

Basin Environmental Service Technologies, LLC

P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com
Office: (505) 396-2378 Fax: (505) 396-1429



14 February 2006

Mr. Larry Johnson
New Mexico Oil Conservation Division
Hobbs District 1
1625 N. French Drive
Hobbs, New Mexico 88240



Re: Closure Request, Young Deep to Lynch 10" Idle
Plains Marketing, L. P. (C-141, dated 06 July 2005)
Plains Marketing, L. P. (Preliminary Site Investigation Report and
Remediation/Closure plan, dated 27 July 2005)
Basin Environmental email confirming verbal approval, dated 05 August 2005
Unit A (NE ¼, NE ¼) Section 19, Township 20 South, Range 34 East
Lea County, New Mexico

Dear Mr. Johnson:

Basin Environmental Services (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for closure of the Young Deep to Lynch 10" Idle remediation site at the above referenced location. Remediation activities were successfully accomplished as proposed in the New Mexico Oil Conservation Division (NMOCD) approved Preliminary Site Investigation Report and Remediation/Closure Plan, dated 27 July 2005. The only remaining task to be completed is reseeding with an approved Bureau of Land Management (BLM) grass seed and monitoring the growth of the grass to ensure vegetation has been established. Reseeding of the Young Deep to Lynch 10" Idle release site is projected to be in the spring of 2006. Hydrating, monitoring the growth process and reporting results to BLM will be adhered to until vegetation has been restored and BLM releases Plains.

Basin responded and clamped the pipeline release on 30 June 2005, located on the Young Deep to Lynch 10" Idle Pipeline. The impacted soils were excavated and stockpiled on a 6-mil poly-liner adjacent to the site. As reported on the C-141, dated 06 July 2005, approximately 35 barrels of crude oil were released and 15 barrels recovered. NMOCD ranking criteria for the Young Deep to Lynch 10" Idle release site is 0-9, which sets the remediation levels for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total

petroleum hydrocarbons – gasoline range organics/diesel range organics (TPH-GRO/DRO) at 50 mg/kg for total BTEX and 5000 mg/kg for TPH-GRO/DRO.

The following NMOCD approved remedial activities were accomplished at the Young Deep to Lynch 10" Idle pipeline release site:

- In June and July 2005, Basin conducted excavation activities at the release point and flow path. The excavation is approximately 125 feet long by 36 feet wide and 8 feet below ground surface (bgs). The impacted soils were placed on a 6-mil poly-liner adjacent to the excavation for future remedial activities. Approximately 1400 cubic yards of impacted soil was excavated and stockpiled on-site. The Young Deep to Lynch Idle 10" Pipeline was de-oiled under the direction of Plains Operations personnel following the crude oil release.
- On 11 July 2005, confirmation soil samples were collected from the walls and floor of the excavation. The soil samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results of the soil samples collected from the floor and walls of the excavation indicate that BTEX and TPH-GRO/DRO concentrations are below NMOCD regulatory standards and no further excavation was necessary. Laboratory results are in Table 1, Soil Chemistry Table.
- On 04 August 2005, a proposed Preliminary Site Investigation Report and Remediation/Closure Plan, dated 27 July 2005, was submitted to NMOCD and verbally approved. The approved plan proposed blending the impacted soil; divided into equal grid cells of approximately 350 cubic yards and collecting soil samples from each grid to ensure TPH concentrations were below 5000 mg/kg. Once laboratory results confirmed the blended soils were below NMOCD standards, backfilling of the blended material would be initiated. The backfilled excavation would be contoured to the original rangeland grade surrounding the site and reseeded with approved BLM grass seed.
- In August 2005, the blending of the impacted soil was conducted. Cells were divided into approximately 350 cubic yards and confirmation soil samples were collected 13 September 2005 and analyzed for BTEX and TPH-GRO/DRO concentrations. Laboratory results of the soil samples collected from the grid cells indicate the blended soils were below NMOCD regulatory standards.
- In September 2005, backfilling of the Young Deep to Lynch 10" Idle excavation site with the blended soil was initiated and completed with the site being contoured to the surrounding pastureland. Reseeding of the site is projected to be in the spring of 2006 to coincide with the beginning of the growing season and spring precipitation to enhance the establishment and root growth of the grass seed. Hydrating, monitoring the growth process and reporting results to BLM will be adhered to until the vegetation is established and BLM releases Plains.

The remediation activities were completed in accordance with the NMOCD approved (Basin email, 05 August 2005) Plains Marketing, L. P., Remediation Work Plan, dated 27 July 2005. Based on the results of the NMOCD approved remediation activities conducted at the Young Deep to Lynch Abandoned 10" release site, Basin, on behalf of Plains, requests that the NMOCD consider this site as eligible for closure under the *New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills and Releases (1993)*.

Should you have any questions or comments, please contact me at (505) 441-2124.

Sincerely,

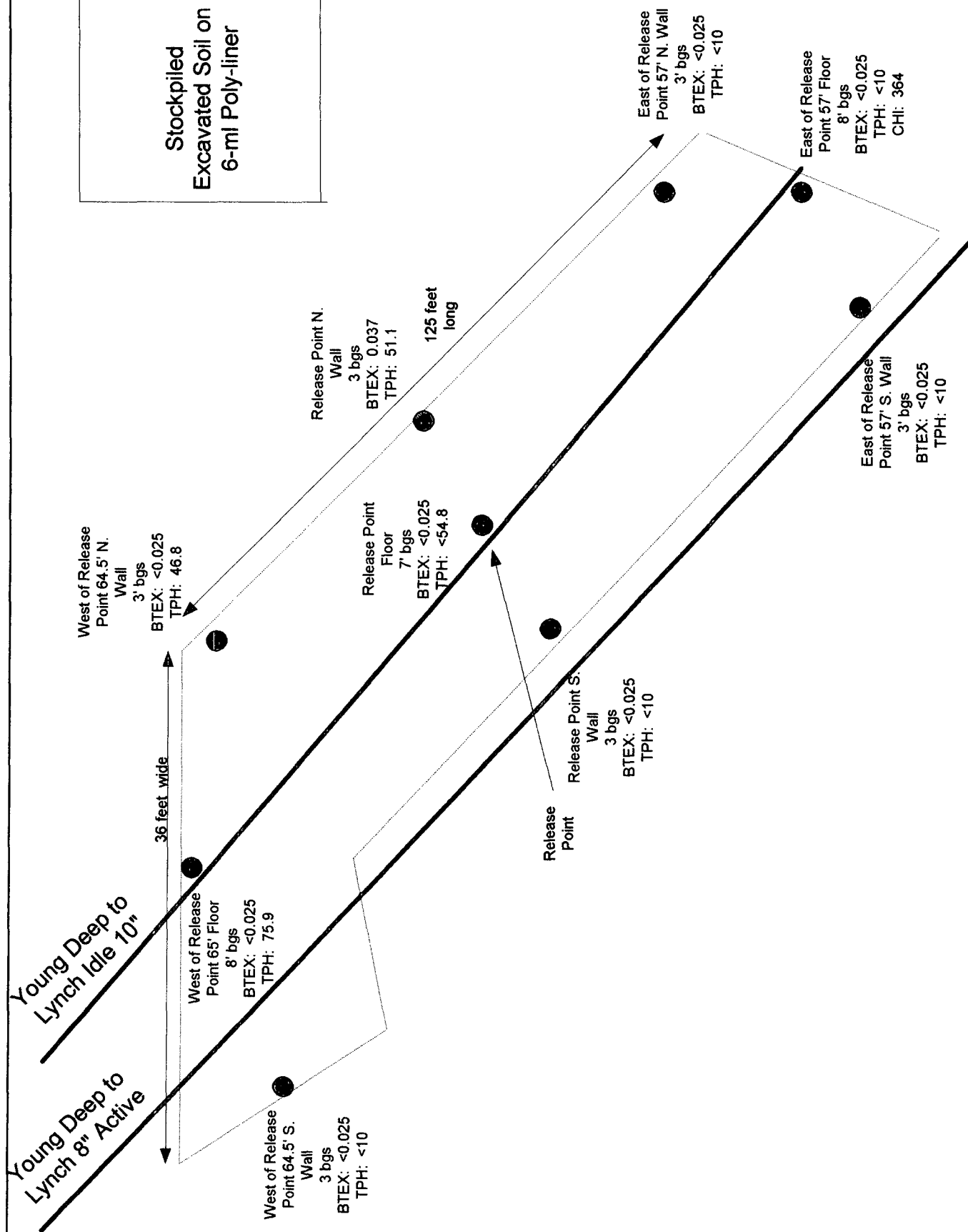
Ken Dutton
Basin Environmental Services

Attachments: Site Map
Table 1, Soil Chemistry Table, Soil Borings
NMOCD C-141 (Initial)
NMOCD C-141 (Final)

cc: Mr. Steve Caffey, BLM (Hobbs, NM Office)
Mr. Jim Amos, BLM (Carlsbad, NM Office)



Stockpiled
Excavated Soil on
6-mil Poly-liner



DESCRIPTION	TITLE	DRAWN BY
Plains Marketing, L.P. Young Deep to Lynch Idle 10" NE/NE S19, T20S, R34E Lea County, New Mexico	Figure 2, Site Map	Basin Environmental Services kad

● Sampling Points

TABLE 1

SOIL CHEMISTRY

PLAINS MARKETING, L.P.
 YOUNG DEEP TO LYNCH 10" IDLE
 LEA COUNTY, NEW MEXICO
 PLAINS EMS: 2005-00156

SAMPLE LOCATION	SAMPLE DEPTH (Below Normal Surface Grade)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M		TOTAL TPH	CHLORIDES
			BENZENE	TOLUENE	ETHYL- BENZENE	M,P- XYLENES	O-XYLENE	GRO	DRO		
			(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
Release Point N. Wall	3' bgs	07/11/05	<0.025	<0.025	<0.025	0.037	<0.025	<10	51.1	51.1	
Release Point S. Wall	3' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10	
Release Point Floor	7' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	54.8	54.8	
West of Release Point 64.5' S. Wall	3' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10	
West of Release Point 64.5' N. Wall	3' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	46.8	46.8	
West of Release Point 65' Floor	8' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	75.9	75.9	
East of Release Point 57' S. Wall	3' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10	
East of Release Point 57' N. Wall	3' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10	
East of Release Point 57' Floor	8' bgs	07/11/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10	364
Stockpile Background		07/13/05	<0.025	0.308	0.139	2.00	0.884	637	4090	4730	
G1	N/A	09/13/05	<0.025	<0.025	<0.025	<0.025	<0.025	42.6	607	650	
G2	N/A	09/13/05	<0.025	<0.025	<0.025	<0.025	<0.025	37.8	620	658	
G3	N/A	09/13/05	<0.025	0.031	<0.025	0.065	<0.025	304	2820	3120	

TABLE 1 (cont)

SOIL CHEMISTRY

PLAINS MARKETING, L.P.
 YOUNG DEEP TO LYNCH 10" IDLE
 LEA COUNTY, NEW MEXICO
 PLAINS EMS: 2005-00156

SAMPLE LOCATION	SAMPLE DEPTH (Below Normal Surface Grade)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M		TOTAL TPH	CHLORIDES (mg/kg)
			BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL- BENZENE (mg/kg)	M,P- XYLENES (mg/kg)	O-XYLENE (mg/kg)	GRO (mg/kg)	DRO (mg/kg)		
G4	N/A	09/13/05	<0.025	0.028	<0.025	0.050	<0.025	128	2180	2310	
G5	N/A	09/13/05	<0.025	0.043	<0.025	0.064	<0.025	117	1910	2030	
G6	N/A	09/13/05	<0.025	0.084	0.027	0.128	0.030	212	2530	2740	
NMOCD CRITERIA			10	TOTAL BTEX 50						5000	

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 Camille Reynolds	
Address 5805 East Hwy. 80, Midland, TX 79706	Telephone No. 505-441-0965	
Facility Name Young Deep to Lynch Idle 10"	Facility Type 10" Steel Pipeline	
Surface Owner BLM	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter A	Section 19	Township 20S	Range 34E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
------------------	---------------	-----------------	--------------	---------------	------------------	---------------	----------------	---------------

Latitude 32° 33' 54.1" Longitude 103° 35' 31.8"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 35 barrels	Volume Recovered 15 barrels
Source of Release 10" Steel Pipeline	Date and Hour of Occurrence 6/30/2005 @ 06:30	Date and Hour of Discovery 6/30/2005 @ 06:45
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Larry Johnson	
By Whom? Camille Reynolds	Date and Hour 6/30/2005 @ 15:37	
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.* Internal corrosion of the 10 inch pipeline resulted in release of crude oil. A clamp was installed on the pipeline to mitigate the release. The line is idle so information concerning volume and pressure on line is unavailable.		
Describe Area Affected and Cleanup Action Taken.* The impacted soil was excavated and stockpiled on plastic. Aerial extent of surface impact was 1,843 square feet.		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Signature: <i>Camille Reynolds</i>		OIL CONSERVATION DIVISION
Printed Name: Camille Reynolds		Approved by District Supervisor:
Title: Remediation Coordinator	Approval Date:	Expiration Date:
E-mail Address: cireynolds@paalp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 7/6/05	Phone: 505-441-0965	

* Attach Additional Sheets If Necessary