

1R - 2162

**GENERAL
CORRESPONDENCE**

YEAR(S):
2010

Hansen, Edward J., EMNRD

From: Jason Henry [JHenry@paalp.com]
Sent: Tuesday, September 21, 2010 2:08 PM
To: VonGonten, Glenn, EMNRD
Cc: Hansen, Edward J., EMNRD; Johnson, Larry, EMNRD; Leking, Geoffrey R, EMNRD; Jeffrey P Dann
Subject: RE: 1R-2162 - Plains 14 Inch Vac to Jal Legacy Release Site - GW impacted notification
Attachments: 14-inch Vac to Jal Legacy Initial C141.pdf; Vac to Jal Legacy GW Chemistry Table.xls

Mr. Von Gonten,

Please accept this email as notification of potentially impacted groundwater as the result of a crude oil release at the following Plains Pipeline site:

14-inch Vac to Jal Legacy site, 1RP-2162 (copy of Initial C-141 attached)

The potential groundwater impact was discovered upon receiving analytical data from a groundwater sample collected from a monitor well (MW-1) that was installed during site investigation activities. I've attached an analytical data table that provides a summary of the results for the groundwater samples collected from monitor well MW-1.

Throughout 2009 and during parts of 2010, Plains has conducted the following site activities:

- excavation of impacted soil,
- site investigation activities,
- off-site disposal of heavily impacted soil,
- soil remediation activities

A thorough history of activities performed at the site through May 2010 is contained in a report titled ***Remediation Summary and Proposed Soil Closure Strategy*** which was delivered to Mr. Edward Hansen on September 14, 2010. The soil closure strategy presented in this report was approved by Mr. Larry Johnson on June 2, 2010, during a meeting at the NMOCD District 1 office and soil remediation activities at the site are currently on-going.

Plains will submit future correspondence regarding site activities to Mr. Hansen and will submit copies of the correspondence to the NMOCD District 1 office.

Please let me know if you have any questions or need additional information.

Thank you,
Jason Henry
Plains Pipeline, L.P.
575-441-1099

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Monday, September 20, 2010 5:00 PM
To: Jason Henry
Cc: Hill, Larry, EMNRD; Leking, Geoffrey R, EMNRD
Subject: 1R-2162 - Plains 14 Inch Vac to Jal Legacy Release Site - GW impacted notification

Dear Mr. Henry:

In addition to your verbal notification, please send an email message to Glenn von Gonten, Acting Environmental Bureau Chief, regarding a release of a volume that may with reasonable probability be detrimental to water or exceed WQCC

standards at the 14 Inch Vac to Jal Legacy Release Site. Please copy Larry Johnson, Geoff Leking of the Division's District 1 Office and me on the message.

Edward J. Hansen
Environmental Bureau
Oil Conservation Division

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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

RECEIVED

APR 20 2009
HOBBSD

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

☒ Initial Report ☐ Final Report

Name of Company	Plains Pipeline, LP	Contact	Jason Henry
Address	2530 Hwy 214 - Denver City, Tx 79323	Telephone No.	(575) 441-1099
Facility Name	14 - inch Vac to Jal Legacy	Facility Type	Pipeline
Surface Owner	Legacy Petroleum	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
F	25	25S	37E					Lea

Latitude N 32° 6' 10.7" Longitude W 103° 7' 10.3"

NATURE OF RELEASE

Type of Release	Crude Oil	Volume of Release	250 bbls	Volume Recovered	0 bbls
Source of Release	14" Steel Pipeline	Date and Hour of Occurrence	04/09/2009	Date and Hour of Discovery	04/09/2009 10:00 a.m.
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Larry Johnson		
By Whom?	Jason Henry	Date and Hour	04/09/2009 @ 14:20		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

During the purging of the 14-inch Sweet Vac to Jal Line, a release of crude oil occurred due to external corrosion. Throughput for the subject line is 0 bbls/day because the line is inactive and was being purged at the time of the release. The depth of the pipeline at the release point is approximately 2' bgs. The H2S concentration in the crude is less than 10 ppm and the gravity of the crude is 38.

Describe Area Affected and Cleanup Action Taken.*

The released crude resulted in a surface stain that measured approximately 300' x 300'. The impacted area will be remediated per applicable guidelines.

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.

OIL CONSERVATION DIVISION

Signature:

Jason Henry

Printed Name: Jason Henry

Approved by District Supervisor:

Title: Remediation Coordinator

Approval Date:

Expiration Date:

E-mail Address: jhenry@paalp.com

Conditions of Approval:

Attached ☐

Date: 04/20/2009 Phone: (575) 441-1099

* Attach Additional Sheets If Necessary

IRP - 2142

TABLE 2

CONCENTRATIONS OF BENZENE, BTEX, CHLORIDES AND TOTAL DISSOLVED SOLIDS IN GROUNDWATER

PLAINS PIPELINE, L.P.
 14-INCH VAC TO JAL LEGACY
 LEA COUNTY, NEW MEXICO
 PLAINS SRS NO. 2009-092
 NMOCD REFERENCE NO: 1R-2162

SAMPLE LOCATION	SAMPLE DATE	METHODS: EPA SW 846-8021B, 5030						CHLORIDES (mg/L)	TDS (mg/L)
		BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL-BENZENE (mg/L)	M,P-XYLENES (mg/L)	O-XYLENES (mg/L)	TOTAL BTEX (mg/L)		
MW-1	07/06/09	<0.001	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	5,300	14,300
MW-1	10/21/09	0.0125	0.0049	<0.0010	<0.0020	<0.0010	0.0174	-	-
MW-1	03/11/10	0.072	0.0243	0.002	<0.0020	0.0017	0.1	-	-
MW-1	06/04/10	0.1407	0.0637	0.0047	0.0041	0.0026	0.2158	-	-
NMOCD CRITERIA		0.01	0.75	0.75	TOTAL XYLENES 0.62			250	10,000