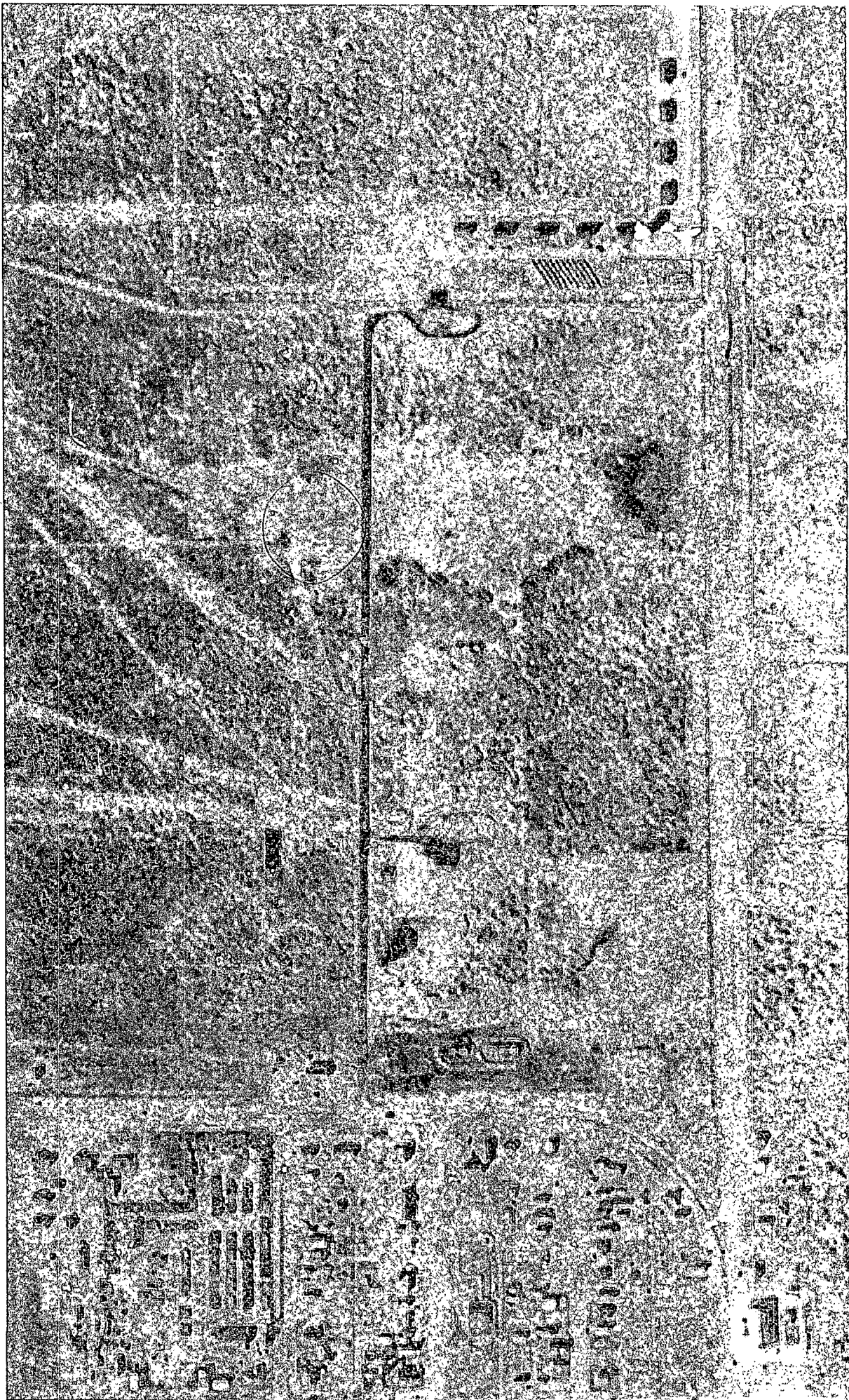


**1R - 486**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):  
2007 - Present**



LRP-486

4/8/2008

Targa  
Meeting

Carl - Targa  
Wrangham

Don Targa  
Embrey

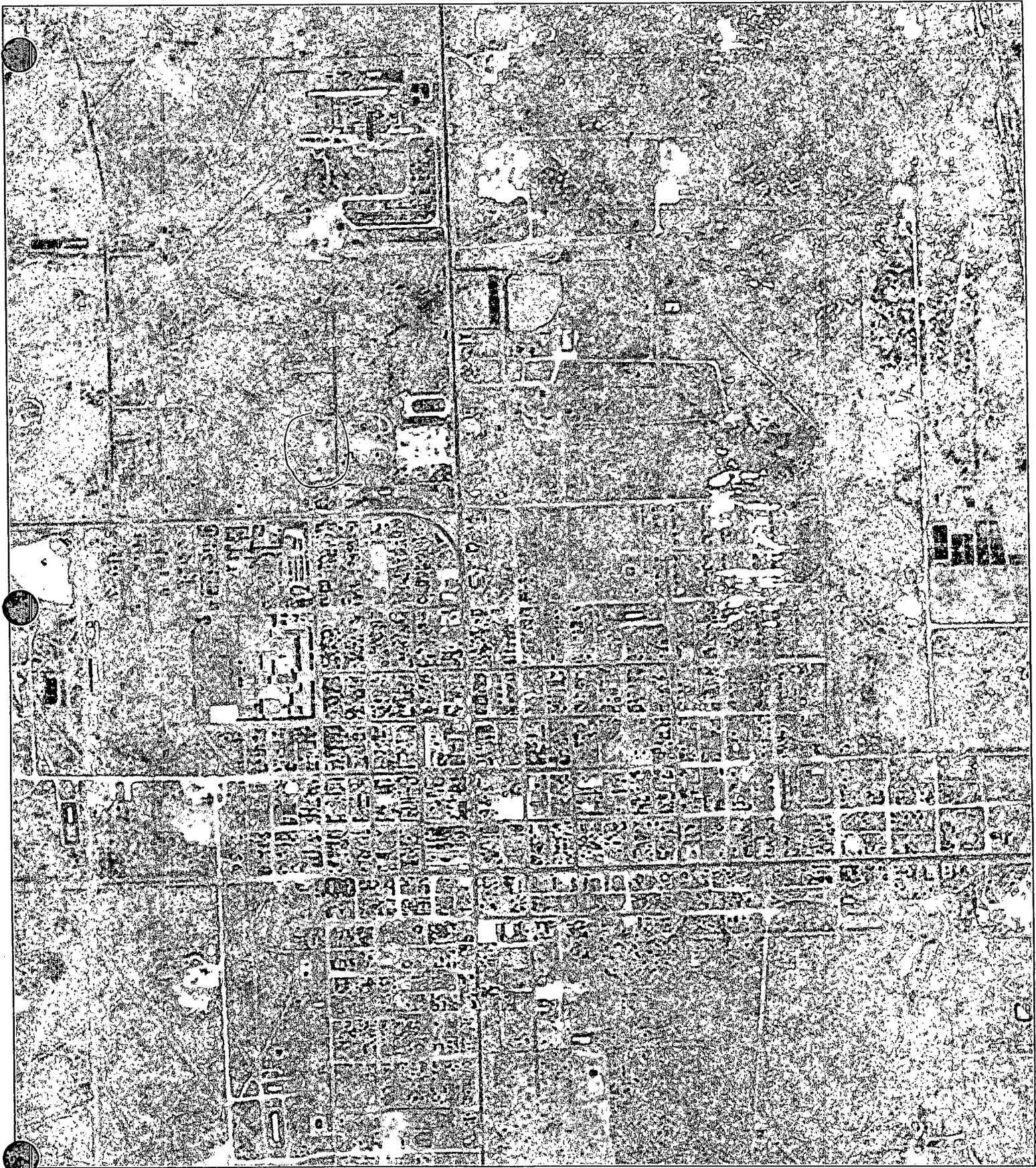
Wayne  
Price-OC

Carl  
Chavez-  
OC

2-7-49

①

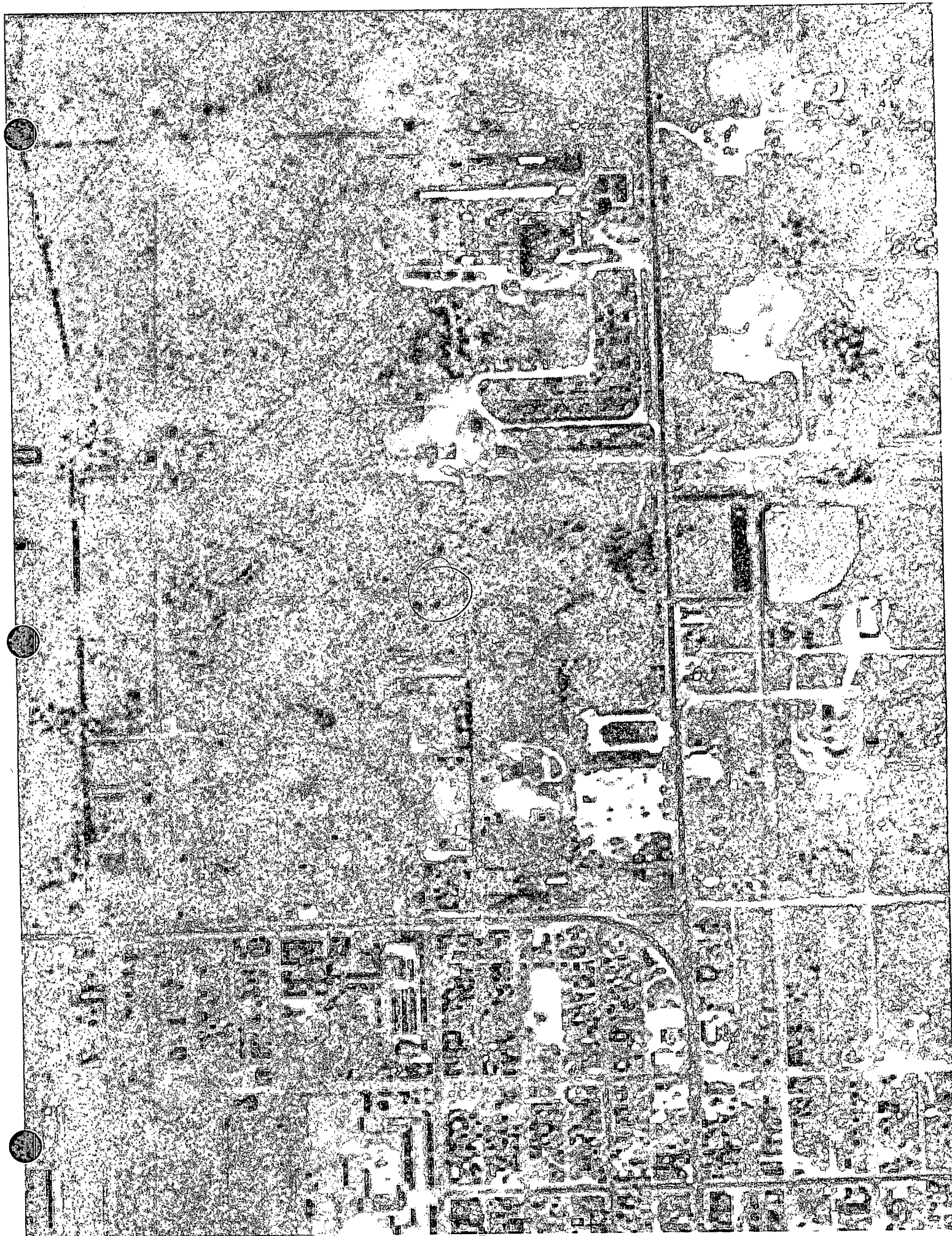
4-28-54



4-28-54

(2)





4-28-54

③

4-28-54



(4)

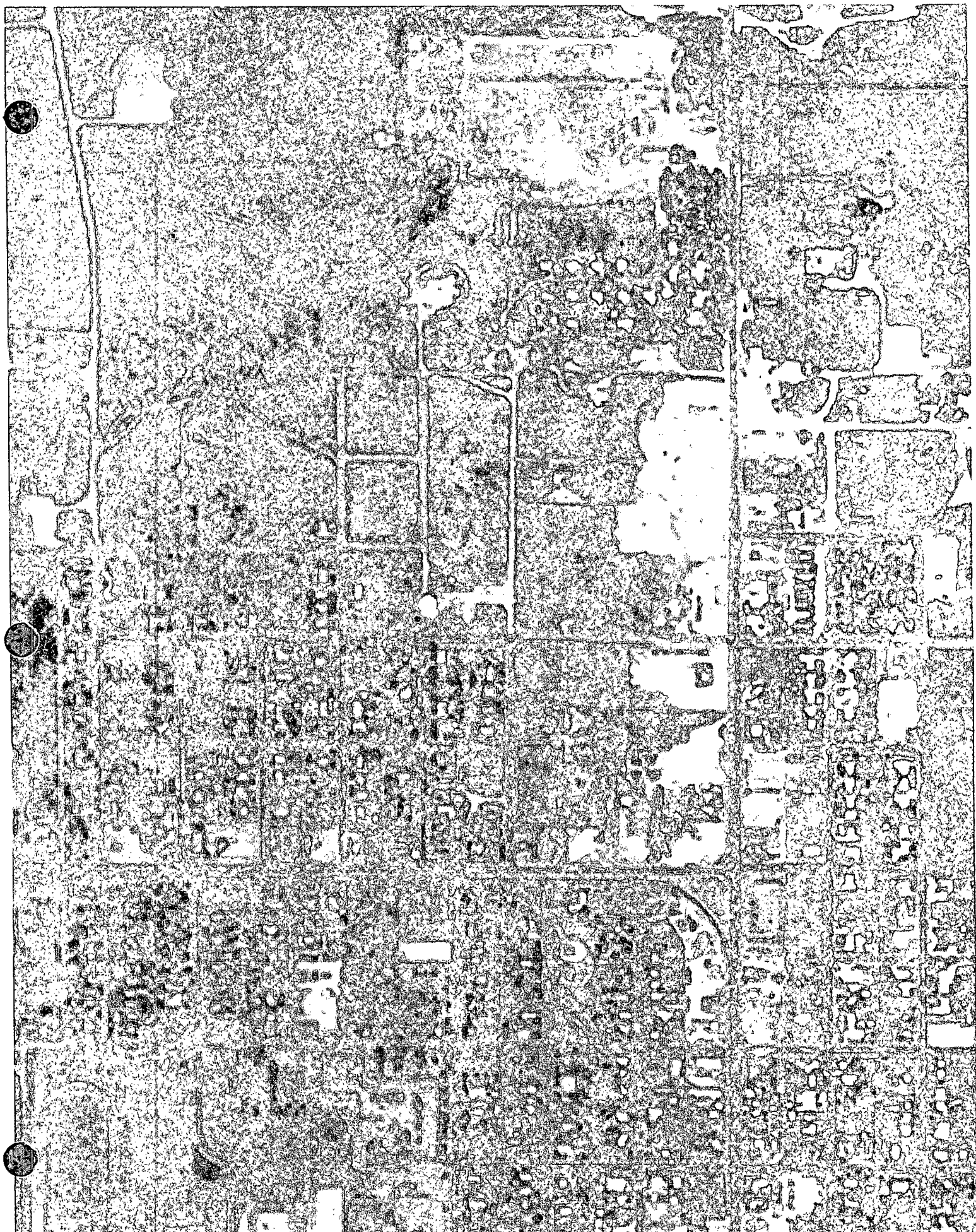
2-4-68





⑤

3-29-77



6

9-30-81

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, December 07, 2007 8:38 AM  
**To:** 'Jeffrey P Dann'  
**Cc:** Daniel M Bryant; Camille J Reynolds; Price, Wayne, EMNRD; Johnson, Larry, EMNRD; Sanchez, Daniel J., EMNRD  
**Subject:** RE: Ruth Property Report

Jeff:

The OCD understands your concern and I think we both realize that the property will be used for residential purposes. We agree that we should review the verification of soil remediation samples on their own merit and in consideration of your concern. Thank you.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
 Oil Conservation Division, Environmental Bureau  
 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
 Office: (505) 476-3491  
 Fax: (505) 476-3462  
 E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
 Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
 (Pollution Prevention Guidance is under "Publications")

---

**From:** Jeffrey P Dann [mailto:jpdann@paalp.com]  
**Sent:** Friday, December 07, 2007 7:29 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Daniel M Bryant; Camille J Reynolds  
**Subject:** RE: Ruth Property Report

Carl:

Thank you for your response to our Site Closure Proposal for the Eunice Site (Ruth Property). The conditions for closure listed below are acceptable to Plains. However, we would like to point out that there is a huge difference in the standard NMOCD BTEX cleanup guidance level of 10 mg/Kg Benzene and 50 mg/Kg BTEX in soil and the "non-detect" BTEX cleanup levels you quoted in your November 29, 2007 recommendation to Plains. We also understand that under the guidelines, the NMOCD "retains the right to require remediation to more stringent levels.....". However, we would just like to request that the NMOCD keep an open mind in the event that one of more of the final confirmation soil samples reports a minor T-E-X hit (in the low parts per billion range) and evaluate the data based on it's own merit.

We are in the process of scheduling the work and we will notify the NMOCD (Hobbs and Santa Fe) at least 48 hours prior to the start of work and at least 24 hours prior to conducting any soil sampling activities.

thanks  
 Jeff Dann  
 Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Thursday, November 29, 2007 7:03 PM

12/7/2007



**To:** Jeffrey P Dann  
**Cc:** Johnson, Larry, EMNRD; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** RE: Ruth Property Report

Mr. Dann:

The Oil Conservation Division has completed its review of the Site Assessment Report and Site Closure Proposal "Ruth Property Unit P, Section 28, Township 21 South, Range 37 East City of Eunice, Lea County, New Mexico (Report- September 2007)." The OCD notices that you used air rotary drilling and this is not a desirable method especially when it would appear that Plains Marketing, L.P. has determined the extent of organic contamination surrounding the former J.N. Carson Pump Station.

The OCD has the following comments and/or recommendations on the proposed remediation:

- 1) Testing the sidewalls and the bottom of the excavation will be required to what has been proposed in the report. In addition, we require that chloride samples also be collected (Method 300). We notice that one Chloride sample was collected at SB-1. A chloride soil cleanup concentration of 250 mg/kg is required due to the residential use planned for the property. TPH shall not exceed 100 mg/kg and BTEX shall be non-detect. The only exception would be to cleanup to background, which will require additional samples. Please minimize the dilution when analyzing for chlorides as a dilution of 50 seems elevated for clean soil conditions (< 100 ppm).
- 2) A liner does not appear to be needed if Plains can show that cleanup standards as described above have been met.
- 3) The depth of 12 ft. for the excavation in the vicinity of SB-1 is not an accepted method of the OCD. Plains should rely on PID, olefactory and visual staining to drive the horizontal and vertical extent of the excavation. The chloride samples along the 4 sidewalls and base of the excavation will need to meet the limits in item #1 above.
- 4) The excavation shall remain open and be fenced to prevent trespassers and the analytical data shall be provided to the OCD for approval before filling begins to restore the site. Site restoration shall be implemented to restore the drainage and vegetation to its original state.

Please contact me to discuss the date for the work and any questions you may have. Thank you.

*Disclaimer: Please be advised that NMOCD approval of this plan does not relieve Plains Marketing, L.P. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Plains Marketing, L.P. of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Jeffrey P Dann [mailto:[jpdann@paalp.com](mailto:jpdann@paalp.com)]  
**Sent:** Wednesday, November 07, 2007 1:37 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property Report

12/7/2007

Carl - just wanted to check in and see how you were coming along on the review for our site in Eunice. Let me know if you need anything else.

Jeff Dann  
Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]

**Sent:** Thursday, October 11, 2007 1:37 PM

**To:** Jeffrey P Dann

**Subject:** Ruth Property Report

Jeff:

Hi. I received the report today and will work to read it soon and respond. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

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12/7/2007



## Chavez, Carl J, EMNRD

---

**From:** Jeffrey P Dann [jpdann@paalp.com]  
**Sent:** Monday, September 10, 2007 2:02 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property & Plains Investigation  
**Attachments:** Eunice Historical Site Map.pdf; SB-1 to SB-6 Summary\_Report.pdf; Trench Summ\_Report.pdf

Carl - yes the investigation is complete. All went well and we should have you a report sometime next week. Attached is a map and a summary of the lab data from the soil samples collected in the trench and soil borings (all data considered draft at this point and subject to change). Larry Johnson stopped by several times to check on everything.

call if you need anything else.

Jeff Dann  
Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Monday, September 10, 2007 9:50 AM  
**To:** jpdann@paalp.com  
**Cc:** Johnson, Larry, EMNRD  
**Subject:** Ruth Property & Plains Investigation

Jeff:

Was the investigation completed? If so, can you give me a summary of the findings? Thanks.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

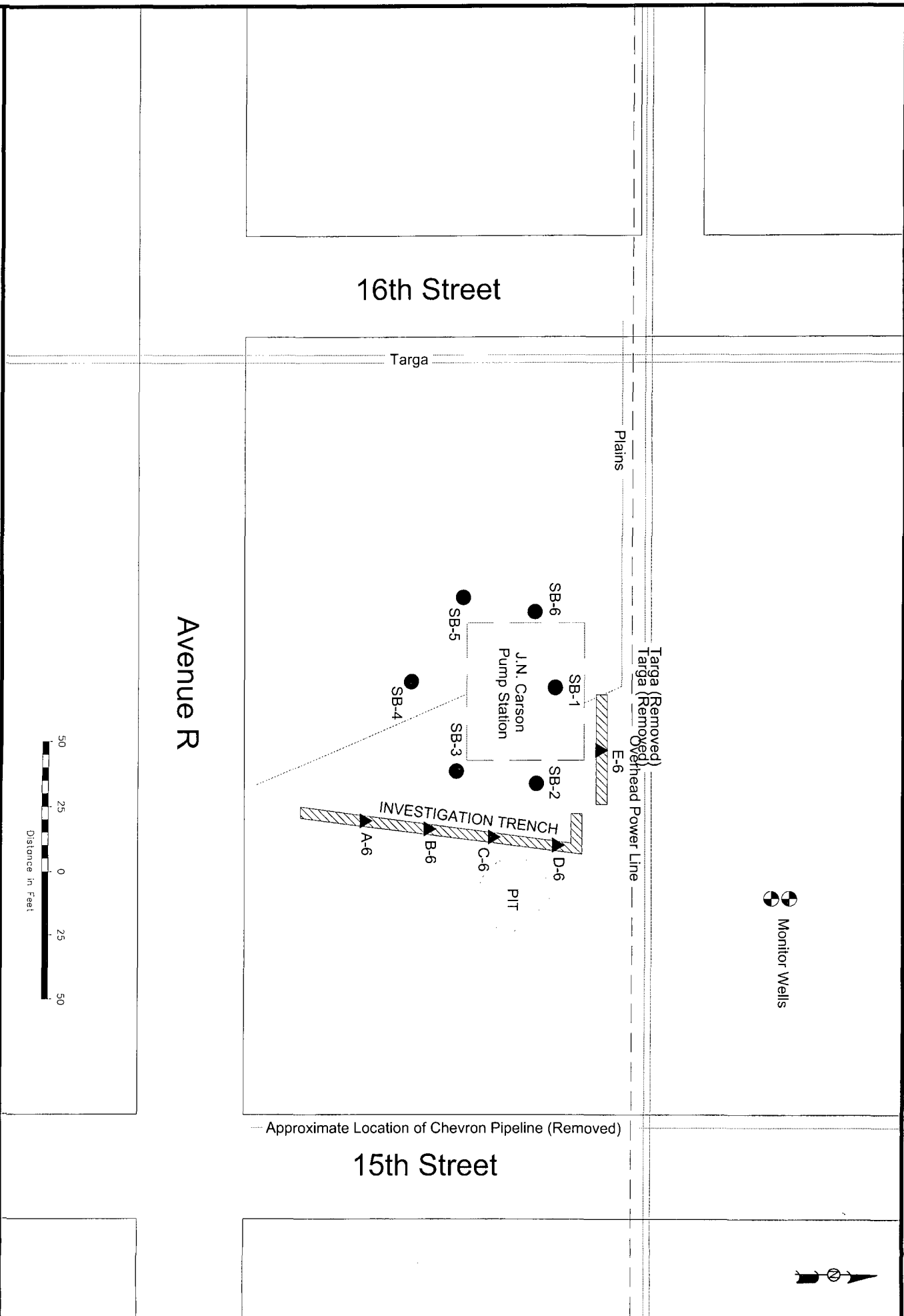
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9/10/2007



Legend:

- Pipeline
- Overhead Electric Line
- Approximate Pump Station Extents
- Investigation Trench Location

Figure 2

Site Map

Plains Marking, L.P.

Ruth Property

SRS # Eunice Historical

Eunice, New Mexico

NOVA

Safety and Environmental

Scale: 1" = 50'

Prep By: CS

Checked By: MKC

August 27, 2007



## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, August 09, 2007 3:21 PM  
**To:** 'Jeffrey P Dann'  
**Cc:** Camille J Reynolds; Daniel M Bryant; Douglas S Kennedy; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD; Johnson, Larry, EMNRD; 'cstanley@novatraining.cc'  
**Subject:** RE: Plains - Eunice Work Plan

**Attachments:** Chevron Texaco Letter 7-30-07.tif



Chevron Texaco  
Letter 7-30-07....

Jeff:

Please find attached a letter from Chevron Texaco that you were copied on. It appears that Chevron is aware of your initial investigation of the property and they will work directly with Plains to ensure that if any impacts from Chevron's historical operations exist, that the impacts are identified and migrated appropriately.

Consequently, I interpret that to mean Chevron will cooperate with Plains on your investigation and Plains should include Mr. Hudson in the field work notification(s), etc. so he may also be present. Perhaps this may help to minimize Plains expenses? Please contact Mr. Hudson for clarification. Thanks.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: CarlJ.Chavez@state.nm.us  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

-----Original Message-----

From: Jeffrey P Dann [mailto:jpdann@paalp.com]  
Sent: Thursday, August 09, 2007 2:43 PM  
To: Chavez, Carl J, EMNRD  
Cc: Camille J Reynolds; Daniel M Bryant; Douglas S Kennedy; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD; Johnson, Larry, EMNRD; 'cstanley@novatraining.cc'  
Subject: RE: Plains - Eunice Work Plan

Carl -- thanks for reviewing our proposal so quickly.

- 1) Plains would like to reiterate that our goal is to delineate the soil impacts to NMOCD standards at and adjacent to our former pump station.
- 3) Plains will leave the trench open following our investigation activities and fence as necessary.
- 4 and 5) Plains will instruct our consultant to follow OCD Headspace and soil sampling protocol during the investigation.
- 6) Pursuant to your request we will combine the investigation results along with a Corrective Action Report.
- 7) Plains will contact the landowner for access to the properties.
- 9) Plains will provide 72 hour notification to the NMOCD.

We anticipate conducting these activities within the next two weeks and will contact you when we have established a start date.

Sincerely,  
Jeff Dann

-----Original Message-----

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
Sent: Friday, August 03, 2007 4:23 PM  
To: Jeffrey P Dann  
Cc: Camille J Reynolds; Daniel M Bryant; Douglas S Kennedy; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD; Johnson, Larry, EMNRD  
Subject: RE: Plains - Eunice Work Plan

Jeff:

Good afternoon. The OCD- Environmental Bureau has reviewed the "Site Assessment Work Plan" (work plan). The OCD has the following comments and/or recommendations:

- 1) The proposed work plan appears to be satisfactory for assessing the extent of contamination associated with Plains historical facility; however, the OCD recommends that you instruct the work crew to be flexible enough to step outward using a 100 ppm PID reading to delineate contamination, along with olfactory senses, soil staining, and contamination discovered during field work.
- 2) Plains may want to consider corrective action in field during the investigation to expedite and minimize corrective action costs under OCD Rule 116.
- 3) I presume the backfilling of the trench will be done with clean fill. Since there were no GRO detected in past sampling, the OCD does not think that BTEX vapors will be an issue; consequently, Plains may leave the trenches open as long as it installs temporary fencing to prevent trespassers, etc. from going into the pits. This may also reduce costs when corrective measures need to be implemented.
- 4) Plains needs to follow OCD Headspace protocol outlined in its guidance document at [http://www.emnrd.state.nm.us/oed/documents/7C\\_spill1.pdf](http://www.emnrd.state.nm.us/oed/documents/7C_spill1.pdf).
- 5) When collecting discrete soil samples from the split-spoon sampler as the spoon is opened and the sheathed core is cut open, Plains needs to immediately collect the soil sample for the lab based on a preliminary scan of stained soils or distinctive visually contaminated soil with the PID to minimize volatilization. Then, quickly collect the sample as prescribed in OCD guidance above for the PID reading.
- 6) Section 3 "Reporting" of the work plan proposes submitting a Site Assessment Report. However, the OCD requires a Corrective Action Report. The OCD would also recommend that corrective actions be taken during the field work if Plains wishes to minimize its expenses on the release.
- 7) The OCD requires that Plains obtain land access through its internal legal staff from the City of Eunice and the landowner. I have provided the complete names with mail addresses and e-mail addresses to facilitate the above in the meeting summary that was e-mailed out after our June 21, 2007 meeting at the site.
- 8) At some point down the road, Targa and Chevron-Exaco may be involved in the corrective action at the site. However, at this time we will wait and see what Plains finds.
- 9) Please provide the OCD with at least 72 hours notice of field work so we may be present during the site assessment and/or corrective action work.



You may recall that Targa agreed at the June 21, 2007 meeting to allow their nearby landfarm to be utilized for any remediation. This may help to reduce Plains treatment or disposal costs?

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: CarlJ.Chavez@state.nm.us  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

-----Original Message-----

From: Jeffrey P Dann [mailto:jpdann@paalp.com]  
Sent: Thursday, August 02, 2007 7:45 AM  
To: Chavez, Carl J, EMNRD  
Cc: Camille J Reynolds; Daniel M Bryant; Douglas S Kennedy  
Subject: Plains - Eunice Work Plan

Carl

Please find attached our Work Plan for investigating the soil impacts at the site in Eunice per your request. Please review and comment.

We have a drill rig on hold for the week of August 13th. If you can complete your review by then we'll be ready to go. If not, we'll reschedule for a later date.

<<ChavezCoverLtr1.pdf>> <<Eunice Historical WP.pdf>>

Hard copy to follow in the mail. I'll be out of the office for a few days (Aug 3-8) and if you need anything, please call Doug Kennedy at (713) 646-4610 or Daniel Bryant at (432) 557-5865

Jeffrey P. Dann, P.G.  
Senior Environmental Specialist  
Plains All American  
(713) 646-4657 (o)  
(713) 646-4199 (f)  
(713) 201-3548 (c)  
email: jpdann@paalp.com

#####

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FYE  
And C

**Matthew P. Hudson**  
Remediation Project  
Manager

**Abandonment Business  
Unit**

Chevron Environmental  
Management Company  
1400 Smith St  
19001A  
Houston, TX 77001  
Tel 713 372 1046  
mhkw@chevron.com

RECEIVED  
2007 AUG 6 PM 2 20

July 30, 2007

Mr. Carl Chavez  
New Mexico Oil Conservation Division  
1220 South St Francis Drive  
Santa Fe, New Mexico 87505

**Subject: Ruth Property Site Meeting and Subsequent Investigation  
Eunice, New Mexico**

Dear Mr. Chavez:

We appreciate the opportunity to meet with you and other interested parties on June 21, 2007, to discuss the assessment and remediation associated with the Ruth Property in Eunice, New Mexico. As discussed at the site meeting, Chevron is committed to participate in any reasonable and necessary environmental assessment and remediation relating to current or historical Chevron operations.

With respect to the Ruth Property, it is our understanding that it is unclear at this time what connection, if any, Chevron's operations in the area may have to potential environmental impacts on the property. We are currently conducting a review of our historical operations in the area, including remediation conducted in the vicinity of the property, to determine if any impacts to the subject property may be a result of our historical operations.

We understand that Plains All American has been asked to lead an initial investigation of the property. Chevron will work directly with representatives from Plains to ensure that if any impacts from Chevron's historical operations exist, they are identified and mitigated appropriately.

Please contact me at (713) 372-1046 should you have any questions or concerns.

Sincerely,

Matthew P. Hudson

cc: Jeff Dann – Plains All American  
James Lingnau – Targa Resources  
The Honorable Matt White – Mayor, City of Eunice



## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, August 03, 2007 3:23 PM  
**To:** 'Jeffrey P Dann'  
**Cc:** Camille J Reynolds; Daniel M Bryant; Douglas S Kennedy; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD; Johnson, Larry, EMNRD  
**Subject:** RE: Plains - Eunice Work Plan

Jeff:

Good afternoon. The OCD- Environmental Bureau has reviewed the "Site Assessment Work Plan" (work plan). The OCD has the following comments and/or recommendations:

- 1) The proposed work plan appears to be satisfactory for assessing the extent of contamination associated with Plains historical facility; however, the OCD recommends that you instruct the work crew to be flexible enough to step outward using a 100 ppm PID reading to delineate contamination, along with olfactory senses, soil staining, and contamination discovered during field work.
- 2) Plains may want to consider corrective action in field during the investigation to expedite and minimize corrective action costs under OCD Rule 116.
- 3) I presume the backfilling of the trench will be done with clean fill. Since there were no GRO detected in past sampling, the OCD does not think that BTEX vapors will be an issue; consequently, Plains may leave the trenches open as long as it installs temporary fencing to prevent trespassers, etc. from going into the pits. This may also reduce costs when corrective measures need to be implemented.
- 4) Plains needs to follow OCD Headspace protocol outlined in its guidance document at [http://www.emnrd.state.nm.us/oed/documents/7C\\_spill1.pdf](http://www.emnrd.state.nm.us/oed/documents/7C_spill1.pdf).
- 5) When collecting discrete soil samples from the split-spoon sampler as the spoon is opened and the sheathed core is cut open, Plains needs to immediately collect the soil sample for the lab based on a preliminary scan of stained soils or distinctive visually contaminated soil with the PID to minimize volatilization. Then, quickly collect the sample as prescribed in OCD guidance above for the PID reading.
- 6) Section 3 "Reporting" of the work plan proposes submitting a Site Assessment Report. However, the OCD requires a Corrective Action Report. The OCD would also recommend that corrective actions be taken during the field work if Plains wishes to minimize its expenses on the release.
- 7) The OCD requires that Plains obtain land access through its internal legal staff from the City of Eunice and the landowner. I have provided the complete names with mail addresses and e-mail addresses to facilitate the above in the meeting summary that was e-mailed out after our June 21, 2007 meeting at the site.
- 8) At some point down the road, Targa and Chevron-Texaco may be involved in the corrective action at the site. However, at this time we will wait and see what Plains finds.
- 9) Please provide the OCD with at least 72 hours notice of field work so we may be present during the site assessment and/or corrective action work. You may recall that Targa agreed at the June 21, 2007 meeting to allow their nearby landfarm to be utilized for any remediation. This may help to reduce Plains treatment or disposal costs?

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
(Pollution Prevention Guidance is under "Publications")

-----Original Message-----

From: Jeffrey P Dann [mailto:jpdann@paalp.com]  
Sent: Thursday, August 02, 2007 7:45 AM  
To: Chavez, Carl J, EMNRD  
Cc: Camille J Reynolds; Daniel M Bryant; Douglas S Kennedy  
Subject: Plains - Eunice Work Plan

Carl

Please find attached our Work Plan for investigating the soil impacts at the site in Eunice per your request. Please review and comment.

We have a drill rig on hold for the week of August 13th. If you can complete your review by then we'll be ready to go. If not, we'll reschedule for a later date.

<<ChavezCoverLtr1.pdf>> <<Eunice Historical WP.pdf>>

Hard copy to follow in the mail. I'll be out of the office for a few days (Aug 3-8) and if you need anything, please call Doug Kennedy at (713) 646-4610 or Daniel Bryant at (432) 557-5865

Jeffrey P. Dann, P.G.  
Senior Environmental Specialist  
Plains All American  
(713) 646-4657 (o)  
(713) 646-4199 (f)  
(713) 201-3548 (c)  
email: jpdann@paalp.com

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USGS Eunice (NM) Topo Map

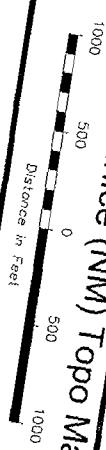


Figure 1  
Site Location  
Map  
Plains Marketing, L.P.  
Ruth Property  
SRSP# Eunice Historical  
Eunice, New Mexico

NOVA

NOVA Safety and Environmental

Scale: 1" = 1000'  
July 31, 2007  
Prep By: DGC  
Check By: [illegible]



**Matthew P. Hudson**  
Remediation Project  
Manager

**Abandonment Business  
Unit**  
Chevron Environmental  
Management Company  
1400 Smith St  
19001A  
Houston, TX 77001  
Tel 713 372 1046  
mhkw@chevron.com

RECEIVED  
2007 AUG 6 PM 2:23

July 30, 2007

Mr. Carl Chavez  
New Mexico Oil Conservation Division  
1220 South St Francis Drive  
Santa Fe, New Mexico 87505

**Subject: Ruth Property Site Meeting and Subsequent Investigation  
Eunice, New Mexico**

Dear Mr. Chavez:

We appreciate the opportunity to meet with you and other interested parties on June 21, 2007, to discuss the assessment and remediation associated with the Ruth Property in Eunice, New Mexico. As discussed at the site meeting, Chevron is committed to participate in any reasonable and necessary environmental assessment and remediation relating to current or historical Chevron operations.

With respect to the Ruth Property, it is our understanding that it is unclear at this time what connection, if any, Chevron's operations in the area may have to potential environmental impacts on the property. We are currently conducting a review of our historical operations in the area, including remediation conducted in the vicinity of the property, to determine if any impacts to the subject property may be a result of our historical operations.

We understand that Plains All American has been asked to lead an initial investigation of the property. Chevron will work directly with representatives from Plains to ensure that if any impacts from Chevron's historical operations exist, they are identified and mitigated appropriately.

Please contact me at (713) 372-1046 should you have any questions or concerns.

Sincerely,

Matthew P. Hudson

cc: Jeff Dann – Plains All American  
James Lingnau – Targa Resources  
The Honorable Matt White – Mayor, City of Eunice

**Chavez, Carl J, EMNRD**


---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, January 15, 2008 8:54 AM  
**To:** 'Curt Stanley'; 'Daniel M Bryant'  
**Cc:** 'Jeffrey P Dann'; Johnson, Larry, EMNRD; Todd Choban; Camille Reynolds; Price, Wayne, EMNRD  
**Subject:** RE: Ruth Property Report

Mr. Stanley:

**Re: Plains Pipeline Ruth Property Excavation**

The New Mexico Oil Conservation Division (NMOCD) hereby approves closure of the Plains Pipeline excavation on the Ruth Property with the following conditions:

- 1) Backfilling of the excavation should include the addition of moisture and compaction between emplacement of 1.5 – 2 ft. lifts of backfill to ensure that the City of Eunice will not experience geotechnical slumping or problems with structural placement of buildings over the excavation area at a future date. Upon reaching property grade, the shallow remnant layer of hydrocarbon stained soils around the power pole and northern excavation area shall be removed; and
- 2) Plains pipelines shall be removed from the property.

Thank you for your cooperation in this matter.

Note: Please be advised that NMOCD approval of this plan does not relieve Plains Pipeline of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Plains Pipeline of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
 Oil Conservation Division, Environmental Bureau  
 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
 Office: (505) 476-3491  
 Fax: (505) 476-3462  
 E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
 Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
 (Pollution Prevention Guidance is under "Publications")

---

**From:** Curt Stanley [mailto:[cstanley@novatraining.cc](mailto:cstanley@novatraining.cc)]  
**Sent:** Friday, January 11, 2008 10:39 AM  
**To:** Chavez, Carl J, EMNRD; 'Daniel M Bryant'  
**Cc:** 'Jeffrey P Dann'; Johnson, Larry, EMNRD; Todd Choban; Camille Reynolds  
**Subject:** RE: Ruth Property Report

Mr. Chavez,

Plains will begin excavation backfilling activities at the Ruth Property in Eunice, New Mexico on Monday, January 14, 2008.

Thank you,

Curt Stanley  
 Sr. Project Manager  
 NOVA Safety and Environmental  
 432.520.7720 (Office)  
 432.238.5781 (Cell)

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:[CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)]  
**Sent:** Friday, January 04, 2008 10:52 AM  
**To:** Daniel M Bryant  
**Cc:** Jeffrey P Dann; Johnson, Larry, EMNRD; Curt Stanley (E-mail)  
**Subject:** RE: Ruth Property Report

1/15/2008

Mr. Bryant:

I have conferred with Mr. Larry Johnson (OCD) on Plains Pipeline's cleanup at the above subject site. Mr. Johnson and I concur that Plains appears to have adequately delineated and removed the point source of contamination associated with its historical operations from the site; however, I am deferring by receipt of this e-mail the final approval to Mr. Wayne Price (EB Chief) when he returns next Tuesday (1/8/2008). We know Plains would like to begin backfilling activities ASAP.

Also, Targa Resources began activities this week along its E-W trending pipeline corridor. The OCD will be meeting with Targa next Tuesday to discuss their initial investigation and to determine their position or intent based on their initial investigation. If we are successful in restoring the site for residential use, and if residential use is ever realized, I will be nominating Plains Pipeline and Targa Resources receive an OCD Environmental Merit Award, since this is essentially the equivalent of an EPA Brownfield Site that was restored and reused to benefit the City of Eunice.

I'm sure Mr. Price will be able to respond next week. Please contact me if you have questions. Thank you for your cooperation in this matter.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
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Website: <http://www.emnrd.state.nm.us/oecd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

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**From:** Daniel M Bryant [mailto:[dmbryant@paalp.com](mailto:dmbryant@paalp.com)]  
**Sent:** Thursday, December 27, 2007 3:43 PM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Jeffrey P Dann; Johnson, Larry, EMNRD; Curt Stanley (E-mail)  
**Subject:** RE: Ruth Property Report

Mr. Chavez,

Attached are the analytical results from the excavation activities performed by Plains at the former J. N. Carson pump station facility on the Ruth property in Eunice, NM. The dimensions of the final excavation are approximately 40' wide by 65' long and 26' in depth. A site sample location map and a summary table documenting the analytical results are also attached for your convenience.

Sidewall samples from the excavation were obtained at a depth of 10' below ground surface (bgs) and 25' bgs from each of the four sidewalls. The base of the excavation was sampled in two locations at 26' bgs. All samples were analyzed for BTEX and TPH and yielded results that were below the laboratory detection limits. Based on these results, Plains has properly defined and excavated the hydrocarbon contamination associated with the historical operation of the J. N. Carson pump on the subject property.

Chloride concentrations from the excavation yielded analytical results that ranged from 4.21 mg/Kg to 66.8 mg/Kg in 9 of the 10 samples obtained from the excavation. The sample obtained from the north sidewall at 10' bgs (N. Wall-10') yielded a concentration of 674 mg/Kg. The sample with the lowest concentration (4.21 mg/Kg) was located on the north sidewall at 25' bgs (N. Wall-25') directly below the 10' bgs sample. It is important to note that all other analytical results for chlorides were below 67 mg/Kg. Considering the age former facility and length of time the contaminants were on the subject property being over 20 years old, it is apparent that the chlorides that exist at 10' bgs have not leached to deeper depths and are unlikely to migrate any deeper.

Please also note on the site map that this sample was taken in close proximity to the power pole for the overhead lines which exist on the north side of the property. In order to maintain the stability and safety of this pole, it would be unsafe to excavate any further in the northerly direction. Since the impact appears isolated and does not appear to pose a risk to the subsurface geology or groundwater, Plains requests that we be allowed to leave this material in place.

Upon your approval, Plains will begin backfilling the excavation with clean soil obtained offsite and hauling the



impacted material to our Lea Station Landfarm.

If you have any questions or need additional information, please contact Jeff Dann at (713) 646-4657 or Daniel Bryant at (432) 557-5865. Thanks for your time and consideration of this matter.

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Friday, December 07, 2007 9:38 AM  
**To:** Jeffrey P Dann  
**Cc:** Daniel M Bryant; Camille J Reynolds; Price, Wayne, EMNRD; Johnson, Larry, EMNRD; Sanchez, Daniel J., EMNRD  
**Subject:** RE: Ruth Property Report

Jeff:

The OCD understands your concern and I think we both realize that the property will be used for residential purposes. We agree that we should review the verification of soil remediation samples on their own merit and in consideration of your concern. Thank you.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
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 Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
 (Pollution Prevention Guidance is under "Publications")

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**From:** Jeffrey P Dann [mailto:jpdann@paalp.com]  
**Sent:** Friday, December 07, 2007 7:29 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Daniel M Bryant; Camille J Reynolds  
**Subject:** RE: Ruth Property Report

Carl:

Thank you for your response to our Site Closure Proposal for the Eunice Site (Ruth Property). The conditions for closure listed below are acceptable to Plains. However, we would like to point out that there is a huge difference in the standard NMOCD BTEX cleanup guidance level of 10 mg/Kg Benzene and 50 mg/Kg BTEX in soil and the "non-detect" BTEX cleanup levels you quoted in your November 29, 2007 recommendation to Plains. We also understand that under the guidelines, the NMOCD "retains the right to require remediation to more stringent levels.....". However, we would just like to request that the NMOCD keep an open mind in the event that one of more of the final confirmation soil samples reports a minor T-E-X hit (in the low parts per billion range) and evaluate the data based on it's own merit.

We are in the process of scheduling the work and we will notify the NMOCD (Hobbs and Santa Fe) at least 48 hours prior to the start of work and at least 24 hours prior to conducting any soil sampling activities.

thanks  
 Jeff Dann  
 Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Thursday, November 29, 2007 7:03 PM  
**To:** Jeffrey P Dann  
**Cc:** Johnson, Larry, EMNRD; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** RE: Ruth Property Report

Mr. Dann:

The Oil Conservation Division has completed its review of the Site Assessment Report and Site Closure Proposal "Ruth Property Unit P, Section 28, Township 21 South, Range 37 East City of Eunice, Lea County, New Mexico (Report- September 2007)." The OCD notices that you used air rotary drilling and this is not a desirable method especially when it would appear that Plains Marketing, L.P. has determined the extent of organic contamination surrounding the former J.N. Carson Pump Station.

The OCD has the following comments and/or recommendations on the proposed remediation:

- 1) Testing the sidewalls and the bottom of the excavation will be required to what has been proposed in the report. In addition, we require that chloride samples also be collected (Method 300). We notice that one Chloride sample was collected at SB-1. A chloride soil cleanup concentration of 250 mg/kg is required due to the residential use planned for the property. TPH shall not exceed 100 mg/kg and BTEX shall be non-detect. The only exception would be to cleanup to background, which will require additional samples. Please minimize the dilution when analyzing for chlorides as a dilution of 50 seems elevated for clean soil conditions (< 100 ppm).
- 2) A liner does not appear to be needed if Plains can show that cleanup standards as described above have been met.
- 3) The depth of 12 ft. for the excavation in the vicinity of SB-1 is not an accepted method of the OCD. Plains should rely on PID, olefactory and visual staining to drive the horizontal and vertical extent of the excavation. The chloride samples along the 4 sidewalls and base of the excavation will need to meet the limits in item #1 above.
- 4) The excavation shall remain open and be fenced to prevent trespassers and the analytical data shall be provided to the OCD for approval before filling begins to restore the site. Site restoration shall be implemented to restore the drainage and vegetation to its original state.

Please contact me to discuss the date for the work and any questions you may have. Thank you.

*Disclaimer: Please be advised that NMOCD approval of this plan does not relieve Plains Marketing, L.P. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Plains Marketing, L.P. of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

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**From:** Jeffrey P Dann [mailto:jpdann@paalp.com]  
**Sent:** Wednesday, November 07, 2007 1:37 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property Report

Carl - just wanted to check in and see how you were coming along on the review for our site in Eunice. Let me know if you need anything else.

Jeff Dann  
 Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Thursday, October 11, 2007 1:37 PM  
**To:** Jeffrey P Dann  
**Subject:** Ruth Property Report

Jeff:

Hi. I received the report today and will work to read it soon and respond. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
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1/15/2008



**Chavez, Carl J, EMNRD**

**From:** Daniel M Bryant [dmbryant@paalp.com]  
**Sent:** Thursday, December 27, 2007 3:43 PM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Jeffrey P Dann; Johnson, Larry, EMNRD; Curt Stanley (E-mail)  
**Subject:** RE: Ruth Property Report  
**Attachments:** Report\_Packet1.pdf; Eunice Hist site map 12-2007.pdf; Eunice Historical Analytical.pdf

Mr. Chavez,

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Please also note on the site map that this sample was taken in close proximity to the power pole for the overhead lines which exist on the north side of the property. In order to maintain the stability and safety of this pole, it would be unsafe to excavate any further in the northerly direction. Since the impact appears isolated and does not appear to pose a risk to the subsurface geology or groundwater, Plains requests that we be allowed to leave this material in place.

Upon your approval, Plains will begin backfilling the excavation with clean soil obtained offsite and hauling the impacted material to our Lea Station Landfarm.

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**Sent:** Friday, December 07, 2007 9:38 AM  
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**Subject:** RE: Ruth Property Report

Jeff:

1/2/2008



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Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
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Plains

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 Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
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**Sent:** Wednesday, November 07, 2007 1:37 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property Report

Carl - just wanted to check in and see how you were coming along on the review for our site in Eunice. Let me know if you need anything else.

Jeff Dann  
 Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Thursday, October 11, 2007 1:37 PM  
**To:** Jeffrey P Dann  
**Subject:** Ruth Property Report

Jeff:

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Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
 Oil Conservation Division, Environmental Bureau



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**Chavez, Carl J, EMNRD**

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, December 19, 2007 3:24 PM  
**To:** 'Embrey, Donald M'; Price, Wayne, EMNRD  
**Cc:** Johnson, Larry, EMNRD; Lingnau, James A.; Wrangham, Calvin W.  
**Subject:** RE: Ruth property Work Plan

Mr. Embrey:

Good afternoon. The Oil Conservation Division (OCD) has completed its review of Targa Midstream Services, LP.

Site Assessment Work Plan dated December 19, 2007. The OCD hereby approves the Work Plan with the following conditions:

- 1) Be sure to start the investigation where the OCD sampled in the trench and go below the pipeline to a depth of at least 10 feet. Evaluate trench corridor for point source(s) locations with migration out and away from the corridor.
- 2) Targa must sample in accordance with EPA protocols to ensure QA/QC of sampling and analytical data results. The reporting limits shall meet OCD data quality objectives or be below WQCC Standards or OCD limits to be valid.
- 3) Targa must also include chloride sampling in its investigation and final verification of soil remediation sampling.

Please contact me if you have questions. Thank you for your cooperation in this matter.

*Disclaimer: Please be advised that OCD approval of this plan does not relieve Targa Midstream Services, L.P. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment.*

*In addition, NMOCD approval does not relieve Targa Midstream Services, L.P. of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
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Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

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**From:** Embrey, Donald M [mailto:DEmbrey@targaresources.com]  
**Sent:** Wednesday, December 19, 2007 1:39 PM  
**To:** Chavez, Carl J, EMNRD; Price, Wayne, EMNRD  
**Cc:** Johnson, Larry, EMNRD; Lingnau, James A.; Wrangham, Calvin W.  
**Subject:** Ruth property Work Plan

Below is the site assessment work plan for the Ruth Property.

Thanks

Don

TARGA MIDSTREAM SERVICES LIMITED PARTNERSHIP

12/19/2007



EUNICE PLANT  
SITE ASSESSMENT WORK PLAN  
RUTH PROPERTY  
UNIT P, SECTION 28, TOWNSHIP 21 SOUTH, RANGE 37 EAST  
CITY OF EUNICE  
LEA COUNTY, NEW MEXICO

## 1. INTRODUCTION AND BACKGROUND

Based on all the available data, Targa believes that the historical contamination on the subject property is not associated with Targa historical pipeline operations however, at the request of the New Mexico Oil Conservation Division (NMOCD), Targa will excavate and remove hydrocarbon contaminated soil on the Targa pipeline right of way on what is known as the Ruth Property which is located in Unit Letter P, Section 28, Township 21 South, Range 37 East in Lea County, New Mexico.

## 2 SCOPE OF WORK

Targa proposes to excavate the right of way area and remove the hydrocarbons that were identified above the pipelines when they were removed in 2007. Targa will delineate vertical and horizontal contamination in the right of way area and remediate per OCD guidelines. Soil samples will be collected per standard operating procedures and submitted to the laboratory for Total Petroleum Hydrocarbon (TPH) and benzene, toluene, ethyl-benzene and xylene (BTEX) analysis to identify and remove any impacted area. The work will be photographed and documented.

## 3 REPORTING

Targa will notify the Mr. Larry Johnson Hobbs district office and Mr. Carl Chavez of the Santa Fe office when the excavation begins and submit a closure plan with analysis documentation when work is complete for NMOCD approval.

Don Embrey  
Targa Midstream Services  
432.688.0546

---

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12/19/2007

**Chavez, Carl J, EMNRD**

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, November 30, 2007 8:54 AM  
**To:** Sanchez, Daniel J., EMNRD  
**Cc:** Price, Wayne, EMNRD; Johnson, Larry, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** FW: Ruth Property Report

Daniel:

FYI. The EB has reviewed Plains Petroleum Report investigating their former pump station on the property that the City of Eunice wants to purchase from Ms. Ruth and build residences on. Looks like contamination near Eunice on the Ruth Property associated with Plains Marketing is being addressed. However, the contamination underneath the pipeline associated with Targa Resources is currently not being addressed.

At the request of Wayne Price and Larry Johnson, they would like a letter to be sent to Targa Resources (Mr. James Lingnau, Targa Resources, P.O. Box 1909, Eunice NM 88231) requesting that they cleanup the contamination detected under their E-W trending pipeline across the Ruth Property. Wayne said I could write a simple letter requesting or initiating further work to cleanup contamination there.

You may recall that the OCD had originally issued an NOV to Targa, which was later retracted after Mr. Chris Williams had approved the pipeline removal. The OCD subsequently met with Plains, Targa and Chevron (pipeline owners) at the site this past Summer and the first approach was for Plains to investigate their former pump station on the property.

Please let us know if you concur with this approach? Thank you.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
 Oil Conservation Division, Environmental Bureau  
 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
 Office: (505) 476-3491  
 Fax: (505) 476-3462  
 E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
 Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
 (Pollution Prevention Guidance is under "Publications")

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, November 29, 2007 6:03 PM  
**To:** 'Jeffrey P Dann'  
**Cc:** Johnson, Larry, EMNRD; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** RE: Ruth Property Report

Mr. Dann:

The Oil Conservation Division has completed its review of the Site Assessment Report and Site Closure Proposal "Ruth Property Unit P, Section 28, Township 21 South, Range 37 East City of Eunice, Lea County, New Mexico (Report- September 2007)." The OCD notices that you used air rotary drilling and this is not a desirable method especially when it would appear that Plains Marketing, L.P. has determined the extent of organic contamination surrounding the former J.N. Carson Pump Station.

The OCD has the following comments and/or recommendations on the proposed remediation:

- 1) Testing the sidewalls and the bottom of the excavation will be required to what has been proposed in the report. In addition, we require that chloride samples also be collected (Method 300). We notice that one

11/30/2007

Chloride sample was collected at SB-1. A chloride soil cleanup concentration of 250 mg/kg is required due to the residential use planned for the property. TPH shall not exceed 100 mg/kg and BTEX shall be non-detect. The only exception would be to cleanup to background, which will require additional samples. Please minimize the dilution when analyzing for chlorides as a dilution of 50 seems elevated for clean soil conditions (< 100 ppm).

2) A liner does not appear to be needed if Plains can show that cleanup standards as described above have been met.

3) The depth of 12 ft. for the excavation in the vicinity of SB-1 is not an accepted method of the OCD. Plains should rely on PID, olefactory and visual staining to drive the horizontal and vertical extent of the excavation. The chloride samples along the 4 sidewalls and base of the excavation will need to meet the limits in item #1 above.

4) The excavation shall remain open and be fenced to prevent trespassers and the analytical data shall be provided to the OCD for approval before filling begins to restore the site. Site restoration shall be implemented to restore the drainage and vegetation to its original state.

Please contact me to discuss the date for the work and any questions you may have. Thank you.

*Disclaimer: Please be advised that NMOCD approval of this plan does not relieve Plains Marketing, L.P. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Plains Marketing, L.P. of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

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Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Jeffrey P Dann [mailto:[jpdann@paalp.com](mailto:jpdann@paalp.com)]  
**Sent:** Wednesday, November 07, 2007 1:37 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property Report

Carl - just wanted to check in and see how you were coming along on the review for our site in Eunice. Let me know if you need anything else.

Jeff Dann  
Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:[CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)]  
**Sent:** Thursday, October 11, 2007 1:37 PM  
**To:** Jeffrey P Dann  
**Subject:** Ruth Property Report

Jeff:

Hi. I received the report today and will work to read it soon and respond. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.

11/30/2007

Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
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**Chavez, Carl J, EMNRD**

---

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Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
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Office: (505) 476-3491  
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Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

11/30/2007



**From:** Jeffrey P Dann [mailto:jpdann@paalp.com]  
**Sent:** Wednesday, November 07, 2007 1:37 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property Report

Carl - just wanted to check in and see how you were coming along on the review for our site in Eunice. Let me know if you need anything else.

Jeff Dann  
Plains

-----Original Message-----

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Carl J. Chavez, CHMM  
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11/30/2007

TABLE 1

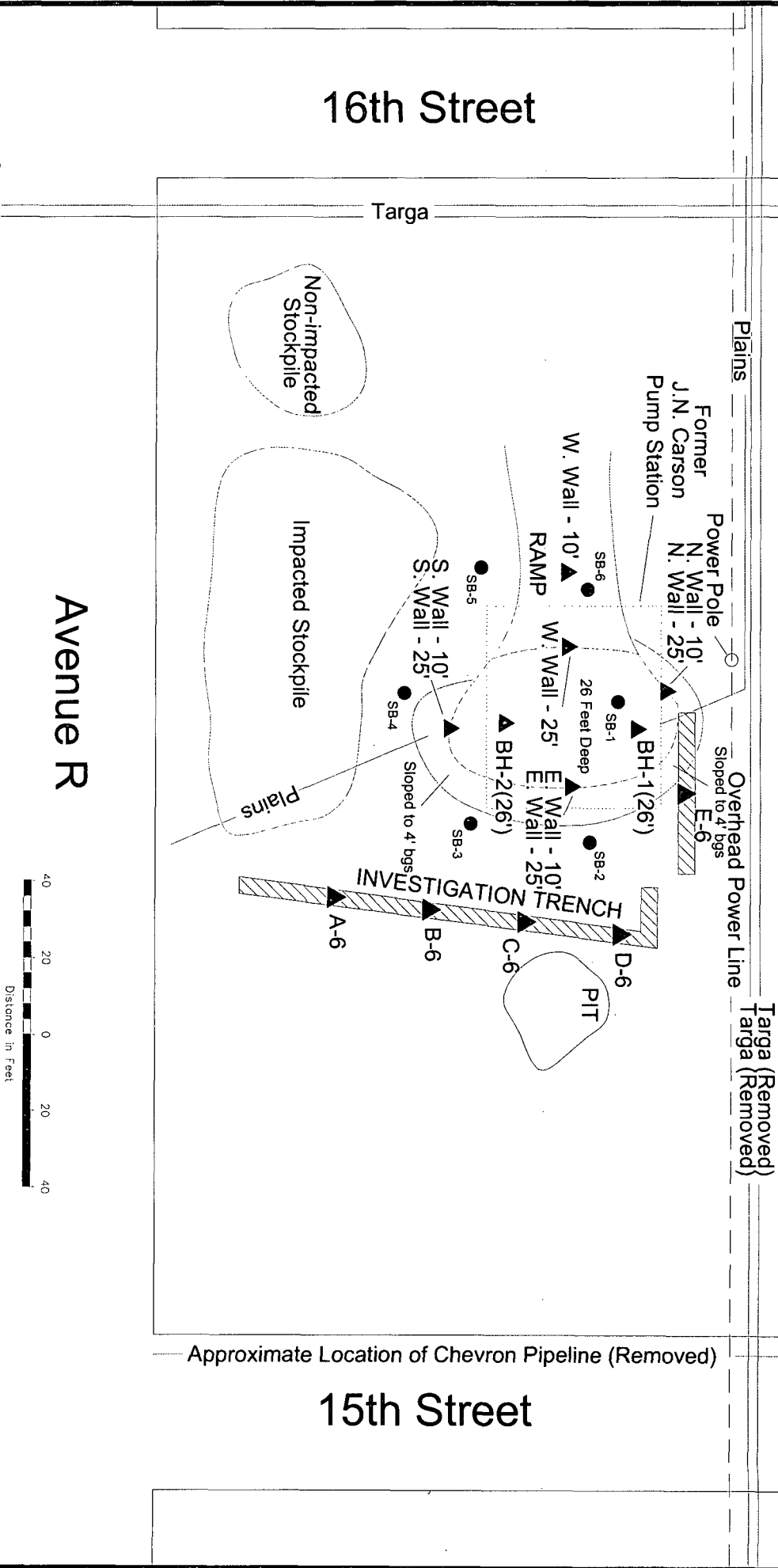
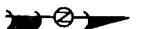
## CONCENTRATIONS OF BTEX, TPH AND CHLORIDE IN SOIL

PLAINS MARKETING, L.P.  
RUTH PROPERTY (EUNICE HISTORICAL)  
EUNICE, NEW MEXICO

*All concentrations are reported in mg/Kg*

SAMPLE LOCATION	SAMPLE DATE	PID READING	METHODS: SW 846-80210b					METHOD: mod 8015b (DRO/GRO)			METHOD AS INDICATED CHLORIDE	
			BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	TOTAL BTEX	TPH DRO	TPH GRO		TOTAL TPH
NMOCD Regulatory Limit		-	10					50			100	250
D-6	08/17/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	2.88		<50	
C-6	08/17/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
B-6	08/17/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
A-6	08/17/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
E-6	08/17/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
SB-1 @ 2'	08/20/07	7	<0.01	<0.01	<0.01	<0.01	<0.01	847	<1.00		847	SM4500-CL/B
SB-1 @ 5'	08/20/07	23	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	<100
SB-1 @ 10'	08/20/07	237	<0.01	<0.01	5.300	9.650	14.95	1990	390		2380	
SB-1 @ 15'	08/20/07	25	<0.01	<0.01	<0.01	<0.01	<0.01	156	33.2		189	
SB-1 @ 20'	08/20/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	3.22		<50	
SB-1 @ 25'	08/20/07	6	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	2.14		<50	
SB-1 @ 30'	08/20/07	7	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	1.89		<50	
SB-2 @ 15'	08/20/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	1.31		<50	
SB-3 @ 15'	08/20/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
SB-4 @ 15'	08/20/07	6	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
SB-5 @ 15'	08/20/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
SB-6 @ 15'	08/20/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	
E. Wall-10'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	E-300.1
S. Wall-10'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	66.8
W. Wall-10'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	9.49
N. Wall-10'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	52.1
W. Wall-25'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	674
E. Wall-25'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	16
S. Wall-25'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	9.1
N. Wall-25'	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	15.8
BH-1(26)	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	4.21
BH-2(26)	12/18/07	0	<0.01	<0.01	<0.01	<0.01	<0.01	<50.0	<1.00		<50	7.43
												5.57

Monitor Wells



Legend:

- Pipeline
- Overhead Electric Line
- ..... Approximate Pump Station Extents
- ||||| Investigation Trench Location
- SB-1 Soil Boring Location
- Sector Monitor Wells
- ▲ Sample Location
- Soil Stockpile
- Excavation Extent
- Electrical Power Pole

Figure 2

Site and Sample  
Locations  
Plains Marketing, L.P.  
Ruth Property  
SRS # Eunice Historical  
Eunice, New Mexico



NOVA Safety and Environment

Scale: 1" = 40'  
Prep By: CS  
Checked By: TKC  
August 27, 2007

# TRACE ANALYSIS, INC.

6201 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800 • 378 • 1296 FAX 805 • 794 • 1298  
 200 East Sunset Road, Suite E El Paso, Texas 79922 988 • 588 • 3463 FAX 915 • 585 • 3443  
 5003 Basin Street, Suite A1 Midland, Texas 79703 432 • 683 • 6306 FAX 432 • 683 • 6113  
 6015 Harris Parkway, Suite 110 Ft. Worth, Texas 76132 817 • 201 • 5260  
 E-Mail: info@traceanalysis.com

## Analytical and Quality Control Report

Curt Stanley  
 Nova Safety & Environmental  
 2057 Commerce St.  
 Midland, TX, 79703

Report Date: December 21, 2007

Work Order: 7121824



Project Location: Eunice, NM  
 Project Name: Eunice Historical (Ruth Property)  
 Project Number: Eunice Historical (Ruth Property)

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
145705	E. Wall-10'	soil	2007-12-18	12:00	2007-12-18
145706	S. Wall-10'	soil	2007-12-18	12:05	2007-12-18
145707	W. Wall-10'	soil	2007-12-18	12:10	2007-12-18
145708	N. Wall-10'	soil	2007-12-18	12:15	2007-12-18
145709	W. Wall-25'	soil	2007-12-18	12:20	2007-12-18
145710	E. Wall-25'	soil	2007-12-18	12:25	2007-12-18
145711	S. Wall-25'	soil	2007-12-18	12:30	2007-12-18
145712	N. Wall-25'	soil	2007-12-18	12:35	2007-12-18
145713	BH-1 (26')	soil	2007-12-18	12:40	2007-12-18
145714	BH-2 (26')	soil	2007-12-18	12:45	2007-12-18

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

### Standard Flags

B - The sample contains less than ten times the concentration found in the method blank.

Analytical Report

Sample: 145705 - E. Wall-10'

Analysis: BTEN

QC Batch: 44093

Prep Batch: 37992

Analytical Method: S 8021B

Date Analyzed: 2007-12-20

Sample Preparation: 2007-12-20

Prep Method: S 5035

Analyzed By: KB

Prepared By: KB

Parameter	Flag	Result	Units	Dilution	RL		
Benzene		<0.0100	mg/Kg	1	0.0100		
Toluene		<0.0100	mg/Kg	1	0.0100		
Ethylbenzene		<0.0100	mg/Kg	1	0.0100		
Xylene		<0.0100	mg/Kg	1	0.0100		
Surrogate							
Trifluorotoluene (TFT)	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
4-Bromofluorobenzene (4-BFB)		0.884	mg/Kg	1	1.00	88	65.4 - 124
		0.955	mg/Kg	1	1.00	96	73.9 - 138

Sample: 145705 - E. Wall-10'

Analysis: Chloride (IC)

QC Batch: 44042

Prep Batch: 37947

Analytical Method: E 300.0

Date Analyzed: 2007-12-20

Sample Preparation: 2007-12-20

Prep Method: N/A

Analyzed By: ER

Prepared By: ER

Parameter	Flag	Result	Units	Dilution	RL
RL					
Chloride		66.8	mg/Kg	5	1.00

Sample: 145705 - E. Wall-10'

Analysis: TPH DRO

QC Batch: 44085

Prep Batch: 37984

Analytical Method: Mod. 8015B

Date Analyzed: 2007-12-20

Sample Preparation: 2007-12-20

Prep Method: N/A

Analyzed By: TG

Prepared By: TG

Parameter	Flag	Result	Units	Dilution	RL
RL					
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
-----------	------	--------	-------	----------	--------------	------------------	-----------------



Parameter	Flag	RL Result	Units mg/Kg	Dilution	Percent Recovery	Recovery Limits
GRO		<1.00		1		1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.16	mg/Kg	1	1.00	116	34.1 - 161
4-Bromofluorobenzene (4-BFB)		1.18	mg/Kg	1	1.00	118	31.8 - 159

**Sample: 145706 - S. Wall-10'**

Analysis: BTEX      Analytical Method: S 8021B      Prep Method: S 5035  
QC Batch: 44093      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	Percent Recovery	Recovery Limits
Benzene		<0.0100	mg/Kg	1		0.0100
Toluene		<0.0100	mg/Kg	1		0.0100
Ethylbenzene		<0.0100	mg/Kg	1		0.0100
Xylene		<0.0100	mg/Kg	1		0.0100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.907	mg/Kg	1	1.00	91	65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.982	mg/Kg	1	1.00	98	73.9 - 138

**Sample: 145706 - S. Wall-10'**

Analysis: Chloride (IC)      Analytical Method: E 300.0      Prep Method: N/A  
QC Batch: 44042      Date Analyzed: 2007-12-20      Analyzed By: ER  
Prep Batch: 37947      Sample Preparation: 2007-12-20      Prepared By: ER

Parameter	Flag	RL Result	Units	Dilution	Percent Recovery	Recovery Limits
Chloride		9.49	mg/Kg	1		1.00

**Sample: 145706 - S. Wall-10'**

Analysis: TPH DRO      Analytical Method: Mod. 8015B      Prep Method: N/A  
QC Batch: 44085      Date Analyzed: 2007-12-20      Analyzed By: TG

**Sample: 145706 - S. Wall-10'**

Analysis: TPH GRO      Analytical Method: S 8015B      Prep Method: S 5035  
 QC Batch: 44095      Date Analyzed: 2007-12-20      Analyzed By: KB  
 Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL Result	Units mg/Kg	Dilution	1	RL	
GRO		<1.00	mg/Kg			1.00	
Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.15	mg/Kg	1	1.00	115	34.1 - 161
4-Bromofluorobenzene (4-BFB)		1.22	mg/Kg	1	1.00	122	31.8 - 159

**Sample: 145707 - W. Wall-10'**

Analysis: BTEX      Analytical Method: S 8021B      Prep Method: S 5035  
 QC Batch: 44093      Date Analyzed: 2007-12-20      Analyzed By: KB  
 Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.0100	mg/Kg	1	0.0100
Toluene		<0.0100	mg/Kg	1	0.0100
Ethylbenzene		<0.0100	mg/Kg	1	0.0100
Xylene		<0.0100	mg/Kg	1	0.0100
Surrogate	Flag	Result	Units	Dilution	Spike Amount Percent Recovery Recovery Limits
Trifluorotoluene (TFT)		0.835	mg/Kg	1	84 65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.907	mg/Kg	1	91 73.9 - 138

**Sample: 145707 - W. Wall-10'**

Analysis: Chloride (IC)      Analytical Method: E 300.0      Prep Method: N/A  
 QC Batch: 44039      Date Analyzed: 2007-12-19      Analyzed By: ER  
 Prep Batch: 37941      Sample Preparation: 2007-12-19      Prepared By: ER

Parameter	Flag	RL Result	Units mg/Kg	Dilution	5	RL
Chloride		52.1	mg/Kg			1.00

Parameter	Flag	RL Result	Units mg/Kg	Dilution	RL
DRO		<50.0		1	50.0

Surrogate	Flag	Result	Units mg/Kg	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Tricortane	104			1	100	104	33.3 - 164

**Sample: 145707 - W. Wall-10'**

Analysis: TPH GRO      Analytical Method: S 8015B      Prep Method: S 5035  
 QC Batch: 44095      Date Analyzed: 2007-12-20      Analyzed By: KB  
 Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL Result	Units mg/Kg	Dilution	RL
GRO		<1.00		1	1.00

Surrogate	Flag	Result	Units mg/Kg	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.07		1	1.00	107	34.1 - 161
4-Bromofluorobenzene (4-BFB)		1.12		1	1.00	112	31.8 - 159

**Sample: 145708 - N. Wall-10'**

Analysis: BTEX      Analytical Method: S 8021B      Prep Method: S 5035  
 QC Batch: 44093      Date Analyzed: 2007-12-20      Analyzed By: KB  
 Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL Result	Units mg/Kg	Dilution	RL
Benzene		<0.0100		1	0.0100
Toluene		<0.0100		1	0.0100
Ethylbenzene		<0.0100		1	0.0100
Xylene		<0.0100		1	0.0100

Surrogate	Flag	Result	Units mg/Kg	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.820		1	1.00	82	65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.873		1	1.00	87	73.9 - 138

Sample: 145708 - N. Wall-10'

Analysis: TPH DRO      Analytical Method: Mod. 8015B      Prep Method: N/A  
QC Batch: 44085      Date Analyzed: 2007-12-20      Analyzed By: TG  
Prep Batch: 37984      Sample Preparation: 2007-12-20      Prepared By: TG

Parameter	Flag	RL		Units	Dilution	RL
		Result				
DRO		<50.0		mg/Kg	1	50.0
Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery
n-Triacontane		92.0	mg/Kg	1	100	92
						33.3 - 164

Sample: 145708 - N. Wall-10'

Analysis: TPH GRO      Analytical Method: S 8015B      Prep Method: S 5035  
QC Batch: 44095      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL		Units	Dilution	RL
		Result				
GRO		<1.00		mg/Kg	1	1.00
Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery
Trifluorotoluene (TFT)		1.05	mg/Kg	1	1.00	105
4-Bromofluorobenzene (4-BFB)		1.08	mg/Kg	1	1.00	108
						34.1 - 161
						31.8 - 159

Sample: 145709 - W. Wall-25'

Analysis: BTEX      Analytical Method: S 8021B      Prep Method: S 5035  
QC Batch: 44093      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	RL		Units	Dilution	RL
		Result				
Benzene		<0.0100		mg/Kg	1	0.0100
Toluene		<0.0100		mg/Kg	1	0.0100
Ethylbenzene		<0.0100		mg/Kg	1	0.0100
Xylene		<0.0100		mg/Kg	1	0.0100

**Sample: 145709 - W. Wall-25'**

Analysis: Chloride (IC) Analytical Method: E 300.0 Prep Method: N/A  
 QC Batch: 44039 Date Analyzed: 2007-12-19 Analyzed By: ER  
 Prep Batch: 37941 Sample Preparation: 2007-12-19 Prepared By: ER

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		16.0	mg/Kg	5	1.00

**Sample: 145709 - W. Wall-25'**

Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A  
 QC Batch: 44085 Date Analyzed: 2007-12-20 Analyzed By: TG  
 Prep Batch: 37984 Sample Preparation: 2007-12-20 Prepared By: TG

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		98.8	mg/Kg	1	100	99	33.3 - 164

**Sample: 145709 - W. Wall-25'**

Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035  
 QC Batch: 44095 Date Analyzed: 2007-12-20 Analyzed By: KB  
 Prep Batch: 37992 Sample Preparation: 2007-12-20 Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorobluene (TFI)		1.09	mg/Kg	1	1.00	109	34.1 - 161
4-Bromofluorobenzene (4-BFB)		1.12	mg/Kg	1	1.00	112	31.8 - 159

sample 145710 continued ...

Parameter	Flag	RL			Dilution	RL
		Result	Units			
Xylene		<0.0100	mg/Kg		1	0.0100

Surrogate	Flag	Result	Units	Dilution	Spike		Recovery
					Amount	Percent	
Trifluorotoluene (TFT)		0.814	mg/Kg	1	1.00	81	65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.868	mg/Kg	1	1.00	87	73.9 - 138

Sample: 145710 - E. Wall-25'

Analysis: Chloride (IC)      Analytical Method: E 300.0      Prep Method: N/A  
QC Batch: 44042      Date Analyzed: 2007-12-20      Analyzed By: ER  
Prep Batch: 37947      Sample Preparation: 2007-12-20      Prepared By: ER

Parameter	Flag	RL			Dilution	RL
		Result	Units			
Chloride		9.10	mg/Kg		1	1.00

Sample: 145710 - E. Wall-25'

Analysis: TPH DRO      Analytical Method: Mod. 8015B      Prep Method: N/A  
QC Batch: 44085      Date Analyzed: 2007-12-20      Analyzed By: TG  
Prep Batch: 37984      Sample Preparation: 2007-12-20      Prepared By: TG

Parameter	Flag	RL			Dilution	RL
		Result	Units			
DRO		<50.0	mg/Kg		1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike		Recovery
					Amount	Percent	
n-Triacontane		90.1	mg/Kg	1	100	90	33.3 - 164

Sample: 145710 - E. Wall-25'

Analysis: TPH GRO      Analytical Method: S 8015B      Prep Method: S 5035  
QC Batch: 44095      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB



**Sample: 145711 - S. Wall-25'**

Analysis: BTEX	Analytical Method: S 8021B	Prep Method: S 5035
QC Batch: 44093	Date Analyzed: 2007-12-20	Analyzed By: KB
Prep Batch: 37992	Sample Preparation: 2007-12-20	Prepared By: KB

Parameter	Flag	Result	Units	Dilution	RL
Benzene		<0.0100	mg/Kg	1	0.0100
Toluene		<0.0100	mg/Kg	1	0.0100
Ethylbenzene		<0.0100	mg/Kg	1	0.0100
Xylene		<0.0100	mg/Kg	1	0.0100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.835	mg/Kg	1	1.00	84	65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.892	mg/Kg	1	1.00	89	73.9 - 138

**Sample: 145711 - S. Wall-25'**

Analysis: Chloride (1C)	Analytical Method: E 300.0	Prep Method: N/A
QC Batch: 44039	Date Analyzed: 2007-12-19	Analyzed By: ER
Prep Batch: 37941	Sample Preparation: 2007-12-19	Prepared By: ER

Parameter	Flag	Result	Units	Dilution	RL
Chloride		15.8	mg/Kg	5	1.00

**Sample: 145711 - S. Wall-25'**

Analysis: TPH DRO	Analytical Method: Mod. 8015B	Prep Method: N/A
QC Batch: 44085	Date Analyzed: 2007-12-20	Analyzed By: TG
Prep Batch: 37984	Sample Preparation: 2007-12-20	Prepared By: TG

Parameter	Flag	Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Tridecane		111	mg/Kg	1	100	111	33.3 - 164

sample 145711 continued ...

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.10	mg/Kg	1	1.00	110	34.1 - 161
4-Bromofluorobenzene (4-BFB)		1.11	mg/Kg	1	1.00	111	31.8 - 159

**Sample: 145712 - N. Wall-25'**

Analysis: BTEX Analytical Method: S 8021B Prep Method: S 5035  
 QC Batch: 44093 Date Analyzed: 2007-12-20 Analyzed By: KB  
 Prep Batch: 37992 Sample Preparation: 2007-12-20 Prepared By: KB

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.0100	mg/Kg	1	0.0100
Toluene		<0.0100	mg/Kg	1	0.0100
Ethylbenzene		<0.0100	mg/Kg	1	0.0100
Xylene		<0.0100	mg/Kg	1	0.0100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.832	mg/Kg	1	1.00	83	65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.894	mg/Kg	1	1.00	89	73.9 - 138

**Sample: 145712 - N. Wall-25'**

Analysis: Chloride (IC) Analytical Method: E 300.0 Prep Method: N/A  
 QC Batch: 44042 Date Analyzed: 2007-12-20 Analyzed By: ER  
 Prep Batch: 37947 Sample Preparation: 2007-12-20 Prepared By: ER

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		4.21	mg/Kg	1	1.00

sample 145712 continued ...

Parameter		Flag	RL		Units		Dilution		RL	
			Result							
Parameter	Flag		Result		Units		Dilution		RL	
DRO			<50.0		mg/Kg		1		50.0	
Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits			
n-Triacontane		108	mg/Kg	1	100	108	33.3 - 164			

Sample: 145712 - N. Wall-25'

Analysis: TPH GRO      Analytical Method: S 8015B      Prep Method: S 5035  
QC Batch: 44095      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter		Flag	RL		Units		Dilution		RL	
			Result							
GRO			<1.00		mg/Kg		1		1.00	
Surrogate		Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits		
Trifluorotoluene (TFT)			1.08	mg/Kg	1	1.00	108	34.1 - 161		
4-Bromofluorobenzene (4-BFB)			1.11	mg/Kg	1	1.00	111	31.8 - 159		

Sample: 145713 - BH-1 (26')

Analysis: BTEX      Analytical Method: S 8021B      Prep Method: S 5035  
QC Batch: 44093      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Parameter		Flag	RL		Units		Dilution		RL	
			Result							
Benzene			<0.0100		mg/Kg		1		0.0100	
Toluene			<0.0100		mg/Kg		1		0.0100	
Ethylbenzene			<0.0100		mg/Kg		1		0.0100	
Xylene			<0.0100		mg/Kg		1		0.0100	

Spike      Percent      Recovery

**Sample: 145713 - BH-1 (26')**

Analysis:	Chloride (IC)	Analytical Method:	E 300.0	Prep Method:	N/A
QC Batch:	44042	Date Analyzed:	2007-12-20	Analyzed By:	ER
Prep Batch:	37947	Sample Preparation:	2007-12-20	Prepared By:	ER

Parameter	Flag	Result	Units	Dilution	RL
Chloride		7.43	mg/Kg	1	1.00

**Sample: 145713 - BH-1 (26')**

Analysis:	TPH DRO	Analytical Method:	Mod. 8015B	Prep Method:	N/A
QC Batch:	44085	Date Analyzed:	2007-12-20	Analyzed By:	TG
Prep Batch:	37984	Sample Preparation:	2007-12-20	Prepared By:	TG

Parameter	Flag	Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		106	mg/Kg	1	100	106	33.3 - 164

**Sample: 145713 - BH-1 (26')**

Analysis:	TPH GRO	Analytical Method:	S 8015B	Prep Method:	S 5035
QC Batch:	44095	Date Analyzed:	2007-12-20	Analyzed By:	KB
Prep Batch:	37992	Sample Preparation:	2007-12-20	Prepared By:	KB

Parameter	Flag	Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		1.22	mg/Kg	1	1.00	122	34.1 - 161
4-Bromofluorobenzene (4-BFB)		1.23	mg/Kg	1	1.00	123	31.8 - 159

sample 145714 continued . . .

Parameter	Flag	RL		Units	Dilution	RL	
		Result		mg/Kg	1		0.0100
Xylene		<0.0100					
Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorobluene (TFT)		0.777	mg/Kg	1	1.00	78	65.4 - 124
4-Bromofluorobenzene (4-BFB)		0.822	mg/Kg	1	1.00	82	73.9 - 138

Sample: 145714 - BH-2 (26')

Analysis: Chloride (IC)      Analytical Method: E 300.0      Prep Method: N/A  
QC Batch: 44042      Date Analyzed: 2007-12-20      Analyzed By: ER  
Prep Batch: 37947      Sample Preparation: 2007-12-20      Prepared By: ER

Parameter	Flag	RL		Units	Dilution	RL	
		Result		mg/Kg	1		1.00
Chloride		5.57					

Sample: 145714 - BH-2 (26')

Analysis: TPH DRO      Analytical Method: Mod. 8015B      Prep Method: N/A  
QC Batch: 44085      Date Analyzed: 2007-12-20      Analyzed By: TG  
Prep Batch: 37984      Sample Preparation: 2007-12-20      Prepared By: TG

Parameter	Flag	RL		Units	Dilution	RL	
		Result		mg/Kg	1		50.0
DRO		<50.0					
Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		107	mg/Kg	1	100	107	33.3 - 164

Sample: 145714 - BH-2 (26')

Analysis: TPH GRO      Analytical Method: S 8015B      Prep Method: S 5035  
QC Batch: 44095      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      Sample Preparation: 2007-12-20      Prepared By: KB

Method Blank (1)      QC Batch: 44039

QC Batch: 44039      Date Analyzed: 2007-12-19      Analyzed By: ER  
Prep Batch: 37941      QC Preparation: 2007-12-19      Prepared By: ER

Parameter	Flag	MDL		Units	RL
		Result	Dilution		
Chloride		<0.140	1	mg/Kg	1

Method Blank (1)      QC Batch: 44042

QC Batch: 44042      Date Analyzed: 2007-12-20      Analyzed By: ER  
Prep Batch: 37947      QC Preparation: 2007-12-20      Prepared By: ER

Parameter	Flag	MDL		Units	RL
		Result	Dilution		
Chloride		<0.140	1	mg/Kg	1

Method Blank (1)      QC Batch: 44085

QC Batch: 44085      Date Analyzed: 2007-12-20      Analyzed By: TG  
Prep Batch: 37984      QC Preparation: 2007-12-20      Prepared By: TG

Parameter	Flag	MDL		Units	RL
		Result	Dilution		
DRO		<22.3	1	mg/Kg	50

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		109	mg/Kg	1	100	109	33.3 - 164

Method Blank (1)      QC Batch: 44093

QC Batch: 44093      Date Analyzed: 2007-12-20      Analyzed By: KB  
Prep Batch: 37992      QC Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	MDL		Units	RL
		Result	Dilution		
Benzene		<0.00333	1	mg/Kg	0.01
Toluene		<0.00372	1	mg/Kg	0.01
Ethylbenzene		<0.00206	1	mg/Kg	0.01

Eunice, NM

Eunice Historical (Ruth Property)

Method Blank (1)      QC Batch: 44095

QC Batch:	44095	Date Analyzed:	2007-12-20	Analyzed By:	KB
Prep Batch:	37592	QC Preparation:	2007-12-20	Prepared By:	KB

Prep Batch: 37992      QC Preparation: 2007-12-20      Prepared By: KB

Parameter	Flag	MDL Result	Units	RL
GRO		<0.459	mg/Kg	1

GRO	<0.459	mg/Kg	1
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Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TfT)	1	0.933	mg/Kg	1	1.00	93	96 - 115
4-Bromofluorobenzene (4-BFB)		0.594	mg/Kg	1	1.00	59	51.6 - 103

Compound	Concentration (mg/Kg)	Residue Level (mg/Kg)	Residue Level (ppm)
Trifluorotoluene (TFT)	0.933	1	93 - 115
4-Bromofluorobenzene (4-BFB)	0.594	1	51.6 - 103

4-Bromofluorobenzene (4-BFB)	0.594	mg/Kg	1	1.00	59	51.6 - 103
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## Laboratory Control Spike (LCS-1)

QC Batch:	44039	Date Analyzed:	2007-12-19	Analyzed By:	ER
Prep Batch:	37941	QC Preparation:	2007-12-19	Prepared By:	ER

Prep Batch: 37941      QC Preparation: 2007-12-19      Prepared By: ER

Param	LCS		Spike		Matrix		Rec.	
	Result	Units	Dil.	Amount	Result	Rec.	Limit	
Chloride	2	12.1	mg/Kg	1	12.5	<0.140	97	90 - 110

Chloride	2	12.1	mg/Kg	1	12.5	<0.140	97	90 - 110
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Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD		Dil.	Spike		Matrix		Rec.		RPD	
	Result	Units		Amount	Result	Rec.	Limit	RPD	Limit		
Chloride	11.8	mg/Kg	1	12.5	<0.140	94	90 - 110	2	20		

Chloride	11.8	mg/Kg	1	12.5	<0.140	94	90 - 110	2	20
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Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

## Laboratory Control Spike (LCS-1)

QC Batch:	44042	Date Analyzed:	2007-12-20	Analyzed By:	ER
Prep Batch:	37947	QC Preparation:	2007-12-20	Prepared By:	ER

Prep Batch: 37947      QC Preparation: 2007-12-20      Prepared By: ER

Param	LCS		Dil.	Spike		Matrix		Rec.	
	Result	Units		Amount	Result	Rec.	Limit		
Chloride	11.8	mg/Kg	1	12.5	<0.140	94	90 - 110		

Chloride	11.8	mg/Kg	1	12.5	<0.140	94	90 - 110
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Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec. Limit	RPD Limit
1							

Param	Result	Units	Dil.	Amount	Result	Rec.	Limit	RPD	Limit
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### Laboratory Control Spike (LCS-1)

QC Batch: 44085  
 Prep Batch: 37984

Date Analyzed: 2007-12-20  
 QC Preparation: 2007-12-20

Analyzed By: TG  
 Prepared By: TG

Param	LCS		Units	Dil.	Spike Amount	Matrix		Rec.	RPD Limit
	Result	Result				Result	Result		
DRO		266	mg/Kg	1	250	<22.3	106		54.3 - 149

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCS		Units	Dil.	Spike Amount	Matrix		Rec.	RPD Limit
	Result	Result				Result	Result		
DRO		254	mg/Kg	1	250	<22.3	102		54.3 - 149

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS		Units	Dil.	Spike Amount	LCS		Rec.	RPD Limit
	Result	Result				Result	Result		
n-Tricantane		108	mg/Kg	1	100	108	107		33.3 - 164

### Laboratory Control Spike (LCS-1)

QC Batch: 44093  
 Prep Batch: 37992

Date Analyzed: 2007-12-20  
 QC Preparation: 2007-12-20

Analyzed By: KB  
 Prepared By: KB

Param	LCS		Units	Dil.	Spike Amount	Matrix		Rec.	RPD Limit
	Result	Result				Result	Result		
Benzene		0.931	mg/Kg	1	1.00	<0.00333	93		79.4 - 109
Toluene		0.912	mg/Kg	1	1.00	<0.00372	91		80.4 - 109
Ethylbenzene		0.911	mg/Kg	1	1.00	<0.00206	91		81.3 - 107
Xylene		2.74	mg/Kg	1	3.00	<0.00259	91		81.4 - 108

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCS		Units	Dil.	Spike Amount	Matrix		Rec.	RPD Limit
	Result	Result				Result	Result		
Benzene		0.890	mg/Kg	1	1.00	<0.00333	89		79.4 - 109
Toluene		0.872	mg/Kg	1	1.00	<0.00372	87		80.4 - 109
Ethylbenzene		0.860	mg/Kg	1	1.00	<0.00206	86		81.3 - 107
Xylene		2.59	mg/Kg	1	3.00	<0.00259	86		81.4 - 108

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS		Units	Dil.	Spike Amount	LCS		Rec.	RPD Limit
	Result	Result				Result	Result		

Param	LCS		Units		Dil.	Spike		Matrix		Rec.	Limit	
	Result					Amount		Result				
GRO	8.34		mg/Kg		1	10.0		<0.459		83	78.7 - 108	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD		Units		Dil.	Spike		Matrix		Rec.	RPD	
	Result					Amount		Result			Limit	
GRO	8.92		mg/Kg		1	10.0		<0.459	89	78.7 - 108	7	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS		LCSD		Units		Dil.	Spike		Matrix		Rec.	Limit	
	Result		Result					Amount		Result				
Trifluorotoluene (TFT)	0.897		0.941		mg/Kg		1	1.00		90	94	83.7 - 110		
4-Bromofluorobenzene (4-BFB)	0.838		0.863		mg/Kg		1	1.00		84	86	74.4 - 107		

Matrix Spike (MS-1)      Spiked Sample: 145714

QC Batch: 44042      Date Analyzed: 2007-12-20      Analyzed By: ER

Prep Batch: 37947      QC Preparation: 2007-12-20      Prepared By: ER

Param	MS		Units		Dil.	Spike		Matrix		Rec.	Limit	
	Result					Amount		Result				
Chloride	17.4		mg/Kg		1	12.5		5.573		95	80 - 120	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD		Units		Dil.	Spike		Matrix		Rec.	RPD	
	Result					Amount		Result			Limit	
Chloride	17.1		mg/Kg		1	12.5		5.573	92	80 - 120	2	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Matrix Spike (MS-1)      Spiked Sample: 145706

QC Batch: 44085      Date Analyzed: 2007-12-20      Analyzed By: TG

Prep Batch: 37984      QC Preparation: 2007-12-20      Prepared By: TG

Param	MS		Units		Dil.	Spike		Matrix		Rec.	Limit	
	Result					Amount		Result				
DRO	223		mg/Kg		1	250		<22.3	89	35.1 - 161		

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Matrix Spike (MS-1)      Spiked Sample: 145706

QC Batch:    44093      Date Analyzed:    2007-12-20      Analyzed By:    KB

Prep Batch:   37992      QC Preparation:    2007-12-20      Prepared By:    KB

Param	MS		Units		Dil.	Spike		Matrix	Result	Rec.	Rec.	
	Result					Amount	Amount				Limit	Limit
Benzene	0.877	mg/Kg			1	1.00		<0.00333		88	43.2 - 116	
Toluene	0.929	mg/Kg			1	1.00		<0.00372		93	46.3 - 121	
Ethylbenzene	1.01	mg/Kg			1	1.00		<0.00206		101	54.2 - 127	
Xylene	3.09	mg/Kg			1	3.00		<0.00259		103	49.9 - 131	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD		Units		Dil.	Spike		Matrix	Result	Rec.	Rec.		RPD	Limit
	Result					Amount	Amount				Limit	Limit		
Benzene	0.824	mg/Kg			1	1.00		<0.00333		82	43.2 - 116	6	20	
Toluene	0.859	mg/Kg			1	1.00		<0.00372		86	46.3 - 121	8	20	
Ethylbenzene	0.927	mg/Kg			1	1.00		<0.00206		93	54.2 - 127	9	20	
Xylene	2.83	mg/Kg			1	3.00		<0.00259		94	49.9 - 131	9	20	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS		MSD		Units	Spike		Matrix	Amount	Rec.	MS		MSD	Rec.
	Result		Result			Amount	Amount				Rec.	Rec.		
Trifluorotoluene (TFT)	0.876		0.827		mg/Kg	1		1		1	88	83		68 - 127
4-Bromofluorobenzene (4-BFPB)	1.00		0.904		mg/Kg	1		1		1	100	90		68.6 - 144

Matrix Spike (MS-1)      Spiked Sample: 145715

QC Batch:    44095      Date Analyzed:    2007-12-20      Analyzed By:    KB

Prep Batch:   37992      QC Preparation:    2007-12-20      Prepared By:    KB

Param	MS		Units		Dil.	Spike		Matrix	Result	Rec.	Rec.	
	Result					Amount	Amount				Limit	Limit
GRO	12.3	mg/Kg			1	10.0		1.42		109	51.3 - 130	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD		Units		Dil.	Spike		Matrix	Result	Rec.	Rec.		RPD	Limit
	Result					Amount	Amount				Limit	Limit		
GRO	13.0	mg/Kg			1	10.0		1.42		116	51.3 - 130	6	19.6	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	Flag	Units	ICVs		ICVs		Percent		Date
			True	Found	True	Found	Recovery	Limits	
Chloride		mg/Kg	12.5	11.8	94		90 - 110		2007-12-19

Standard (CCV-1)

QC Batch: 44039

Date Analyzed: 2007-12-19

Analyzed By: ER

Param	Flag	Units	CCVs		CCVs		Percent		Date
			True	Found	True	Found	Recovery	Limits	
Chloride		mg/Kg	12.5	11.8	94		90 - 110		2007-12-19

Standard (ICV-1)

QC Batch: 44042

Date Analyzed: 2007-12-20

Analyzed By: ER

Param	Flag	Units	ICVs		ICVs		Percent		Date
			True	Found	True	Found	Recovery	Limits	
Chloride		mg/Kg	12.5	11.8	94		90 - 110		2007-12-20

Standard (CCV-1)

QC Batch: 44042

Date Analyzed: 2007-12-20

Analyzed By: ER

Param	Flag	Units	CCVs		CCVs		Percent		Date
			True	Found	True	Found	Recovery	Limits	
Chloride		mg/Kg	12.5	11.9	95		90 - 110		2007-12-20

Standard (ICV-1)

QC Batch: 44085

Date Analyzed: 2007-12-20

Analyzed By: TG

Param	Flag	Units	ICVs		ICVs		Percent		Date
			True	Found	True	Found	Recovery	Limits	
DRO		mg/Kg	250	251	100		85 - 115		2007-12-20

**Standard (CCV-2)**

QC Batch: 44085

Date Analyzed: 2007-12-20

Analyzed By: TG

Param	Flag	Units	CCVs		CCVs		CCVs		Percent		Date
			True	Conc.	Found	Conc.	Recovery	Percent	Recovery	Limits	
DRO		mg/Kg	250		271		108		85 - 115		2007-12-20

**Standard (ICV-1)**

QC Batch: 44093

Date Analyzed: 2007-12-20

Analyzed By: KB

Param	Flag	Units	ICVs		ICVs		ICVs		Percent		Date
			True	Conc.	Found	Conc.	Recovery	Percent	Recovery	Limits	
Benzene		mg/Kg	0.100		0.0913		91		85 - 115		2007-12-20
Toluene		mg/Kg	0.100		0.0892		89		85 - 115		2007-12-20
Ethylbenzene		mg/Kg	0.100		0.0885		88		85 - 115		2007-12-20
Xylene		mg/Kg	0.300		0.265		88		85 - 115		2007-12-20

**Standard (CCV-1)**

QC Batch: 44093

Date Analyzed: 2007-12-20

Analyzed By: KB

Param	Flag	Units	CCVs		CCVs		CCVs		Percent		Date
			True	Conc.	Found	Conc.	Recovery	Percent	Recovery	Limits	
Benzene		mg/Kg	0.100		0.0933		93		85 - 115		2007-12-20
Toluene		mg/Kg	0.100		0.0889		89		85 - 115		2007-12-20
Ethylbenzene		mg/Kg	0.100		0.0889		89		85 - 115		2007-12-20
Xylene		mg/Kg	0.300		0.268		89		85 - 115		2007-12-20

**Standard (ICV-1)**

QC Batch: 44095

Date Analyzed: 2007-12-20

Analyzed By: KB

Param	Flag	Units	ICVs		ICVs		ICVs		Percent		Date
			True	Conc.	Found	Conc.	Recovery	Percent	Recovery	Limits	
GRO		mg/Kg	1.00		0.854		85		85 - 115		2007-12-20

# TraceAnalysis, Inc.

email: lab@traceanalysis.com

6701 Aberdeen Avenue, Suite 9  
Lubbock, Texas 79424  
Tel (806) 794-1296  
Fax (806) 794-1298  
1 (800) 378-1296

5002 Basin Street, Suite A1  
Midland, Texas 79703  
Tel (432) 689-6301  
Fax (432) 689-6313

200 East Sunset Rd, Suite E  
El Paso, Texas 79922  
Tel (915) 585-3443  
Fax (915) 585-4944  
1 (888) 588-3443

8808 Camp Bowie Blvd. West, Suite 180  
Ft. Worth, Texas 76116  
Tel (817) 201-5260  
Fax (817) 560-4336

LAB Order ID #

7121824

Page

of

1

Company Name:

Phone #:

Address: (Street, City, Zip)

Fax #:

Project Person:

E-mail:

voice to:

different from above)

Object #:

Project Name:

Object Location (including state):

Sampler Signature

TraceAnalysis, Inc.

Project Name: SAME

DATE 12/18/07

TIME

MTBE 8021B / 602 / 8260B / 624

BTEX 8021B / 602 / 8260B / 624

TPH 418.1 / TX1005 / TX1005 Ext(C35)

PH 8015 GRO / DRO / TVHC

PAH 8270C / 625

Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7

TCLP Metals Ag As Ba Cd Cr Pb Se Hg

TCLP Volatiles

TCLP Semi Volatiles

TCLP Pesticides

RCI

GC/MS Vol. 8260B / 624

GC/MS Semi. Vol. 8270C / 625

PCB's 8082 / 608

Pesticides 8081A / 608

BOD, TSS, pH

Moisture Content

CHLORIDES (E300)

Turn Around Time if different from standard

Hold

24hr

LAB USE ONLY

REMARKS:

300.1 - Lubbock

BTEX vto/GEO - Midland

TRRP Report Required

Check if Special Reporting

Limits Are Needed

repeating limit

for BTEX

pH - vto/GEO

Log-in/Review

LAB USE ONLY

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TRRP Report Required

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Limits Are Needed

repeating limit

for BTEX

pH - vto/GEO



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

Oil Conservation Division

November 30, 2007

**Re: Site Assessment Report and Site Closure Proposal- September 2007 (Plains Marketing L.P.)**

Mr. James Lingnau  
Targa Resources  
P.O. Box 1909  
Eunice, New Mexico 88231

Dear Mr. Lingnau:

The New Mexico Oil Conservation Division (OCD), Environmental Bureau (EB) has completed its review of the Plains Petroleum Report investigation (report) of their former pump station on or in the vicinity of the Ruth Property. You may recall from our June 21, 2007 site meeting where we discussed options with the Mayor of Eunice for addressing contamination at the site to restore the land to residential conditions, subsequent to verifying that organic soil contamination existed below the property.

Based on the Plains report, contamination associated with Plains Marketing L.P. has been determined to be within the confines of their former pump station. Since you were copied on the report, you should be aware of this.

Consequently, the contamination underneath the Targa pipeline associated with Targa Resources (see attachments) appears to be associated with the pipeline trending East to West across the Ruth Property. We are aware that the OCD District Office had approved the removal of Targa's pipeline; however, it appears that the contamination associated with the OCD's original analytical testing points to Targa Resources.

We hereby request, similar to Plains Marketing L.P. stemming from the June 21, 2007 site meeting that Targa conduct an investigation to delineate the horizontal and vertical extent of contamination along and beneath its former pipelines. I have attached the OCD's remediation recommendations to Plains for your use and reference on cleanup standards.

Please contact me within 5 days of receipt of this letter to discuss Targa's timeframe to submit a site assessment report and expedite corrective action(s) associated with Targa's former pipeline and historical facility on site. You may recall that the OCD is on a tight schedule to remediate



contamination for the City of Eunice and the Ruth's. It is our hope that we will be able to resolve this issue informally and quickly. If, however, the OCD does not receive a response from Targa Resources within 5 days, the OCD will proceed with compliance and enforcement action(s). Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl Chavez", with a stylized flourish at the end.

Mr. Carl Chávez  
Environmental Engineer

CC:/LWP

Attachments

xc:   OCD District Office  
      Joshua and Delinda Ruth  
      Mr. Matt White (City of Eunice- Mayor)  
      Mr. Matthew Hudson, Chevron Environmental Management Company  
      Mr. Jeff Dann, Plains Marketing, L.P.

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, November 29, 2007 6:03 PM  
**To:** 'Jeffrey P Dann'  
**Cc:** Johnson, Larry, EMNRD; Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** RE: Ruth Property Report

Mr. Dann:

The Oil Conservation Division has completed its review of the Site Assessment Report and Site Closure Proposal "Ruth Property Unit P, Section 28, Township 21 South, Range 37 East City of Eunice, Lea County, New Mexico (Report- September 2007)." The OCD notices that you used air rotary drilling and this is not a desirable method especially when it would appear that Plains Marketing, L.P. has determined the extent of organic contamination surrounding the former J.N. Carson Pump Station.

The OCD has the following comments and/or recommendations on the proposed remediation:

- 1) Testing the sidewalls and the bottom of the excavation will be required to what has been proposed in the report. In addition, we require that chloride samples also be collected (Method 300). We notice that one Chloride sample was collected at SB-1. A chloride soil cleanup concentration of 250 mg/kg is required due to the residential use planned for the property. TPH shall not exceed 100 mg/kg and BTEX shall be non-detect. The only exception would be to cleanup to background, which will require additional samples. Please minimize the dilution when analyzing for chlorides as a dilution of 50 seems elevated for clean soil conditions (< 100 ppm).
- 2) A liner does not appear to be needed if Plains can show that cleanup standards as described above have been met.
- 3) The depth of 12 ft. for the excavation in the vicinity of SB-1 is not an accepted method of the OCD. Plains should rely on PID, olefactory and visual staining to drive the horizontal and vertical extent of the excavation. The chloride samples along the 4 sidewalls and base of the excavation will need to meet the limits in item #1 above.
- 4) The excavation shall remain open and be fenced to prevent trespassers and the analytical data shall be provided to the OCD for approval before filling begins to restore the site. Site restoration shall be implemented to restore the drainage and vegetation to its original state.

Please contact me to discuss the date for the work and any questions you may have. Thank you.

*Disclaimer: Please be advised that NMOCD approval of this plan does not relieve Plains Marketing, L.P. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Plains Marketing, L.P. of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oecd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

11/30/2007

**From:** Jeffrey P Dann [mailto:jpdann@paalp.com]  
**Sent:** Wednesday, November 07, 2007 1:37 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: Ruth Property Report

Carl - just wanted to check in and see how you were coming along on the review for our site in Eunice. Let me know if you need anything else.

Jeff Dann  
Plains

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Thursday, October 11, 2007 1:37 PM  
**To:** Jeffrey P Dann  
**Subject:** Ruth Property Report

Jeff:

Hi. I received the report today and will work to read it soon and respond. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

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11/30/2007

OCD Analytical Data Sample Results  
From Thursday (8/17/2006)

**Hall Environmental Analysis Laboratory, Inc.**

Date: 05-Sep-06

CLIENT: NM Oil Conservation Division	Client Sample ID: Ruth 1S
Lab Order: 0608240	Collection Date: 8/17/2006 4:27:00 PM
Project: Field Inspection	Date Received: 8/18/2006
Lab ID: 0608240-07	Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	21000	1000		mg/Kg	100	8/25/2006 3:34:32 AM
Motor Oil Range Organics (MRO)	17000	5000		mg/Kg	100	8/25/2006 3:34:32 AM
Surr: DNOP	0	61.7-135	S	%REC	100	8/25/2006 3:34:32 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	500		mg/Kg	100	8/25/2006 3:49:13 PM
Surr: BFB	119	84.5-129		%REC	100	8/25/2006 3:49:13 PM

**Hall Environmental Analysis Laboratory, Inc.**

Date: 05-Sep-06

CLIENT: NM Oil Conservation Division	Client Sample ID: Ruth 1 S
Lab Order: 0608240	Collection Date: 8/17/2006 4:29:00 PM
Project: Field Inspection	Date Received: 8/18/2006
Lab ID: 0608240-08	Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8310: PAHS						Analyst: JMP
Naphthalene	ND	2.5		mg/Kg	10	8/30/2006 12:02:47 PM
1-Methylnaphthalene	ND	2.5		mg/Kg	10	8/30/2006 12:02:47 PM
2-Methylnaphthalene	ND	2.5		mg/Kg	10	8/30/2006 12:02:47 PM
Acenaphthylene	ND	2.5		mg/Kg	10	8/30/2006 12:02:47 PM
Acenaphthene	ND	2.5		mg/Kg	10	8/30/2006 12:02:47 PM
Fluorene	ND	0.30		mg/Kg	10	8/30/2006 12:02:47 PM
Phenanthrene	ND	0.15		mg/Kg	10	8/30/2006 12:02:47 PM
Anthracene	ND	0.15		mg/Kg	10	8/30/2006 12:02:47 PM
Fluoranthene	ND	0.20		mg/Kg	10	8/30/2006 12:02:47 PM
Pyrene	ND	0.25		mg/Kg	10	8/30/2006 12:02:47 PM
Benz(a)anthracene	0.080	0.020		mg/Kg	10	8/30/2006 12:02:47 PM
Chrysene	ND	0.11		mg/Kg	10	8/30/2006 12:02:47 PM
Benzo(b)fluoranthene	ND	0.040		mg/Kg	10	8/30/2006 12:02:47 PM
Benzo(k)fluoranthene	ND	0.010		mg/Kg	10	8/30/2006 12:02:47 PM
Benzo(a)pyrene	ND	0.010		mg/Kg	10	8/30/2006 12:02:47 PM
Dibenz(a,h)anthracene	ND	0.030		mg/Kg	10	8/30/2006 12:02:47 PM
Benzo(g,h,i)perylene	ND	0.030		mg/Kg	10	8/30/2006 12:02:47 PM
Indeno(1,2,3-cd)pyrene	ND	0.040		mg/Kg	10	8/30/2006 12:02:47 PM
Surr: Benzo(e)pyrene	143	52.8-123	S	%REC	10	8/30/2006 12:02:47 PM

**Hall Environmental Analysis Laboratory, Inc.**

Date: 05-Sep-06

CLIENT:	NM Oil Conservation Division	Client Sample ID:	Ruth 1 S
Lab Order:	0608240	Tag Number:	
Project:	Field Inspection	Collection Date:	8/17/2006 4:25:00 PM
Lab ID:	0608240-06A	Date Received:	8/18/2006
		Matrix:	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 7471: MERCURY						
Mercury	ND	0.033		mg/Kg	1	Analyst: MAP 9/1/2006
EPA METHOD 6010B: SOIL METALS						
Arsenic	ND	2.5		mg/Kg	1	Analyst: NMO 9/5/2006 9:05:12 AM
Barium	55	0.20		mg/Kg	2	9/5/2006 9:46:31 AM
Cadmium	ND	0.20		mg/Kg	2	9/5/2006 9:46:31 AM
Chromium	5.6	0.30		mg/Kg	1	9/5/2006 9:05:12 AM
Lead	3.9	0.25		mg/Kg	1	9/5/2006 1:41:05 PM
Selenium	ND	5.0		mg/Kg	2	9/5/2006 9:46:31 AM
Silver	ND	0.25		mg/Kg	1	9/5/2006 9:05:12 AM

**Hall Environmental Analysis Laboratory, Inc.**

Date: 05-Sep-06

CLIENT:	NM Oil Conservation Division	Client Sample ID:	Ruth 2 N
Lab Order:	0608240	Collection Date:	8/17/2006 4:47:00 PM
Project:	Field Inspection	Date Received:	8/18/2006
Lab ID:	0608240-10	Matrix:	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						
Diesel Range Organics (DRO)	100000	2000		mg/Kg	200	Analyst: SCC 8/25/2006 5:12:44 AM
Motor Oil Range Organics (MRO)	65000	10000		mg/Kg	200	8/25/2006 5:12:44 AM
Surr: DNOP	0	61.7-135	S	%REC	200	8/25/2006 5:12:44 AM
EPA METHOD 8015B: GASOLINE RANGE						
Gasoline Range Organics (GRO)	ND	500		mg/Kg	100	Analyst: NSB 8/25/2006 4:18:15 PM
Surr: BFB	128	84.5-129		%REC	100	8/25/2006 4:18:15 PM

## Hall Environmental Analysis Laboratory, Inc.

Date: 05-Sep-06

CLIENT: NM Oil Conservation Division  
 Lab Order: 0608240  
 Project: Field Inspection  
 Lab ID: 0608240-11

Client Sample ID: Ruth 2 N  
 Collection Date: 8/17/2006 4:49:00 PM  
 Date Received: 8/18/2006  
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8310: PAHS						Analyst: JMP
Naphthalene	ND	1.2		mg/Kg	5	8/30/2006 4:00:40 AM
1-Methylnaphthalene	ND	1.2		mg/Kg	5	8/30/2006 4:00:40 AM
2-Methylnaphthalene	ND	1.2		mg/Kg	5	8/30/2006 4:00:40 AM
Acenaphthylene	ND	1.2		mg/Kg	5	8/30/2006 4:00:40 AM
Acenaphthene	ND	1.2		mg/Kg	5	8/30/2006 4:00:40 AM
Fluorene	ND	0.15		mg/Kg	5	8/30/2006 4:00:40 AM
Phenanthrene	0.28	0.075		mg/Kg	5	8/30/2006 4:00:40 AM
Anthracene	ND	0.075		mg/Kg	5	8/30/2006 4:00:40 AM
Fluoranthene	ND	0.10		mg/Kg	5	8/30/2006 4:00:40 AM
Pyrene	0.14	0.12		mg/Kg	5	8/30/2006 4:00:40 AM
Benz(a)anthracene	0.012	0.010		mg/Kg	5	8/30/2006 4:00:40 AM
Chrysene	0.066	0.055		mg/Kg	5	8/30/2006 4:00:40 AM
Benzo(b)fluoranthene	0.035	0.020		mg/Kg	5	8/30/2006 4:00:40 AM
Benzo(k)fluoranthene	ND	0.0050		mg/Kg	5	8/30/2006 4:00:40 AM
Benzo(a)pyrene	ND	0.0050		mg/Kg	5	8/30/2006 4:00:40 AM
Dibenz(a,h)anthracene	ND	0.015		mg/Kg	5	8/30/2006 4:00:40 AM
Benzo(g,h,i)perylene	ND	0.015		mg/Kg	5	8/30/2006 4:00:40 AM
Indeno(1,2,3-cd)pyrene	ND	0.020		mg/Kg	5	8/30/2006 4:00:40 AM
Surrogate: Benzo(e)pyrene	17.0	52.8-123	S	%REC	5	8/30/2006 4:00:40 AM

## Hall Environmental Analysis Laboratory, Inc.

Date: 05-Sep-06

CLIENT: NM Oil Conservation Division  
 Lab Order: 0608240  
 Project: Field Inspection  
 Lab ID: 0608240-09

Client Sample ID: Ruth 2 N  
 Collection Date: 8/17/2006 4:45:00 PM  
 Date Received: 8/18/2006  
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 7471: MERCURY						Analyst: MAP
Mercury	ND	0.033		mg/Kg	1	9/1/2006
EPA METHOD 6010B: SOIL METALS						Analyst: NMO
Arsenic	ND	2.5		mg/Kg	1	9/5/2006 9:07:41 AM
Barium	85	0.20		mg/Kg	2	9/5/2006 9:49:30 AM
Cadmium	ND	0.20		mg/Kg	2	9/5/2006 9:49:30 AM
Chromium	6.5	0.30		mg/Kg	1	9/5/2006 9:07:41 AM
Lead	13	0.50		mg/Kg	2	9/5/2006 2:01:14 PM
Selenium	ND	5.0		mg/Kg	2	9/5/2006 9:49:30 AM
Silver	ND	0.25		mg/Kg	1	9/5/2006 9:07:41 AM