1R - 385

APPROVALS

YEAR(S):

2006

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

April 13, 2006

Ms. Camille Reynolds
Plains All American Pipeline, L.P.
3112 West Highway 82
Lovington, NM 88260

RE: 2005 Annual Monitoring Report
Plains Vacuum 10-inch to Jal Site, Plains Ref: 2001-10248
SW/4 SW/4 Section 20, Township 19 South, Range 37 East
Lea County, New Mexico
NMOCD File Number: 1R-0385

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division has received and reviewed the above report submitted on behalf of Plains All American Pipeline, L.P. (Plains) by Environmental Plus, Inc. This report is hereby accepted and approved with the following understandings and conditions:

1. Plains will continue to monitor the groundwater monitoring/recovery well network monthly for the potential presence of PSH in the groundwater. Groundwater levels data will be collected monthly.
2. Plains will sample the groundwater in the monitor well network quarterly and have the samples analyzed for BTEX.
3. Plains will submit a soil closure request for this site.
4. Plains will submit a 2006 Annual Monitoring Report for this site by April 1, 2007.

NMOCD approval of this report does not relieve Plains of liability should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other governmental agency.

If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Copy: NMOCD, Hobbs
Jason Stegemoller, EPI

Martin, Ed, EMNRD

To... cjreynolds@paalp.com

Cc...

Bcc...

Subject: Vacuum 10" to Jal Site (1R-0385)

Attachments:

I have received the email from Iain Olness regarding the above site and the attachments showing analyses results and sampling locations.

Backfilling, as described in Iain's message, may commence.

Ed Martin
NMOCD
1220 S. St. Francis
Santa Fe, NM 87505
PH: (505) 476-3492
FA: (505) 476-3462
email: ed.martin@state.nm.us
Cell: (505) 690-0894

Martin, Ed

Vacuum 10" To JAL (2002-10248)

1R-385

Dear Mr. Martin:

Attached is a table documenting the analytical results for the soil sampling associated with excavation activities at the above-referenced site. In addition, two figures are also attached showing the sampling locations. EPI, on behalf of Plains is proposing to initiate backfilling activities in this excavation as analytical results indicate the removal of impacted soil. Prior to backfilling the excavation with the stockpiled rock, EPI will place three (3) feet of sand in the excavation in which groundwater is exposed (reference Figure 5). Upon your approval, EPI, on behalf of Plains, will initiate backfilling activities at the site.

Should you have any questions or concerns, please feel free to contact me at (505) 394-3481 or via e-mail at iolness@hotmail.com. All official correspondence should by submitted to Camille Reynolds at:

Camille Reynolds
Remediation Coordinator
Plains All American Pipeline, L.P.
3112 West Highway 82
Lovington, NM 88260

(505)441-0965
cjreynolds@paalp.com

Sincerely,

ENVIRONMENTAL PLUS, INC.

Iain A. Olness, P.G.
Hydrogeologist

Environmental Plus, Inc.
P.O. Box 1558
Eunice, NM 88231

(505) 394-3481
(505) 394-2601 (facsimile)

TABLE 5

Summary of Soil Analytical Results

Vacuum 10-Inch to Jal - Ref #2002-10248

Sample ID	Sample Date	Benzene (µg/Kg)	Toluene (µg/Kg)	Ethylbenzene (µg/Kg)	m,p-Xylenes (µg/Kg)	o-Xylene (µg/Kg)	Total BTEX (µg/Kg)	TPH (as gasoline) (mg/Kg)	TPH (as diesel) (mg/Kg)	Total TPH (mg/Kg)
SLEV1022504W-NESW	25-Feb-04	<20	312	1,920	2,910	1,800	6,942	608	18,400	[illegible]
SLEV1022504W-ESW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	<2.5	<7.5
SLEV1022504W-WSW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	7.31	7
SLEV1022504W-SESW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	<2.5	<7.5
SLEV1022504W-SBH	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	<2.5	<7.5
SLEV1022504W-SWSW	25-Feb-04	<20	52	177	205	396	830	106	3,690	[illegible]
SLEV1022504W-NBH	25-Feb-04	<20	<20	<20	<40	<20	<120	179	8,690	[illegible]
SLEV1022504W-NWSW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	<2.5	<7.5
SLEV1022504E-NWSW	25-Feb-04	<20	<20	<20	<40	<20	<120	7.15	1,980	[illegible]
SLEV1022504E-SBH	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	4.78	5
SLEV1022504E-WSW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	<2.5	<7.5
SLEV1022504E-NBH	25-Feb-04	<20	181	769	1,270	714	2,934	337	9,640	[illegible]
SLEV1022504E-NESW	25-Feb-04	<20	<20	34.4	47	168	249	136	6,580	[illegible]
SLEV1022504W-SWSW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	<2.5	<7.5
SLEV1022504W-SESW	25-Feb-04	<20	<20	<20	<40	<20	<120	<5	13.3	13
EE Bottom SXP 1	5-May-05	<25	26.8	38.2	209	49	323	208	2,170	[illegible]
EE Bottom SXP 1 - B	17-May-05	<25	<25	<25	<25	<25	<125	<10.0	35.4	35.4
EE Wall SXP1	5-May-05	<25	15[4]	37.2	97.3	37.6	187	<10.0	<10.0	10.0
EE Bottom SXP 2	5-May-05	<25	<25	<25	<25	<25	<125	<10.0	<10.0	<10.0
EE Wall SXP 2	5-May-05	<25	<25	<25	<25	<25	<125	<10.0	<10.0	<10.0
EE Bottom SXP 3	5-May-05	<25	<25	<25	<25	<25	<125	<10.0	<10.0	<10.0
EE Wall SXP 3	5-May-05	<25	<25	<25	53.7	<25	53.7	<10.0	<10.0	<10.0
EE SXP 4	5-May-05	<25	<25	<25	<25	<25	<125	<10.0	<10.0	<10.0
EE SXP 5	5-May-05	<25	<25	<25	<25	<25	<125	<10.0	11.6	11.6
EE SXP 6	5-May-05	<25	<25	<25	62.9	<25	62.9	12.1	181	[illegible]
EE SXP 6 - B	17-May-05	<25	<25	<25	44.1	28.1	72.2	<10.0	<10.0	<10.0
EE SXP 7	5-May-05	<25	<25	<25	46.0	<25	46.0	6.88[4]	139	[illegible]
EE SXP 7 - B	17-May-05	<25	<25	<25	<25	<25	<125	<10.0	<10.0	<10.0
EE SXP 8	5-May-05	<25	<25	<25	<25	<25	<125	<10.0	9.66[4]	<10.0
EE SXP 9	5-May-05	<25	<25	<25	<25	<25	<125	86.4	879	[illegible]
EE SXP - 9	17-May-05	<25	<25	<25	<25	<25	<125	<10.0	76.8	76.8
EE SXP 10	5-May-05	<25	<25	<25	45.0	<25	<125	7.43[4]	80.8	80.8
NMOCD Remedial Thresholds		**10,000**					**50,000**			**100**

[illegible] values are in excess of the NMOCD Remediation Thresholds

[2] NA : Not Analyzed

[3] NS : Not Sampled

[4] Detected, but below the Reporting Limit; therefore, result is an estimated concentration.

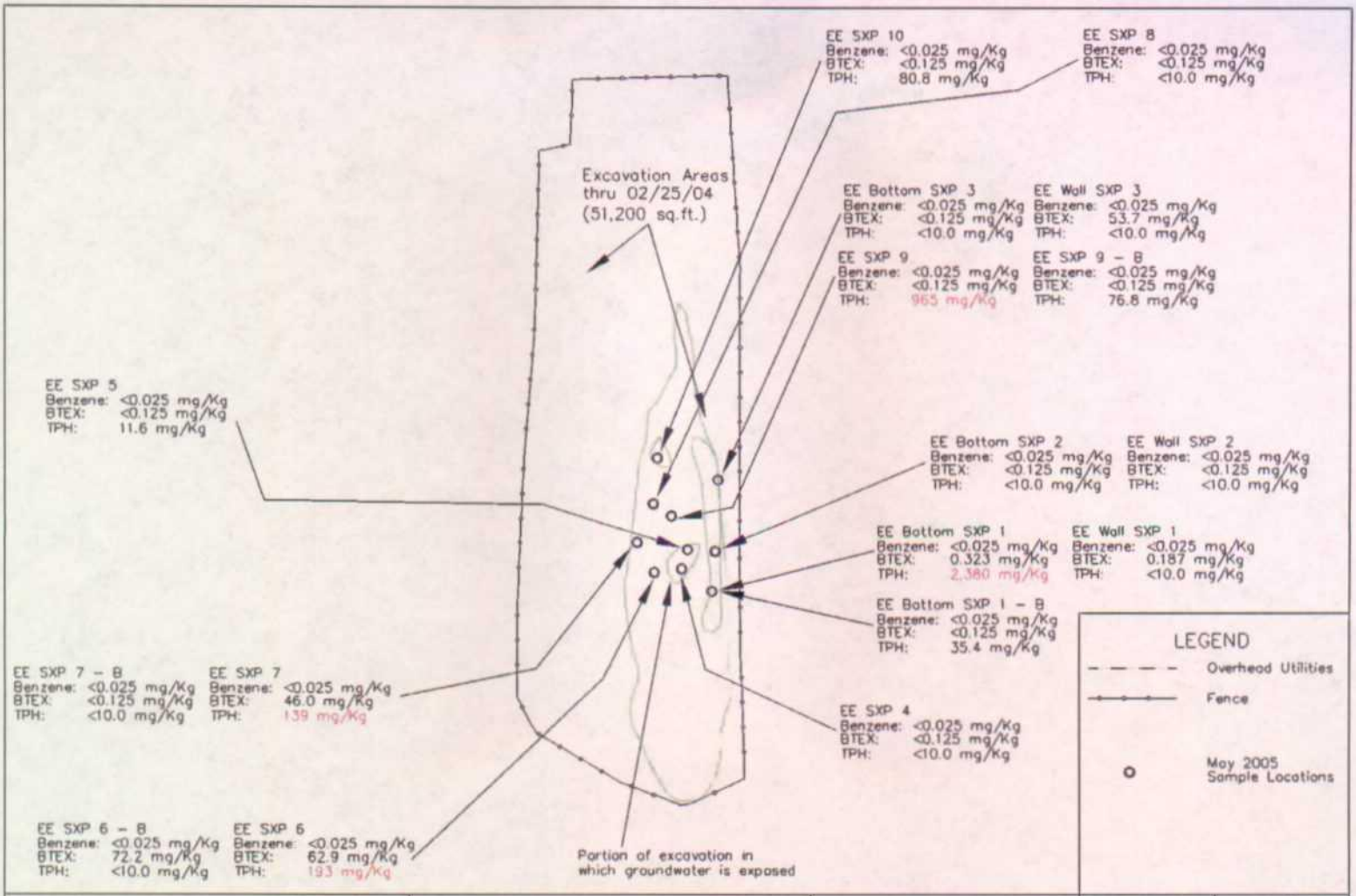

Figure 5
2005 Excavation Sampling Map
Plains All American Pipeline, L.P.
Vacuum 10" to Jal

Lea County, New Mexico
SW 1/4 of the SW 1/4, Sec. 20, T19S, R37E
N 32° 38' 21.3" W 103° 16' 46.2"
Elevation: 3,627 feet amsl

DWG By: Iain Olness
March 2004

REVISED:

SHEET
1 of 1

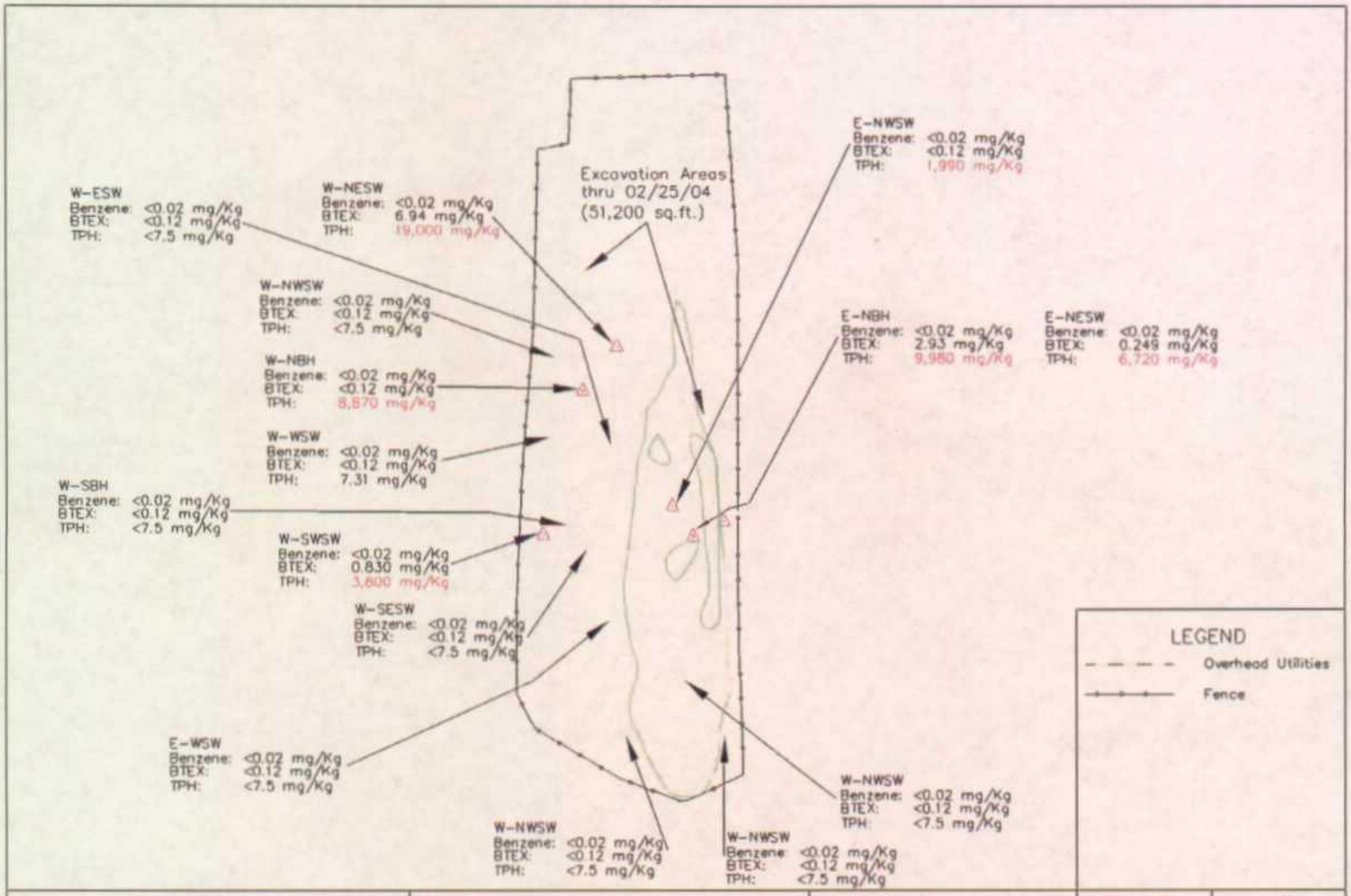

Figure 4 02-25-04 Excavation Sampling Map Plains All American Pipeline, L.P. Vacuum 10" to Jal	Lea County, New Mexico SW 1/4 of the SW 1/4, Sec. 20, T19S, R37E N 32° 38' 21.3" W 103° 16' 46.2" Elevation: 3,627 feet amsl	DWG By: Iain Olness March 2004	REVISED:	N
		0 150 300 Feet	SHEET 1 of 1	

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

April 21, 2005

Ms. Camille Reynolds
Plains All American Pipeline, L.P.
3112 West U.S. Highway 182
Lovington, NM 88260

Re: Plains All American Pipeline, L.P.
Annual Monitoring Report
Vacuum 10-Inch to Jal Site
Plains Ref: 2002-10248
SW/4 SW/4 of Section 20, T-19S, R-37E
Lea County New Mexico
NMOCD Ref: 1R-0385

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the above report. The report is hereby accepted with the following understandings and conditions:

1. Plains All American Pipeline, L.P. (Plains) will continue to monitor the groundwater monitoring/recovery well network on a monthly basis to recover PSH from the impacted groundwater monitoring wells. Plains will also collect groundwater level data from this network on a monthly basis and measure the level of phase-separated hydrocarbons on the groundwater.
2. The monitoring/recovery well network may be sampled on a semi-annual basis, as requested, and the samples will be submitted for quantification of BTEX. In the event PSH are not detected during a sampling event in RW-1, that well shall be included in the semi-annual sampling event.
3. The soils impacted above the NMOCD remedial thresholds remaining in the bottom and sidewalls of the excavation will be excavated and disposed of. Plains will submit a report describing this excavation and disposal by July 31, 2005. Included in the report will be:
    a. Amount of soil excavated.
    b. Method of disposal and name of NMOCD-approved facility where disposal took place.
    c. Sample results of the bottom and sidewalls of the resulting excavation after the additional soils have been removed.

If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin

Edwin E. Martin
Environmental Bureau

Cc: NMOCD, Hobbs