# ANNUAL MONITORING REPORT

YEAR(S):

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### 2008 ANNUAL MONITORING REPORT F [)

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### HDO-90-23

NE ¼, NW ¼, SECTION 6, TOWNSHIP 20 SOUTH, RANGE 37 EAST LEA COUNTY, NEW MEXICO PLAINS SRS NUMBER: HDO-90-23 **NMOCD REFERENCE AP-009** 

**PREPARED FOR:** 

PLAINS MARKETING, L.P. 333 Clay Street, Suite 1600 Houston, Texas 77002



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February 2009

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### **ENCLOSED ON DATA DISK**

2008 Annual Monitoring Report

2008 Tables 1, 2 and 3 – Groundwater Elevation, BTEX, TPH and PAH Concentration Data 2008 Figures 1, 2A-2D, and 3A-3D

Electronic Copies of Laboratory Reports

Historic Table 1 and 2 – Groundwater Elevation and BTEX, TPH, PAH Concentration Tables Historic Table 1 and 2 – Groundwater Elevation and BTEX, TPH, PAH 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 HDO-90-23 Site, which was formally the responsibility of Texas New Mexico Pipeline Company (TNM), 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 2008 only. However, historic data tables as well as 2008 laboratory analytical reports are provided on the enclosed data disk. A Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each quarter of 2008 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 sampled as per a NMOCD directive.

### SITE DESCRIPTION AND BACKGROUND INFORMATION

The site is located in the NE 1/4 of the NW 1/4 of Section 6, Township 20 South, Range 37 East in Lea County. The HDO 90-23 release was discovered by TNM personnel and reported on March 27, 1990. According to the release report, an estimated 750 barrels of crude oil were released and 550 barrels were recovered. The release occurred from a 14-inch Texas-New Mexico Pipeline Company (TNM) pipeline and was attributed to structural failure associated with internal pipeline corrosion. Limited excavation occurred around the release point to repair the pipeline. The Release Notification and Corrective Action (Form C-141) is provided as Appendix A.

In February 1998, nine soil borings were advanced and five monitoring wells were installed by a previous contractor to assess the subsurface conditions. In September 1999, three additional monitor wells were installed. In the fall of 2002, monitor wells MW-9 through MW-15 were installed. In November 2004, NOVA installed two additional monitor wells (MW-16 and MW-17) to further delineate the southeast extent of the dissolved phase plume.

On August 9, 2005, NOVA personnel discovered and documented a leaking produced water pipeline approximately 100 feet north of monitor well MW-3. The leaking pipeline was reported to NMOCD, Hobbs District Office on the same day. The pipeline was identified as a Mar Oil and Gas (MAR) Pipeline. A MAR employee was successful in closing an off site valve to stop the produced water flow. On August 12, 2005, MAR employees began limited excavation surrounding monitor well MW-3, stockpiling the soil on site. Since the activities of August 2005, the excavated soil has been stockpiled on site.

In February 2007, NOVA personnel discovered and documented a crude oil release approximately 500 feet northwest of monitor well MW-15. The release was associated with a production pump jack operated by MAR and to date this release has not been remediated.

Currently, thirteen groundwater monitor wells (MW-2 through MW-6, MW-8, MW-9 and MW-12 through MW-17) and two product recovery wells (RW-1 and RW-2) are onsite.

### FIELD ACTIVITIES

### **Product Recovery Efforts**

A measurable thickness of PSH was detected in monitor wells MW-2, MW-6 and MW-15 during the 2008 annual reporting period. A maximum PSH thickness of 1.32 feet in monitor well MW-6 was recorded on September 25, 2008 and is shown on Table 1. The average thickness of PSH in monitor and recovery wells containing PSH during 2008 was 0.97 feet. Approximately twenty gallons of PSH were recovered from the site during the 2008 reporting period. Approximately 803 gallons (19.1 barrels) of PSH have been recovered through automated and manual recovery methods since project inception.

### **Groundwater Monitoring**

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.

NMOCD Approved Sampling Schedule							
MW-1	Plugged and Abandoned						
MW-2	Quarterly						
MW-3	Quarterly						
	Semi-Annually						
	Semi-Annually						
	Quarterly						
	Plugged and Abandoned						
	Annually						
MW-9	Quarterly						
MW-10	Plugged and Abandoned						
MW-11	Plugged and Abandoned						
MW-12	Quarterly						
MW-13	Quarterly						
MW-14	Quarterly						
MW-15	Quarterly						
MW-16	Quarterly						
MW-17	Quarterly						

The site monitor wells were gauged and sampled on February 8, May 9, August 13, and November 6, 2008. During each sampling event, sampled 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 collected using disposable Teflon samplers. Water samples were placed 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 at a licensed disposal facility.

Locations of the monitor wells and the inferred groundwater gradient, which were constructed utilizing measurements collected during the four quarterly monitoring events, are depicted on Figures 2A through 2D. Groundwater elevation data for 2008 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 0.0009 feet/foot to the southeast as measured between monitor wells MW-2 and MW-17. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3,413.54 and 3,420.50 feet above mean sea level, in recovery well RW-1 and monitor well MW-15 on August 13, 2008.

Currently, thirteen monitor wells and two recovery wells are located on site.

### LABORATORY RESULTS

Groundwater samples obtained during the quarterly sampling events of 2008 were delivered to TraceAnalysis, Inc. in Midland, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method 8021B, and Polynuclear Aromatic Hydrocarbons (PAH) concentrations by EPA Method 8270C. Monitoring wells containing measurable amounts of PSH were analyzed for Total Petroleum Hydrocarbons (TPH) concentrations by EPA Method 8015M. A listing of BTEX and TPH constituent concentrations for 2008 are summarized in Table 2 and the PAH constituent concentrations for 2008 are provided on the enclosed data disk. The quarterly groundwater sample results for BTEX constituent concentrations are depicted on Figures 3A through 3D. Plains, at the request of the NMOCD, collected groundwater samples below PSH levels in all monitor wells containing PSH.

Monitor well MW-2 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from 1.93 mg/L during the 4<sup>th</sup> quarter to 2.85 mg/L during the 2<sup>nd</sup> quarter of 2008. Benzene concentrations were above the NMOCD regulatory standard of 0.01 mg/L during all four quarters of the reporting period. Toluene concentrations ranged from 0.0118 mg/L during the 4<sup>th</sup> quarter to 0.0613 mg/L during the 1<sup>st</sup> quarter of 2008. Toluene concentrations were below the NMOCD regulatory standards of 0.75 mg/L during all four quarters of 2008. Ethylbenzene concentrations ranged from 3.28 mg/L during the 1<sup>st</sup> quarter to 0.748 mg/L during the 4<sup>th</sup> quarter of 2008. Ethylbenzene concentrations were above the NMOCD regulatory standards of 0.75 mg/L during the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> quarters and below the NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period. Xylene concentrations ranged from 1.08 mg/L during the 1<sup>st</sup> quarter to 0.0964 mg/L during the 4<sup>th</sup> quarter of the reporting period. Xylene concentrations were above NMOCD regulatory standards of 0.62 mg/L during the 3<sup>rd</sup> and 4<sup>th</sup> quarters of the reporting period. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated elevated concentrations above WQCC Drinking Water Standards for naphthalene (0.0729 mg/L), 1-methylnaphthalene (0.139 mg/L) and 2methylnaphthalene (0.110 mg/L). Additional PAH constituents detected above MDLs include phenanthrene (0.0227 mg/L) and dibenzofuran (0.0175 mg/L), which are below WQCC standards.

**Monitor well MW-3** is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the  $3^{rd}$  quarter to 0.0446 mg/L during the  $2^{nd}$  quarter of 2008. Benzene concentrations were above NMOCD regulatory standards during the  $1^{st}$  and  $2^{nd}$  quarters of the reporting period. Toluene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. Ethylbenzene concentrations ranged from <0.001 mg/L during the  $3^{rd}$  quarter to 0.0463 mg/L during the  $1^{st}$  quarter of 2008. Ethylbenzene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations ranged from 0.0020 mg/L during the  $4^{th}$  quarter to 0.0034 mg/L during the  $3^{rd}$  quarter of 2008. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Toluene concentrations were below NMOCD mg/L during the  $4^{th}$  quarter sampling event indicated elevated concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. PAH analysis during the  $4^{th}$  quarter sampling event indicated elevated concentrations above MDLs for 1-methylnaphthalene (0.0203 mg/L), dibenzofuran (0.0032 mg/L), fluorine (0.00202 mg/L), and phenanthrene (0.00152 mg/L), which are below WQCC standards.

**Monitor well MW-4** is sampled on a semi-annual schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during the 2<sup>nd</sup> and 4<sup>th</sup> quarter sampling events. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last twenty-seven consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

**Monitor well MW-5** is sampled on a semi-annual schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during the 2<sup>nd</sup> and 4<sup>th</sup> quarter sampling events. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last sixteen consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

Monitor well MW-6 is monitored on a quarterly schedule. Monitor well MW-6 was not sampled during the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> quarters of the reporting period, due to the presence of PSH in the monitor well. PSH thicknesses of 1.01 feet, 1.03 feet and 1.31 feet were reported during the 1<sup>st</sup>,  $2^{nd}$  and  $3^{rd}$  quarters of 2008, respectively. Benzene concentrations were above the NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period with a concentration of 1.07 mg/L. Toluene concentrations were above the NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period with a concentration of 0.776 mg/L. Ethylbenzene concentrations were above the NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period with a concentration of 1.37 mg/L. Xylene concentrations were above the NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period with a concentration of 2.8 mg/L. Analytical results indicated a total TPH result of 318.5 mg/L. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated elevated concentrations above WQCC Drinking Water Standards for naphthalene (0.238 mg/L), 1-methylnaphthalene (0.532 mg/L) and 2methylnaphthalene (0.50 mg/L). Additional PAH constituents detected above MDLs include fluorene (0.072 mg/L), phenanthrene (0.102 mg/L) and dibenzofuran (0.0833 mg/L), which are below WQCC standards.

**Monitor well MW-8** is sampled on an annual schedule and analytical results indicate Benzene concentrations were below NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting

period with a concentration of 0.0028 mg/L. Toluene concentrations were below NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period with a concentration of 0.001 mg/L. Ethylbenzene concentrations were below the MDL during the 4<sup>th</sup> quarter of the reporting period. Xylene concentrations were below the NMOCD regulatory standards during the 4<sup>th</sup> quarter of the reporting period with a concentration of 0.0012 mg/L. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last thirty-five consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

**Monitor well MW-9** is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during all four quarters of 2008. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last twenty-five consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

**Monitor well MW-12** is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during all four quarters of 2008. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last twenty-five consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

**Monitor well MW-13** is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during all four quarters of 2008. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last fifteen consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

Monitor well MW-14 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from 0.0045 mg/L during the 2<sup>nd</sup> and 3<sup>rd</sup> quarters to 0.0083 mg/L during the 4<sup>th</sup> guarter of 2008. Benzene concentrations were below the NMOCD regulatory standard during all four quarters of the reporting period. Toluene concentrations ranged from 0.0011 mg/L during the 2<sup>nd</sup> quarter to 0.0053 mg/L during the 1<sup>st</sup> quarter of 2008. Toluene concentrations were below the NMOCD regulatory standards during all four quarters of 2008. Ethylbenzene concentrations ranged from 0.0865 mg/L during the 2<sup>nd</sup> quarter to 0.325 mg/L during the 4<sup>th</sup> quarter of 2008. Ethylbenzene concentrations were below the NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations ranged from 0.0213 mg/L during the 2<sup>nd</sup> quarter to 0.0780 mg/L during the 4<sup>th</sup> quarter of the reporting period. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated elevated concentrations above WOCC Drinking Water Standards for chrysene (0.000703 mg/L). Additional PAH constituents detected above MDLs include naphthalene (0.00638 mg/L), 1methylnaphthalene (0.0141 mg/L), 2-methylnaphthalene (0.00647 mg/L), fluorene (0.000874 mg/L), phenanthrene (0.00465 mg/L) and dibenzofuran (0.00458 mg/L), which are below WQCC standards.

**Monitor well MW-15** is monitored / sampled on a quarterly schedule. Monitor well MW-15 was not sampled in the  $2^{nd}$  quarter of the reporting period, due to the presence of PSH in the monitor well. Analytical results for the  $1^{st}$ ,  $3^{rd}$  and  $4^{th}$  quarters of the reporting period indicate benzene concentrations were <0.001 mg/L. Benzene concentrations were below NMOCD regulatory standards during the three sampled quarters of the reporting period. Toluene, ethylbenzene and xylene constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during the three sampled quarters of 2008, with the exception of the  $1^{st}$  quarter. The  $1^{st}$  quarter analytical results indicate an ethylbenzene concentration of 0.0063 mg/L and a xylene concentrations above MDLs for 1-methylnaphthalene (0.00194 mg/L), 2-methylnaphthalene (0.000615 mg/L) and phenanthrene (0.000857 mg/L), which are below WQCC standards.

**Monitor well MW-16** is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during all four quarters of 2008. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last seventeen consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

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**Monitor well MW-17** is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below the MDL and NMOCD regulatory standards for each BTEX constituent during all four quarters of 2008. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last sixteen consecutive quarters. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated no elevated concentrations were detected above the respective MDLs.

**Recovery well RW-1** is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from 0.0126 mg/L during the 3<sup>rd</sup> quarter to 1.06 mg/L during the 4<sup>th</sup> quarter of 2008. Benzene concentrations were above NMOCD regulatory standards all four quarters of the reporting period. Toluene concentrations ranged from <0.010 mg/L during the 2<sup>nd</sup> quarter to 0.0431 mg/L during the 4<sup>th</sup> quarter of 2008. Toluene concentrations were below the NMOCD regulatory standards during all four quarters of the reporting period. Ethylbenzene concentrations ranged from <0.005 mg/L during the 3<sup>rd</sup> quarter to 0.494 mg/L during the 1<sup>st</sup> quarter of 2008. Ethylbenzene concentrations were above NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations ranged from 0.0082 mg/L during the 3<sup>rd</sup> quarter to 0.249 mg/L during the 1<sup>st</sup> quarter of 2008. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Sugnature of 2008. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Sugnature of 2008. The reporting period. PAH analysis during the 4<sup>th</sup> quarter sampling event indicated elevated concentrations above MDLs for naphthalene (0.0187 mg/L), 1-methylnaphthalene (0.0136 mg/L), 2-methylnaphthalene (0.0106 mg/L), dibenzofuran (0.00117 mg/L), fluorine (0.00079 mg/L), and phenanthrene (0.000549 mg/L), which are below WQCC standards.

**Recovery well RW-2** is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 3<sup>rd</sup> quarter to 0.264 mg/L during the 4<sup>th</sup> quarter of 2008. Benzene concentrations were above NMOCD regulatory standards during the

 $1^{st}$ ,  $2^{nd}$  and  $4^{th}$  quarters of the reporting period. Toluene concentrations ranged from <0.001 mg/L during the  $1^{st}$ ,  $2^{nd}$  and  $3^{rd}$  quarters to 0.0014 mg/L during the  $4^{th}$  quarter of 2008. Toluene concentrations were below the NMOCD regulatory standards during all four quarters of the reporting period. Ethylbenzene concentrations ranged from <0.001 mg/L during the  $1^{st}$  and  $3^{rd}$  quarters to 0.0204 mg/L during the  $4^{th}$  quarter of 2008. Ethylbenzene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the  $1^{st}$  and  $3^{rd}$  quarters to 0.0187 mg/L during the  $4^{th}$  quarter of 2008. Xylene concentrations were below NMOCD regulatory standards during the  $1^{st}$  and  $3^{rd}$  quarters of the reporting period. Xylene concentrations were below NMOCD regulatory standards during all four quarters to 0.0187 mg/L during the  $4^{th}$  quarter of 2008. Xylene concentrations were below NMOCD regulatory standards during all four quarters of the reporting period. PAH analysis during the  $4^{th}$  quarter sampling event indicated elevated concentrations above MDLs for 1-methylnaphthalene (0.000774 mg/L), which are below WQCC standards.

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

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This report presents the results of monitoring activities for the annual monitoring period of 2008. Currently, there are thirteen groundwater monitor wells (MW-2 through MW-6, MW-8, MW-9 and MW-12 through MW-17) and two recovery wells (RW-1 and RW-2) on-site. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.0009 feet/foot to the southeast.

Monitor wells MW-6 (first, second, and third quarters) and MW-15 (second quarter only) contained PSH and were not sampled in one or more quarters during the reporting period. The average thickness of PSH in monitor and recovery wells containing PSH during 2008 was 0.97 feet.

Approximately twenty gallons of PSH were recovered from the site during the 2008 reporting period. Approximately 803 gallons (19.1 barrels) of PSH have been recovered through automated and manual recovery methods since project inception.

Review of laboratory analytical results generated from analysis of the groundwater samples obtained during the 2008 monitoring period indicates BTEX constituent concentrations are below NMOCD regulatory standards in ten of the thirteen monitor wells and two recovery wells. Groundwater samples from monitor well MW-6 exhibited elevated TPH concentrations for GRO and DRO. Analytical results on groundwater samples collected indicate PAH distributions mirrored those of BTEX distributions over the site.

### **ANTICIPATED ACTIONS**

Plains respectfully requests NMOCD approval to modify the sampling schedule for the following monitor well:

• Monitor well MW-9 is currently sampled on a quarterly schedule. Plains proposes to modify the schedule to a semi-annual schedule. This upgradient monitor well was

installed during the 1<sup>st</sup> quarter 2003 and the analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last twenty-five consecutive quarters.

Monitor well MW-16 is currently sampled on a quarterly schedule. Plains proposes to
modify the schedule to an annual schedule. This down gradient monitor well was
installed during the 4<sup>th</sup> quarter 2004 and the analytical results indicate BTEX constituent
concentrations have been below NMOCD regulatory standards for the last seventeen
consecutive quarters. Down gradient monitoring is maintained by monitor well MW-17.

Groundwater monitoring, quarterly sampling, manual weekly PSH recovery will continue in 2009. An Annual Monitoring report will be submitted to the NMOCD before April 1, 2010.

### 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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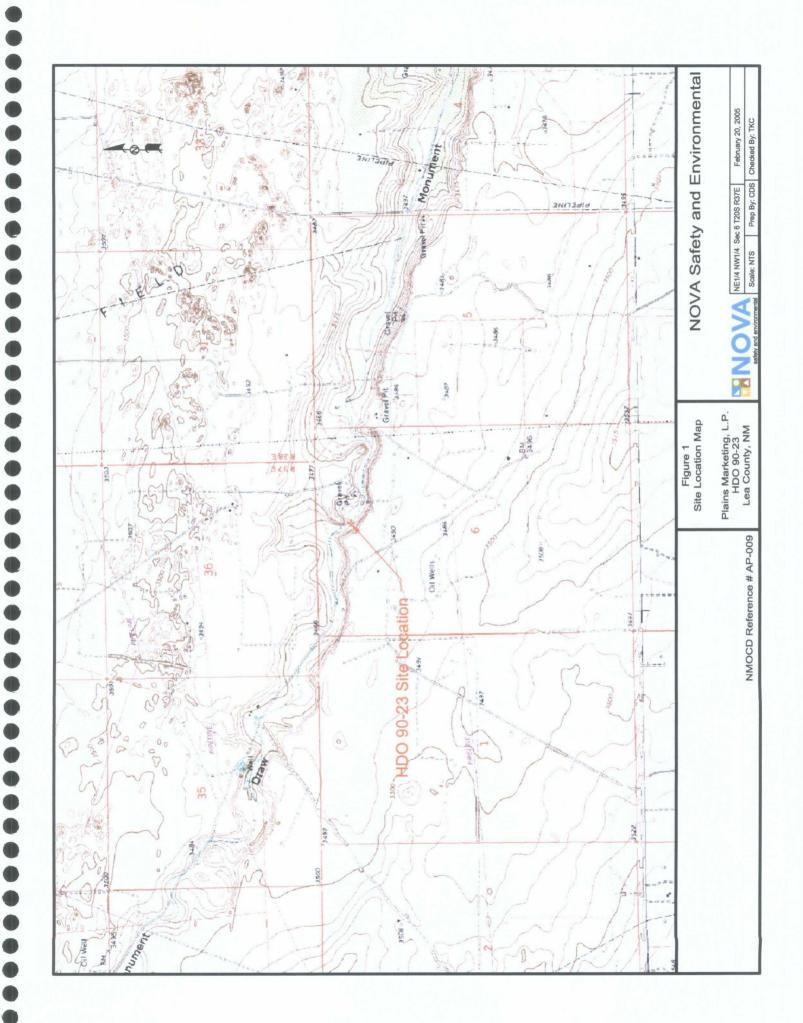
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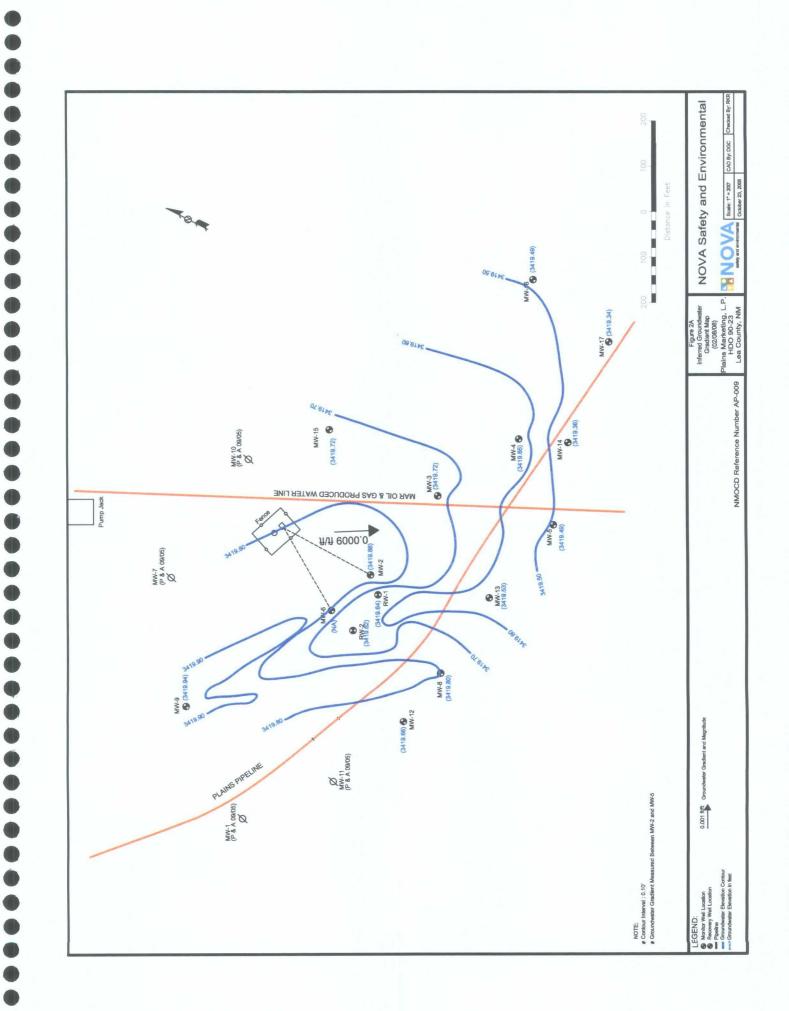
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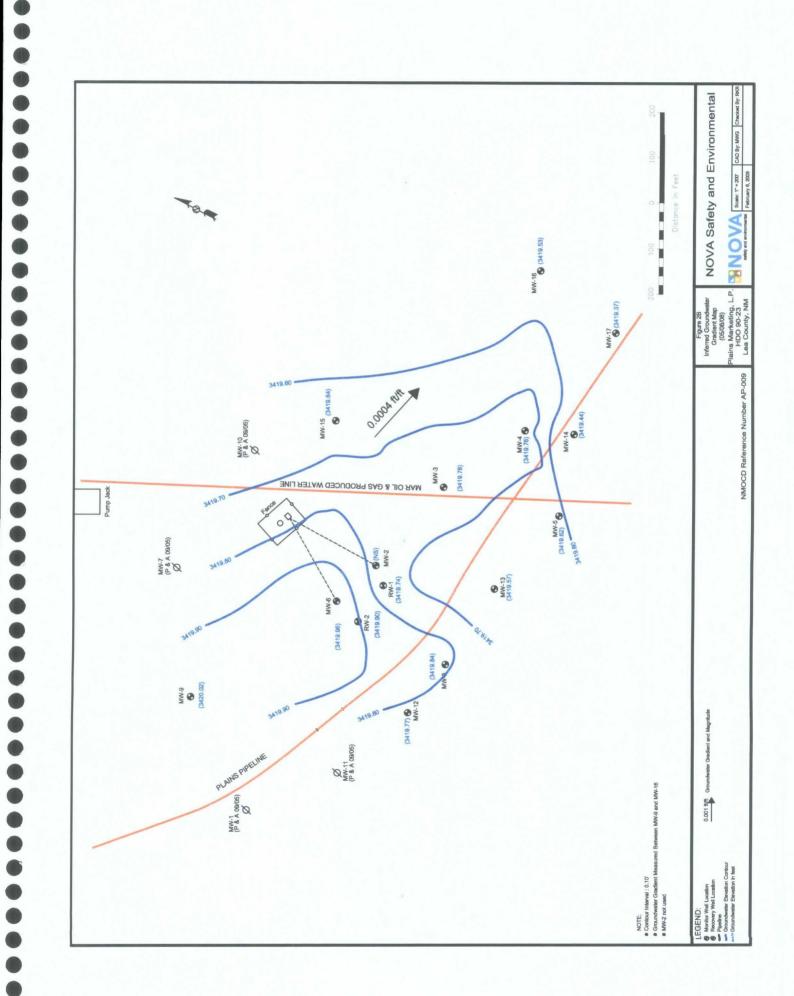
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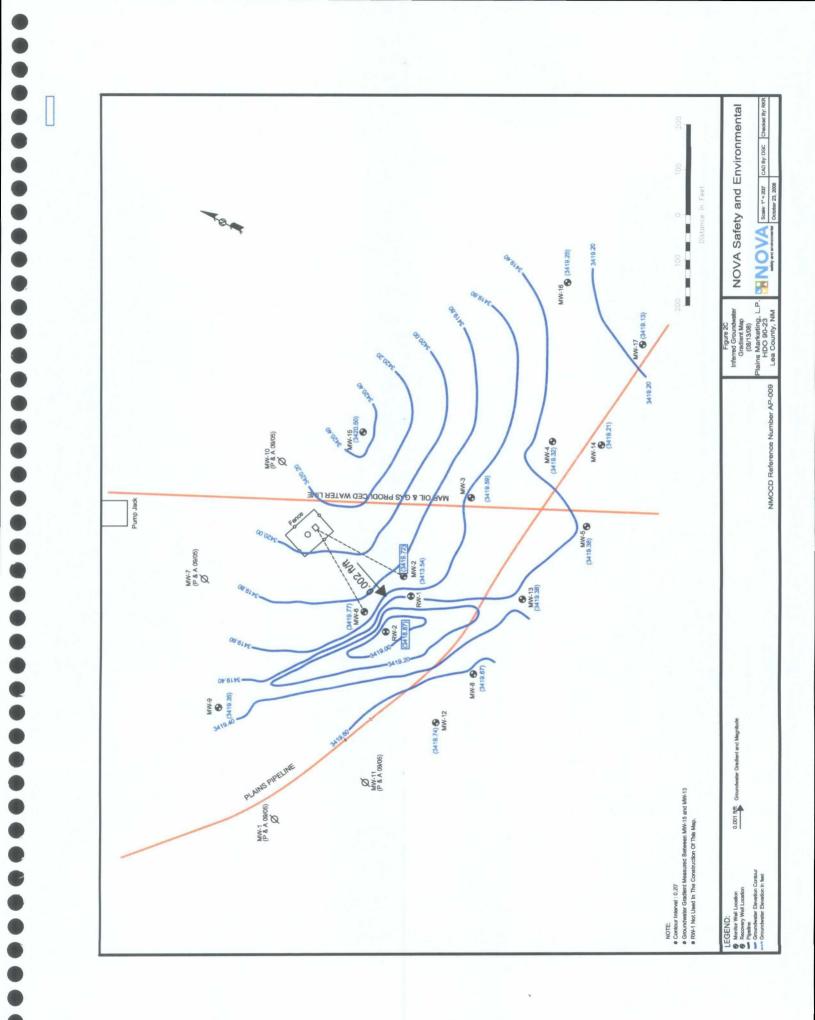
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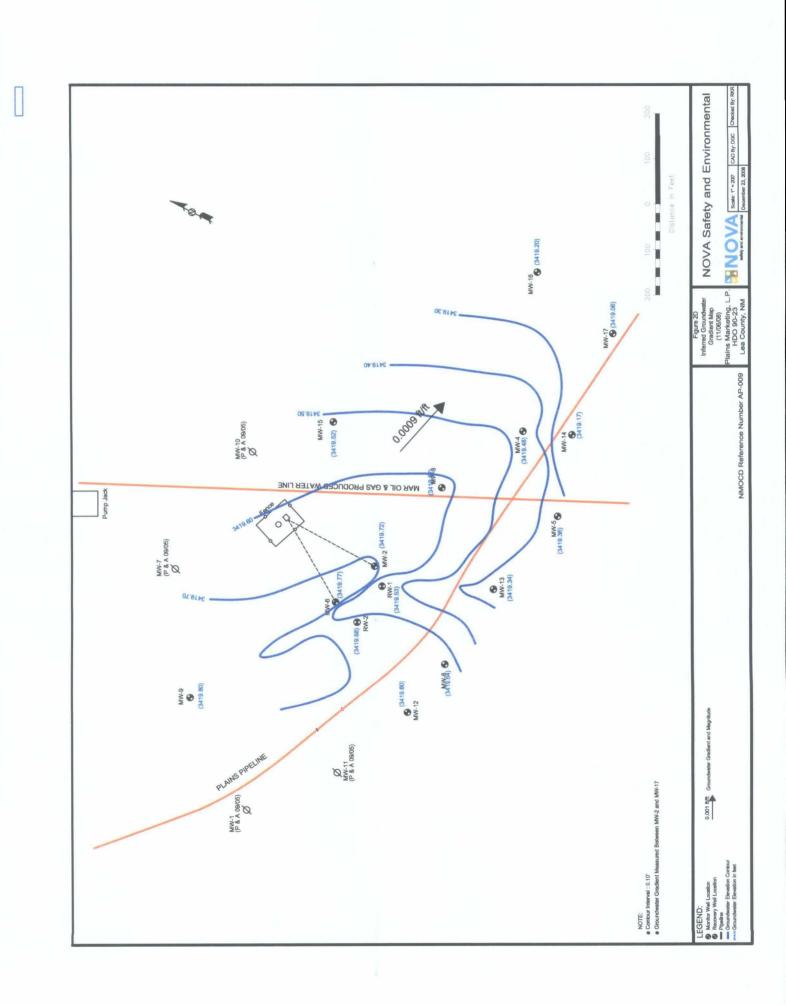
# FIGURES







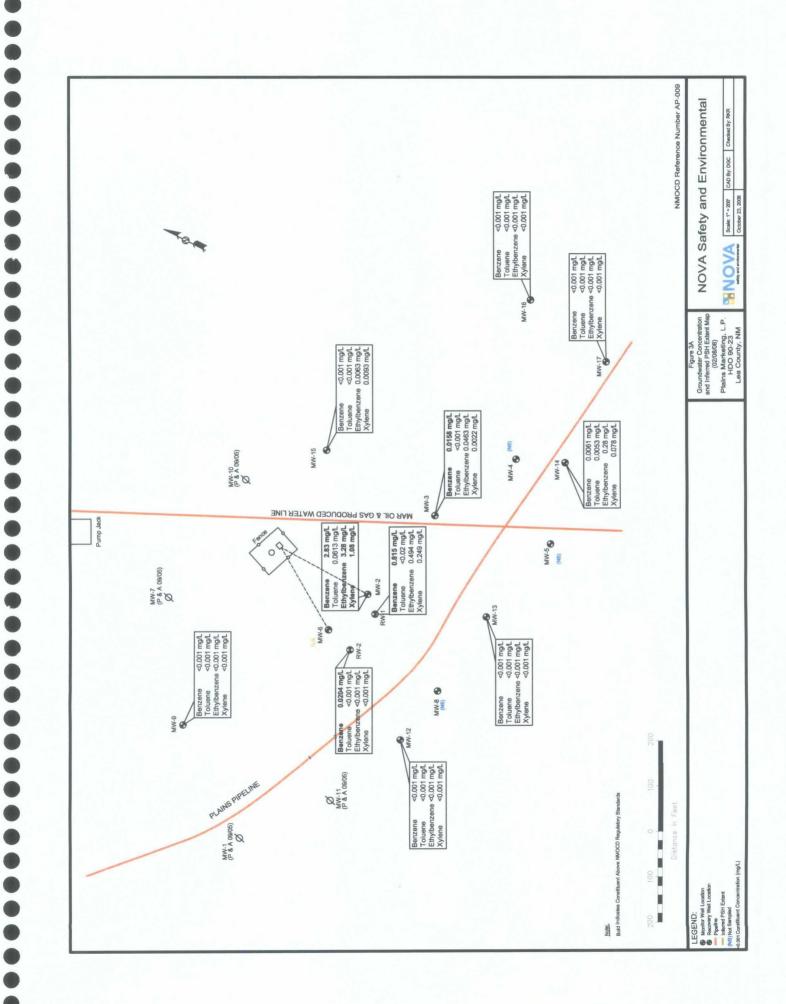




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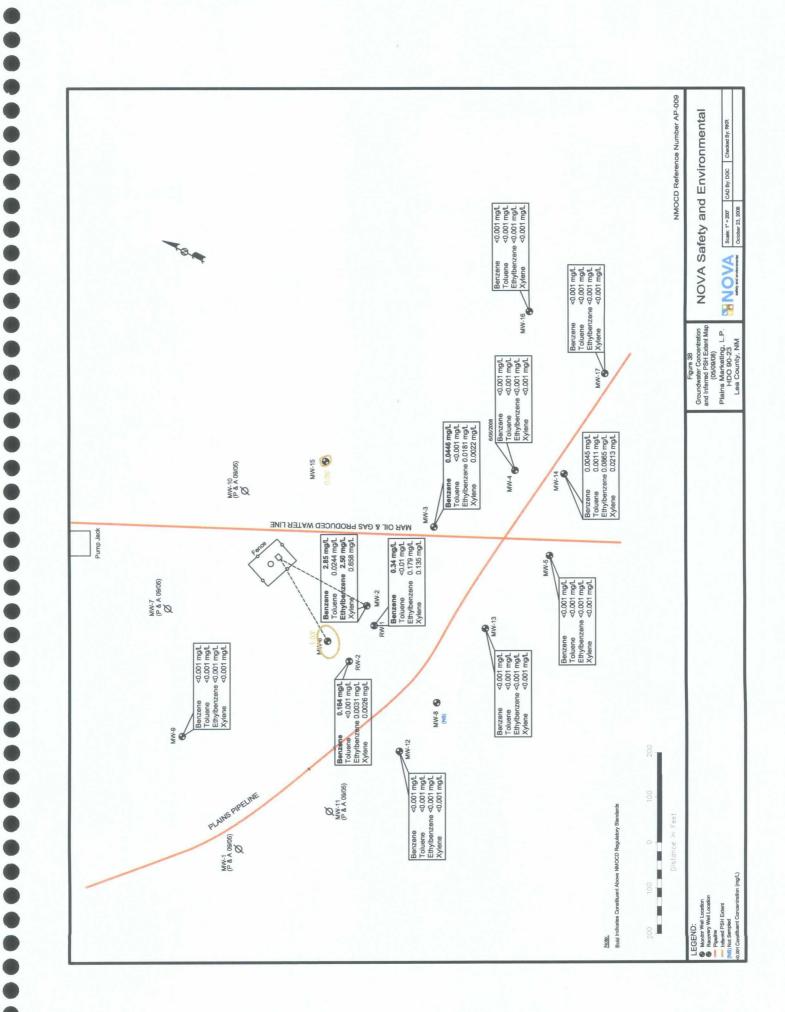
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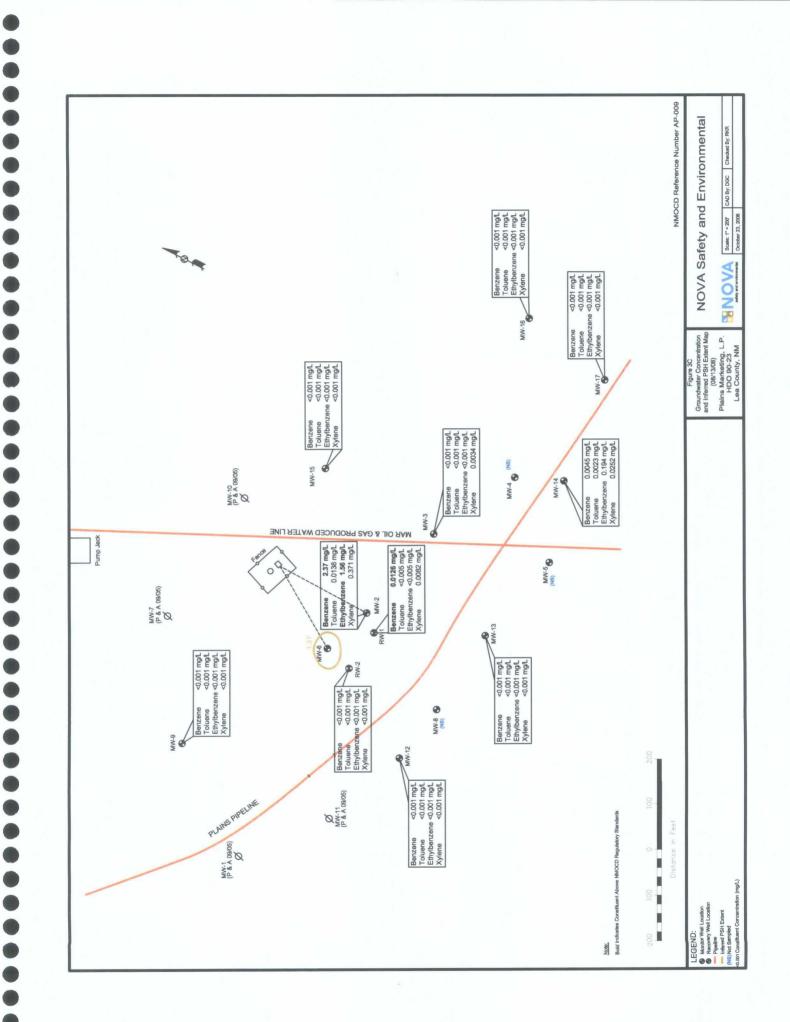
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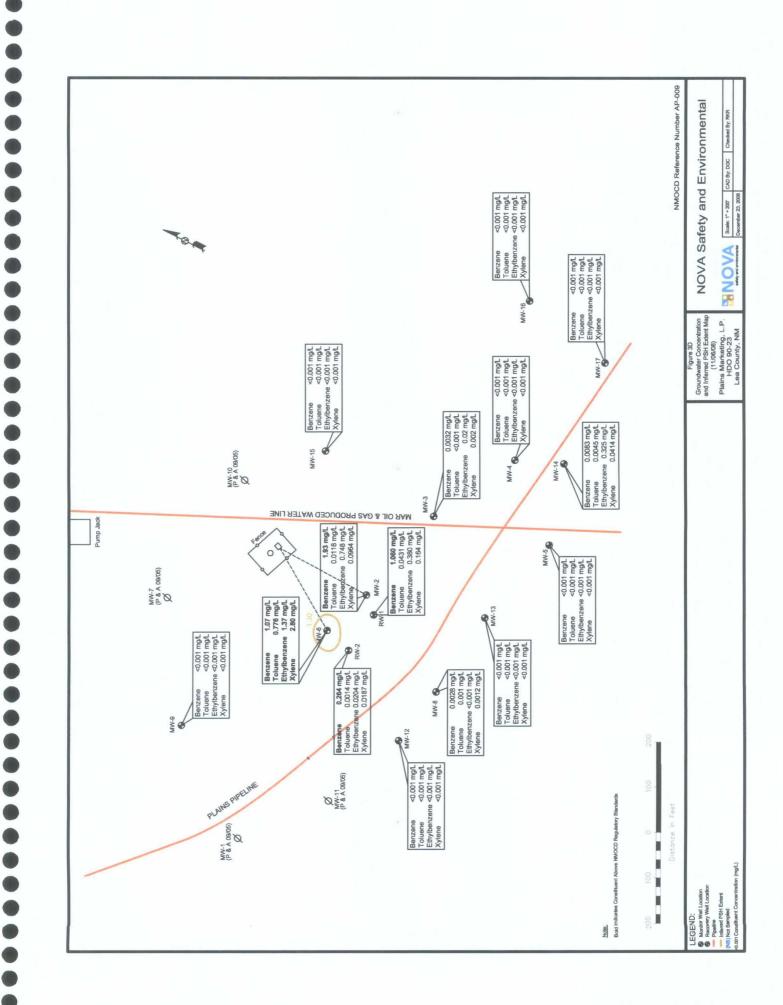
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### 2008 - GROUNDWATER ELEVATION DATA

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### PLAINS MARKETING, L.P. HDO 90 - 23 LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER AP-009

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW - 2	02/08/08 、	3,465.44	-	45.56	0.00	3,419.88
MW - 2	02/15/08	3,465.44	_	45.53	0.00	3,419.91
MW - 2	02/22/08	3,465.44	-	45.56	0.00	3,419.88
MW - 2	04/04/08	3,465.44	-	45.56	0.00	3,419.88
MW - 2	05/08/08	3,465.44	_	46.51	0.00	3,418.93
MW - 2	05/16/08	3,465.44	-	45.55	0.00	3,419.89
MW - 2	06/05/08	3,465.44	-	45.52	0.00	3,419.92
MW - 2	06/27/08	3,465.44		45.67	0.00	3,419.77
MW - 2	07/15/08	3,465.44	-	45.68	0.00	3,419.76
MW - 2	08/12/08	3,465.44	_	45.72	0.00	3,419.72
MW - 2	08/13/08	3,465,44	-	45.72	0.00	3,419.72
MW - 2	09/25/08	3,465.44	_	45.72	0.00	3,419.72
MW - 2	09/30/08	3,465.44	45.69	45.70	0.01	3,419.75
MW - 2	10/08/08	3,465.44	_	45.71	0.00	3,419.73
MW - 2	10/24/08	3,465.44	_	45.70	0.00	3,419.74
MW - 2	11/06/08	3,465.44	-	45.72	0.00	3,419.72
	11/08/08	3,465.44	-	45.70	0.00	3,419.74
MW - 3	<i>02/08/08</i>	3,464.68	-	44.96	0.00	3,419.72
MW - 3	02/15/08	3,464.68	-	44.95	0.00	3,419.73
MW - 3	02/22/08	3,464.68	-	44.95	0.00	3,419.73
MW - 3	04/04/08	3,464.68	-	44.94	0.00	3,419.74
MW - 3	05/08/08	3,464.68	-	44.90	0.00	3,419.78
MW - 3	05/16/08	3,464.68	-	44.94	0.00	3,419.74
MW - 3	06/27/08	3,464.68	-	45.01	0.00	3,419.67
MW - 3	08/13/08	3,464.68	_	45.09	0.00	3,419.59
MW - 3	09/30/08	3,464.68	-	45.02	0.00	3,419.66
MW - 3	10/08/08	3,464.68	-	45.10	0.00	3,419.58
MW - 3	10/24/08	3,464.68	-	44.90	0.00	3,419.78
MW - 3	11/06/08	3,464.68	_	45.06	0.00	3,419.62
MW - 4	02/08/08	3,465.76	-	46.11	0.00	3,419.65
MW - 4	05/08/08	3,465.76	-	46.00	0.00	3,419.76
MW - 4	06/05/08	3,465.76	-	46.40	0.00	3,419.36
MW - 4	08/13/08	3,465.76	-	46.44	0.00	3,419.32
MW - 4	11/06/08	3,465.76	-	46.28	0.00	3,419.48
MW - 5	02/08/08	3,467.40	-	47.91	0.00	3,419.49
MW - 5	05/08/08	3,467.40	-	47.78	0.00	3,419.62
MW - 5	08/13/08	3,467.40	-	48.02	0.00	3,419.38
MW - 5	11/06/08	3,467.40	-	48.04	0.00	3,419.36
MW - 6	02/15/08	3,465.42	45.33	46.34	1.01	3,419.94
MW - 6	02/22/08	3,465.42	45.33	46.29	0.96	3,419.95
MW - 6	04/04/08	3,465.42	45.33	46.32	0.99	3,419.94
MW - 6	05/08/08	3,465.42	45.31	46.34	1.03	3,419.96
MW - 6	05/16/08	3,465.42	45.33	46.31	0.98	3,419.94

### 2008 - GROUNDWATER ELEVATION DATA

### PLAINS MARKETING, L.P. HDO 90 - 23 LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER AP-009

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WELL	DATE	TOP OF CASING	DEPTH TO	DEPTH TO	PSH	CORRECTED GROUNDWATER
NUMBER	MEASURED	ELEVATION	PRODUCT	WATER	THICKNESS	ELEVATION
MW - 6	06/05/08	3,465.42	45.31	46.30	0.99	3,419.96
MW - 6	06/27/08	3,465.42	45.38	46.48	1.10	3,419.88
MW - 6	07/15/08	3,465.42	45.42	46.61	1.19	3,419.82
MW - 6	08/12/08	3,465.42	45.45	46.76	1.15	3,419.77
MW - 6	08/13/08	3,465.42	45.45	46.76	1.31	3,419.77
MW - 6	09/25/08	3,465.42	45.49	46.81	1.32	3,419.73
MW - 6	09/30/08	3,465.42	45.47	46.68	1.32	3,419.77
MW - 6	10/08/08	3,465.42	45.47	46.73	1.26	3,419.76
MW - 6	10/24/08	3,465.42	45.43	46.73	1.30	3,419.80
MW - 6	11/06/08	3,465.42	45.46	46.76	1.30	3,419.77
MW - 6	11/08/08	3,465.42	45.43	46.38	0.95	3,419.85
	11/00/00		+5.+5	+0.50	0.95	5,417.05
MW - 8	02/08/08	3,467.61	-	47.81	0.00	3,419.80
MW - 8	05/08/08	3,467.61		47.77	0.00	3,419.84
MW - 8	08/13/08	3,467.61	-	47.94	0.00	3,419.67
MW - 8	11/06/08	3,467.61		47.97	0.00	3,419.64
1VI W = 0	11/00/00	5,407.01	_		0.00	
MW-9	02/08/08	3,465.74	_	45.80	0.00	3,419.94
MW-9	05/08/08	3,465.74	-	45.72	0.00	3,420.02
MW-9	08/13/08	3,465.74	_	46.39	0.00	3,419.35
MW-9	11/06/08	3,465.74		45.94	0.00	3,419.80
	11/00/03	3,403.74	-	43.94	0.00	3,417.00
MW - 12	02/08/08	3466.69	_	47.03	0.00	3,419.66
MW - 12	05/08/08	3466.69		46.92	0.00	3,419.77
MW - 12	08/13/08	3466.69		46.95	0.00	3,419.74
MW - 12	11/06/08	3466.69		47.09	0.00	3,419.60
	11/00/00	5400.07			0.00	5,417.00
MW - 13	02/08/08	3466.98	_	47.45	0.00	3,419.53
MW - 13	05/08/08	3466.98		47.41	0.00	3,419.57
MW - 13	08/13/08	3466.98		47.60	0.00	3,419.38
MW - 13	11/06/08	3466.98		47.64	0.00	3,419.34
	11,00,00	5 100.20			0.00	
MW - 14	02/08/08	3466.50	-	47.14	0.00	3,419.36
MW - 14	02/15/08	3466.50	_	47.11	0.00	3,419.39
MW - 14	02/22/08	3466.50	-	47.10	0.00	3,419.40
MW - 14	04/04/08	3466.50	-	47.09	0.00	3,419.41
MW - 14	05/08/08	3466.50	-	47.06	0.00	3,419.44
MW - 14	05/16/08	3466.50		47.10	0.00	3,419.40
MW - 14	06/05/08	3466.50	-	47.09	0.00	3,419.41
MW - 14	06/27/08	3466.50	-	47.13	0.00	3,419.37
MW - 14	07/15/08	3466.50	-	47.24	0.00	3,419.26
MW - 14	08/12/08	3466.50	-	47.29	0.00	3,419.20
MW - 14	08/13/08	3466.50	-	47.29	0.00	3,419.21
MW - 14	09/25/08	3466.50	· _	47.34	0.00	3,419.16
MW - 14	09/30/08	3466.50	_	47.33	0.00	3,419.17
MW - 14	10/08/08	3466.50	-	47.37	0.00	3,419.13
MW - 14	10/24/08	3466.50	· -	47.32	0.00	3,419.18

### 2008 - GROUNDWATER ELEVATION DATA

### PLAINS MARKETING, L.P. HDO 90 - 23 LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER AP-009

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW - 14	11/06/08	3466.50	-	47.33	0.00	3,419.17
MW - 14	11/08/08	3466.50	-	47.24	0.00	3,419.26
MW - 15	02/08/08	3466.10	· _	46.38	0.00	3,419.72
MW - 15	05/08/08	3466.10	46.45	46.50	0.05	3,419.64
MW - 15	05/16/08	3466.10	46.38	46.48	0.10	3,419.71
MW - 15	06/05/08	3466.10	_	46.41	0.00	3,419.69
MW - 15	06/27/08	3466.10	_	46.49	0.00	3,419.61
MW - 15	07/15/08	3466.10	-	46.53	<sup>v.</sup> 0.00	3,419.57
MW - 15	08/12/08	3466.10	_	45.60	0.00	3,420.50
MW - 15	08/13/08	3466.10	-	45.60	0.00	3,420.50
MW - 15	09/25/08	3466.10	-	46.60	0.00	3,419.50
MW - 15	09/30/08	3466.10	-	46.61	0.00	3,419.49
MW - 15	10/08/08	3466.10	-	46.62	0.00	3,419.48
MW - 15	10/24/08	3466.10	-	46.60	0.00	3,419.50
MW - 15	11/06/08	3466.10	-	46.58	0.00	3,419.52
<u>MW - 15</u>	11/08/08	3466.10		46.60	0.00	3,419.50
MW-16	<i>02/08/08</i>	3465.93	-	46.44	0.00	3,419.49
MW-16	05/08/08	3465.93	-	46.40	0.00	3,419.53
MW-16	08/13/08	3465.93	-	46.68	0.00	3,419.25
MW-16	11/06/08	3465.93	-	46.73	0.00	3,419.20
MW-17	02/08/08	3468.68	-	49.34	0.00	3,419.34
MW-17	05/08/08	3468.68	-	49.31	0.00	3,419.37
MW-17	08/13/08	3468.68	-	49.55	0.00	3,419.13
MW-17	11/06/08	3468.68	-	49.62	0.00	3,419.06
RW - 1	02/08/08	3465.02	-	45.38	0.00	3,419.64
RW - 1	05/08/08	3465.02	-	45.28	0.00	3,419.74
RW - 1	08/13/08	3465.02	-	51.48	0.00	3,413.54
RW - 1	09/30/08	3465.02	-	45.57	0.00	3,419.45
RW - 1	10/08/08	3465.02	-	45.52	0.00	3,419.50
RW - 1	10/24/08	3465.02	-	45.48	0.00	3,419.54
RW - 1	11/06/08	3465.02	-	45.49	0.00	3,419.53
RW - 2	02/08/08	3465.21	-	45.59	0.00	3419.62
RW - 2	05/08/08	3465.21	-	45.31	0.00	3419.90
RW - 2	08/13/08	3465.21	-	46.34	0.00	3418.87
RW - 2	09/30/08	3465.21	-	45.55	0.00	3419.66
RW - 2	10/08/08	3465.21	-	45.53	0.00	3419.68
RW - 2	10/24/08	3465.21	-	45.53	0.00	3419.68
<u>RW - 2</u>	11/06/08	3465.21 merican Vertical I	· -	45.53	0.00	3419.68

Note: Elevations based on North American Vertical Datum of 1929.

\* Complete Historical Tables provided on the attached CD.

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### 2008 - CONCENTRATIONS OF BTEX AND TPH IN GROUNDWATER

### PLAINS MARKETING, L.P.

### HDO 90-23

### LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

		EPA SW 8	346-8015M	<u> </u>		SW 846-8012B, 5	030	
SAMPLE LOCATION	SAMPLE DATE	GRO C6-C12 mg/L	C6-C12 C12-C35 BENZENE TOLUENE		ETHYL- BENZENE	m, p - XYLENES	o - XYLENE	
NMOCD RE				0.01	0.75	0.750	0.0	520
MW - 2	02/09/08			2.83	0.0613	3.28	1.	08
MW - 2	05/09/08			2.85	0.0244	2.5	0.0	58
MW - 2	08/13/08			2.37	0.0138	1.560	0.3	710
MW - 2	11/06/08			1.93	0.0118	0.748	0.0	964
MW - 3	02/09/08			0.0158	< 0.001	0.0463	0.0	022
MW - 3	05/09/08			0.0446	< 0.001	0.0181	0.0	022
MW - 3	08/13/08			<0.001	< 0.001	< 0.001	0.0	034
MW - 3	11/06/08			0.0032	< 0.001	0.0200	0.0	020
MW - 4	02/08/08			Not Sampled	on Current S	Sample Schedu	le	
MW - 4	06/05/08			< 0.001	< 0.001	< 0.001	<0.	001
MW - 4	08/13/08			Not Sampled	on Current S	Sample Schedu	le	
MW - 4	11/11/08			< 0.001	< 0.001	< 0.001	<0.	001
MW - 5	02/08/08	· - · ·		Not Sampled	on Current S	Sample Schedu	le	
MW - 5	05/09/08			< 0.001	< 0.001	< 0.001		001
MW - 5	08/13/08			Not Sampled	on Current S	Sample Schedu	le	
MW - 5	11/06/08			< 0.001	< 0.001	<0.001		001
MW - 6	02/09/08			Not Sampled	due to PSH	in Well		
MW - 6	05/09/08				due to PSH			
MW - 6	08/13/08				due to PSH			
MW - 6	11/06/08	84.5	234	1.07	0.776	1.37	2	.8
MW - 8	02/08/08			Not Sampled	on Current S	Sample Schedu	le	
MW - 8	05/09/08					Sample Schedu		
MW - 8	08/13/08					Sample Schedu		
MW - 8	11/06/08			0.0028	0.001	< 0.001		012
	11/00/00			0.0020	0.001		0.0	<u></u>
MW - 9	02/08/08			<0.001	<0.001	< 0.001	<0	001
MW - 9	05/09/08			< 0.001	< 0.001	< 0.001		001
MW - 9	08/13/08			< 0.001	< 0.001	< 0.001		001
MW - 9	11/06/08			< 0.001	< 0.001	< 0.001		001
MW - 12	02/08/08			<0.001	<0.001	<0.001	()>	001
MW - 12 MW - 12	05/09/08	<b> </b>		<0.001	< 0.001	<0.001		001
MW - 12 MW - 12	08/13/08			<0.001	<0.001	<0.001		001
MW - 12 MW - 12	11/06/08			<0.001	<0.001	<0.001		001
11117 - 12	11,00,00				-0.001	~0,001	~0	
MW - 13	02/08/08			<0.001	<0.001	< 0.001	~^	001
MW - 13	02/08/08			<0.001	< 0.001	<0.001		001
			<u> </u>	<0.001		·		
MW - 13	08/19/08 11/06/08			<0.001	<0.001 <0.001	<0.001 <0.001		001 001
MW - 13								

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### 2008 - CONCENTRATIONS OF BTEX AND TPH IN GROUNDWATER

### PLAINS MARKETING, L.P. HDO 90-23 LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

		EPA SW 8	46-8015M	T		SW 846-8012B, 5	5030						
SAMPLE LOCATION	N DATE CGC12 C12_C35 [BENZENE]TOLUENE		12-C35 BENZENE TOLUENE DENZENE VVI ENI										
NMOCD REG				0.01	0.75	0.750	0.0	520					
MW - 14	02/09/08			0.0061	0.0053	0.28	0.0	078					
MW - 14	05/09/08			0.0045	0.0011	0.0865	0.0	213					
MW - 14	08/13/08			0.0045	0.0023	0.1940	0.0	252					
MW - 14	11/06/08			0.0083	0.0045	0.3250	0.0	414					
MW - 15	02/09/08			< 0.001	< 0.001	0.0063	0.0	093					
MW - 15	05/09/08			Not Sampled	due to PSH	in Well							
MW - 15	08/13/08			< 0.001	< 0.001	< 0.001	<0.	001					
MW - 15	11/06/08			< 0.001	< 0.001	< 0.001	<0.	001					
MW - 16	02/08/08			< 0.001	<0.001	< 0.001	<0.	001					
MW - 16	05/09/08			< 0.001	< 0.001	< 0.001	<0.001						
MW - 16	08/13/08			< 0.001	< 0.001	< 0.001	<0.	001					
MW - 16	11/06/08			< 0.001	< 0.001	< 0.001	<0.	001					
MW - 17	<i>02/08/08</i> · · ·			< 0.001	< 0.001	< 0.001	· · · <0.	001					
MW - 17	05/09/08			< 0.001	. <0.001	< 0.001	<0.	001					
MW - 17	08/13/08			< 0.001	< 0.001	< 0.001	<0.	001					
MW - 17	11/06/08			< 0.001	< 0.001	< 0.001	<0.	001					
RW - 1	02/08/08			0.815	< 0.020	0.494	0.2	.49					
RW - 1	05/09/08			0.34	<0,01	0.179		.35					
RW - 1	08/13/08			0.0126	< 0.005	< 0.005		082					
RW - 1	11/06/08			1.06	0.0431	0.380	0.1	.64					
RW - 2	02/08/08			0.0204	< 0.001	< 0.001		001					
RW - 2	05/09/08			0.164	< 0.001	0.0031		026					
RW - 2	08/13/08			< 0.001	< 0.001	< 0.001		001					
RW - 2	11/06/08			0.264	0.0014	0.0204	0.0	187					

\* Complete Historical Tables are provided on the attached CD.

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TABLE 3

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# POLYNUCLEAR AROMATIC HYDROCARBON CONCENTRATIONS IN GROUNDWATER - 2008

# PLAINS MARKETING, L.P. TNM HDO-90-23 LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER AP-009

All water concentrations are reported in mg/L	EPA SW846-8270C, 3510	
All water		

						_		_	_	_															
Dibeazofaran		0.0175		0.0032	24202	ाह	C01000.0~		<0.000184			0.0833	渡る 朝鮮	<0.000184	181.41 - 34.1. BW		<0.000185	新学会	<0.000183	And a second	1990 - XX 201	<0.000185		10	22222
οποίκη τη αγοία τη		0.11		<0.000183	A CONTRACTOR	-0 000182	COLONA		<0.000184			0.5 	CAN SER	<0.000184	1. (1997)-1997)-19		<0.000183	が開始に	<0.000183	Software Software	11.01	<0.000185		0 00647	1.2222
ություն ու հերություն հերություն հերություն հերություն հերություն հերություն հերություն հերություն հերություն հ Դերություն հերություն հերություն հերություն հերություն հերություն հերություն հերություն հերություն հերություն հ	J\2m E0.0	0.139	262462	0.0203	21		601000		<0.000184	2.000-000-000-000-000-000-000-000-000-00	are the second second	0.552		<0.000184			<81000.0>		<0.000183	State of the second		<0.000185		0.0141	1 - 1 - 2 - 2
Pyrene	_	<0.000922	NERGENERAL	<0.000183	C. Sanda Barras Barras	20 000182	601000		<0.000184	13		<0.0188		<0.000184			- C81000.0>		<0.000183	a to the set of the set of the set of the set	のないというない	<0.000185		<0.000186	
Рьеаянтиеле		0.0227 <		0.00152 <	1991-1990-1990-1990-1990-1990-1990-1990	<0.000183 <	101000		<0.000184 <		Contraction of the	0.102		<0.000184	CA COLUMN AND AND AND		> <81000.0>	本で見た思いた	<0.000183 <	24 2392-23930-244-444-4444-4444-4444-4444-4444-4444	中にいたいの見る法	<0.000185		0 00465	
ənəladıdıqaM	.1\зт £0.0	0.0729		<0.000183	ell Carologianes	<0.000182			<0.000184 <	All and all all all all all all all all all al		0.238		<0.000184 <		yr 6. 1	> C81000.0>		<0.000183 <	274 (448)-400 (40)-400 (32)-324	Conception of	<0.000185 <		0 00638	
эвэтүq(bэ-€,5,1]овэbaI	.I\2m \$000.0	<0.000922		<0.000183 <	AND INCOMENDATION OF A DESCRIPTION OF A	<0.000183 <	C01000		<0.000184 <		8 A I I	<0.0188		<0.000184 <	25 STATES		> C81000.0>		<0.000183 <	0.04/20000000000000000000000000000000000	記載などの	<0.000185 <		<0.000186	
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**TABLE 3** 

# POLYNUCLEAR AROMATIC HYDROCARBON CONCENTRATIONS IN GROUNDWATER - 2008

# PLAINS MARKETING, L.P. TINM HDO-90-23 LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER AP-009

All water concentrations are reported in mg/L	EPA SW846-8270C, 3510
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∑ənəladıtıqanlydısM-2		0.000615	<0.000184	<0.000183	0.0106	<0.000185
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Рієпацільная		0.000857	<0.000184	<0.000183	0.000549	<0.000185
ənəladıdqaN	Луш ЕО.О	<0.000184	<0.000184	<0.000183	0.0187	<0.000185
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Ацогеле	_	<0.000184	<0.000184	<0.000183	0.00079	<0.000185
Fluoranthene		<0.000184	<0.000184	<0.000183	<0.000184	<0.000185
Dibenz[a,a]anthracene	.7\2m E000.0	<0.000184	<0.000184	<0.000183	<0.000184	<0.000185
Сргузепе	Луат 2000.0	<0.000184	<0.000184	<0.000183	<0.000184	<0.000185
Вепхо[k]fluoranthene	.1\ <b>ұт 2000,0</b>	<0.000184	<0.000184	<0.000183	<0.000184	<0.000185
Benzo[g,ů,i]perylene		<0.000184	<0.000184	<0.000183	<0.000184	<0.000185
Benzo[b]fluoranthene	Луат 2000.0	<0.000184	<pre>&lt;0.000184 &lt; 0.000184</pre>	<0.000183	<0.000184	<0.000185
Benzo[a]pyrene	Л\2m 7000.0	<0.000184		<0.000183	<0.000184	<0.000185
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# APPENDICES

### Ó **APPENDIX A: Release Notification and Corrective Action** 6) (Form C-141) 6) 6) 6)

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## OIL CONSERVATION DIVISION

### NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

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