1R - 420

REPORTS

DATE:

2006

1R420
Report
2006

2006
ANNUAL MONITORING REPORT

TEXACO SKELLY F

SW ¼ NW ¼ SECTION 21, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS EMS NUMBER: 2002-11229
NMOCD Reference Number 1R-0420

Prepared For:

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March 2007

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ENCLOSED ON DATA DISK

INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. Beginning on May 29, 2004, project management responsibilities for the Texaco Skelly F site (the site) were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The site, which was formerly the responsibility of Enron Oil Trading and Transportation (EOTT), is now the responsibility of Plains. This report is intended to be viewed as a complete document with text, figures, tables and appendices. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2006 only. However, historic data tables as well as 2006 laboratory analytical reports are presented on the enclosed data disk. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each quarter of 2006 to assess the levels and extent of dissolved phase constituents and Phase Separated Hydrocarbon (PSH). Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH on the water column and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is SW ¼ NW ¼ Section 21, Township 20 South, Range 37 East. The release was discovered by the Texas-New Mexico Pipeline Company (TNM) on the four-inch crude oil transportation line. The pipeline was reportedly repaired with a clamp. No information is currently available documenting the discovery date, release volume or nature of line failure. The Release Notification and Corrective Action Form (C-141) is provided as Appendix B. No site excavation activities have been conducted onsite regarding this release. A Geoprobe® Rig was utilized during the initial site investigation to delineate crude oil impacted soil. Laboratory analysis of soil samples collected during this initial stage of the investigation indicates that subsurface soil impacted by the crude oil release were limited to areas at and below the surface staining.

On March 7, 2006, monitor wells MW-7 and MW-8 and recovery well RW-2 were installed at the site. One (1) additional soil boring was advanced to evaluate to vertical extent of hydrocarbon impact within the source area. Analytical results of the soil samples collected during the installation of the monitor wells and the advancement of the soil boring, during the 2006 reporting period are provided in Table 3, Concentrations of TPH and BTEX in Soil. Boring logs and monitor well details are provided in Appendix A.

Eight groundwater monitor wells (MW-1 through MW-8) and two (2) product recovery wells (RW-1 and RW-2) are currently onsite. Manual product recovery is being conducted weekly from recovery wells RW-1 and RW-2 and monitor wells MW-7 (when present) and MW-8.

FIELD ACTIVITIES

During each quarterly sampling event, monitor well MW-8 and recovery wells RW-1 and RW-2 exhibited a measurable thickness of PSH and were not sampled. Monitor well MW-7 exhibited PSH during the 2nd and 3rd quarters and was not sampled during these quarters. Monitor well MW-4 exhibited a sheen throughout the reporting period. A maximum thickness of 3.09 feet of PSH was detected in monitor well MW-8 on August 18, 2006. The average thickness of PSH in wells exhibited PSH was 1.07 feet. Groundwater Elevation data is provided as Table 1. Approximately 268 gallons (approximately 6.4 barrels) of PSH was recovered from the site during the 2006 reporting period. Approximately 570 gallons (approximately 13.6 barrels) of PSH has been recovered since project inception.

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule, which was approved by the NMOCD in correspondence dated April 28, 2004 and amended by NMOCD correspondence dated June 22, 2005.

NMOCD Approved Sampling Schedule	
MW-1	Annually
MW-2	Annually
MW-3	Annually
MW-4	Annually
MW-5	Quarterly
MW-6	Annually
MW-7	Quarterly
MW-8	Quarterly
RW-1	Quarterly
RW-2	Quarterly

The site monitor wells and recovery wells were gauged and sampled on March 14, June 16, September 8, and November 14, 2006. During each sampling event, sampled monitor wells were purged of approximately three well volumes of water or until the wells failed to produce water using a PVC bailer or electric Grundfos pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Key Energy of Hobbs, New Mexico utilizing a licensed disposal facility (NMOCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed from measurements collected during the four (4) quarterly events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2006 is provided as Table 1. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.002 feet/foot to the south-southeast as measured between groundwater monitor wells MW-1 and MW-7. This is consistent with data presented on Figures 2A through 2C from earlier in the year. Corrected groundwater elevations ranged between 3,492.97 and 3,495.40 feet above mean sea level, in recovery RW-2 on July 31, 2006 and April 18, 2006, respectively.

LABORATORY RESULTS

Recovery wells RW-1 and RW-2 and monitor well MW-8 contained measurable PSH throughout the reporting period and were not sampled. Monitor well MW-7 contained measurable PSH during the 2nd and 3rd quarter sampling event and was not sampled during these quarters. Monitor well MW-4 exhibited a sheen throughout the reporting period.

Groundwater samples collected during the 2006 quarterly monitoring events were delivered to Trace Analysis, Inc., of Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8021b. A listing of BTEX constituent concentrations for 2006 is summarized in Table 2 and copies of the laboratory reports for 2006 are provided on the enclosed disk. The inferred extent of PSH and groundwater sampling results for BTEX constituent concentrations are depicted on Figures 3A-3D, the Groundwater Concentration Maps.

Monitor well MW-1 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below laboratory method detection limits (MDL) and NMOCD regulatory standards of 0.01 mg/L for benzene, 0.75 mg/L for toluene, 0.75 mg/L for ethylbenzene and 0.62 for xylene, during the 4th quarter sampling event.

Monitor well MW-2 is sampled on an annual schedule and analytical results indicate a benzene concentration of 0.0014 mg/L during the 4th quarter sampling event. This 4th quarter benzene concentration is below NMOCD regulatory standards. Toluene and ethylbenzene concentrations were below MDL constituent and NMOCD regulatory standards during the 4th quarter sampling event. The analytical results indicated a xylene concentration of 0.0014 mg/L, this concentration was below the NMOCD regulatory standards.

Monitor well MW-3 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event.

Monitor well MW-4 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from 0.0341 mg/L during the 1st quarter to 0.0692 mg/L during the 3rd quarter of 2006. Benzene concentrations were above NMOCD regulatory standards during all four (4) quarters of the reporting period. Toluene concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of the reporting period. Ethylbenzene concentrations were below MDL and NMOCD regulatory standards during the 1st, 2nd, and 3rd quarters. Analytical results during the 4th quarter sampling event indicate an ethylbenzene concentration of 0.0014 mg/L (below NMOCD regulatory standards). Xylene concentrations ranged from <0.001 mg/L during the 4th quarter to 0.0719 mg/L during the 3rd quarter of 2006. Xylene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period.

Monitor well MW-5 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event.

Monitor well MW-6 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event.

Monitor well MW-7 is sampled/monitored on a quarterly schedule. Monitor well MW-7 was not sampled during the 2nd and 3rd quarters of the reporting period, due to the reported presence of PSH in the monitor well. PSH thicknesses of 0.05 feet and 0.03 feet were reported during the 2nd and 3rd quarters, respectively. Analytical results from the 1st and 4th quarters indicate benzene concentrations ranged from 0.0401 mg/L during the 1st quarter to 0.109 mg/L during the 4th quarter of 2006. Benzene concentrations were above NMOCD regulatory standards during the 1st and 4th quarters of the reporting period. Toluene concentrations ranged from 0.0072 mg/L during the 4th quarter to 0.0125 mg/L during the 1st quarter of 2006. Toluene concentrations were below NMOCD regulatory standards during the 1st and 4th quarters of the reporting period. Ethylbenzene concentrations ranged from 0.03 mg/L during the 1st quarter to 0.0757 mg/L during the 4th quarter of 2006. Ethylbenzene concentrations were below NMOCD regulatory standards during the 1st and 4th quarters of the reporting period. Xylene concentrations ranged from 0.0143 mg/L during the 4th quarter to 0.616 mg/L during the 1st quarter of 2006. Xylene concentrations were below NMOCD regulatory standards during the 1st and 4th quarters of the reporting period.

Monitor well MW-8 is monitored on a quarterly schedule. Monitor well MW-8 was not sampled during any of the four (4) quarters of the reporting period, due to the reported presence of PSH in the monitor well. PSH thicknesses of 0.23 feet, 2.10 feet, 1.85 feet and 0.17 feet were reported during the 1st, 2nd, 3rd, and 4th quarters of 2006, respectively.

Recovery well RW-1 is monitored on a quarterly schedule. Recovery well RW-1 was not sampled during any of the four (4) quarters of the reporting period, due to the reported presence of PSH in the recovery well. PSH thicknesses of 1.77 feet, 1.32 feet, 2.09 feet and 0.95 feet were reported during the 1st, 2nd, 3rd, and 4th quarters of 2006, respectively.

Recovery well RW-2 is monitored on a quarterly schedule. Recovery well RW-2 was not sampled during any of the four (4) quarters of the reporting period, due to the reported presence of PSH in the recovery well. PSH thicknesses of 0.86 feet, 0.91 feet, 2.52 feet and 0.58 feet were reported during the 1st, 2nd, 3rd, and 4th quarters of 2006, respectively.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of monitoring activities for the 2006 annual monitoring period. Eight (8) groundwater monitor wells (MW-1 through MW-8) and two (2) recovery wells (RW-1 and RW-2) are currently onsite. Manual product recovery is now being conducted twice weekly from monitor wells MW-8 and MW-7 (when PSH is present) and recovery wells RW-1 and RW-2. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.002 feet/foot to the south-southeast.

Recovery wells RW-1 and RW-2 and monitor well MW-8 contained measurable PSH throughout the reporting period and were not sampled. Monitor well MW-7 contained measurable PSH during the 2nd and 3rd quarter sampling event and was not sampled during these quarters. Monitor well MW-4 exhibited a sheen throughout the reporting period. Approximately 268 gallons (approximately 6.4 barrels) of PSH was recovered from the site during the 2006 reporting period. Approximately 570 gallons (approximately 13.6 barrels) of PSH has been recovered since project inception in January 2003.

Review of the laboratory analytical results of the groundwater samples obtained during this annual reporting period indicate BTEX constituent concentrations are below the applicable NMOCD regulatory standards in five (5) of the ten (10) monitor and recovery wells on site. Recovery wells RW-1, RW-2 and monitor well MW-8 consistently exhibited measurable thicknesses of PSH during each sampling event and were not sampled. Monitor well MW-7 exhibited measurable PSH during the 2nd and 3rd quarters of the reporting period.

Dissolved phase hydrocarbon impact above the applicable NMOCD regulatory standard appears to be limited to monitor and recovery wells currently or previously containing PSH.

ANTICIPATED ACTIONS

Quarterly groundwater monitoring and sampling will continue in 2007. PSH will be recovered on a twice weekly schedule. An Annual Monitoring Report will be submitted to the NMOCD before April 1, 2008.

An additional down gradient monitor well may be required to fully delineate the dissolved phase hydrocarbon plume at the site. A Duke Energy Field Services (DEFS) pipeline is located down gradient of monitor MW-4. The pipeline right-of-way exhibits extensive surface hydrocarbon staining. NOVA and Plains representatives have documented hydrocarbon releases and pipe clamps on the previously exposed pipeline.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination

of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of NOVA and/or Plains.

DISTRIBUTION

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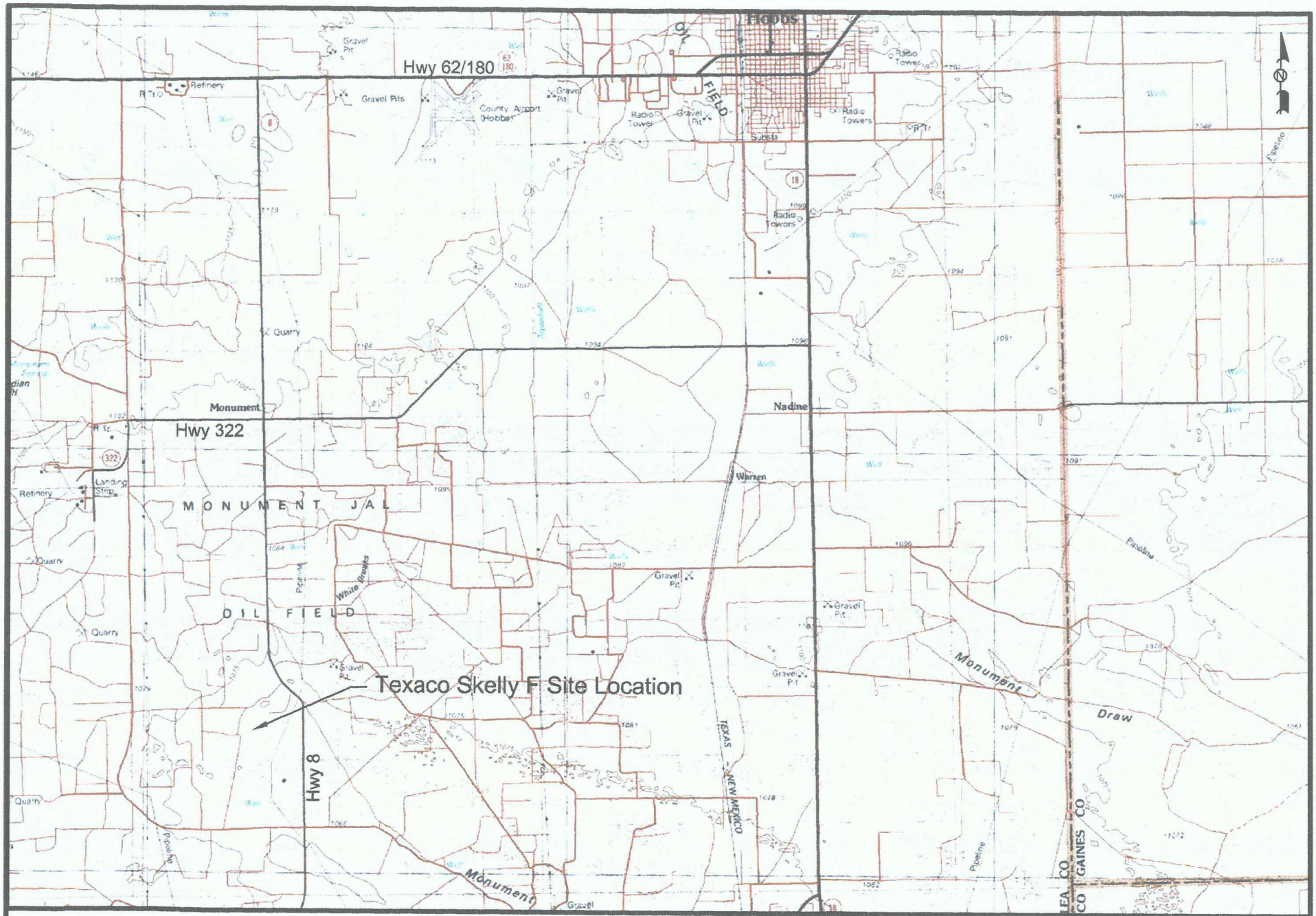
FIGURES



SW1/4 NW1/4 Section 21, T20S, R37E

6 3 0 3 6

Distance in Miles

Figure 1
Site Location Map
Plains Marketing, L.P.
Texaco Skelly F
Lea County, NM

NOVA Safety and Environmental

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February 15, 2005	Scale: 1" = 6 Miles	Prep By: DPM
		Checked By: MRE

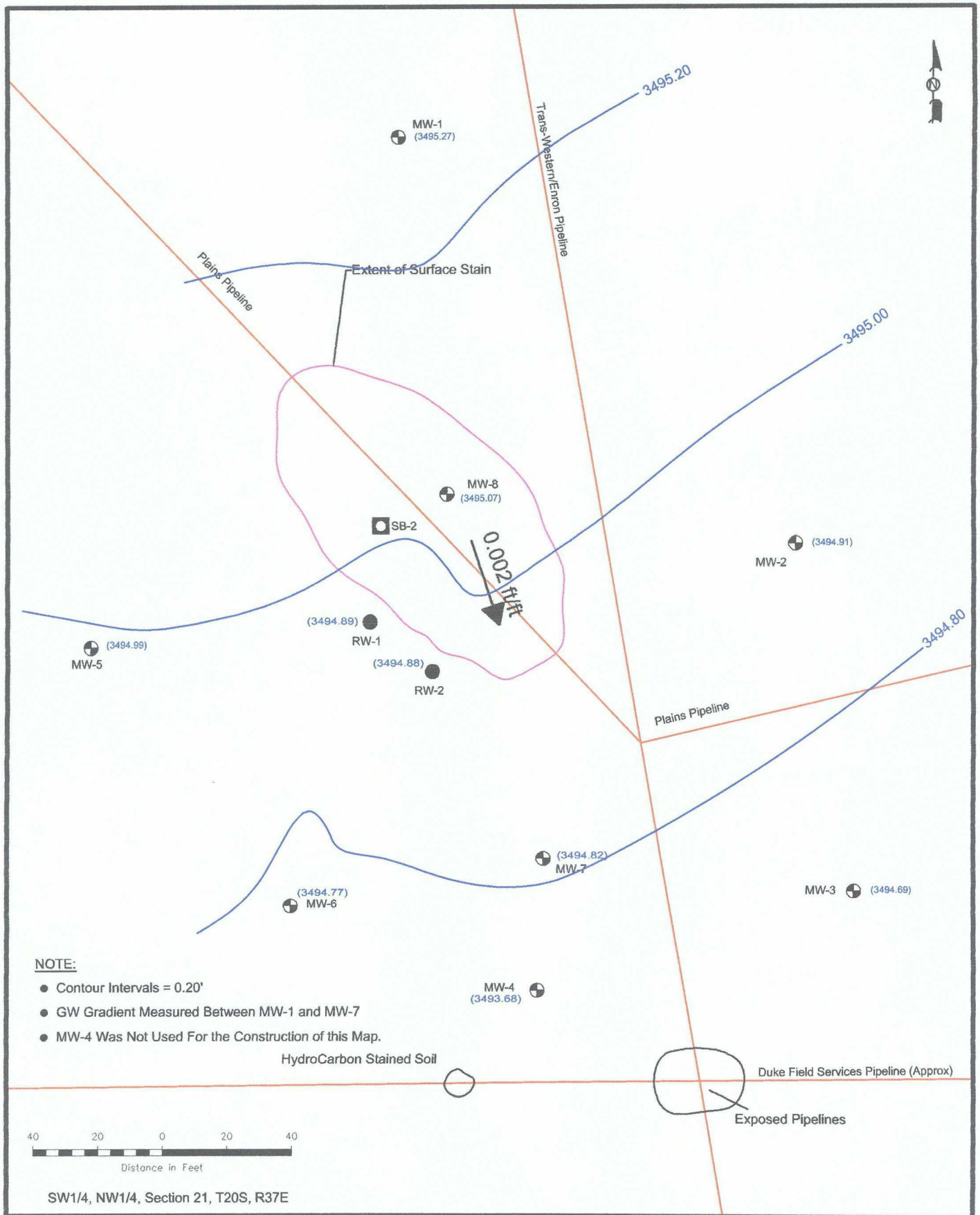

Figure 2A
Inferred Groundwater Gradient Map
(03/14/06)
Plains Marketing, L.P.
Texaco Skelly "F" Site
Lea County, NM

NOVA Safety and Environmental

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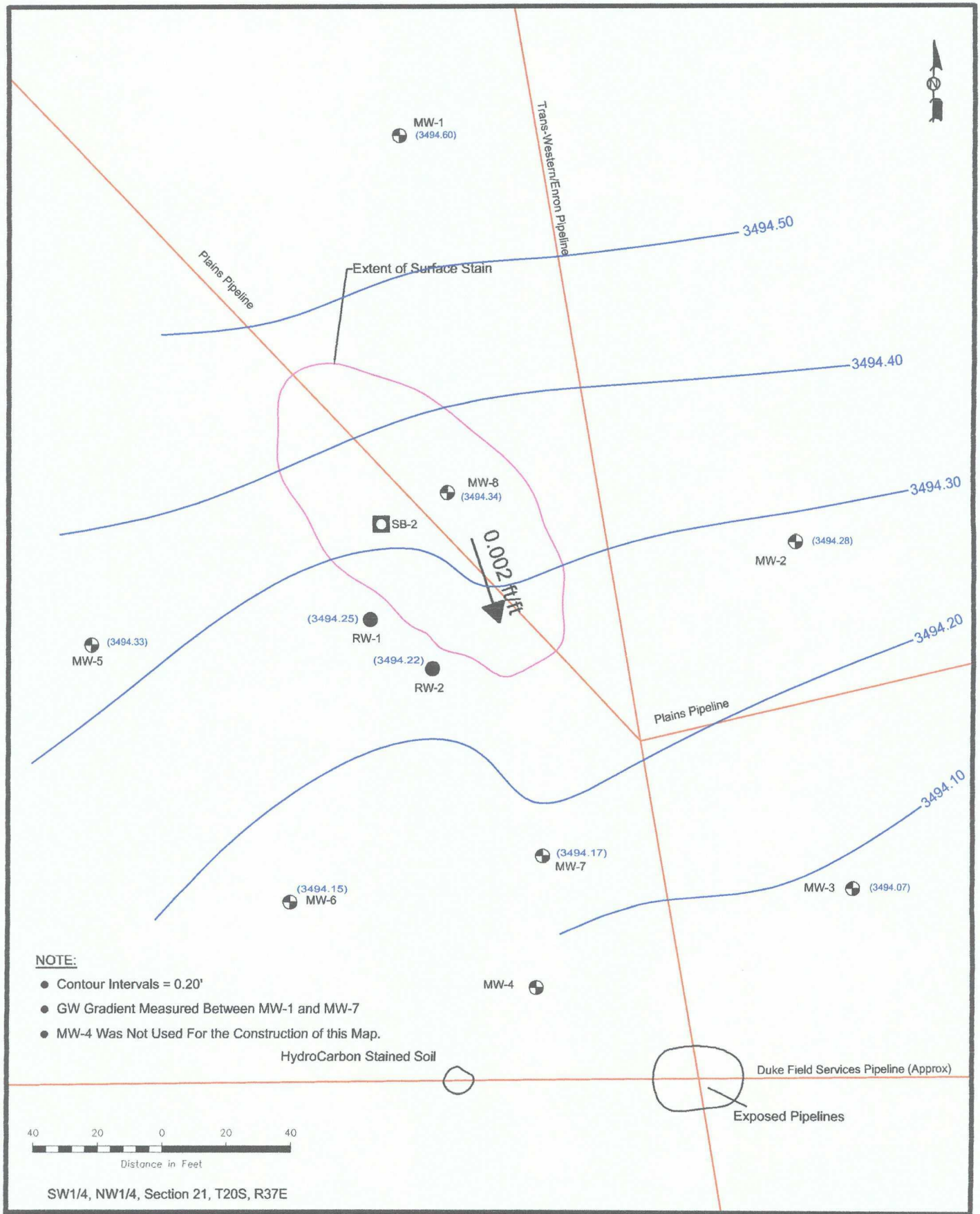

Legend:

- Monitor Well Location
- Recovery Well
- Soil Boring Location
- Pipeline
- (3494.69) Groundwater Elevation (feet)
- Groundwater Elevation Contour Line
- 0.001 ft/ft Groundwater Gradient and Magnitude

Figure 2B
Inferred Groundwater Gradient Map
(06/16/06)
Plains Marketing, L.P.
Texaco Skelly "F" Site
Lea County, NM

NOVA Safety and Environmental

February 8, 2007	Scale: 1" = 40'	CAD By: DGC
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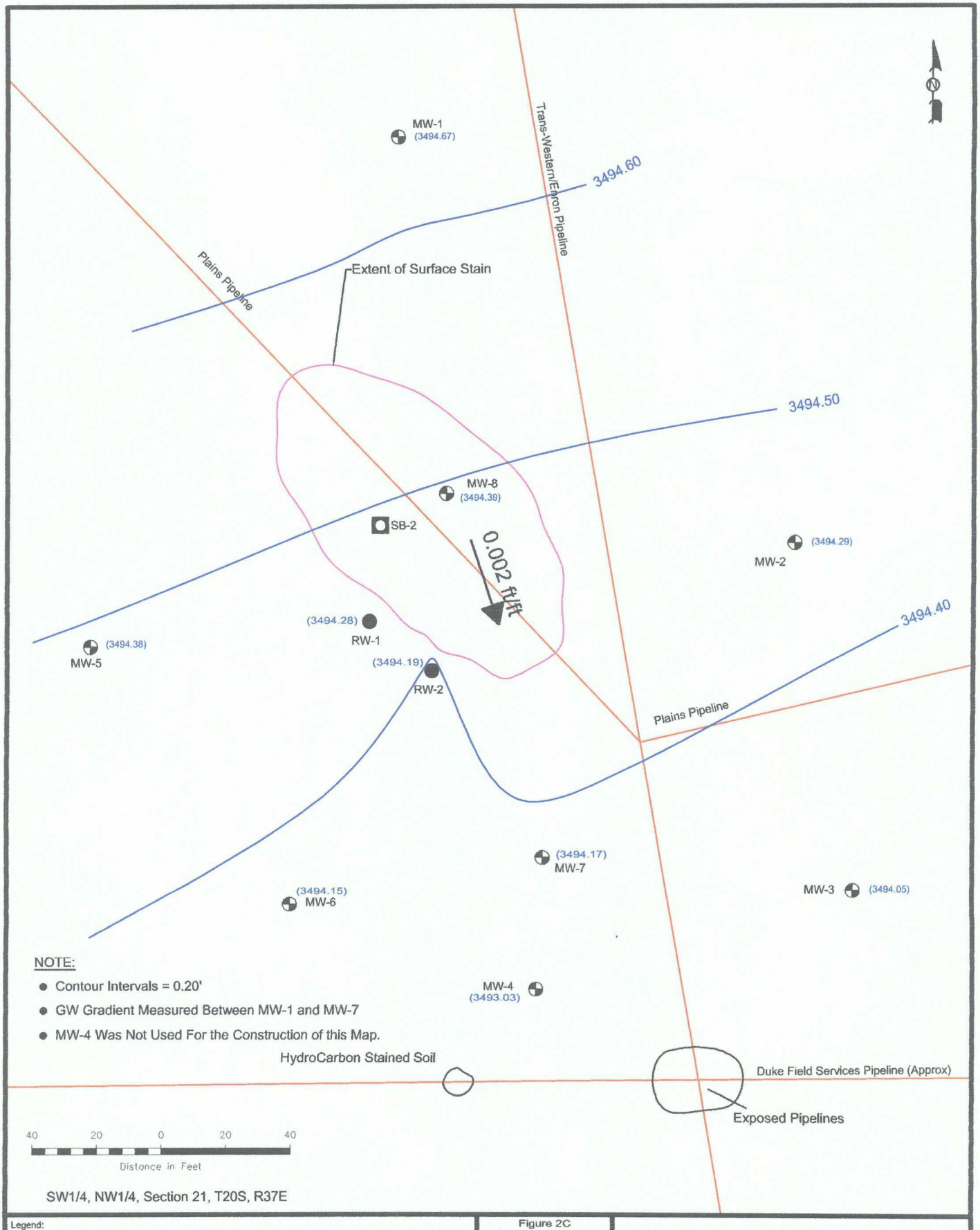

Figure 2C
Inferred Groundwater Gradient Map (09/08/06)
Plains Marketing, L.P.
Texaco Skelly "F" Site
Lea County, NM

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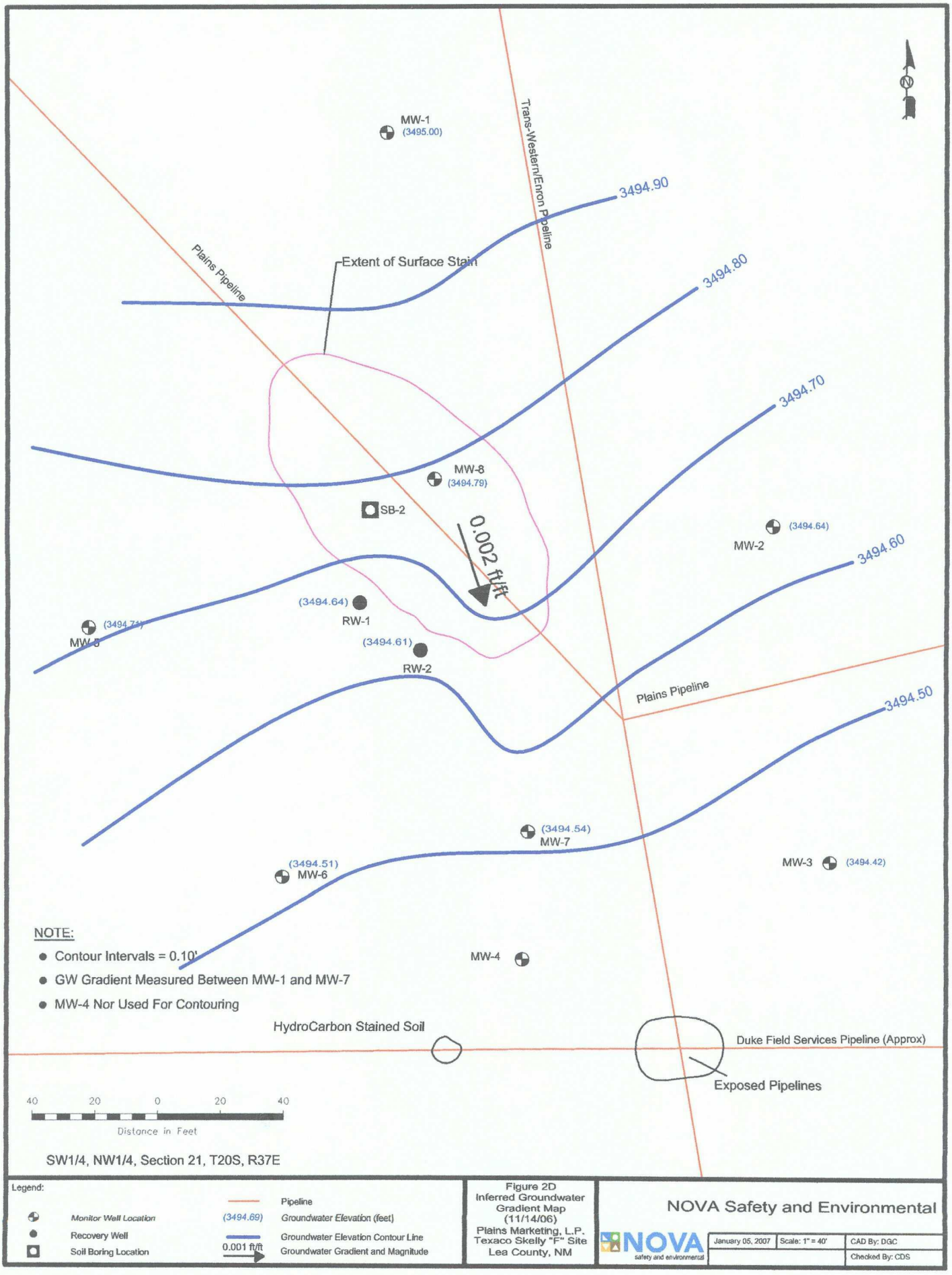

Figure 2D
Inferred Groundwater Gradient Map
(11/14/06)
Plains Marketing, L.P.
Texaco Skelly "F" Site
Lea County, NM

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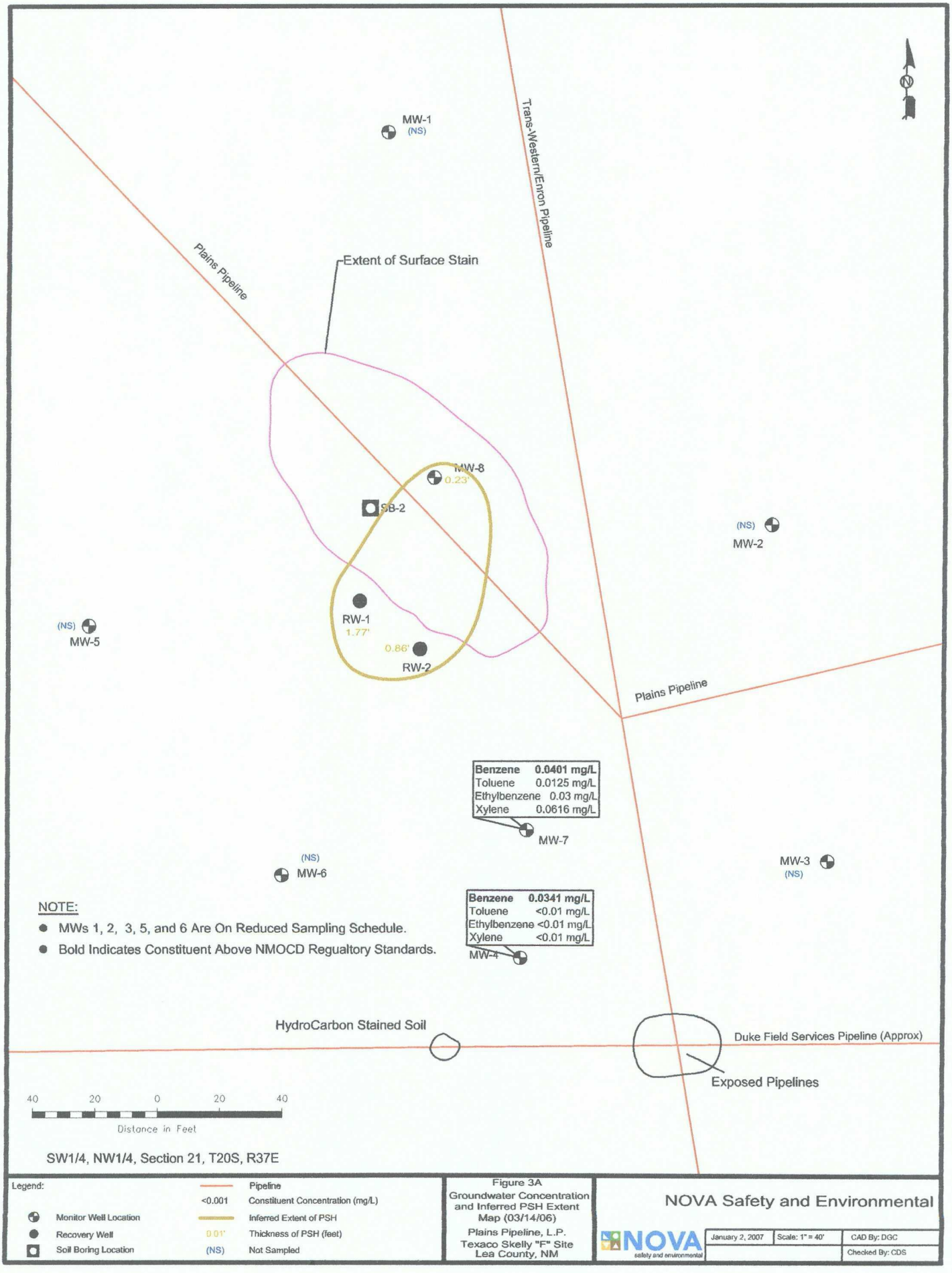

Figure 3A
Groundwater Concentration and Inferred PSH Extent Map (03/14/06)
Plains Pipeline, L.P.
Texaco Skelly "F" Site
Lea County, NM

NOVA Safety and Environmental

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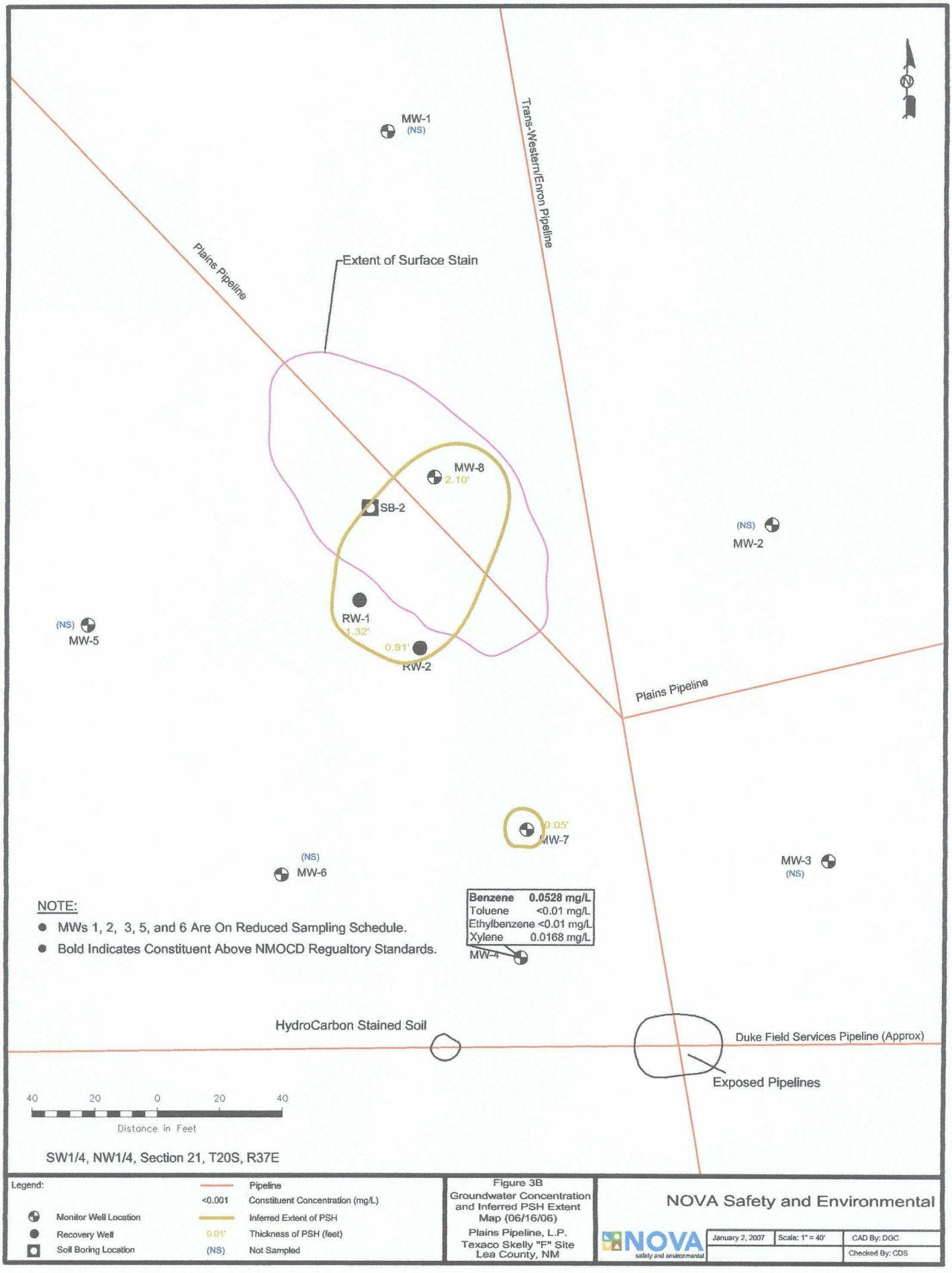

Figure 3B
Groundwater Concentration and Inferred PSH Extent Map (06/16/06)
Plains Pipeline, L.P.
Texaco Skelly "F" Site
Lea County, NM

NOVA Safety and Environmental

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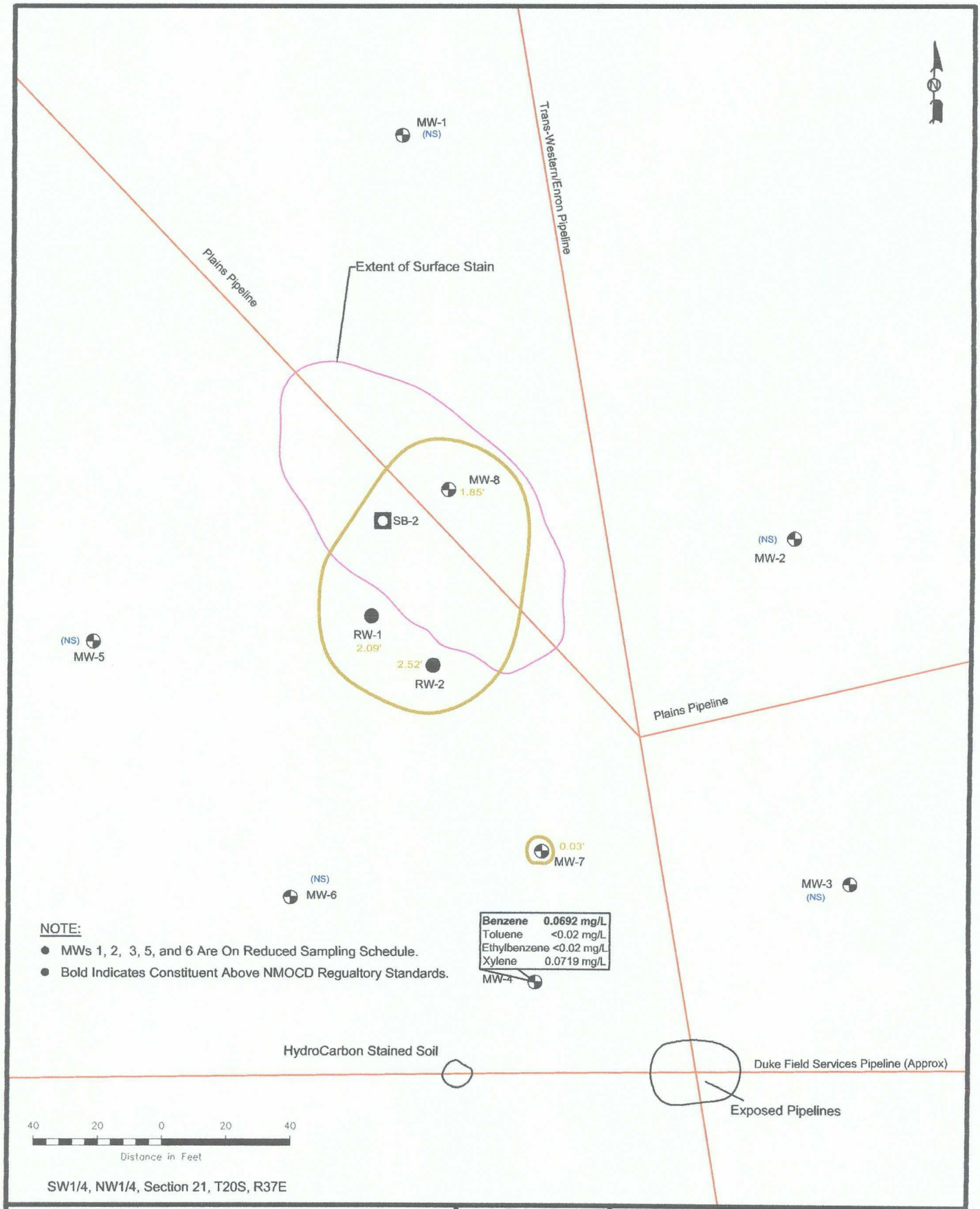

NOTE:

- MWs 1, 2, 3, 5, and 6 Are On Reduced Sampling Schedule.
- Bold Indicates Constituent Above NMOCD Regualtory Standards.

Legend:		
	Pipeline	
	<0.001	Constituent Concentration (mg/L)
Monitor Well Location		Inferred Extent of PSH
Recovery Well	0.01'	Thickness of PSH (feet)
Soil Boring Location	(NS)	Not Sampled

Figure 3C
Groundwater Concentration and Inferred PSH Extent Map (09/08/06)
Plains Pipeline, L.P.
Texaco Skelly "F" Site
Lea County, NM

NOVA Safety and Environmental

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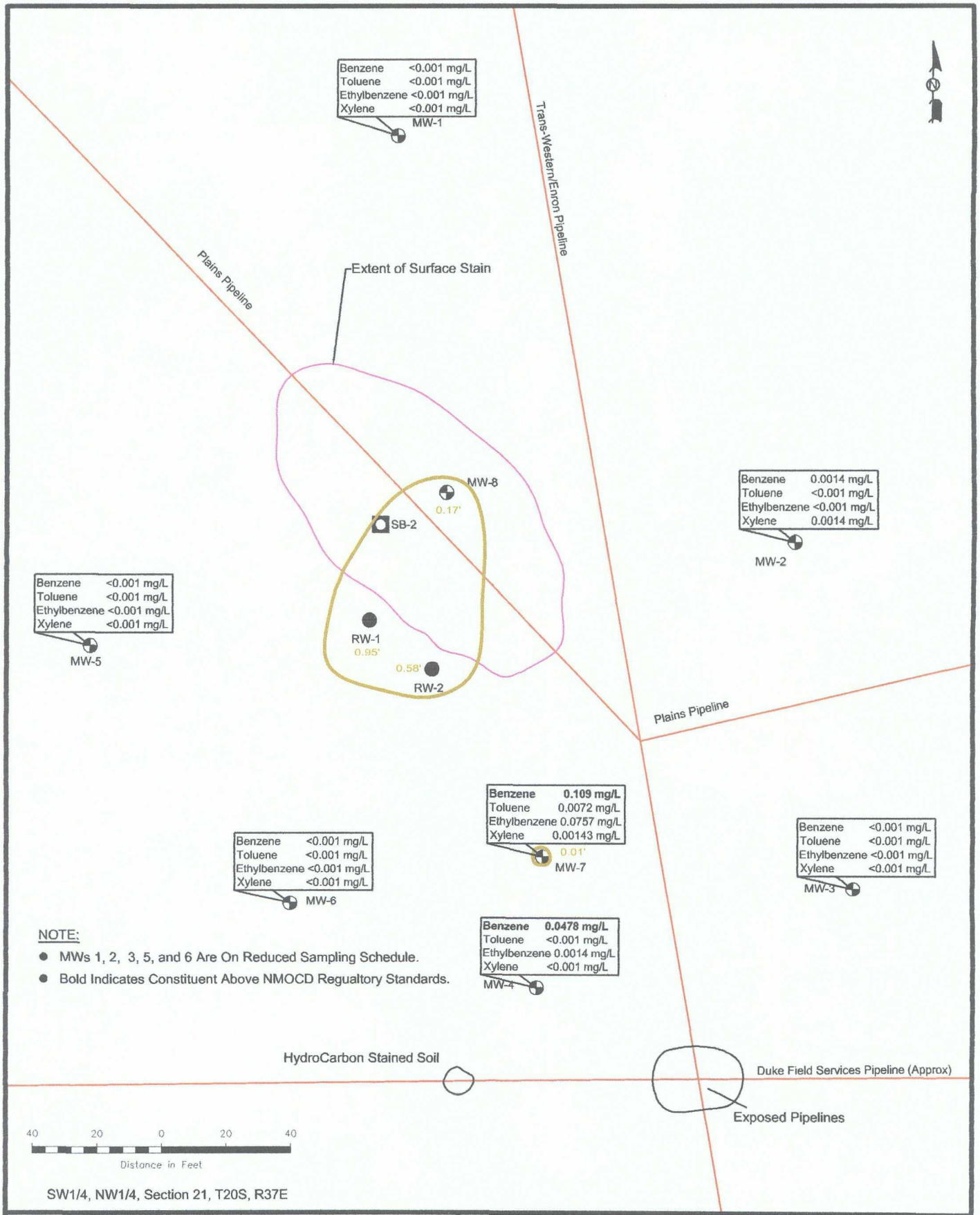


Figure 3D
Groundwater Concentration and Inferred PSH Extent Map (11/14/06)
Plains Pipeline, L.P.
Texaco Skelly "F" Site
Lea County, NM

NOVA Safety and Environmental

January 2, 2007	Scale: 1" = 40'	CAD By: DGC
		Checked By: CDS

TABLES

TABLE 1

2006 GROUNDWATER ELEVATION TABLE

PLAINS MARKETING, L.P.
TEXACO SKELLY F
LEA COUNTY, NM

Well Number	Date Measured	Top of Casing Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
MW-1	*03/14/06*	3521.04	-	25.77	0.00	3495.27
	06/16/06	3521.04	-	26.44	0.00	3494.60
	09/08/06	3521.04	-	26.37	0.00	3494.67
	11/14/06	3521.04	-	26.04	0.00	3495.00
MW-2	*03/14/06*	3518.80	-	23.89	0.00	3494.91
	06/16/06	3518.80	-	24.52	0.00	3494.28
	09/08/06	3518.80	-	24.51	0.00	3494.29
	11/14/06	3518.80	-	24.16	0.00	3494.64
MW-3	*03/14/06*	3520.52	-	25.83	0.00	3494.69
	06/16/06	3520.52	-	26.45	0.00	3494.07
	09/08/06	3520.52	-	26.47	0.00	3494.05
	11/14/06	3520.52	-	26.10	0.00	3494.42
MW-4	*03/14/06*	3519.91	sheen	26.23		3493.68
	06/16/06	3519.91	sheen	26.87		3493.04
	09/08/06	3519.91		26.88		3493.03
	09/18/06	3519.91	sheen	26.75		3493.16
	10/02/06	3519.91	sheen	26.77		3493.14
	10/06/06	3519.91	sheen	26.68		3493.23
	10/24/06	3519.91		26.61		3493.30
	10/26/06	3519.91	sheen	26.63		3493.28
	11/03/06	3519.91	sheen	26.60		3493.31
	11/09/06	3519.91	sheen	26.55		3493.36
	11/14/06	3519.91	sheen	26.52		3493.39
	11/15/06	3519.91	sheen	26.50		3493.41
MW-5	*03/14/06*	3519.62	-	24.63	0.00	3494.99
	06/16/06	3519.62	-	25.29	0.00	3494.33
	09/08/06	3519.62	-	25.24	0.00	3494.38
	11/14/06	3519.62	-	24.91	0.00	3494.71
MW-6	*03/14/06*	3520.71	-	25.94	0.00	3494.77
	06/16/06	3520.71	-	26.56	0.00	3494.15
	09/08/06	3520.71	-	26.56	0.00	3494.15
	11/14/06	3520.71	-	26.20	0.00	3494.51
MW-7	03/09/06	3521.02	-	26.18	0.00	3494.84

TABLE 1

2006 GROUNDWATER ELEVATION TABLE

PLAINS MARKETING, L.P.
TEXACO SKELLY F
LEA COUNTY, NM

Well Number	Date Measured	Top of Casing Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
MW-7	*03/14/06*	3521.02	sheen	26.20	0.00	3494.82
	06/16/06	3521.02	26.84	26.89	0.05	3494.17
	07/05/06	3521.02	27.15	27.19	0.04	3493.86
	07/12/06	3521.02	27.19	27.22	0.03	3493.83
	07/18/06	3521.02	27.14	27.16	0.02	3493.88
	07/26/06	3521.02	27.20	27.22	0.02	3493.82
	07/31/06	3521.02	27.22	27.24	0.02	3493.80
	08/08/06	3521.02	sheen	27.29	0.00	3493.73
	08/18/06	3521.02	26.21	26.23	0.02	3494.81
	08/22/06	3521.02	27.16	27.19	0.03	3493.86
	09/08/06	3521.02	26.85	26.88	0.03	3494.17
	09/18/06	3521.02	26.71	26.74	0.03	3494.31
	10/02/06	3521.02	26.73	26.76	0.03	3494.29
	10/06/06	3521.02	26.65	26.70	0.05	3494.36
	10/10/06	3521.02	26.63	26.64	0.01	3494.39
	10/16/06	3521.02	26.60	26.63	0.03	3494.42
	10/20/06	3521.02	26.56	26.57	0.01	3494.46
	10/24/06	3521.02	sheen	26.58	0.00	3494.44
	10/26/06	3521.02	26.56	26.60	0.04	3494.45
	11/03/06	3521.02	26.57	26.58	0.01	3494.45
	11/09/06	3521.02	sheen	26.55	0.00	3494.47
	11/14/06	3521.02	26.48	26.49	0.01	3494.54
	11/15/06	3521.02	26.48	26.49	0.01	3494.53
	11/17/06	3521.02	sheen	26.53	0.00	3494.49
	11/20/06	3521.02	sheen	26.52	0.00	3494.70
	11/22/06	3521.02	sheen	26.49	0.00	3494.80
	11/27/06	3521.02	sheen	26.51	0.00	3494.98
	11/29/06	3521.02	sheen	26.46	0.00	3495.00
	12/04/06	3521.02	sheen	26.47	0.00	3494.90
	12/08/06	3521.02	sheen	26.57	0.00	3494.84
	12/13/06	3521.02	sheen	26.47	0.00	3495.06
	12/15/06	3521.02	sheen	26.40	0.00	3495.03
	12/18/06	3521.02	sheen	26.49	0.00	3495.48
MW-8	03/09/06	3519.78	-	24.67	0.00	3495.11
	03/14/06	3519.78	24.68	24.91	0.23	3495.07
	03/17/06	3519.78	24.64	24.96	0.32	3495.09
	03/22/06	3519.78	24.65	25.20	0.55	3495.05
	03/29/06	3519.78	24.56	25.08	0.52	3495.14

TABLE 1

2006 GROUNDWATER ELEVATION TABLE

PLAINS MARKETING, L.P.
TEXACO SKELLY F
LEA COUNTY, NM

Well Number	Date Measured	Top of Casing Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
MW-8	04/03/06	3519.78	24.61	25.02	0.41	3495.11
	04/11/06	3519.78	24.53	24.99	0.46	3495.18
	04/18/06	3519.78	24.50	25.10	0.60	3495.19
	04/25/06	3519.78	24.53	25.01	0.48	3495.18
	05/02/06	3519.78	24.50	25.62	1.12	3495.11
	05/09/06	3519.78	24.55	25.46	0.91	3495.09
	05/16/06	3519.78	24.65	25.49	0.84	3495.00
	05/23/06	3519.78	24.72	26.21	1.49	3494.84
	06/01/06	3519.78	24.88	27.05	2.17	3494.57
	06/06/06	3519.78	24.96	27.02	2.06	3494.51
	06/13/06	3519.78	25.05	27.50	2.45	3494.36
	06/16/06	3519.78	25.13	27.23	2.10	3494.34
	06/20/06	3519.78	25.14	27.79	2.65	3494.24
	07/05/06	3519.78	25.33	28.24	2.91	3494.01
	07/12/06	3519.78	25.38	28.18	2.80	3493.98
	07/18/06	3519.78	25.33	27.85	2.52	3494.07
	07/26/06	3519.78	25.39	28.36	2.97	3493.94
	07/31/06	3519.78	25.42	28.06	2.64	3493.96
	08/08/06	3519.78	25.44	28.09	2.65	3493.94
	08/18/06	3519.78	25.41	28.50	3.09	3493.91
	08/22/06	3519.78	25.39	27.47	2.08	3494.08
	09/08/06	3519.78	25.11	26.96	1.85	3494.39
	09/18/06	3519.78	24.99	26.75	1.76	3494.53
	10/02/06	3519.78	25.00	26.74	1.74	3494.52
	10/06/06	3519.78	24.96	26.66	1.70	3494.57
	10/10/06	3519.78	24.98	26.33	1.35	3494.60
	10/16/06	3519.78	24.94	26.24	1.30	3494.65
	10/20/06	3519.78	24.96	25.96	1.00	3494.67
	10/24/06	3519.78	24.94	26.19	1.25	3494.65
	10/26/06	3519.78	24.99	25.70	0.71	3494.68
	11/03/06	3519.78	24.95	25.85	0.90	3494.70
	11/09/06	3519.78	24.90	25.81	0.91	3494.74
	11/14/06	3519.78	24.96	25.13	0.17	3494.79
	11/15/06	3519.78	24.94	25.12	0.18	3494.81
	11/17/06	3519.78	24.95	25.32	0.37	3494.77
	11/20/06	3519.78	24.98	25.07	0.09	3494.79
	11/22/06	3519.78	24.96	25.11	0.15	3494.80
	11/27/06	3519.78	24.94	25.08	0.14	3494.82
	11/29/06	3519.78	24.93	25.00	0.07	3494.84

TABLE 1

2006 GROUNDWATER ELEVATION TABLE

PLAINS MARKETING, L.P.
TEXACO SKELLY F
LEA COUNTY, NM

Well Number	Date Measured	Top of Casing Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
MW-8	12/04/06	3519.78	24.93	25.03	0.10	3494.84
	12/08/06	3519.78	24.95	25.08	0.13	3494.81
	12/13/06	3519.78	24.93	25.06	0.13	3494.83
	12/15/06	3519.78	24.89	24.99	0.10	3494.88
	12/18/06	3519.78	24.92	25.21	0.29	3494.82
RW-1	01/04/06	3519.68	24.63	26.05	1.42	3494.84
	01/10/06	3519.68	24.51	26.29	1.78	3494.90
	01/17/06	3519.68	24.55	26.20	1.65	3494.88
	01/26/06	3519.68	24.56	26.29	1.73	3494.86
	01/31/06	3519.68	24.54	26.50	1.96	3494.85
	02/07/06	3519.68	24.67	25.99	1.32	3494.81
	02/13/06	3519.68	24.56	26.06	1.50	3494.90
	02/22/06	3519.68	24.65	26.10	1.45	3494.81
	02/27/06	3519.68	24.59	26.10	1.51	3494.86
	03/07/06	3519.68	24.47	26.58	2.11	3494.89
	03/14/06	3519.68	24.52	26.29	1.77	3494.89
	03/17/06	3519.68	24.49	26.60	2.11	3494.87
	03/22/06	3519.68	24.50	26.90	2.40	3494.82
	03/29/06	3519.68	24.41	26.48	2.07	3494.96
	04/03/06	3519.68	24.48	26.13	1.65	3494.95
	04/11/06	3519.68	24.40	26.20	1.80	3495.01
	04/18/06	3519.68	24.32	26.65	2.33	3495.01
	04/25/06	3519.68	24.40	26.33	1.93	3494.99
	05/02/06	3519.68	24.30	27.06	2.76	3494.97
	05/09/06	3519.68	24.33	27.13	2.80	3494.93
	05/16/06	3519.68	24.49	27.28	2.79	3494.77
	05/23/06	3519.68	24.55	27.46	2.91	3494.69
	06/01/06	3519.68	24.91	28.32	3.41	3494.26
	06/06/06	3519.68	24.97	27.02	2.05	3494.40
	06/13/06	3519.68	25.07	27.21	2.14	3494.29
	06/16/06	3519.68	25.23	26.55	1.32	3494.25
	06/20/06	3519.68	25.21	27.21	2.00	3494.17
	07/05/06	3519.68	25.44	27.42	1.98	3493.94
	07/12/06	3519.68	25.46	27.44	1.98	3493.92
	07/18/06	3519.68	25.45	27.20	1.75	3493.97
	07/26/06	3519.68	25.50	27.36	1.86	3493.90
	07/31/06	3519.68	26.52	27.16	0.64	3493.06
	08/08/06	3519.68	25.54	27.43	1.89	3493.86

TABLE 1

2006 GROUNDWATER ELEVATION TABLE

PLAINS MARKETING, L.P.
TEXACO SKELLY F
LEA COUNTY, NM

Well Number	Date Measured	Top of Casing Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
RW-1	08/18/06	3519.68	25.49	27.51	2.02	3493.89
	08/22/06	3519.68	25.50	26.96	1.46	3493.96
	09/08/06	3519.68	25.09	27.18	2.09	3494.28
	09/18/06	3519.68	24.94	27.23	2.29	3494.40
	10/02/06	3519.68	24.95	25.24	0.29	3494.69
	10/06/06	3519.68	24.95	27.09	2.14	3494.41
	10/10/06	3519.68	25.00	26.33	1.33	3494.48
	10/16/06	3519.68	24.95	26.65	1.70	3494.48
	10/20/06	3519.68	24.98	25.96	0.98	3494.55
	10/24/06	3519.68	24.95	26.21	1.26	3494.54
	10/26/06	3519.68	25.02	25.80	0.78	3494.54
	11/03/06	3519.68	24.93	26.22	1.29	3494.56
	11/09/06	3519.68	24.91	26.03	1.12	3494.60
	11/14/06	3519.68	24.90	25.85	0.95	3494.64
	11/15/06	3519.68	24.89	25.81	0.92	3494.65
	11/17/06	3519.68	24.86	26.07	1.21	3494.64
	11/20/06	3519.68	24.90	25.78	0.88	3494.65
	11/22/06	3519.68	24.91	25.51	0.60	3494.68
	11/27/06	3519.68	24.87	25.75	0.88	3494.68
	11/29/06	3519.68	24.88	25.44	0.56	3494.72
	12/04/06	3519.68	24.86	25.64	0.78	3494.70
	12/08/06	3519.68	24.90	25.54	0.64	3494.68
	12/13/06	3519.68	24.86	25.59	0.73	3494.71
	12/15/06	3519.68	24.90	25.35	0.45	3494.71
	12/18/06	3519.68	24.90	25.41	0.51	3494.70
RW-2	03/09/06	3520.24	25.30	25.36	0.06	3494.93
	03/14/06	3520.24	25.23	26.09	0.86	3494.88
	03/17/06	3520.24	25.18	26.46	1.28	3494.87
	03/22/06	3520.24	25.17	26.95	1.78	3494.80
	03/29/06	3520.24	25.08	26.65	1.57	3494.92
	04/03/06	3520.24	25.15	26.30	1.15	3494.92
	04/11/06	3520.24	25.07	26.29	1.22	3494.99
	04/18/06	3520.24	24.47	26.95	2.48	3495.40
	04/25/06	3520.24	25.01	26.74	1.73	3494.97
	05/02/06	3520.24	24.93	27.91	2.98	3494.86
	05/09/06	3520.24	24.96	27.80	2.84	3494.85
	05/16/06	3520.24	25.15	27.48	2.33	3494.74
	05/23/06	3520.24	25.21	27.79	2.58	3494.64

TABLE 1

2006 GROUNDWATER ELEVATION TABLE

PLAINS MARKETING, L.P.
TEXACO SKELLY F
LEA COUNTY, NM

Well Number	Date Measured	Top of Casing Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
RW-2	06/01/06	3520.24	25.48	27.57	2.09	3494.45
	06/06/06	3520.24	25.69	26.86	1.17	3494.37
	06/13/06	3520.24	25.38	27.21	1.83	3494.59
	06/16/06	3520.24	25.88	26.79	0.91	3494.22
	06/20/06	3520.24	25.70	27.35	1.65	3494.29
	07/05/06	3520.24	26.07	27.02	0.95	3494.03
	07/12/06	3520.24	26.10	28.06	1.96	3493.85
	07/18/06	3520.24	26.06	27.79	1.73	3493.92
	07/26/06	3520.24	26.08	28.14	2.06	3493.85
	07/31/06	3520.24	27.16	27.88	0.72	3492.97
	08/08/06	3520.24	26.12	28.22	2.10	3493.81
	08/18/06	3520.24	26.09	28.41	2.32	3493.80
	08/22/06	3520.24	26.07	27.75	1.68	3493.92
	09/08/06	3520.24	25.67	28.19	2.52	3494.19
	09/18/06	3520.24	25.51	28.18	2.67	3494.33
	10/02/06	3520.24	25.53	28.20	2.67	3494.31
	10/06/06	3520.24	25.47	28.12	2.65	3494.37
	10/10/06	3520.24	25.62	26.77	1.15	3494.45
	10/16/06	3520.24	25.60	26.75	1.15	3494.47
	10/20/06	3520.24	25.00	26.26	1.26	3495.05
	10/24/06	3520.24	25.56	26.72	1.16	3494.51
	10/26/06	3520.24	25.68	26.22	0.54	3494.48
	11/03/06	3520.24	25.60	26.50	0.90	3494.51
	11/09/06	3520.24	25.51	26.44	0.93	3494.59
	11/14/06	3520.24	25.54	26.12	0.58	3494.61
	11/15/06	3520.24	25.52	26.10	0.58	3494.63
	11/17/06	3520.24	25.56	26.41	0.85	3494.55
	11/20/06	3520.24	25.56	26.26	0.70	3494.58
	11/22/06	3520.24	25.56	26.11	0.55	3494.60
	11/27/06	3520.24	25.54	26.25	0.71	3494.59
	11/29/06	3520.24	25.53	26.03	0.50	3494.64
	12/04/06	3520.24	25.51	26.20	0.69	3494.63
	12/08/06	3520.24	25.56	26.23	0.67	3494.58
	12/13/06	3520.24	25.51	26.21	0.70	3494.63
	12/15/06	3520.24	25.48	26.00	0.52	3494.68
	12/18/06	3520.24	25.54	26.07	0.53	3494.62

Note: NM denotes parameter not measured due to site acess restrictions imposed by landowner.
Note: Elevations based on the North American Vertical Datum of 1929.

TABLE 2

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
TEXACO SKELLY "F"
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	EPA Method SW 846-8021B				
		BENZENE	TOLUENE	ETHYL-BENZENE	m - p XYLENES	o - XYLENE
NMOCD Regulatory Limit		0.01	0.75	0.75	Total XYLENES 0.62	
MW-1	03/14/06	Not Sampled on Current Sample Schedule				
	06/16/06	Not Sampled on Current Sample Schedule				
	09/08/06	Not Sampled on Current Sample Schedule				
	11/14/06	<0.001	<0.001	<0.001	<0.001	
MW-2	03/14/06	Not Sampled on Current Sample Schedule				
	06/16/06	Not Sampled on Current Sample Schedule				
	09/08/06	Not Sampled on Current Sample Schedule				
	11/14/06	0.0014	<0.001	<0.001	0.0014	
MW-3	03/14/06	Not Sampled on Current Sample Schedule				
	06/16/06	Not Sampled on Current Sample Schedule				
	09/08/06	Not Sampled on Current Sample Schedule				
	11/14/06	<0.001	<0.001	<0.001	<0.001	
MW-4	03/14/06	**0.0341**	<0.01	<0.01	<0.01	
	06/16/06	**0.0528**	<0.01	<0.01	0.0168	
	09/08/06	**0.0692**	<0.02	<0.02	0.0719	
	11/14/06	**0.0478**	<0.001	0.0014	<0.001	
MW-5	03/14/06	Not Sampled on Current Sample Schedule				
	06/16/06	Not Sampled on Current Sample Schedule				
	09/08/06	Not Sampled on Current Sample Schedule				
	11/14/06	<0.001	<0.001	<0.001	<0.001	
MW-6	03/14/06	Not Sampled on Current Sample Schedule				
	06/16/06	Not Sampled on Current Sample Schedule				
	09/08/06	Not Sampled on Current Sample Schedule				
	11/14/06	<0.001	<0.001	<0.001	<0.001	
MW-7	03/14/06	**0.0401**	0.0125	0.03	0.0616	
	06/16/06	Not sampled Due to PSH in Well				
	09/08/06	Not sampled Due to PSH in Well				
	11/14/06	**0.109**	0.0072	0.0757	0.0143	
MW-8	03/14/06	Not sampled Due to PSH in Well				
	06/16/06	Not sampled Due to PSH in Well				

TABLE 2

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
TEXACO SKELLY "F"
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	EPA Method SW 846-8021B				
		BENZENE	TOLUENE	ETHYL-BENZENE	m - p XYLENES	o - XYLENE
NMOCD Regulatory Limit		0.01	0.75	0.75	Total XYLENES 0.62	
MW-8	09/08/06	Not sampled Due to PSH in Well				
	11/14/06	Not sampled Due to PSH in Well				
RW-1	03/14/06	Not sampled Due to PSH in Well				
	06/16/06	Not sampled Due to PSH in Well				
	09/08/06	Not sampled Due to PSH in Well				
	11/14/06	Not sampled Due to PSH in Well				
RW-2	03/14/06	Not sampled Due to PSH in Well				
	06/16/06	Not sampled Due to PSH in Well				
	09/08/06	Not sampled Due to PSH in Well				
	11/14/06	Not sampled Due to PSH in Well				

Note : NS denotes well not sampled due to site access restrictions imposed by landowner.
Concentrations in **BOLD** are above the applicable NMOCD Regulatory Standard.

TABLE 3

2006 CONCENTRATIONS OF TPH and BTEX IN SOIL

PLAINS MARKETING, L.P.
TEXACO SKELLY "F"
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/Kg

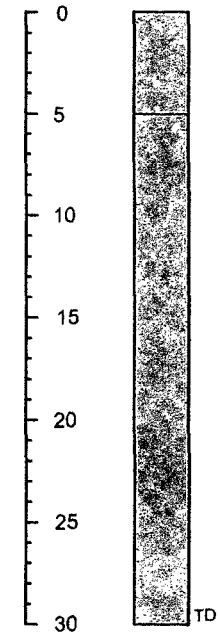
SAMPLE LOCATION	SAMPLE DATE	EPA Method SW 846-8015M			EPA Method SW 846-8021B					BTEX
		TPH DRO	TPH GRO	TOTAL TPH	BENZENE	TOLUENE	ETHYL-BENZENE	m - p XYLENES	o - XYLENE	
NMOCD Regulatory Limit				100	10			Total XYLENES		50
MW-7 10-15'	03/07/06	<50.0	<1	<50						
MW-7 20-25'	03/07/06	<50.0	52.6	52.6	0.0461	0.0929	0.455	1.21		1.804
MW-8 10-15'	03/07/06	1950	2030	**3980**	0.163	0.668	4.66	9.39		14.881
MW-8 15-20'	03/07/06	1310	1130	**2440**						
MW-8 20-25'	03/07/06	824	984	**1808**						
SB-2 10-15'	03/07/06	<50.0	<1	<50						
SB-2 15-20'	03/07/06	<50.0	<1	<50						
SB-2 20-25'	03/07/06	1060	281	**1341**	<0.05	<0.05	0.125	0.376		0.501
RW-2 10-15'	03/07/06	<50.0	<1	<50						
RW-2 20-25'	03/07/06	1400	656	**2056**	<0.05	0.547	2.74	4.31		7.597

Concentrations in **BOLD** are above the applicable NMOCD Regulatory Standard.

APPENDICES

APPENDIX A:
Boring Logs and Monitor Well Details

Soil Boring SB-2



PID	Odor	Stain	Soil Description
31.6	None	None	Sand, brown, clayey.
3.8	None	None	
(2.5)	Slight	Slight	
(14.3)	Slight	None	Sand, brownish-tan, fine grained.
(26.9)	Heavy	None	
7.1	Heavy	None	

Soil Boring Details

Date Drilled 03-07-06

Depth of Soil Boring 40 ft

(oval) Indicates samples selected for Laboratory Analysis.

PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The soil boring was installed on date using air rotary drilling techniques.
2. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
3. The depths indicated are referenced from the ground surface.

Soil Boring Log And Details

Soil Boring SB-2

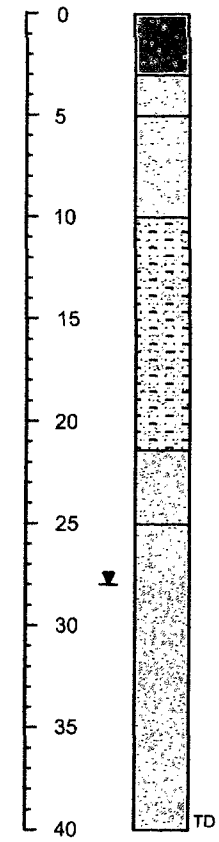
Plains Marketing, L.P. Texaco Skelly "F" Site Lea County, NM

NOVA safety and environmental

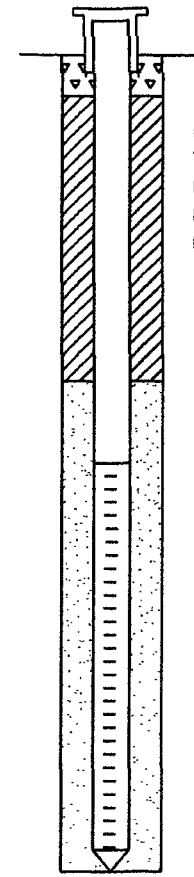
NOVA Safety and Environmental

Scale: NTS	CAD By: DGC	Checked By: CDS
March 23, 2007		

Monitor Well MW-7



PID	Odor	Stain	Soil Description
NA	None	None	Sand, brown, clayey, moist.
5.3	None	None	Sand, very light brown, very fine grained.
1.5	None	None	Sand, very light brown, very fine grained.
(74.6)	Slight	None	
	Slight	None	Sand, very light brown, clayey, very fine grained.
	Slight	None	
(123)	Heavy	None	Sand, gray, very fine grained.
3.3	Slight	None	Sand, gray, very fine grained.



Monitor Well Details

Date Drilled	03-07-06
Thickness of Bentonite Seal	14 ft
Length of PVC Well Screen	20 ft
Depth of PVC Well	40 ft
Depth of Exploratory Well	40 ft

Grout Surface Seal

Bentonite Pellet Seal

Sand Pack

Screen

▼ Indicates the groundwater level measured on date.

( ) Indicates samples selected for Laboratory Analysis.

PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The monitoring well was installed on date using air rotary drilling techniques.
2. The well was constructed with 2" ID, 0.020 inch factory slotted, threaded joint, schedule 40 PVC pipe.
3. The well is protected with a locked stick up steel cover and a compression cap.
4. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
5. The depths indicated are referenced from the ground surface.

Boring Log And Monitor Well Details

Monitor Well MW-7

Plains Marketing, L.P. Texaco Skelly "F" Site Lea County, NM

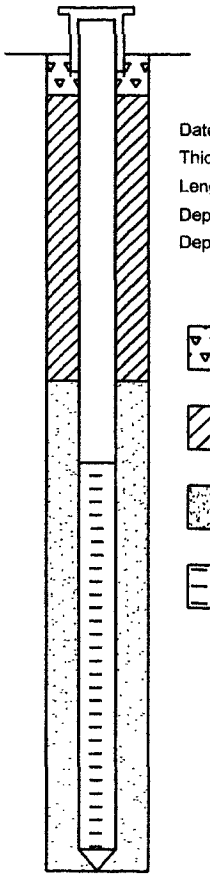
NOVA safety and environmental

NOVA Safety and Environmental

Scale: NTS	CAD By: DGC	Checked By: CDS
March 23, 2007		

Monitor Well MW-8

Depth (feet)	PID	Odor	Stain	Soil Description
0	31.4	None	None	Sand, brown, clayey.
5	11.0	Slight	None	Sand, brown, clayey.
10	(250)	Heavy	Slight	Sand, grey, clayey, very fine grained.
15	(352)	Very Heavy	None	
20	(226)	Very Heavy	None	Clay, greenish-grey, sandy.
25	6.7	Very Heavy	None	
30	NA	Heavy	NA	
35	NA	Heavy	NA	Clay, greenish-grey, sandy, wet, no sample.
40 TD				



Monitor Well Details

Date Drilled	03-07-06
Thickness of Bentonite Seal	14 ft
Length of PVC Well Screen	20 ft
Depth of PVC Well	40 ft
Depth of Exploratory Well	40 ft

- Grout Surface Seal
- Bentonite Pellet Seal
- Sand Pack
- Screen

(250) Indicates samples selected for Laboratory Analysis.

PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The monitoring well was installed on date using air rotary drilling techniques.
2. The well was constructed with 2" ID. 0.020 inch factory slotted, threaded joint, schedule 40 PVC pipe.
3. The well is protected with a locked stick up steel cover and a compression cap.
4. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
5. The depths indicated are referenced from the ground surface.

Boring Log And Monitor Well Details

Monitor Well MW-8

Plains Marketing, L.P. Texaco Skelly "F" Site Lea County, NM

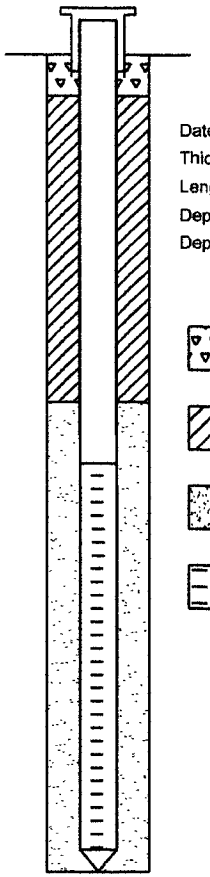
NOVA safety and environmental

NOVA Safety and Environmental

Scale: NTS	CAD By: DGC	Checked By: CDS
March 23, 2007		

Recovery Well RW-2

Depth (feet)	PID	Odor	Stain	Soil Description
0	2.0	None	None	Clay, sandy, brown, fine grained.
5	7.0	None	None	
10	(1.3)	None	None	Sand, brown, very fine grained.
15	4.5	None	None	
20	(352)	Heavy	None	
25	71.9	Heavy	None	
30	NA	Very Heavy	None	Sand, greenish-grey, clayey.
35	NA	Very Heavy	None	
40				TD



Recovery Well Details

Date Drilled	03-07-06
Thickness of Bentonite Seal	15 ft
Length of PVC Well Screen	20 ft
Depth of PVC Well	40 ft
Depth of Exploratory Well	40 ft

- Grout Surface Seal
- Bentonite Pellet Seal
- Sand Pack
- Screen

( ) Indicates samples selected for Laboratory Analysis.

PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The recovery well was installed on date using air rotary drilling techniques.
2. The well was constructed with 2" ID, 0.020 inch factory slotted, threaded joint, schedule 40 PVC pipe.
3. The well is protected with a locked stick up steel cover and a compression cap.
4. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
5. The depths indicated are referenced from the ground surface.

Boring Log And Recovery Well Details

Recovery Well RW-2

Plains Marketing, L.P. Texaco Skelly "F" Site Lea County, NM

NOVA safety and environmental

NOVA Safety and Environmental

Scale: NTS	CAD By: DGC	Checked By: CDS
March 23, 2007		

APPENDIX B:
Release Notification and Corrective Action
(Form C-141)

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

x Initial Report ☐ Final Report

Name of Company	Plains Pipeline, LP	Contact:	Camille Reynolds
Address:	3705 E. Hwy 158, Midland, TX 79706	Telephone No.	505-441-0965
Facility Name	Texaco Skelly F	Facility Type:	4" Steel Pipeline

Surface Owner:	Millard Deck Estate	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	21	20S	37E					Lea

Latitude 32 degrees 33' 48.02" **Longitude** 103 degrees 15' 48.08"

NATURE OF RELEASE

Type of Release: Crude Oil	Volume of Release: 30	Volume Recovered 0
Source of Release: 4" Steel Pipeline	Date and Hour of Occurrence 09/15/1998	Date and Hour of Discovery 09/15/1998 02:00 PM
Was Immediate Notice Given? Yes ☒ No ☐ Not Required	If YES, To Whom? Donna Williams	
By Whom? Frank Hernandez	Date and Hour 02/02/01 02:30 PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of 4" steel pipeline. Forty feet of the line was replaced.

Describe Area Affected and Cleanup Action Taken.* Forty feet of the line was replaced. The aerial extent of surface impact was approximately 30' x 100'.
NOTE: This information was obtained from historical EOTT files, Plains acquired EOTT/Link on April 1, 2004 and Plains assumes this information to be correct.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	OIL CONSERVATION DIVISION	
Printed Name: Camille Reynolds	Approved by District Supervisor:	
Title: Remediation Coordinator	Approval Date:	Expiration Date:
E-mail Address: cjreynolds@paalp.com	Conditions of Approval:	Attached ☐
Date: 3/21/2005 Phone: (505)441-0965		

* Attach Additional Sheets If Necessary