1R - 388

REPORTS



1R-388 Report 2006

2006 ANNUAL MONITORING REPORT

MONUMENT BARBER 10-INCH SOUR

SW ¼ SW ¼ SECTION 32, TOWNSHIP 19 SOUTH, RANGE 37 EAST LEA COUNTY, NEW MEXICO PLAINS EMS NUMBER: 2000-10655 NMOCD Reference 1R-03/38 &

Prepared For:

PLAINS MARKETING, L.P. 333 CLAY STREET, SUITE 1600 HOUSTON, TEXAS 77002

Prepared By:

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March 2007

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2006 Annual Monitoring Report 2006 Tables 1 and 2 - Groundwater Elevation and BTEX Concentration Data 2006 Figures 1, 2A-2D, and 3A-3D Electronic Copies of Laboratory Reports Historic Table 1 and 2 - Groundwater Elevation and BTEX Concentration Tables

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 were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The Monument Barber 10-Inch Sour site (the site), which was formerly the responsibility by 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 provided 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 feet were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is SW/4 of the SW/4, Section 32, Township 19 South, Range 37 East, Lea County, New Mexico. The Monument Barber 10-Inch Sour release was discovered by EOTT employees and reported on August 7, 2000. The Release Notification and Corrective Action Form (C-141) is provided as Appendix A. An estimated 1,600 barrels of crude oil were released and 1,300 barrels were recovered. The release resulted in a surface stain measuring approximately 100 feet in length by eight (8) feet in width. The excavated soil was transported to a NMOCD approved disposal facility. Thirty four (34) soil borings were installed by a previous consultant to characterize the horizontal and vertical crude oil impact.

Four (4) groundwater monitor wells (MW-1 through MW-4) and two (2) PSH recovery wells (RW-1 and RW-2) are currently on-site. An excavation measuring approximately 40 feet wide by 70 feet long by six (6) feet in depth remains from the initial response and site investigation activities.

As indicated on Figures 2A-2D and 3A-3D, there is an off-site third party (Equilon) release located approximately 150 feet upgradient of the site. The historical presence of product in this area is documented by gauging data from monitor well MW-3. Historic data tables are provided on the enclosed data disk. The NMOCD has been notified of this off-site, up-gradient source area. The NMOCD has stated the Equilon release site, which is up-gradient of the Monument Barber 10-Inch Sour site, is considered a potential contributing source area for the groundwater impact present at the Monument Barber 10-Inch Sour site.

FIELD ACTIVITIES

No measurable PSH was reported in any of the site monitor or recovery wells during the 2006 reporting period. Hydrocarbon sheen was reported in recovery well RW-2 and monitor well MW-3 during the 1st and 2nd quarters of 2006 only. Evidence suggests and is supported by the NMOCD, that the sheen reported in monitor well MW-3 may be the result of a previous (date unknown) Equilon Pipeline release. The Equilon release is depicted in Figures 2A-2D and 3A-3D.

The landowner's agent would not allow Plains or its contractors, access to the site during the 4th quarter 2006. Plains representatives were given permission to conduct 4th quarter 2006 sampling on January 4, 2007, the results of this sampling event are being included in this 2006 Annual Monitoring Report.

Quarterly sampling events for the reporting period were performed according to the following sampling schedule, which was approved by the NMOCD on correspondence dated April 28, 2004.

NMOCD Approved Sampling Schedule		
MW-1	Quarterly	
MW-2	Quarterly	
MW-3	Quarterly	
MW-4	Quarterly	
RW-1	Quarterly	
RW-2	Quarterly	

The site monitor wells were gauged and sampled on March 13, June 12, September 8, 2006 and January 4, 2007. 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 monitoring events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2006 is provided as Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.003 feet/foot to the southeast as measured between groundwater monitor well MW-3 and recovery well RW-2. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3,535.76 and 3,537.39 feet above mean sea level, in recovery well RW-2 on January 18, 2006 and monitor well MW-4 on January 4, 2007, respectively.

LABORATORY RESULTS

No measurable PSH was reported in any of the site monitor or recovery wells during the 2006 reporting period. Hydrocarbon sheen was reported in recovery well RW-2 and monitor well MW-3 during the 1st and 2nd quarters of 2006 only.

Groundwater samples collected during 2006 monitoring events were delivered to Trace Analysis, Inc., 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 2006 laboratory reports are provided on the enclosed disk. The inferred extent of PSH on site and quarterly groundwater sampling results for BTEX constituent concentrations are depicted on Figures 3A through 3D.

Monitor well MW-1 is sampled on a quarterly schedule and analytical results indicate benzene, toluene and ethylbenzene 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 mg/L for xylene, during all four (4) quarters of 2006. Xylene concentrations ranged from <0.001 mg/L during the 2^{nd} , 3^{rd} , and 4^{th} quarters to 0.002 mg/L during the 1^{st} quarter of the reporting period. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period.

Monitor well MW-2 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 1st, 2nd, and 4th quarters to 0.002 mg/L during the 3rd quarter of 2006. Benzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Toluene concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of 2006. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1st, 2nd, and 4th quarters to 0.006 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of 0.001 mg/L during the 1st, 2nd, and 4th quarters to 0.006 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 1st, 2nd, and 4th quarter of 2006. Xylene concentrations were below the NMOCD regulatory of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of 0.019 mg/L during the 3rd quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters to 0.019 mg/L during the 3rd quarter of 2006.

Monitor well MW-3 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 3^{rd} and 4^{th} quarters to 0.002 mg/L during the 1^{st} and 2^{nd} quarters of 2006. Benzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Toluene concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of 2006. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1^{st} , 2^{nd} , and 4^{th} quarters to 0.003 mg/L during the 3^{rd} quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during the 3^{rd} quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.001 mg/L during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.001 mg/L during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations from 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period.

Monitor well MW-4 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of 2006.

Recovery well RW-1 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 1st, 2nd, and 4th quarters to 0.003 mg/L during the 3rd quarter of 2006. Benzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Toluene concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of 2006. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1st, 2nd, and 4th quarters to 0.004 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during all four (4) quarters to 0.001 mg/L during the 1st, 2nd, and 4th quarters to 0.004 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 3rd quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters to 0.017 mg/L during the 3rd quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 1st and 2nd quarters to 0.017 mg/L during the 3rd quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period.

Recovery well RW-2 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 2^{nd} quarter to 0.007 mg/L during the 3^{rd} quarter of 2006. Benzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Toluene concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of 2006. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1^{st} , 2^{nd} , and 4^{th} quarters to 0.008 mg/L during the 3^{rd} quarter of 2006. Ethylbenzene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of 2006. Xylene concentrations were below the NMOCD regulatory standard during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during the 3^{rd} quarter of 2006. Xylene concentrations were below the NMOCD regulatory standard during all four (4) quarters of the reporting period.

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 groundwater monitoring activities for the 2006 annual monitoring period. Four (4) groundwater monitor wells (MW-1 through MW-4) and two (2) PSH recovery wells (RW-1 and RW-2) are currently on-site. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.003 feet/foot to the southeast.

As indicated on Figures 2A-2D and 3A-3D, there was an apparent off-site third party release located approximately 150 feet upgradient of the Monument Barber 10-inch Sour leak location. The presence of PSH in the area of the Equilon Pipeline release is documented by historic gauging data from monitor well MW-3. The NMOCD has been notified of this off site, upgradient source area. The NMOCD has stated the Equilon release site is considered a potential contributing source area for the groundwater contamination present at the Monument Barber 10-Inch Sour site.

The landowner's agent would not allow Plains or its contractors, access to the site during the 4th quarter 2006. Plains representatives were given permission to conduct 4th quarter sampling on January 4, 2007, the results of this sampling event are being included in this 2006 Annual Monitoring Report.

No measurable PSH was reported in any of the site monitor or recovery wells during the 2006 reporting period. Hydrocarbon sheen was reported in recovery well RW-2 and monitor well

MW-3 during the 1st and 2nd quarters of 2006 only. PSH thicknesses in all monitor and recovery wells have been decreasing since project inception.

A review of the laboratory analytical results indicates BTEX constituent concentrations are below the appropriate NMOCD regulatory standards in all monitor wells and recovery wells during all four (4) quarters of the reporting period.

ANTICIPATED ACTIONS

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Quarterly groundwater monitoring, gauging and sampling will continue. Pending favorable analytical results through the 3rd quarter 2007 sampling event, Plains anticipates submitting a groundwater closure request to the NMOCD.

Plains submitted a *Soil Remediation Work Plan* to the NMOCD in March 2006 to address the remaining hydrocarbon impacted soil onsite and to progress this site toward an NMOCD approved closure. To date, Plains has not received a response from the NMOCD as to the status of the Work Plan.

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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Copy 1	Ben Stone New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505
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FIGURES

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TABLES

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TABLE 1

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2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P. MONUMENT BARBER ESTATE 10" SOUR LEA COUNTY, NEW MEXICO

		TOP OF				CORRECTED
WELL	DATE	CASING	DEPTH TO	ДЕРТН ТО	PSH	GROUND WATER
NUMBER	MEASURED	ELEVATION	PRODUCT	WATER	THICKNESS	ELEVATION
MW-1	03/13/06	3,565.64	-	28.91	0.00	3536.73
	06/12/06	3,565.64	-	28.97	0.00	3536.67
	07/19/06	3,565.64	-	28.93	0.00	3536.71
	09/08/06	3,565.64	-	28.72	0.00	3536.92
	01/04/07	3,565.64	-	28.80	0.00	3536.84
MW-2	03/13/06	3,565.58	<u> </u>	29.25	0.00	3536.33
	06/12/06	3,565.58	-	29.36	0.00	3536.22
	09/08/06	3,565.58	-	28.61	0.00	3536.97
	01/04/07	3,565.58	-	28.86	0.00	3536.72
MW-3	01/18/06	3,567.44	sheen	29.18	0.00	3538.26
	02/15/06	3,567.44	sheen	30.39	0.00	3537.05
	03/13/06	3,567.44	sheen	30.38	0.00	3537.06
	03/20/06	3,567.44	sheen	30.40	0.00	3537.04
	04/19/06	3,567.44	sheen	30.39	0.00	3537.05
	05/24/06	3,567.44	sheen	30.39	0.00	3537.05
	06/12/06	3,567.44	-	30.39	0.00	3537.05
	07/19/06	3,567.44	sheen	30.44	0.00	3537.00
	09/08/06	3,567.44	-	30.11	0.00	3537.33
	01/04/07	3,567.44	-	30.30	0.00	3537.14
MW-4	03/13/06	3,567.27		30.19	0.00	3537.08
	06/12/06	3,567.27	-	30.22	0.00	3537.05
	09/08/06	3,567.27	-	29.89	0.00	3537.38
	01/04/07	3,567.27	-	29.88	0.00	3537.39
RW-1	03/13/06	3,566.48	-	29.41	0.00	3537.07
	06/12/06	3,566.48	-	29.43	0.00	3537.05
	09/08/06	3,566.48	-	29.12	0.00	3537.36
	01/04/07	3,566.48	-	29.29	0.00	3537.19
RW-2	01/18/06	3,566.09	sheen	30.33	0.00	3535.76
	02/15/06	3,566.09	sheen	29.27	0.00	3536.82
	03/13/06	3,566.09	sheen	29.31	0.00	3536.78
	03/20/06	3,566.09	sheen	29.33	0.00	3536.76
	05/24/06	3,566.09	sheen	29.36	0.00	3536.73
	06/12/06	3,566.09	-	29.41	0.00	3536.68
	07/19/06	3,566.09	-	29.41	0.00	3536.68
	09/08/06	3,566.09	-	28.95	0.00	3537.14
	01/04/07	3,566.09	-	29.06	0.00	3537.03

Elevations based on the 1929 North American Vertical Datum.

TABLE 2

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P. MONUMENT 10" SOUR LEA COUNTY, NEW MEXICO

Results are reported in mg/L.

SAMPLE SAMPLE		Method: SW 846-8021B, 5030							
LOCATION	DATE	BENZENE	TOLUENE	ETHYL- BENZENE	m, p - o - XYLENES XYLENE				
NMOCD Re	gulatory Limit	0.01	0.75	0.75	Total XYLENES 0.62				
MW-1	03/13/06	< 0.001	< 0.001	< 0.001	0.002				
	06/12/06	< 0.001	< 0.001	< 0.001	< 0.001				
	09/08/06	< 0.001	< 0.001	< 0.001	< 0.001				
	01/04/07	< 0.001	< 0.001	< 0.001	< 0.001				
MW-2	03/13/06	< 0.001	< 0.001	< 0.001	< 0.001				
	06/12/06	< 0.001	< 0.001	< 0.001	< 0.001				
	09/08/06	0.002	< 0.001	0.006	0.019				
	01/04/07	<0.001	< 0.001	< 0.001	< 0.001				
MW-3	03/13/06	0.002	< 0.001	< 0.001	0.003				
	06/12/06	0.002	< 0.001	< 0.001	0.001				
	09/08/06	< 0.001	< 0.001	0.003	0.013				
	01/04/07	< 0.001	< 0.001	< 0.001	0.004				
MW-4	03/13/06	< 0.001	< 0.001	< 0.001	< 0.001				
	06/12/06	< 0.001	< 0.001	< 0.001	< 0.001				
	09/08/06	< 0.001	< 0.001	< 0.001	< 0.001				
	01/04/07	< 0.001	< 0.001	< 0.001	< 0.001				
RW-1	03/13/06	< 0.001	<0.001	< 0.001	< 0.001				
	06/12/06	< 0.001	< 0.001	<0.001	< 0.001				
	09/08/06	0.003	< 0.001	0.004	0.017				
	01/04/07	< 0.001	< 0.001	< 0.001	0.002				
RW-2	03/13/06	0.002	< 0.001	< 0.001	0.004				
	06/12/06	< 0.001	< 0.001	< 0.001	< 0.001				
	09/08/06	0.007	< 0.001	0.008	0.020				
	01/04/07	0.003	<0.001	< 0.001	0.003				

Note: EB-1 denotes equipment blank collected on sampling date.

N/A = Not Applicable

APPENDICES

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

Lioned III 1000 Rio Brazon Rond, Aztec, NM 87410 District IV 2040 South Pacheco, Santa Fe, NM 87303	Conservation Division 2040 South Pacheco Santa Fe, NM 87505 Submit 2 Copies to app District Office in accu- with Rule 1 fc
Release Notificat	tion and Corrective Action
Name of Company	OPERATOR Initial Report
EOTT Energy Pipeline Limited Partnership	Gieon Waldrop
P.O. Bar 1660, Midland, TX 79702	Telephone No. 915/684 3453
raciuty Name Moanment 10" Sour (6")	Facility Type
Surface Owner Mineral (Owner Lease No
Unit Letter Section Township Range Feat from the	ON OF RELEASE
32 195 37E	Les
Type of Release NATOR	Volume of Release
Source of Release	Li600 bots Li350 bots Li350 bots
Pipeline Valve flange. Was Immediate Notice Given?	August 8, 2000 August 8, 2000 August 8, 2000 at 16 AM
By Where?	tred Donna Williams - NMOCD, Hobbs District Office
Wayne Braneria	Dete and Hour August 8, 2600
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.
Describe Cause of Problem and Remedial Action Taken. [*] Poly weld broke on the west end of valve flange. Released oil was and oil flowed into a ditch 100 yards http://Oil was recovered with Describe Area Affected and Classup Action Taken. [*] Heavily impacted soil, from the ditch only, was excevated and has incovated due to the presence of pipelines. ETGI has begun deim	contained in a bell hole and ditch. Bellhole (35'z 45'z 10'dcep) filled to h a vacuum truck. uled to a landfarm for treatment. Solls in the bellhole could not be reating the site and will premare a remediation worknian
hereby certify that the information given above is rue and complete ad regulations all operators are required to report and/or file certain r indanger public braith or the environment. The scorptance of a C-14 f liability should their operations have failed to adequately investigat outer, human health or the environment. In addition, NMOCD accept outer futures with any other federal, state, or local laws and/or regulation	to the best of my knewledge and understand that pursuant to NMOCD rules elease notifications and perform corrective actions for releases which may I report by the NMOCD marked as "Final Report" does not relieve the oper a and remediate contamination that pose a threat to ground water, surface tence of a C-141 report does not relieve the operator of responsibility for ma
ignature Sour Weldy	OIL CONSERVATION DIVISION
rinted Name: Clenn Waldrop	Approved by District Supervisor:
	Approval Date: Expiration Date:
ile District Manager	
ille: District Manager ave: 8/17/00 Phone: 915/684-3453	Conditions of Americal