the cleanup of the leak site.

EOTT Energy Pipeline, by issue of this letter and attachments requests closure on the project. If you have any questions or need additional information, please don't hesitate to call.

Sincerely,



Lennah Frost  
Environmental Engineer

/lf

Attachments

cc: A. Hugh - Environmental File  
Neil Stidham - Shell Pipe Line  
B. Garduno

# ENVIRONMENTAL LAB. OF , INC.

"Don't Treat Your Soil Like Dirt!"

NICKELL ENVIRONMENTAL  
ATTN: MR. RONNIE W. NICKELL  
19 BARRY ROAD  
MIDLAND, TEXAS 79708  
FAX: 915-520-3844

RECEIVING DATE: 04/03/97  
SAMPLE TYPE: SOIL  
PROJECT #: EOT 502-1  
PROJECT NAME: EOTT HUGHES GATHERING  
PROJECT LOCATION: EUNICE, NM

ANALYSIS DATE: 04/04/97  
SAMPLING DATE: 04/03/97  
SAMPLE CONDITION: INTACT

ELT#	FIELD CODE	TPH O10-C25 (mg/kg)
10645	EOT 502-1	73

QUALITY CONTROL	1040
TRUE VALUE	1118
% PRECISION	93
RPD	1

Methods: EPA SW 846-8015M Diesel Range Organics (DRO)

  
Michael R. Fowler

4-7-97  
Date

