

Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Thursday, April 26, 2018 2:04 PM
To: Bratcher, Mike, EMNRD; Shelly Tucker
Cc: 'Camille J Bryant'; algroves@paalp.com; Weaver, Crystal, EMNRD; Rebecca Haskell
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley
TRC

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Friday, March 16, 2018 9:26 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher
NMOC District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In

addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, February 1, 2018 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as “Stage 3A Excavation Area” with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the “Stage 3B Excavation Area”. A copy of the initial NMOCD C-141 is attached for your reference.

The “Stage 4A Excavation Area” was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the “Stage 4A Excavation Area” with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and

WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOC and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOC and BLM approval to backfill the "Stage 3B Excavation Area" with locally obtained non-impacted material.

The "Stage 4B Excavation Area" was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7', SSW-6 @ 7', ESW-6 @ 7' and WSW-6 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7', SSW-6 @ 7', and WSW-6 @ 7' to 0.0138 mg/Kg for soil sample ESW-6 @ 7'. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7' and WSW-6 @ 7' to 0.07129 mg/Kg for soil sample NSW-4 @ 7'. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7' to 10,980.0 mg/Kg for soil sample NSW-4 @ 7'. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7' to 364 mg/Kg for soil sample ESW-6 @ 7'.

The "Stage 4B Excavation Area" consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOC and BLM approval

to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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From: Shelly Tucker [<mailto:stucker@blm.gov>]

Sent: Wednesday, October 11, 2017 7:38 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker
BLM-Carlsbad
EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>

Date: 10/11/17 11:26 AM (GMT-07:00)

To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, October 11, 2017 12:21 PM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as “Stage 3A Excavation Area”. BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, October 5, 2017 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Thursday, September 14, 2017 10:18 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

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From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Tuesday, September 5, 2017 8:40 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Friday, April 27, 2018 10:31 AM
To: 'Stanley, Curtis D.'; Shelly Tucker
Cc: 'Camille J Bryant'; algroves@paalp.com; Weaver, Crystal, EMNRD; Rebecca Haskell
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

Thanks for the extra attempt in 4B. You are approved by OCD for backfill in the 3B, 4A and area north of the containment.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley
TRC

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Friday, March 16, 2018 9:26 AM
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Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
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575-748-1283 Ext 108

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Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as "Stage 3A Excavation Area" with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the "Stage 3B Excavation Area". A copy of the initial NMOCD C-141 is attached for your reference.

The "Stage 4A Excavation Area" was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200

mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 4A Excavation Area" with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results

indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the “Stage 3B Excavation Area” with locally obtained non-impacted material.

The “Stage 4B Excavation Area” was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8’) was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7’, SSW-6 @ 7’, ESW-6 @ 7’ and WSW-6 @ 7’) were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7’, SSW-6 @ 7’, and WSW-6 @ 7’ to 0.0138 mg/Kg for soil sample ESW-6 @ 7’. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7’ and WSW-6 @ 7’ to 0.07129 mg/Kg for soil sample NSW-4 @ 7’. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7’ to 10,980.0 mg/Kg for soil sample NSW-4 @ 7’. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7’ to 364 mg/Kg for soil sample ESW-6 @ 7’.

The “Stage 4B Excavation Area” consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOCD and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705
T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Shelly Tucker [<mailto:stucker@blm.gov>]

Sent: Wednesday, October 11, 2017 7:38 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker
BLM-Carlsbad
EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>
Date: 10/11/17 11:26 AM (GMT-07:00)
To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, October 11, 2017 12:21 PM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as "Stage 3A Excavation Area". BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, October 5, 2017 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site

Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Thursday, September 14, 2017 10:18 AM
To: Stanley, Curtis D. <CStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Tuesday, September 5, 2017 8:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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Bratcher, Mike, EMNRD

From: Tucker, Shelly <stucker@blm.gov>
Sent: Friday, April 27, 2018 10:41 AM
To: Bratcher, Mike, EMNRD
Cc: Stanley, Curtis D.; Camille J Bryant; algores@paalp.com; Weaver, Crystal, EMNRD; Rebecca Haskell
Subject: Re: [EXTERNAL] RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

BLM concurs with NMOCD approval.

NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

Bureau of Land Management

620 E. Greene St
Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Fri, Apr 27, 2018 at 10:31 AM, Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us> wrote:

RE: Plains Marketing * 2RP-4147

Curt,

Thanks for the extra attempt in 4B. You are approved by OCD for backfill in the 3B, 4A and area north of the containment.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>

Sent: Thursday, April 26, 2018 2:04 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley

TRC

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Friday, March 16, 2018 9:26 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Thursday, February 1, 2018 7:42 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as "Stage 3A Excavation Area" with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the "Stage 3B Excavation Area". A copy of the initial NMOCD C-141 is attached for your reference.

The "Stage 4A Excavation Area" was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable

laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 4A Excavation Area" with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 3B Excavation Area" with locally obtained non-impacted material.

The "Stage 4B Excavation Area" was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH

concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7', SSW-6 @ 7', ESW-6 @ 7' and WSW-6 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7', SSW-6 @ 7', and WSW-6 @ 7' to 0.0138 mg/Kg for soil sample ESW-6 @ 7'. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7' and WSW-6 @ 7' to 0.07129 mg/Kg for soil sample NSW-4 @ 7'. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7' to 10,980.0 mg/Kg for soil sample NSW-4 @ 7'. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7' to 364 mg/Kg for soil sample ESW-6 @ 7'.

The "Stage 4B Excavation Area" consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOCD and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Shelly Tucker [<mailto:stucker@blm.gov>]
Sent: Wednesday, October 11, 2017 7:38 PM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker

BLM-Carlsbad

EPS - Spill/Release Coordinator

575-234-5905

575-361-0084

stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>

Date: 10/11/17 11:26 AM (GMT-07:00)

To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]

Sent: Wednesday, October 11, 2017 12:21 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as "Stage 3A Excavation Area". BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575-748-1283](tel:575-748-1283) Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, October 5, 2017 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



[2057 Commerce, Midland, TX 79703](#)

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Thursday, September 14, 2017 10:18 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Tuesday, September 5, 2017 8:40 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at [575-441-1099](tel:575-441-1099).

Respectfully,

Curt D. Stanley
Senior Project Manager



[2057 Commerce, Midland, TX 79703](#)

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Monday, May 14, 2018 3:34 PM
To: Bratcher, Mike, EMNRD; Shelly Tucker
Cc: 'Camille J Bryant'; algroves@paalp.com; Weaver, Crystal, EMNRD; Rebecca Haskell
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)
Attachments: doc20180514101937.pdf; doc20180514101913.pdf

Mike / Shelly,

On May 2, 2018, TRC on behalf of Plains, utilized a hydrovac to hydro excavate the two (2) areas of concern (Floor-9 @ 8' and NSW-4 @ 7') in the Stage 4B Excavation Area at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (2RP-4147). Soil represented by soil sample Floor-9 @ 8' area was excavated an additional six (6) inches vertically to approximately 8.5 feet bgs and soil represented by soil sample NSW-4 @ 7' was excavated an additional six to twelve (6 – 12) inches horizontally to the north of soil sample NSW-4 @ 7'.

Soil samples (Floor-9A @ 8.5' and NSW-4A @ 7') were collected and submitted to the laboratory for analysis. The analytical results indicated benzene concentrations were less than the laboratory reporting limit (RL). BTEX concentrations for soil samples Floor-9A @ 8.5' and NSW-4A @ 7' were 0.0326 mg/Kg and 0.0312 mg/Kg, respectively. TPH concentrations for soil samples Floor-9A @ 8.5' and NSW-4A @ 7' were 215.6 mg/Kg and 98.5 mg/Kg, respectively. Please reference the attached Table 1 – Concentrations of BTEX, TPH, and Chloride in Soil and Figure 2 – Site Details and Confirmation Soil Sample Location Map for additional details.

Based on the analytical results and with NMOCD and BLM approval, Plains requests permission to backfill the Stage 4B Excavation Area with locally purchased, non-impacted soil.

Talon LPE, on behalf of Plains, has applied for a drilling permit to install the monitor well (MW-1) requested by the NMOCD and the BLM. NMOCD and BLM will be notified when the installation of the monitor well has been scheduled.

Respectfully,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705
T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Friday, April 27, 2018 11:31 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD

<Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

Thanks for the extra attempt in 4B. You are approved by OCD for backfill in the 3B, 4A and area north of the containment.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>

Sent: Thursday, April 26, 2018 2:04 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley
TRC

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Friday, March 16, 2018 9:26 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com; Weaver,

Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, February 1, 2018 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as "Stage 3A Excavation Area" with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the "Stage 3B Excavation Area". A copy of the initial NMOCD C-141 is attached for your reference.

The "Stage 4A Excavation Area" was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to

466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 4A Excavation Area" with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 3B Excavation Area" with locally obtained non-impacted material.

The "Stage 4B Excavation Area" was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7', SSW-6 @ 7', ESW-6 @ 7' and WSW-6 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7', SSW-6 @ 7', and WSW-6 @ 7' to 0.0138 mg/Kg for soil sample ESW-6 @ 7'. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7' and WSW-6 @ 7' to 0.07129 mg/Kg for soil sample NSW-4 @ 7'. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7' to 10,980.0 mg/Kg for soil sample NSW-4 @ 7'. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7' to 364 mg/Kg for soil sample ESW-6 @ 7'.

The "Stage 4B Excavation Area" consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOCD and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Shelly Tucker [<mailto:stucker@blm.gov>]

Sent: Wednesday, October 11, 2017 7:38 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker
BLM-Carlsbad
EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>

Date: 10/11/17 11:26 AM (GMT-07:00)

To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]

Sent: Wednesday, October 11, 2017 12:21 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as "Stage 3A Excavation Area". BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, October 5, 2017 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Thursday, September 14, 2017 10:18 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Tuesday, September 5, 2017 8:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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TABLE 1
CONCENTRATIONS OF BTEX, TPH, AND CHLORIDE IN SOIL
ALPHA GATHERING SEG 3 LAT 6E (CONCHO - SCREECH OWL CTB)
PLAINS MARKETING, L.P.
EDDY COUNTY, NM
PLAINS SRS NUMBER: 2017-053

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	STATUS	Methods: EPA SW 846-8021B, 5030						Methods:				CHLORIDE (mg/Kg)
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	m,p XYLENE (mg/Kg)	o XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M				
										GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TOTAL TPH (mg/Kg)	
NMOCD Regulatory Guideline				10	-	-	-	-	50	-	-	-	100	600
D1 @ 2'	3/22/2017	2'	In-Situ	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	<27.174	<27.174	<27.174	<27.174	124
D2 @ 3'	3/22/2017	3'	In-Situ	<0.0238	<0.0476	<0.0238	0.147	0.0369	0.1839	32.393	39.679	<29.762	72.072	162
D3 @ 3'	3/22/2017	3'	Excavated	<0.0217	<0.0435	<0.0217	0.243	0.0572	0.3002	108.34	509.40	53.489	671.229	83.8
D4 @ 2.5'	3/22/2017	2.5'	Excavated	0.123	0.809	0.661	4.46	1.54	7.593	615.94	1523.1	168.80	2,307.84	548
D5 @ 2'	3/22/2017	2'	Excavated	0.0540	0.802	0.717	4.36	1.71	7.6430	485.12	1266.1	163.13	1,914.35	73.4
D6 @ Surface	3/28/2017	Surface	ATOA	0.667	4.81	2.60	14.8	7.72	30.60	7,490	21,100	2,870	31,460	209
D7 @ Surface	3/28/2017	Surface	ATOA	2.40	10.1	4.55	25.0	7.85	49.90	11,000	25,700	3,370	40,070	41.4
D8 @ Surface	3/28/2017	Surface	ATOA	0.745	5.88	2.68	16.5	3.40	29.21	4,850	16,300	2,190	23,340	471
Floor-1 @ 2'	4/19/2017	2'	In-Situ	<0.00111	<0.00222	<0.00111	<0.00222	<0.00111	<0.00222	<27.8	<27.8	<27.8	<27.8	13.3
Floor-2 @ 3	4/19/2017	3'	In-Situ	<0.00122	<0.00244	<0.00122	<0.00244	<0.00122	<0.00244	<30.5	<30.5	<30.5	<30.5	74.1
Floor-3 @ 3'	4/19/2017	3'	Excavated	<0.0244	1.45	0.981	6.12	2.75	11.3010	122	406	64.8	592.8	37.3
D6-Surface-1' Horiz	4/19/2017	Surface	ATOA	<0.0208	2.29	1.59	6.42	3.11	13.41	1,570	6,210	824	8,604	52.4
D6-Surface-2.5' Horiz	4/19/2017	Surface	ATOA	<0.0208	2.61	1.90	6.72	3.23	14.46	1,720	3,910	671	6,301	20.0
D7-Surface-1' Horiz	4/19/2017	Surface	ATOA	<0.0816	4.04	2.02	8.20	3.59	17.85	2,060	9,790	1,300	13,150	235
D7-Surface-3' Horiz	4/19/2017	Surface	ATOA	0.129	3.95	1.61	7.11	3.06	15.859	2,100	9,610	1,340	13,050	262
D8-Surface-10" Horiz	4/19/2017	Surface	ATOA	<0.0204	1.24	1.01	6.41	2.94	11.60	1,450	6,530	986	8,966	197
D8-Surface-2' Horiz	4/19/2017	Surface	ATOA	<0.0204	0.477	0.329	3.95	1.81	6.566	724	3,860	613	5,197	402
Floor-1 @ 7.5'	6/13/2017	7.5'	Excavated	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<25.0	131.2	39.3	170.5	113
ESW-1 @ 7'	6/13/2017	7'	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00100	<0.00200	<25.0	33.2	<25.0	33.2	351
ESW-1 @ 4'	6/13/2017	4'	ATOA	<0.00100	<0.00200	<0.00100	<0.00200	<0.00100	<0.00200	76.1	2,463	444.8	2,984	640
Floor-1 @ 9'	6/15/2017	9'	In-Situ	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	<27.2	<27.2	<27.2	<27.2	227
Conf. D-3 @ 3.5'	6/15/2017	3.5'	Excavated	-	-	-	-	-	-	61.4	3,420	522	4,003	-
Floor-3 @ 14'	6/23/2017	14'	In-Situ	<0.00108	<0.00215	<0.00108	<0.00215	<0.00108	<0.00215	<26.882	<26.882	<26.882	<26.882	9.18

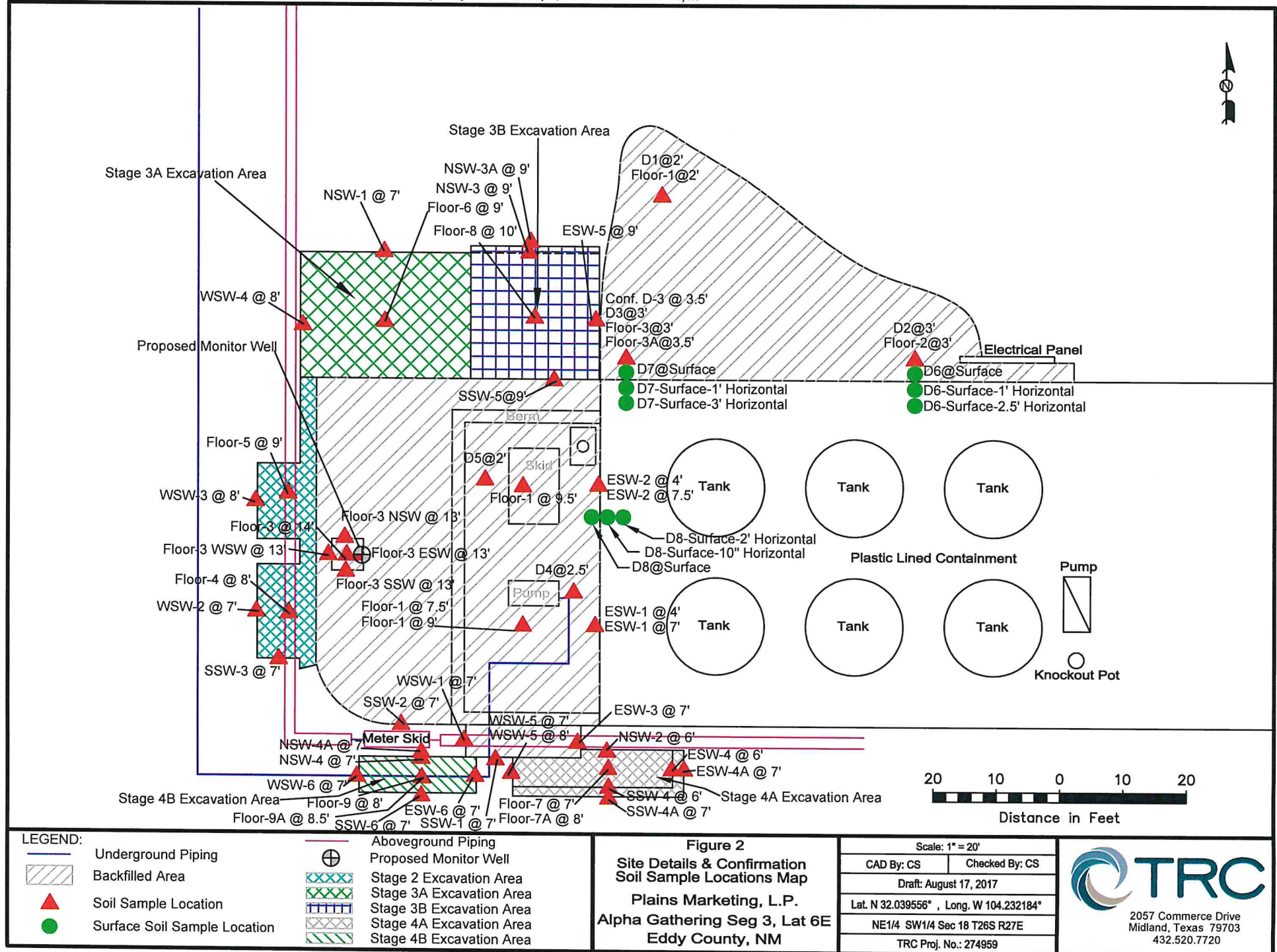
TABLE 1
CONCENTRATIONS OF BTEX, TPH, AND CHLORIDE IN SOIL
ALPHA GATHERING SEG 3 LAT 6E (CONCHO - SCREECH OWL CTB)
PLAINS MARKETING, L.P.
EDDY COUNTY, NM
PLAINS SRS NUMBER: 2017-053

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	STATUS	Methods: EPA SW 846-8021B, 5030						Methods:				CHLORIDE (mg/Kg)
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	m,p XYLENE (mg/Kg)	o XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M				
										GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TOTAL TPH (mg/Kg)	
NMOCD Regulatory Guideline				10	-	-	-	-	50	-	-	-	100	600
Floor-3 ESW @ 13'	6/23/2017	13'	In-Situ	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	<27.174	<27.174	<27.174	<27.174	120
Floor-3 SSW @ 13'	6/23/2017	13'	In-Situ	<0.00112	<0.00225	<0.00112	<0.00225	<0.00112	<0.00225	<28.090	<28.090	<28.090	<28.090	242
Floor-2 @ 9.5'	6/23/2017	9.5'	In-Situ	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	<27.174	32.609	<27.174	32.609	41.8
ESW-2 @ 7.5'	6/23/2017	7.5'	In-Situ	<0.00106	<0.00213	<0.00106	<0.00213	<0.00106	<0.00213	<26.596	78.202	<26.596	78.202	22.4
ESW-2 @ 4'	6/23/2017	4'	ATOA	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	<27.174	203.30	42.326	245.626	22.4
Floor-3 WSW @ 13'	6/29/2017	13'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.253	<25.253	<25.253	<25.253	15.0
Floor-3 NSW @ 13'	6/29/2017	13'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.253	<25.253	<25.253	<25.253	45.4
ESW-3 @ 7'	6/29/2017	7'	ATOA	-	-	-	-	-	-	<25.253	169.60	29.889	199.489	-
WSW-1 @ 7'	6/29/2017	7'	ATOA	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<25.510	<25.510	<25.510	<25.510	708
SSW-1 @ 7'	6/29/2017	7'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.253	<25.253	<25.253	<25.253	268
SSW-2 @ 7'	6/29/2017	7'	In-Situ	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<25.773	<25.773	<25.773	<25.773	508
Floor-4 @ 8'	8/16/2017	8'	In-Situ	<0.00110	<0.00220	<0.00110	<0.00220	<0.00110	<0.00220	<27.5	<27.5	<27.5	<27.5	113
WSW-3 @ 8'	8/16/2017	8'	In-Situ	<0.00108	<0.00215	<0.00108	<0.00215	<0.00108	<0.00215	<26.9	<26.9	<26.9	<26.9	328
Floor-5 @ 9'	8/16/2017	9'	In-Situ	<0.00106	<0.00213	<0.00106	<0.00213	<0.00106	<0.00213	<26.6	<26.6	<26.6	<26.6	232
WSW-2 @ 7'	8/16/2017	7'	In-Situ	<0.00108	<0.00215	<0.00108	<0.00215	<0.00108	<0.00215	<26.9	<26.9	<26.9	<26.9	280
SSW-3 @ 7'	8/16/2017	7'	In-Situ	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	<27.2	<27.2	<27.2	<27.2	117
WSW-4 @ 8'	9/21/2017	8'	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00100	<0.00200	<25.0	<25.0	<25.0	<25.0	27.8
NSW-1 @ 7'	9/21/2017	7'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.3	<25.3	<25.3	<25.3	29.3
Floor-6 @ 9'	9/21/2017	9'	In-Situ	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<25.5	59.7	46.8	106.5	20.7
Floor-7 @ 7'	10/25/2017	7'	Excavated	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<26.0	213	180	393	200
SSW-4 @ 6'	10/25/2017	6'	Excavated	<0.00109	<0.00217	<0.00109	<0.00217	<0.00109	<0.00217	43.1	172	152	367.1	422
NSW-2 @ 6'	10/25/2017	6'	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00100	<0.00200	<25.0	<25.0	<25.0	<25.0	40.5
ESW-4 @ 6'	10/25/2017	6'	Excavated	<0.00106	<0.00213	<0.00106	<0.00213	<0.00106	<0.00213	<26.6	95.9	104.0	199.9	466
Floor-3A @ 3.5'	10/25/2017	3.5'	In-Situ	<0.00105	<0.00211	<0.00105	<0.00211	<0.00105	<0.00211	<26.3	27.1	27.4	54.5	159

TABLE 1
CONCENTRATIONS OF BTEX, TPH, AND CHLORIDE IN SOIL
ALPHA GATHERING SEG 3 LAT 6E (CONCHO - SCREECH OWL CTB)
PLAINS MARKETING, L.P.
EDDY COUNTY, NM
PLAINS SRS NUMBER: 2017-053

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	STATUS	Methods: EPA SW 846-8021B, 5030						Methods:				CHLORIDE (mg/Kg)
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	m,p XYLENE (mg/Kg)	o XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)	EPA SW 846-8015M				
										GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TOTAL TPH (mg/Kg)	
NMOCD Regulatory Guideline				10	-	-	-	-	50	-	-	-	100	600
WSW-5 @ 7'	11/16/2017	7'	ATOA	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<25.5	154	282.0	436.0	374
SSW-4A @ 7'	11/16/2017	7'	In-Situ	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<25.8	32.3	85.9	118.0	412.0
ESW-4A @ 7'	11/16/2017	7'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.3	<25.3	<25.3	<25.3	26.6
Floor 7A @ 8'	11/16/2017	8'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.3	<25.3	<25.3	<25.3	28.5
Floor -8 @ 10'	11/16/2017	10'	In-Situ	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<26.0	<26.0	<26.0	<26.0	93.8
SSW-5 @ 9'	11/16/2017	9'	In-Situ	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<25.5	<25.5	<25.5	<25.5	54.0
ESW-5 @ 9'	11/16/2017	9'	In-Situ	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<25.5	<25.5	<25.5	<25.5	94.3
NSW-3 @ 9'	11/17/2017	9'	Excavated	<0.00109	<0.00217	<0.001096	<0.00217	<0.001096	<0.00217	<27.2	51.90	207.00	258.90	41.1
Floor-9 @ 8'	11/29/2017	8'	Excavated	<0.00112	0.00239	0.00408	0.0219	0.0416	0.06997	747	3290	528.0	4,565.0	265
NSW-4 @ 7'	11/29/2017	7'	Excavated	<0.00104	0.0108	0.00289	0.0324	0.0252	0.07129	1300	8450	1230.0	10,980.0	174
SSW-6 @ 7'	11/29/2017	7'	In-Situ	<0.00111	<0.00222	<0.00111	<0.00222	<0.00111	<0.00222	<27.8	66.1	<27.8	66.1	29.2
WSW-5 @ 8'	11/29/2017	8'	ATOA	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<25.8	285	63.6	348.6	343
ESW-6 @ 7'	11/29/2017	7'	ATOA	0.0138	0.0164	0.0162	0.0559	0.0300	0.1323	394	1260	192	1,846	364
WSW-6 @ 7'	11/29/2017	7'	ATOA	<0.00112	<0.00225	<0.00112	<0.00225	<0.00112	<0.00225	284	2940	401	3,625	144
NSW-3A @ 9'	11/30/2017	9'	In-Situ	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<25.3	<25.3	<25.3	<25.3	61.4
NSW-4A @ 7'	5/2/2018	7'	In-Situ	<0.00104	<0.0104	<0.00521	0.0208	0.0104	0.0312	<26.0	132	84	215.6	-
Floor-9A @ 8.5'	5/2/2018	8.5'	In-Situ	<0.00109	<0.0109	<0.00543	0.0217	0.0109	0.0326	<27.2	98.5	<27.2	98.5	-

DRAWING NAME: H:\Novall\Project Files\Plains\New Mexico\Concho Sreech Owl C1B1 Figure 2c Site Layout.dwg — PLOT DATE: May 14, 2018 - 10:18AM — LAYOUT: Layout1



Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, May 15, 2018 7:57 AM
To: 'Stanley, Curtis D.'; Shelly Tucker
Cc: 'Camille J Bryant'; algroves@paalp.com; Weaver, Crystal, EMNRD; Rebecca Haskell
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

Your request to backfill the Stage 4B excavation area is approved. Federal sites will require BLM approval also.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Monday, May 14, 2018 3:34 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On May 2, 2018, TRC on behalf of Plains, utilized a hydrovac to hydro excavate the two (2) areas of concern (Floor-9 @ 8' and NSW-4 @ 7') in the Stage 4B Excavation Area at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (2RP-4147). Soil represented by soil sample Floor-9 @ 8' area was excavated an additional six (6) inches vertically to approximately 8.5 feet bgs and soil represented by soil sample NSW-4 @ 7' was excavated an additional six to twelve (6 – 12) inches horizontally to the north of soil sample NSW-4 @ 7'.

Soil samples (Floor-9A @ 8.5' and NSW-4A @ 7') were collected and submitted to the laboratory for analysis. The analytical results indicated benzene concentrations were less than the laboratory reporting limit (RL). BTEX concentrations for soil samples Floor-9A @ 8.5' and NSW-4A @ 7' were 0.0326 mg/Kg and 0.0312 mg/Kg, respectively. TPH concentrations for soil samples Floor-9A @ 8.5' and NSW-4A @ 7' were 215.6 mg/Kg and 98.5 mg/Kg, respectively. Please reference the attached Table 1 – Concentrations of BTEX, TPH, and Chloride in Soil and Figure 2 – Site Details and Confirmation Soil Sample Location Map for additional details.

Based on the analytical results and with NMOCD and BLM approval, Plains requests permission to backfill the Stage 4B Excavation Area with locally purchased, non-impacted soil.

Talon LPE, on behalf of Plains, has applied for a drilling permit to install the monitor well (MW-1) requested by the NMOCD and the BLM. NMOCD and BLM will be notified when the installation of the monitor well has been scheduled.

Respectfully,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Friday, April 27, 2018 11:31 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

Thanks for the extra attempt in 4B. You are approved by OCD for backfill in the 3B, 4A and area north of the containment.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>

Sent: Thursday, April 26, 2018 2:04 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley
TRC

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Friday, March 16, 2018 9:26 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Thursday, February 1, 2018 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as “Stage 3A Excavation Area” with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the “Stage 3B Excavation Area”. A copy of the initial NMOCD C-141 is attached for your reference.

The “Stage 4A Excavation Area” was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the “Stage 4A Excavation Area” with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX

concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 3B Excavation Area" with locally obtained non-impacted material.

The "Stage 4B Excavation Area" was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7', SSW-6 @ 7', ESW-6 @ 7' and WSW-6 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7', SSW-6 @ 7', and WSW-6 @ 7' to 0.0138 mg/Kg for soil sample ESW-6 @ 7'. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7' and WSW-6 @ 7' to 0.07129 mg/Kg for soil sample NSW-4 @ 7'. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7' to 10,980.0 mg/Kg for soil sample NSW-4 @ 7'. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7' to 364 mg/Kg for soil sample ESW-6 @ 7'.

The "Stage 4B Excavation Area" consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOCD and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705
T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Shelly Tucker [<mailto:stucker@blm.gov>]
Sent: Wednesday, October 11, 2017 7:38 PM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOCD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker
BLM-Carlsbad
EPS - Spill/Release Coordinator
575-234-5905
575-361-0084
stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>
Date: 10/11/17 11:26 AM (GMT-07:00)
To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, October 11, 2017 12:21 PM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as “Stage 3A Excavation Area”. BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Thursday, October 5, 2017 7:42 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Thursday, September 14, 2017 10:18 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Tuesday, September 5, 2017 8:40 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south

of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Wednesday, May 23, 2018 1:38 PM
To: Tucker, Shelly; Bratcher, Mike, EMNRD
Cc: 'Camille J Bryant'; Amber L Groves; Weaver, Crystal, EMNRD; Rebecca Haskell
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Good Afternoon Mike and Shelly,

TRC, on behalf of Plains Marketing, LP, anticipates completing the backfilling of the Alpha Gathering Seg 3, Lat 6E (COG Screech Owl TB) Release Site during the week beginning May 28, 2018. We are awaiting an NMOSE Permit to Drill the monitor well planned for the Site. On receipt of the drilling permit and scheduling of the monitor well installation we will notify BLM, NMOCD, and COG.

Respectfully,

Curt Stanley
TRC

From: Camille J Bryant [mailto:CJBryant@paalp.com]
Sent: Friday, April 27, 2018 12:50 PM
To: Tucker, Shelly <stucker@blm.gov>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Stanley, Curtis D. <CDStanley@trcsolutions.com>; Amber L Groves <ALGroves@paalp.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>
Subject: Re: [EXTERNAL] RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thanks!

Sent from my iPhone

On Apr 27, 2018, at 11:41 AM, Tucker, Shelly <stucker@blm.gov> wrote:

BLM concurs with NMOCD approval.

NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

Bureau of Land Management

620 E. Greene St
Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Fri, Apr 27, 2018 at 10:31 AM, Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us> wrote:

RE: Plains Marketing * 2RP-4147

Curt,

Thanks for the extra attempt in 4B. You are approved by OCD for backfill in the 3B, 4A and area north of the containment.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Thursday, April 26, 2018 2:04 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell <RHaskell@concho.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

As Mike suggested, we are going to utilize a hydrovac to attempt to remove the elevated hydrocarbons represented by soil samples Floor-9 @ 8' and NSW-4 @ 7' in the Stage 4B Excavation area. We will be on site on Wednesday, May 2, 2018, a time has not been established as of now, but I will notify you as soon as we set a time.

It is our understanding we have permission to backfill the Stage 3B Excavation Area, Stage 4A Excavation area, and the area north of the Concho Screech Owl secondary containment with non-impacted, locally obtained like material. Is this correct?

Thank you,

Curt Stanley

TRC

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Friday, March 16, 2018 9:26 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Shelly Tucker <stucker@blm.gov>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * 2RP-4147

Curt,

You are approved to backfill as proposed. I don't remember if we talked about this or not, but in the 4B area, Floor 9 @ 8' and NSW 4 @ 7', is there any chance a hydrovac would be an option to get out some of the elevated hydrocarbons in those areas?

Thanks,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, February 1, 2018 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Nikki A Green <NAGreen@paalp.com>; algroves@paalp.com

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as “Stage 3A Excavation Area” with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure 2), pending the removal of equipment in the “Stage 3B Excavation Area”. A copy of the initial NMOCD C-141 is attached for your reference.

The “Stage 4A Excavation Area” was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the “Stage 4A Excavation Area” with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The "Stage 3B Excavation Area" was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9', ESW-5 @ 9', and NSW-3 @ 9') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9' and ESW-5 @ 9' to 258.90 mg/Kg for soil sample NSW-3 @ 9'. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9' to 94.3 for soil sample ESW-5 @ 9'.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9'. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9', soil sample NSW-3A @ 9' was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the "Stage 3B Excavation Area" with locally obtained non-impacted material.

The "Stage 4B Excavation Area" was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7', SSW-6 @ 7', ESW-6 @ 7' and WSW-6 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7', SSW-6 @ 7', and WSW-6 @ 7' to 0.0138 mg/Kg for soil sample ESW-6 @ 7'. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7' and WSW-6 @ 7' to 0.07129 mg/Kg for soil sample NSW-4 @ 7'. TPH concentrations ranged

from 66.1 mg/Kg for soil sample SSW-6 @ 7' to 10,980.0 mg/Kg for soil sample NSW-4 @ 7'. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7' to 364 mg/Kg for soil sample ESW-6 @ 7'.

The "Stage 4B Excavation Area" consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOCD and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.

<image001.jpg>

10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Shelly Tucker [<mailto:stucker@blm.gov>]
Sent: Wednesday, October 11, 2017 7:38 PM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker

BLM-Carlsbad

EPS - Spill/Release Coordinator

575-234-5905

575-361-0084

stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>

Date: 10/11/17 11:26 AM (GMT-07:00)

To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]

Sent: Wednesday, October 11, 2017 12:21 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>;

Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as "Stage 3A Excavation Area".
BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Thursday, October 5, 2017 7:42 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager

<image001.jpg>

[2057 Commerce, Midland, TX 79703](#)

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Thursday, September 14, 2017 10:18 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Tuesday, September 5, 2017 8:40 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at [575-441-1099](tel:575-441-1099).

Respectfully,

Curt D. Stanley
Senior Project Manager

<image001.jpg>

[2057 Commerce, Midland, TX 79703](#)

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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Attention:

The information contained in this message and/or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you received this in error, please contact the Plains Service Desk at 713-646-4444 and delete the material from any system and destroy any copies.

This footnote also confirms that this email message has been scanned for Viruses and Content and cleared.

Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Wednesday, September 12, 2018 8:27 AM
To: Bratcher, Mike, EMNRD; Tucker, Shelly; Rebecca Haskell
Cc: 'Camille J Bryant'; Amber L Groves
Subject: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

Weather permitting, TRC Environmental Corporation (TRC) on behalf of Plains Marketing, LP (Plains) anticipates commencing the drilling of the NMOCD and BLM requested soil boring at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl on Wednesday, September 19, 2018 or Thursday, September 20, 2018. I will email all of you early next week to give you an exact day and time for drilling.

As per the NMOCD and in concurrence with the BLM, the soil boring will be advanced to a maximum depth of approximately one-hundred ten (110) feet below ground surface (bgs). Soil samples will be collected a five (5) foot drilling intervals and selected soil samples will be submitted to the laboratory for total petroleum hydrocarbon (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) analysis.

- If groundwater is not encountered prior to reaching the NMOCD and BLM approved drilling maximum depth of one-hundred ten (110) feet bgs, a "temporary" well will be set and gauged with a water meter seventy-two (72) hours after the setting of the temporary well.
- If groundwater is detected in the "temporary" well after 72 hours, a permanent monitor well will be installed at the location.
- If groundwater is encountered prior to reaching the NMOCD and BLM approved one-hundred ten (110) foot bgs maximum drilling depth, the soil boring will be advanced approximately fifteen (15) feet below the groundwater interface and a permanent groundwater monitor well will be installed.
- If groundwater is NOT detected in the soil boring or "temporary" well within seventy-two (72) hours, the soil boring will be plugged and abandoned by a licensed New Mexico Water Well Driller using New Mexico Office of the State Engineer (NMOSE) approved plugging procedures.

If the drilling schedule changes due to adverse weather you will be contacted as soon as possible.

If you have any questions, please contact Camille Bryant at 575.441.1099 or contact the undersigned.

Respectfully,

Curt

Curt D. Stanley
Senior Project Manager



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, September 12, 2018 1:08 PM
To: 'Stanley, Curtis D.'; Tucker, Shelly; Rebecca Haskell
Cc: 'Camille J Bryant'; Amber L Groves; Pruett, Maria, EMNRD
Subject: RE: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

RE: 2RP-4147

Curt,

Thanks for the notification. Please copy Maria Pruett on all environmental issues for District 2. She is the new Environmental Specialist here.

Maria's email address: maria.pruett@state.nm.us

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Wednesday, September 12, 2018 8:27 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Rebecca Haskell <RHaskell@concho.com>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Amber L Groves <ALGroves@paalp.com>
Subject: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

Weather permitting, TRC Environmental Corporation (TRC) on behalf of Plains Marketing, LP (Plains) anticipates commencing the drilling of the NMOCD and BLM requested soil boring at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl on Wednesday, September 19, 2018 or Thursday, September 20, 2018. I will email all of you early next week to give you an exact day and time for drilling.

As per the NMOCD and in concurrence with the BLM, the soil boring will be advanced to a maximum depth of approximately one-hundred ten (110) feet below ground surface (bgs). Soil samples will be collected a five (5) foot drilling intervals and selected soil samples will be submitted to the laboratory for total petroleum hydrocarbon (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) analysis.

- If groundwater is not encountered prior to reaching the NMOCD and BLM approved drilling maximum depth of one-hundred ten (110) feet bgs, a "temporary" well will be set and gauged with a water meter seventy-two (72) hours after the setting of the temporary well.
- If groundwater is detected in the "temporary" well after 72 hours, a permanent monitor well will be installed at the location.

- If groundwater is encountered prior to reaching the NMOCD and BLM approved one-hundred ten (110) foot bgs maximum drilling depth, the soil boring will be advanced approximately fifteen (15) feet below the groundwater interface and a permanent groundwater monitor well will be installed.
- If groundwater is NOT detected in the soil boring or “temporary” well within seventy-two (72) hours , the soil boring will be plugged and abandoned by a licensed New Mexico Water Well Driller using New Mexico Office of the State Engineer (NMOSE) approved plugging procedures.

If the drilling schedule changes due to adverse weather you will be contacted as soon as possible.

If you have any questions, please contact Camille Bryant at 575.441.1099 or contact the undersigned.

Respectfully,

Curt

Curt D. Stanley
Senior Project Manager



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Wednesday, September 19, 2018 12:54 PM
To: Bratcher, Mike, EMNRD; Tucker, Shelly; Rebecca Haskell
Cc: 'Camille J Bryant'; Amber L Groves
Subject: FW: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

On Thursday, September 20, 2018 at approximately 10 AM Mountain Time we will commence drilling at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl. If you have any questions, concerns, or need driving directions please contact me by phone or email.

Respectfully,

Curt Stanley
TRC

From: Stanley, Curtis D.
Sent: Wednesday, September 12, 2018 9:27 AM
To: 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Rebecca Haskell <RHaskell@concho.com>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Amber L Groves <ALGroves@paalp.com>
Subject: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

Weather permitting, TRC Environmental Corporation (TRC) on behalf of Plains Marketing, LP (Plains) anticipates commencing the drilling of the NMOCD and BLM requested soil boring at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl on Wednesday, September 19, 2018 or Thursday, September 20, 2018. I will email all of you early next week to give you an exact day and time for drilling.

As per the NMOCD and in concurrence with the BLM, the soil boring will be advanced to a maximum depth of approximately one-hundred ten (110) feet below ground surface (bgs). Soil samples will be collected a five (5) foot drilling intervals and selected soil samples will be submitted to the laboratory for total petroleum hydrocarbon (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) analysis.

- If groundwater is not encountered prior to reaching the NMOCD and BLM approved drilling maximum depth of one-hundred ten (110) feet bgs, a "temporary" well will be set and gauged with a water meter seventy-two (72) hours after the setting of the temporary well.
- If groundwater is detected in the "temporary" well after 72 hours, a permanent monitor well will be installed at the location.
- If groundwater is encountered prior to reaching the NMOCD and BLM approved one-hundred ten (110) foot bgs maximum drilling depth, the soil boring will be advanced approximately fifteen (15) feet below the groundwater interface and a permanent groundwater monitor well will be installed.
- If groundwater is NOT detected in the soil boring or "temporary" well within seventy-two (72) hours, the soil boring will be plugged and abandoned by a licensed New Mexico Water Well Driller using New Mexico Office of the State Engineer (NMOSE) approved plugging procedures.

If the drilling schedule changes due to adverse weather you will be contacted as soon as possible.

If you have any questions, please contact Camille Bryant at 575.441.1099 or contact the undersigned.

Respectfully,

Curt

Curt D. Stanley
Senior Project Manager



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, September 20, 2018 9:57 AM
To: 'Stanley, Curtis D.'; Tucker, Shelly; Rebecca Haskell (RHaskell@concho.com)
Cc: Camille J. Bryant (cjbryant@paalp.com); Amber L Groves; Pruett, Maria, EMNRD
Subject: FW: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Curt,

Thanks for the notification. Please include Maria Pruett on all environmental correspondence to District 2 as she will be the main point of contact going forward.

Maria's email address: maria.pruett@state.nm.us

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Wednesday, September 19, 2018 12:54 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Rebecca Haskell <RHaskell@concho.com>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Amber L Groves <ALGroves@paalp.com>
Subject: FW: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

On Thursday, September 20, 2018 at approximately 10 AM Mountain Time we will commence drilling at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl. If you have any questions, concerns, or need driving directions please contact me by phone or email.

Respectfully,

Curt Stanley
TRC

From: Stanley, Curtis D.
Sent: Wednesday, September 12, 2018 9:27 AM
To: 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Rebecca Haskell <RHaskell@concho.com>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>; Amber L Groves <ALGroves@paalp.com>
Subject: Drilling at Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl

Mike, Shelly, and Becky,

Weather permitting, TRC Environmental Corporation (TRC) on behalf of Plains Marketing, LP (Plains) anticipates commencing the drilling of the NMOCD and BLM requested soil boring at the Plains Alpha Gathering Seg 3 Lat 6E Release Site (NMOCD 2RP-4147) aka Screech Owl on Wednesday, September 19, 2018 or Thursday, September 20, 2018. I will email all of you early next week to give you an exact day and time for drilling.

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If you have any questions, please contact Camille Bryant at 575.441.1099 or contact the undersigned.

Respectfully,

Curt

Curt D. Stanley
Senior Project Manager



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Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Tuesday, November 27, 2018 3:01 PM
To: Tucker, Shelly; Bratcher, Mike, EMNRD
Cc: 'Camille J Bryant'; Amber L Groves
Subject: [EXT] Confirm Thursday, December 6, 2018 Meeting

Shelly / Mike,

On behalf of Plains Pipeline LP, I would like to thank you both for making time to meet with me, Camille, and possibly Amber on Thursday, December 6, 2018 at 1 pm at the NMOCD Artesia Office.

Respectfully,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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1625 N. French Dr., Hobbs, NM 88240
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District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 384297

CONDITIONS

Operator: PLAINS MARKETING L.P. 333 Clay Street Suite 1900 Houston, TX 77002	OGRID: 34053
	Action Number: 384297
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

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