

ANNUAL MONITORING REPORT

YEAR(S): 5 B - 2007

NOVUS RECEIVED 2008 APR 1 PM 2 06 2007 **ANNUAL MONITORING REPORT TNM 98-05B** NE ¼ NW ¼ of SECTION 26, TOWNSHIP 21 SOUTH, RANGE 37 EAST LEA COUNTY, NEW MEXICO PLAINS EMS: TNM-98-05B-KNOWN NMOCD Reference AP-012 **PREPARED FOR:** PLAINS MARKETING L.P. 333 Clay Street, Suite 1600 Houston, Texas 77002 safety and environmental

Prepared By:

NOVA Safety and Environmental

2057 Commerce Street Midland, Texas 79703

March 2008

Curt D. Stanley

Project Manager

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Todd K. Choban, P.G. Vice President Technical Service

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March 28, 2008

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

Re: Plains All American – Annual Monitoring Reports 25 Sites in Lea County, New Mexico

Dear Mr. Hansen:

Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico Oil Conservation Division (NMOCD). In accordance with the rules and regulations of the NMOCD, Plains All American hereby submits our Annual Monitoring reports for the following sites:

TNM 97-17 TNM 97-18 TNM 98-05A TNM 98-05B TNM 97-04 Texaco Skellv "F" Darr Angell #2 LF-59 **SPS-11** Monument #10 Monument #17 Monument #18 Lea Station to Monument 6" 34 Junction South Station Bob Durham Darr Angell #1 Darr Angell #4 HDO 90-23 Junction 34 to Lea Monument #2 Monument Barber 10" Sour Monument #11 Red Byrd #1 South Monument Gathering Denton Station

Section 21, Township 20 South, Range 37 East, Lea County Section 28, Township 20 South, Range 37 East, Lea County Section 26, Township 21 South, Range 37 East, Lea County Section 26, Township 21 South, Range 37 East, Lea County Section 11, Township 16 South, Range 35 East, Lea County Section 21, Township 20 South, Range 37 East, Lea County Section 14, Township 15 South, Range 37 East, Lea County Section 32, Township 19 South, Range 37 East, Lea County Section 18, Township 18 South, Range 36 East, Lea County Section 32, Township 19 South, Range 37 East, Lea County Section 29, Township 19 South, Range 37 East, Lea County Section 7, Township 20 South, Range 37 East, Lea County Section 5, Township 20 South, Range 37 East, Lea County Section 2, Township 17 South, Range 36 East, Lea County Section 32, Township 19 South, Range 37 East, Lea County Section 11, Township 15 South, Range 37 East, Lea County Sections 2 and 11, Township 15 South, Range 37 East, Lea County Section 6, Township 20 South, Range 37 East, Lea County Section 21, Township 20 South, Range 37 East, Lea County Section 6, Township 20 South, Range 37 East, Lea County Section 32, Township 19 South, Range 37 East, Lea County Section 30, Township 19 South, Range 37 East, Lea County Section 1, Township 20 South, Range 36 East, Lea County Section 5, Township 20 South, Range 37 East, Lea County Section 14, Township 15 South, Range 37 East, Lea County

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2008 APR 1 PM 2 07

3112 West Highway 82 • Lovington, NM 88260 • (505) 396-3341

order to verify the accuracy and completeness of these documents. It is based upon these inquiries and reviews that Plains All American submits the enclosed Annual Monitoring Reports for the above facilities.

If you have any questions or require further information, please contact me at (505) 441-0965.

Sincerely,

Keynolds mile

Camille Reynolds Remediation Coordinator Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

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Figure 1 – Site Location Map Figure 2A – Inferred Groundwater Gradient Map February 20, 2007 Figure 2B – Inferred Groundwater Gradient Map May 15, 2007 Figure 2C – Inferred Groundwater Gradient Map August 9, 2007 Figure 2D – Inferred Groundwater Gradient Map November 13, 2007

Figure 3A – Groundwater Concentration Map February 20, 2007

Figure 3B – Groundwater Concentration Map May 15, 2007

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TABLES

Table 1 – 2007 Groundwater Elevation Data Table 2 – 2007 Concentrations of BTEX in Groundwater

APPENDICES

Appendix A – Release Notification and Corrective Action (Form C-141)

ENCLOSED ON DATA DISK

2007 Annual Report (Text) 2007 Tables 1 and 2 (Groundwater Elevation and BTEX Concentration Data) Figures 1, 2A-2D, 3A-3D 2007 Laboratory Reports Historical Groundwater Elevation Data Historic Groundwater Analytical Results

INTRODUCTION

NOVA Safety and Environmental (NOVA), on behalf of Plains Pipeline, L.P. (Plains), has prepared this 2007 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. This report is intended to be viewed as a complete document with figures, attachments, tables, and text. The report presents the results of four quarterly groundwater monitoring/sampling events conducted at the TNM 98-05B (also known as TNM 98-05) crude oil release site (the site), located in Lea County, New Mexico. The site, formerly the responsibility of Enron Oil Trading and Transportation (EOTT) who became Link Energy, is now the responsibility of Plains. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each quarter of 2007 to assess the levels and extent of dissolved phase hydrocarbons. The groundwater monitoring events consisted of measuring static water levels in the monitor wells, and purging and sampling of each well exhibiting sufficient recharge. Phase Separated Hydrocarbons (PSH) were not detected in any of the on site monitor wells, during the reporting period.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The site is located approximately two (2) miles northeast of the city of Eunice, New Mexico in the NE ¼, NW ¼, Section 26, Township 21 South, Range 37 East (Figure 1). The release occurred on February 4, 1998 while the pipeline was operated by Texas New Mexico Pipeline Company (TNM). An estimated 49 barrels of crude oil was released from the pipeline, of which approximately three barrels were recovered during the initial response activities. The release was attributed to external corrosion of the pipeline.

In summary, investigative and remedial activities have included a shallow soil investigation utilizing a Geo-Probe[®] soil boring machine, a deeper soil investigation utilizing a drilling rig, excavation of crude oil affected soils, and a groundwater investigation whereby ten (10) monitor wells were installed at the site.

In February 2005, NOVA on behalf of Plains, submitted a Site Restoration Work Plan and Proposed Soil Closure Strategy Report to the NMOCD. This report proposed field activities necessary to complete soil remediation and restore surface conditions at the TNM 98-05B site. On April 6, 2005, Plains received NMOCD approval to initiate the above referenced work plan. On May 19 and 20, 2005, Plains contractors excavated previously identified impacted soil from the sidewalls and floor of the excavation. On June 1, 2005, additional impacted soil was removed from the floor of the excavation. The total volume of excavated soil from the May and June 2005 excavations was approximately 350 cubic yards (cy). Analytical results from confirmation soil samples collected from the sidewalls and floor of the excavation indicated Total Petroleum Hydrocarbon (TPH) and Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations were below the NMOCD regulatory standards. On June 20-22, 2005, the excavation was backfilled with stockpiled on-site soil and the surface was contoured to fit the

surrounding topography. On September 7, 2005, additional confirmation soil samples collected from the surface of the former excavation indicated BTEX constituent concentrations and TPH were below NMOCD regulatory standards.

On July 5, 2005, monitor wells MW-6 through MW-10 were plugged and abandoned with NMOCD approval by a licensed State of New Mexico water well driller. There are currently five (5) monitor wells (MW-1 through MW-5) on site

In September 2005, a Soil Closure Request was submitted to the NMOCD and soil closure was approved by the NMOCD in correspondence to Plains, dated November 3, 2005.

RECENT FIELD ACTIVITIES

During the reporting period, no PSH was encountered in any of the site monitor wells.

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 21, 2005:

| Sample Location | Sampling Schedule |
|-----------------|--------------------------------------|
| | Quarterly |
| MW-2 | Quarterly |
| | Quarterly |
| | Quarterly |
| | Quarterly |
| MW-6 | Plugged and Abandoned (July 5, 2005) |
| | Plugged and Abandoned (July 5, 2005) |
| | Plugged and Abandoned (July 5, 2005) |
| | Plugged and Abandoned (July 5, 2005) |
| | Plugged and Abandoned (July 5, 2005) |

Quarterly sampling events for the calendar year 2007 were performed on February 20, May 15, August 9, and November 13, 2007. Each quarterly sampling event consisted of gauging all wells and purging and sampling monitor wells as per the approved sampling schedule. During each sampling event, the monitor wells were purged a minimum of three well volumes of water or until the wells were dry using a PVC bailer or electrical 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 at a licensed disposal facility.

The inferred groundwater gradient, constructed from measurements collected from the monitor wells during each quarterly sampling event, is depicted on Figures 2A through 2D. Groundwater elevation contours, generated from gauging data acquired during each quarterly sampling event of 2007, indicates a general groundwater gradient of 0.003 feet/foot to the southeast as measured between monitor wells MW-1 and MW-4. Groundwater elevation data for the calendar year 2007

is provided in Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

LABORATORY RESULTS

Groundwater samples collected during the 2007 sampling events were delivered to Trace Analysis, Inc. of Lubbock, Texas for determination BTEX constituent concentrations by EPA Method SW846-8021b.

Analytical results of BTEX constituent analysis is summarized in Table 2. Copies of the laboratory reports generated during this reporting period are provided on the enclosed data disk. Quarterly groundwater sample results reflecting benzene and BTEX constituent concentrations and inferred PSH extent maps are depicted on Figures 3A through 3D.

Review of laboratory analytical results generated from analysis of the groundwater samples collected during the 2007 monitoring period, indicate BTEX constituent concentrations are below NMOCD regulatory standards (New Mexico Administrative Code 20.6.2.3103) in all monitor wells.

The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for monitor well MW-1 the last six consecutive quarters, monitor well MW-2 the last twenty-one consecutive quarters, monitor well MW-3 the last twenty-five consecutive quarters, monitor well MW-5 the last twelve consecutive quarters,

SUMMARY

This report presents the results of annual monitoring and sampling for 2007. Monitor wells MW-6 through MW-10 were plugged and abandoned on June 5, 2005 per NMOCD approval. Currently, there are five monitor wells (MW-1 through MW-5) on site. No detectable or measurable amounts of PSH were encountered during the monitoring events conducted during this reporting period.

Groundwater elevation contours, generated from water level measurements acquired during the quarterly sampling events of 2007, indicated a general gradient of 0.003 feet/foot to the southeast.

Review of laboratory analytical results generated from analysis of the groundwater samples collected during the 2007 monitoring period indicate BTEX constituent concentrations are below NMOCD regulatory standards (New Mexico Administrative Code 20.6.2.3103) in all monitor wells.

ANTICIPATED ACTIONS

Monitor well gauging and groundwater sampling will continue in 2008 for the first two quarters of 2008. Pending favorable analytical results, Plains anticipates submitting a Groundwater and Site Closure Request to the NMOCD following the completion of the 2nd quarter sampling event.

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

| Copy 1 | Ed Hansen New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505 |
|---------|--|
| Copy 2: | Larry Johnson New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, District 1 1625 French Drive Hobbs, NM 88240 |
| Copy 3: | Camille Reynolds Plains Marketing, L.P. 3112 Highway 82 Lovington, NM cjreynolds@paalp.com |
| Copy 4: | Jeff Dann Plains Marketing, L.P. 333 Clay Street Suite 1600 Houston, TX 77002 jpdann@paalp.com |
| Copy 5: | NOVA Safety and Environmental 2057 Commerce Street Midland, TX 79703 cstanley@novatraining.cc |
| | |

























TABLE 1

2007 GROUNDWATER ELEVATION DATA

Plains Marketing, LP TNM 98-05B LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER AP-012

| | | TOP OF | | | | CORRECTED |
|---------------|----------|-----------|-----------------|-----------------|--------------------------------|---|
| WELL | DATE | CASING | ДЕРТН ТО | ДЕРТН ТО | PSH | GROUND WATER |
| NUMBER | MEASURED | ELEVATION | PRODUCT | WATER | THICKNESS | ELEVATION |
| | 01/26/07 | 3393.95 | - | 46.77 | 0.00 | 3347.18 |
| | 02/20/07 | 3393.95 | - | 46.79 | 0.00 | 3347.16 |
| | 05/15/07 | 3393.95 | - | 46.60 | 0.00 | 3347.35 |
| | 08/09/07 | 3393.95 | - | 46.49 | 0.00 | 3347.46 |
| | 11/13/07 | 3393.95 | - | 46.53 | 0.00 | 3347.42 |
| | | | | | | eria di sense de la companya de la c |
| MW-2 | 02/20/07 | 3394.75 | - | 47.52 | 0.00 | 3347.23 |
| | 05/15/07 | 3394.75 | - | 47.42 | 0.00 | 3347.33 |
| | 08/09/07 | 3394.75 | - | 47.23 | 0.00 | 3347.52 |
| | 11/13/07 | 3394.75 | - | 47.27 | 0.00 | 3347.48 |
| | | | | | | |
| MW-3 | 02/20/07 | 3393.58 | - | 46.63 | 0.00 | 3346.95 |
| | 05/15/07 | 3393.58 | - | 46.52 | 0.00 | 3347.06 |
| | 08/09/07 | 3393.58 | - | 46.32 | 0.00 | 3347.26 |
| | 11/13/07 | 3393.58 | - | 46.39 | 0.00 | 3347.19 |
| | | | | | | |
| MW-4 | 02/20/07 | 3394.98 | - | 48.18 | 0.00 | 3346.80 |
| | 05/15/07 | 3394.98 | - | 48.08 | 0.00 | 3346.90 |
| | 08/09/07 | 3394.98 | - | 47.89 | 0.00 | 3347.09 |
| | 11/13/07 | 3394.98 | - | 47.93 | 0.00 | 3347.05 |
| | | | | | | |
| MW-5 | 02/20/07 | 3393.47 | - | 46.44 | 0.00 | 3347.03 |
| | 05/15/07 | 3393.47 | - | 46.31 | 0.00 | 3347.16 |
| | 08/09/07 | 3393.47 | - | 46.13 | 0.00 | 3347.34 |
| | 11/13/07 | 3393.47 | - | 46.19 | 0.00 | 3347.28 |
| · 注意:"你们的问题。" | | | | | 5.23 Contraction of the second | |

Elevations based on the North American Vertical Datum of 1929.

TABLE 2

2007 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P. TNM 98-05B LEA COUNTY, NEW MEXICO

| | | | S | V 846-8021B, 50 | 30 | |
|---------------------------|----------------|---|---|-------------------|-------------------|---|
| SAMPLE LOCATION | SAMPLE DATE | BENZENE | TOLUENE | ETHYL- BENZENE | m, p - XYLENES | 0- Xylene |
| NMOCD Regulatory Limit | | 0.01 | 0.75 | 0.75 | Total X 0.6 | ylenes 52 |
| MW-1 | 02/20/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 05/15/07 | < 0.005 | < 0.005 | < 0.005 | <0.0 | 005 |
| | 08/09/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| | 11/13/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| | | | | | | |
| MW-2 | 02/20/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 05/15/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| | 08/09/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| ···· | 11/13/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| 医感激的现在分词 | and the second | | | | | |
| MW-3 | 02/20/07 | < 0.001 | < 0.001 | < 0.001 | <0.(| 001 |
| | 05/15/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 08/09/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 11/13/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| 建和非常有效的 | | | | | | |
| MW-4 | 02/20/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 05/15/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| | 08/09/07 | < 0.001 | < 0.001 | < 0.001 | <0.(| 001 |
| | 11/13/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| | | 24465 | Contraction of the second s | | | |
| MW-5 | 02/20/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 | 001 |
| | 05/15/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 08/09/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | 11/13/07 | < 0.001 | < 0.001 | < 0.001 | <0.0 |)01 |
| | | and the second se | and all the second s | | the second second | Anglei (Series and Series) Anglei (Series) |

All concentrations are reported in mg/L

Note: m, p and o Xylenes combined when analyzed by Trace Laboratories, Inc. only.

• • Appendices • • () ()

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

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| JISTICIA 301 W. Grand Avenue, Artesia, NM 88210 <u>District III</u> | nergy Minerals Oil Conse | New Mexico and Natural Resources rvation Division | | Form C-14 Revised October 10, 200 Submit 2 Copies to appropriat |
|---|---|--|---|---|
| 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1220 S. St. Francis Dr., Santa Fc, NM 87505 | 1220 Sout Santa F | h St. Francis Dr. Se, NM 87505 | | District Office in accordanc with Rule 116 on bac side of for |
| Release | Notificatio | n and Corrective Action | on . | |
| Name of Company Plains Marketing, LP | | OPERATOR Contact Camille Reynolds | x Initia | al Report 🚺 Final Rep |
| Address 5805 East Hwy. 80, Midland, TX 79706 | | Telephone No. 505-441-0965 | | · |
| Surface Owner Delrose Scott | Mineral Owner | | Lease N | Io |
| | LOCATIO | N OF RELEASE | | 1 |
| Unit Letter Section Township Range Feet | from the North | h/South Line Feet from the Ea | st/West Line | County |
| <u> </u> | g | Tangitude 103°08' 30 3" | | Lea |
| | NATTIRE | OR RELEASE | | |
| Type of Release Crude Oll | | Volume of Release 49 barrels | Volume F | Recovered 3 barrels |
| Source of Release 6" Steel Pipeline | | Date and Hour of Occurrence 02-05-1998 | Date and 02-05-199 | Hour of Discovery 98 |
| Was Immediate Notice Given? x Yes 🔲 No [|] Not Required | If YES, To Whom? Linda Williams | | |
| By Whom? Johnny Chapman | | Date and Hour 02-05-1998 @15 | :00 | |
| Was it. Watercourse Reaction? | • | | valercourse. | |
| | | | | |
| Describe Cause of Problem and Remedial Action Take | n.* External corr | osion of 6 inch pipeline. | | |
| Describe Cause of Problem and Remedial Action Take Describe Area Affected and Cleanup Action Taken.* A NOTE: This information was obtained from historia information to be correct. The release occurred du | n.* External corr Aerial extent of sur cal EOTT/Link f ring the time the | osion of 6 inch pipeline. face impact was approximately 100 lles, Plains acquired EOTT/Link o pipeline was owned and operated | x 30 feet, n April 1, 200 by Texas-New | 94 and Plains assumes this Mexico Pipeline Company. |
| Describe Cause of Problem and Remedial Action Taken. Describe Area Affected and Cleanup Action Taken. ANOTE: This information was obtained from historic information to be correct. The release occurred due I hereby certify that the information given above is true regulations all operators are required to report and/or fi public health or the environment. The acceptance of a should their operations have failed to adequately invest or the environment. In addition, NMOCD acceptance of | Aerial external corr Aerial extent of sur cal EOTT/Link f ring the time the e and complete to ile certain release C-141 report by t tigate and remedia of a C-141 report | osion of 6 inch pipeline. face impact was approximately 100 iles, Plains acquired EOTT/Link of pipeline was owned and operated the best of my knowledge and under notifications and perform corrective he NMOCD marked as "Final Repor- te contamination that pose a threat to does not relieve the operator of respo- | x 30 feet, n April 1, 200 by Texas-New stand that purs actions for rele t" does not reli o ground water onsibility for ca | 14 and Plains assumes this Mexico Pipeline Company. Future to NMOCD rules and cases which may endanger eve the operator of liability s, surface water, human health compliance with any other |
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