

1R - 951

REPORTS

DATE:

June 2011



SOIL CLOSURE REQUEST

SOUTH MONUMENT GATHERING SOUR
NW ¼, NE ¼, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS SRS # 2001-11193
NMOCD REF #1R-951

Prepared for:


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

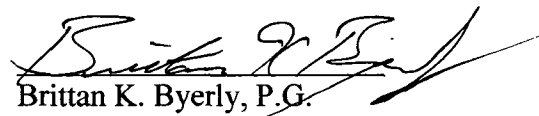


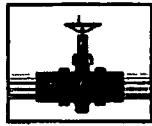
Prepared by:

NOVA Safety and Environmental
2057 Commerce
Midland, Texas 79703

June 2011


Ronald K. Rounsaville
Senior Project Manager


Brittan K. Byerly, P.G.
President



PLAINS
PIPELINE, L.P.

RECEIVED OOD

2011 JUL 11 A 11:58

July 5, 2011

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

RE: Plains Pipeline, L.P. South Monument Gathering Sour Site
NMOCD Reference # 1R-951
Unit Letter B of Section 5, Township 20 South, Range 37 East
Lea County, New Mexico

Dear Mr. Hansen:

Plains Pipeline, L.P. is pleased to submit the attached *Soil Closure Request Report*, dated June 2011, for the South Monument Gathering Sour site. This site is located in Section 5 of Township 20 South, and Range 37 East of Lea County, New Mexico. This document details the soil remediation activities performed at the site.

Should you have any questions or comments, please contact me at (575) 441-1099.

Sincerely,

Jason Henry
Remediation Coordinator
Plains Pipeline, L.P.

CC: Geoff Leking, NMOCD, Hobbs Office

Enclosure

Hansen, Edward J., EMNRD

From: Jason Henry [JHenry@paalp.com]
Sent: Monday, July 18, 2011 3:42 PM
To: Hansen, Edward J., EMNRD
Subject: Plains' South Monument Gathering Sour site (1R-951)

Ed,

Due to the expanded scope of excavation activities conducted at the subject site, a synthetic liner was not placed in the bottomhole of the excavation prior to backfilling. The expanded scope of excavation activities consisted of:

- Limits of excavation were based on a TPH Cleanup concentration of ≤ 100 ppm instead of $\leq 1,000$ ppm
- Vertical limits of excavation were extended past 15' below ground surface (bgs) and in the main excavation area, groundwater was exposed as a result of removing impacted soil
- Clean backfill material was purchased from the landowner instead of using excavated and remediated soil for backfill material

Additionally, the disturbed areas at the site have not been re-seeded yet due to prolonged drought conditions. Plains proposes to delay re-seeding the site until soil moisture conditions improve. If adequate rainfall is not received prior to the last week of October 2011, Plains proposes to re-seed the site during the Spring of 2012.

Finally, Table 1 in the June 2011 *Soil Closure Request* report contains the following typographical errors:

- All of the entries listed under the column heading of $C_{28}-C_{35}$ should have instead been listed under the column heading of $C_{12}-C_{28}$ and the $C_{28}-C_{35}$ column should have been omitted from Table 1.
- The column heading identified as **Total TPH C_6-C_{35}** should have been identified as **Total TPH C_6-C_{28}** instead.

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

Thank you,
Jason Henry
575-441-1099

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1.0 INTRODUCTION

On behalf of Plains Pipeline, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Soil Closure Request to the New Mexico Oil Conservation Division (NMOCD) for the site known as South Monument Gathering Sour (SRS # 2001-11193). The site is located approximately one-half mile southwest of the town of Monument, New Mexico, in the NW ¼ of the NE ¼ of Section 5, Township 20 South, and Range 37 East. The South Monument Gathering Sour release occurred on November 20, 2001 with a reported 1,200 barrel (bbl) loss with zero bbls recovered. The release was attributed to internal pipeline corrosion. The site is now the responsibility of Plains, which acquired the assets of Link Energy in April of 2004. The dimensions of the 2001 main excavation at the leak source measured approximately 170 feet in length (north to south) by 120 feet in width (east to west) by approximately seven feet in depth. The flow path excavation to the east and south of the main excavation measured approximately 850 feet in length. The excavated soil was stockpiled on-site for future remediation. For reference, a Site Location and Excavation Areas map are provided as Figures 1 and 2, respectively. The Release Notification and Corrective Action (Form C-141) is included as Appendix A.

2.0 NMOCD SITE CLASSIFICATION

The depth to groundwater at the site area is approximately 27 feet below ground surface (bgs). Based on the NMOCD soil classification system, 20 points would be assigned to the site as a result of this criterion.

The distance to the nearest water source exceeds 1,000 feet, resulting in zero points being assigned to the site on this ranking criterion. There is no surface water body located within 1,000 feet of the site, resulting in zero points being assigned on this ranking criterion. The NMOCD guidelines indicate that the site would have a Ranking Score of >19. The soil action levels for a site with a Ranking Score of >19 points are as follows:

- Benzene - 10 ppm
- BTEX - 50 ppm
- TPH - 100 ppm

At the request of the landowner, Mr. Jimmy Cooper, hydrocarbon impacted soil exceeding the above NMOCD cleanup standards was transported off-site to the C & C Landfarm and clean, non-impacted material was purchased from a nearby borrow pit as backfill.

3.0 SUMMARY OF RECENT FIELD ACTIVITIES

3.1 Impacted Soil Removal

Pursuant to the Work Plan, approved by the NMOCD on February 19, 2008, excavation of the impacted soils in the area of the release began on August 5, 2010. Approximately 5,000 cubic yards of hydrocarbon impacted soil excavated during the 2001 emergency response activities

was transported off-site to an NMOCD approved landfarm. An excavator was utilized to remove impacted soil from the floor and sidewalls of two original excavation areas. Non-impacted overburden soils from the excavation areas was stockpiled on-site, pending laboratory analysis, and later used to backfill the upper three feet of the excavations. As excavation activities progressed, soil samples were collected from the sidewalls of the main excavation area and from the floors and sidewalls of the flow path excavation areas. Following removal of the impacted stockpile material, confirmation soil samples were also collected from beneath the impacted soil stockpiles. Based on visual and olfactory observations, the final dimensions of the main excavation area were approximately 185 feet in length (north-south) by 250 feet in width (east-west) and averaged approximately 27 feet below ground surface (bgs). The flow path excavation area measured approximately 755 feet in length (north-west) by 55 feet in width (east-west) and averaged approximately 13 feet bgs. An estimated 40,700 cubic yards of hydrocarbon impacted soil was brought to surface, combined with the existing impacted soil stockpile, and transported off-site to an NMOCD approved landfarm. Excavation activities were completed on April 20, 2011. Figure 2 is an Excavation Areas Map depicting the former pipeline location and the three excavation areas and other site details.

3.2 Confirmation Soil Sampling – Excavation Areas

Confirmation soil samples collected from the excavation areas were submitted for laboratory analysis for TPH by Method 8015M and BTEX by Method 8021B. Laboratory submitted samples were placed in a new sterile glass container, equipped with a Teflon-lined lid furnished by the laboratory. Samples were labeled, placed on ice, and chilled to a temperature of approximately 4° C. Appropriate chain-of-custody documentation and shipping protocols were followed. The laboratory analytical reports are presented on the attached CD provided in Appendix C. Table 1 displays the analytical results of confirmation soil samples.

Main Excavation Area

On August 17, 2010, confirmation soil samples were collected from the north, west and east sidewalls of the Main Excavation Area at the 10 foot level. The analytical results of these soil samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively.

On September 10, 2010, confirmation soil samples were collected from the north, west and east sidewalls of the Main Excavation Area at the 20 foot level. The analytical results of these soil samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively.

On October 18, 2010, confirmation soil samples were collected from the south sidewalls of the Main Excavation Area. The analytical results of these soil samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively.

On November 30, 2010, confirmation soil samples were collected from the sidewalls of the southwest corner extension of the Main Excavation Area. The analytical results of these soil

samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively, with the exception of one soil sample collected from the extension excavation sidewall identified as SW Corner N. Wall-2, 20 ft. The analytical results for the sample collected from the southwest corner excavation north wall exhibited a TPH concentration of 592 mg/Kg.

On December 6, 2010, upon receipt of analytical results, the area surrounding soil sample SW Corner N. Wall-2, 20 ft. was further excavated an additional 4 feet to the north. One additional confirmation soil sample identified as SW Corner N. Wall-2B, 20 ft. was collected from the north wall of the southwest corner extension. The analytical results of this soil sample indicated a total TPH concentration below laboratory method detection limits.

On December 14, 2010, confirmation soil samples were collected from the floor of the southwest corner extension of the Main Excavation Area and submitted for laboratory analysis. The analytical results for the samples identified as SW Corner, FLR-1, 15 ft. and SW Corner, FLR-2, 20 ft. indicated TPH concentrations above NMOCD regulatory standards of 100 mg/Kg exhibiting TPH concentrations of 713.5 mg/Kg and 122 mg/Kg, respectively.

On December 22, 2010, upon receipt of the analytical results, the area surrounding the impacted floors of the southwest corner extension were excavated an additional one foot in depth. Confirmation soil samples were collected from the floor area and submitted for laboratory analysis. The analytical results of these soil samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively. A Confirmation Sample Locations Map for the Main Excavation Area is provided as Figure 3.

During excavation activities, heavy oil staining was observed along the south wall and the southwest corner of the main excavation area. At Plains request, an interceptor sump was excavated at the southwest corner floor area to a depth of approximately 28 feet bgs. Groundwater was observed at approximately 27 feet bgs. The sump was initially constructed and measured approximately 25 feet by 15 feet with an approximate depth of 29 feet bgs in order to capture Phase Separated Hydrocarbons (PSH) observed on top of the groundwater. As the excavation activities progressed within the Main Excavation area, other sumps were excavated to groundwater in various locations along the main excavation floor to delineate the presence of PSH. The main excavation area consisted of fractured caliche approximately 17-19 feet thick overlying a massive silicious sandstone bed approximately 8-10 feet thick which overlies a confining red clay layer. The north, northeast, central, west and southwest portions of the floor were excavated down to the red clay layer. The impacted soil from the floor area was transported off-site for proper disposal and the entire area backfilled with clean, non-impacted material. Figure 3 illustrates the extent and depth of the extended floor excavation.

Flow Path Excavation Areas

Southern Flow Path Area

On September 16 and 21, 2010, confirmation soil samples were collected from the floor and south, west and east sidewalls of the southern flow path excavation area. The analytical results

of these final soil confirmation samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively. The final dimensions of the Southern Flow Path Excavation Area measured approximately 245 feet in length (north to south and averaged approximately 55 feet in width (east to west). Please refer to Figure 4, Confirmation Sample Locations Map for the South Flow Path Excavation Area sample locations.

Mid Flow Path Area

On October 5, 2010 and February 18, March 1, March 7 and March 11, 2011, confirmation soil samples were collected from the floor and sidewalls of the mid flow path excavation area. The analytical results of these soil samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively. The final dimensions of the Mid Flow Path Excavation Area measured approximately 315 feet in length (north to south and averaged approximately 43 feet in width (east to west). Please refer to Figure 4, Confirmation Sample Locations Map for the Mid Flow Path Excavation Area sample locations.

North Flow Path Area

On February 18 and 21, 2011, confirmation soil samples were collected from the floor and sidewalls of the north flow path excavation area located east of the main excavation area. The analytical results of these soil samples indicated TPH concentrations were below the NMOCD regulatory standards of 100 mg/Kg, with the exception of one soil sample collected from the north flow path floor excavation identified as N Flow Path FLR-2N, 3 ft. The analytical results for the sample collected from the north flow path excavation floor exhibited a TPH concentration of 477 mg/Kg.

On March 15 and 16, 2011, upon receipt of analytical results, the area surrounding soil sample N Flow Path FLR-2N, 3 ft. was further excavated to final measurements of approximately 30 feet in length by 25 feet wide by approximately 25 feet in depth. Five additional confirmation soil samples were collected and submitted for analysis. The analytical results of these soil samples indicated TPH concentration below the NMOCD regulatory standards of 100 mg/Kg, with the exception of one soil sample collected from the north flow path excavation identified as N Flow Path S. Wall-2N, 20 ft. The analytical results for the sample collected from the north flow path south wall exhibited a TPH concentration of 677.5 mg/Kg.

On March 25, 2011, upon receipt of the analytical results, the area surrounding the sample area identified as N Flow Path S. Wall-2N, 20 Ft. was further excavated approximately five feet to the south. One confirmation soil sample was collected from the South wall area and submitted for laboratory analysis. The analytical results of this soil sample indicated TPH concentrations were below the NMOCD regulatory standards of 100 mg/Kg. Please refer to Figure 4, Confirmation Sample Locations Map for the North Flow Path Excavation Area sample locations.

Impacted Soil Stockpile Excavation Area

On December 6, 2010, confirmation soil samples were collected from an excavation located immediately underneath the former soil stockpile generated during the 2001 emergency response

excavation activities. The impacted soil stockpile excavation area measured approximately 65 feet wide by 55 feet in length and averaged approximately 10 feet in depth. Analytical results of five confirmation soil samples collected from the floor and sidewalls indicated TPH concentrations below the NMOCD regulatory standards of 100 mg/Kg. A Confirmation Sample Locations Map for the Impacted Soil Excavation Area is provided as Figure 3.

3.3 Backfilling and Surface Restoration

Based on analytical results of laboratory analyzed confirmation soil samples obtained from the excavation areas, backfilling of the excavation commenced. The imported backfill material and overburden soil stockpiles were placed in the excavation in twelve-inch lifts and compacted. A water truck was used to supply moisture to the soil to allow for proper compaction.

On April 20, 2011, backfilling activities were completed and the disturbed area was contoured to fit the surrounding topography.

4.0 PSH RECOVERY EFFORTS

During the excavation of the main floor excavation area, PSH and impacted groundwater within the sumps was evacuated using a vacuum truck. From January 14, 2010 through March 9, 2011, approximately 2,250 barrels of impacted groundwater and oil were recovered from the various sumps along the main floor excavation area. On March 9, 2011, a 35 foot deep recovery well was constructed within the sump along the south wall to continue PSH recovery. At the time the recovery well and sump were constructed, the amount of PSH present on the water table had diminished to a sheen in the southwest portion of the excavation. The groundwater in the other areas of the excavation appeared to be free of PSH.

5.0 SOIL CLOSURE REQUEST

Plains has completed the activities proposed in the NMOCD approved Soil Remediation Work Plan dated June 2007 and requests NMOCD approval for Soil Closure.

A complete (including groundwater) Site Closure Request will be submitted to the NMOCD after eight consecutive quarterly groundwater sampling events have demonstrated BTEX concentrations are below the NMOCD regulatory guidelines.

6.0 LIMITATIONS

NOVA has prepared this Soil Closure Request to the best of its ability. No other warranty, expressed or implied, is made or intended. NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change

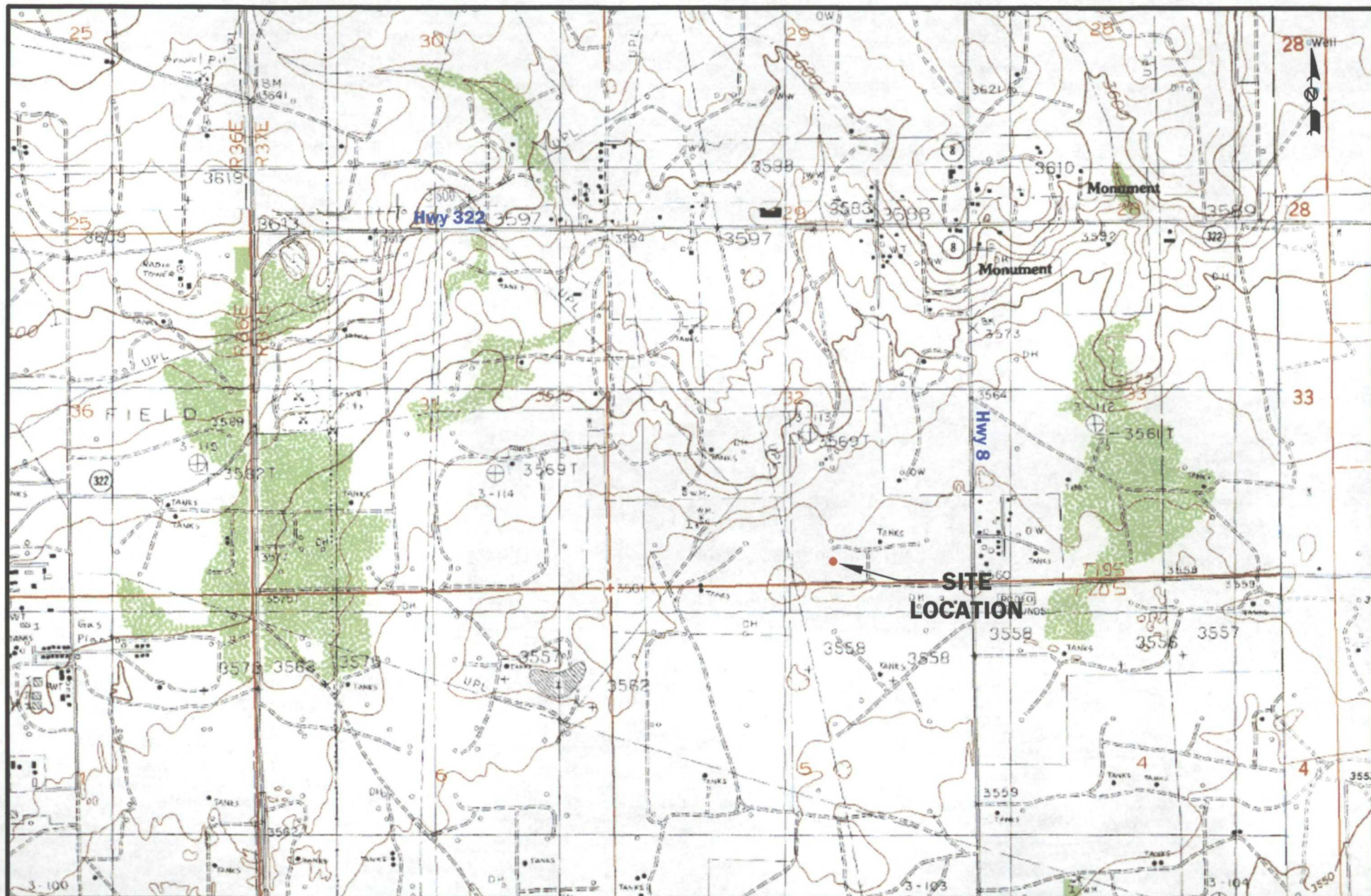
over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report including all exhibits and attachments may not be used by any other party without the express written consent of NOVA and/or Plains.

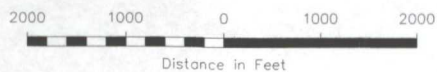
7.0 DISTRIBUTION

- Copy 1: Ed Hansen
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
- Copy 2: Geoffrey R Leking
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division District 1
1625 French Drive
Hobbs, NM 88240
- Copy 3: Jason Henry
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jhenry@paalp.com
- Copy 4: Jeff Dann
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jpdann@paalp.com
- Copy 5: NOVA Safety and Environmental.
2057 Commerce Drive
Midland, Texas 79703
rrounsaville@novatraining.cc

FIGURES



LEGEND:



Plains EMS # 2001-11193
NMOC Reference # RP-951

Figure 1
Site Location Map
South Monument (6) Gathering Station
Plains Marketing, L.P.
Lea County, NM

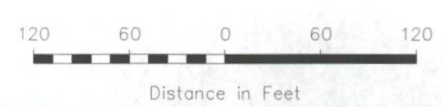
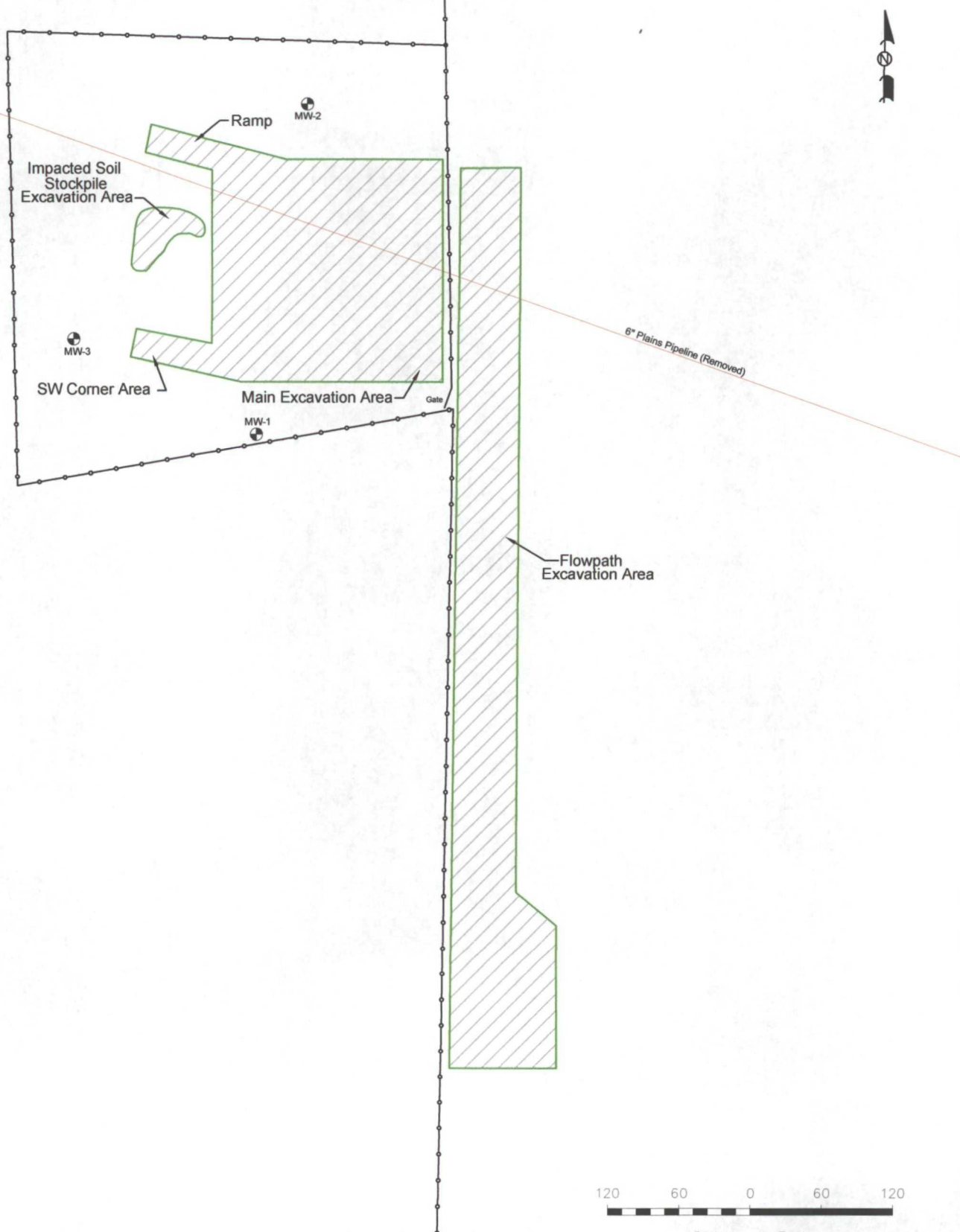



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432.520.7720

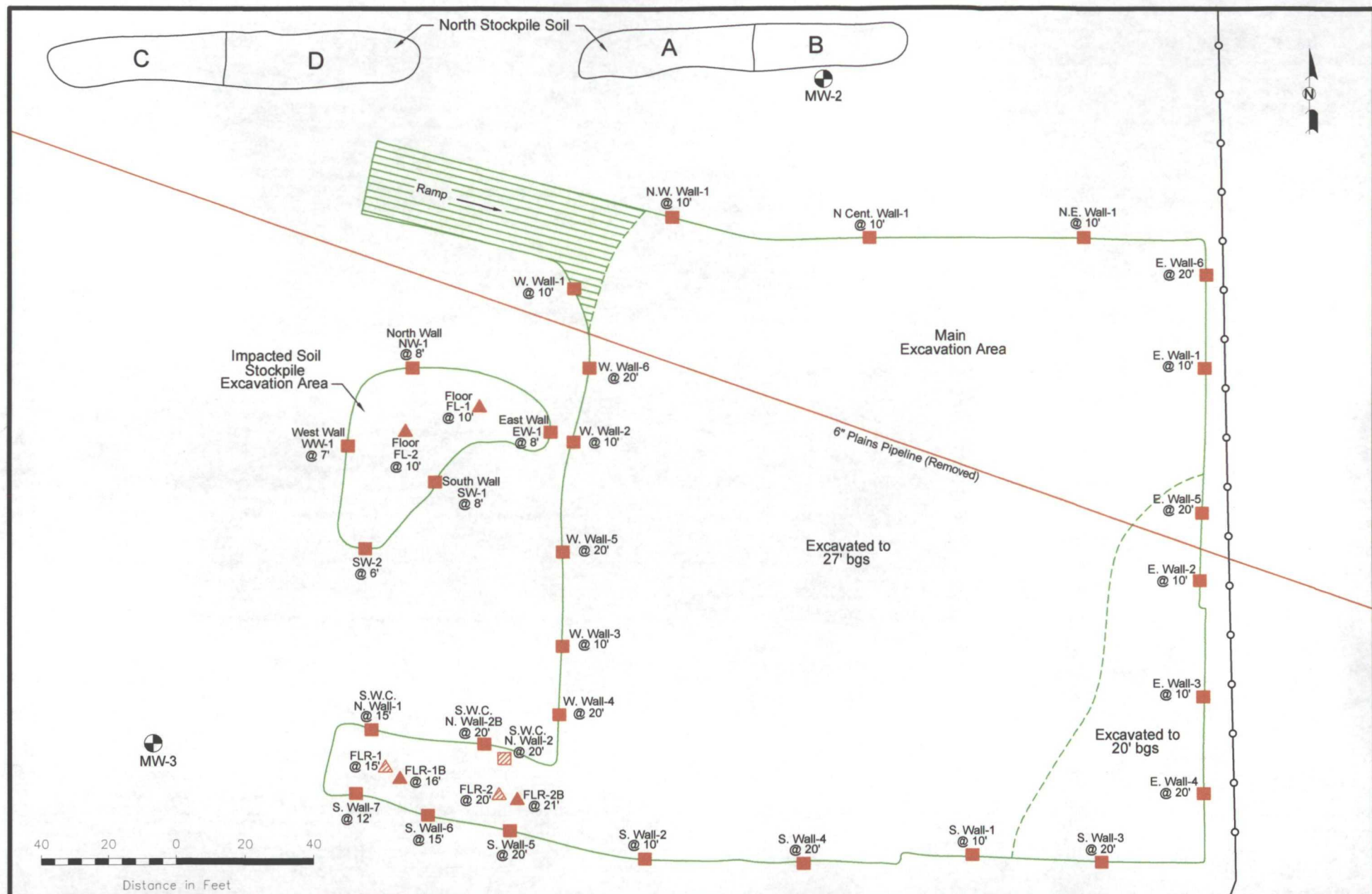
www.novasafetyandenvironmental.com

February 28, 2011	Scale: 1" = 2000'	CAD By: TA	Checked By: RKR
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LATITUDE & LONGITUDE COORDINATES: N 32° 36' 38.41" W 103° 16' 22.16"



LEGEND: Monitor Well Location Pipeline Fence Excavation Areas	Figure 2 Excavation Areas Map Plains SRS# 2011-11193 Plains Marketing, L.P. South Monument Gathering Lea County, NM	<div style="display: flex; justify-content: space-between;"> <div>  <small>safety and environmental</small> </div> <div> 2057 Commerce Drive Midland, Texas 79703 432.520.7720 www.novasafetyandenvironmental.com </div> </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">May 18, 2011</td> <td style="width: 25%;">Scale: 1" = 120'</td> <td style="width: 25%;">CAD By: TA</td> <td style="width: 25%;">Checked By: RKR</td> </tr> <tr> <td colspan="4"> Lat. N 32° 36' 38.41" Long. W 103° 16' 22.16" NW1/4 NE1/4 Sec 5 T20S R37E </td> </tr> </table>	May 18, 2011	Scale: 1" = 120'	CAD By: TA	Checked By: RKR	Lat. N 32° 36' 38.41" Long. W 103° 16' 22.16" NW1/4 NE1/4 Sec 5 T20S R37E			
May 18, 2011	Scale: 1" = 120'	CAD By: TA	Checked By: RKR							
Lat. N 32° 36' 38.41" Long. W 103° 16' 22.16" NW1/4 NE1/4 Sec 5 T20S R37E										



LEGEND:

- Monitor Well Location
- Excavation Limits
- Fenceline

- Wall Soil Sample Location
- Floor Soil Sample Location
- Over Excavated Wall Soil Sample Location
- Over Excavated Floor Soil Sample Location

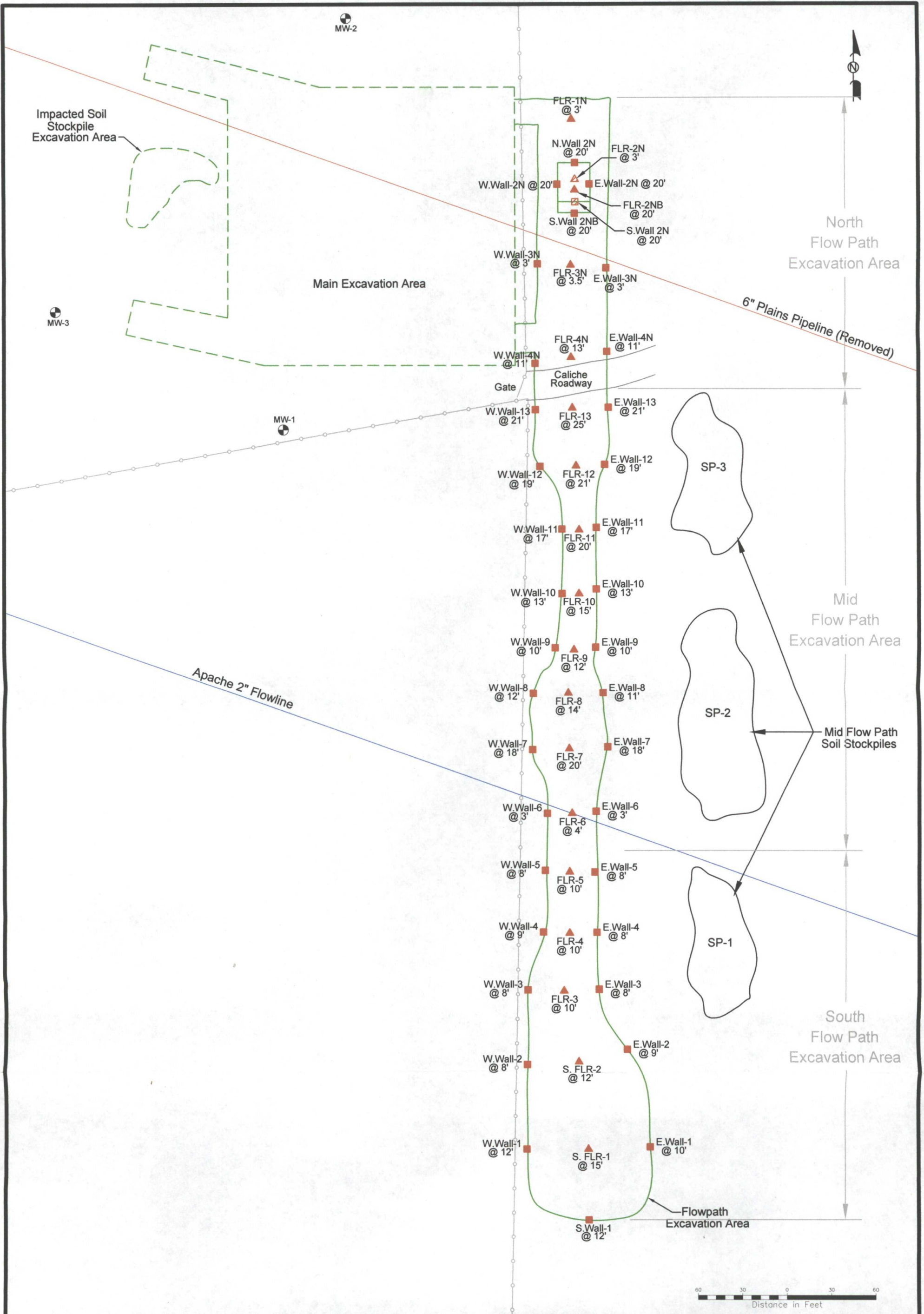
Figure 3
Main Excavation
Area Map
 Plains SRS # 2011-11193
 Plains Marketing, L.P.
 South Monument Gathering
 Lea County, NM



2057 Commerce Drive
 Midland, Texas 79703
 432.520.7720

www.novasafetyandenvironmental.com

May 19, 2011	Scale: 1" = 40'	CAD By: TA	Checked By: RKR
Lat. N 32° 36' 38.41" Long. W 103° 16' 22.16" NW1/4 NE1/4 Sec 5 T20S R37E			



LEGEND:	
	Monitor Well Location
	Fenceline
	Pipeline
	Flowline
	Wall Soil Sample Location
	Over Excavated Wall Soil Sample Location
	Floor Soil Sample Location
	Over Excavated Floor Soil Sample Location

Figure 4
 Confirmation Soil Sample
 Location Map
 Flow Path Excavation Areas
 Plains SRS# 2011-11193
 Plains Marketing, L.P.
 S. Monument Gathering Sour
 Lea County, NM



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 Midland, Texas 79703
 432.520.7720

www.novasafetyandenvironmental.com

May 19, 2011	Scale: 1" = 60'	CAD By: TA	Checked By: RKR
Lat. N 32° 36' 38.41" Long. W 103° 16' 22.16" NW1/4 NE1/4 Sec 5 T20S R37E			

TABLES

Table 1
CONCENTRATIONS OF TPH AND BTEX IN SOIL
PLAINS MARKETING, L.P.
SOUTH MONUMENT GATHERING SOUR
Lea County, New Mexico
Plains SRS# 2001-11193

All concentrations are in mg/kg

SAMPLE DATE	SAMPLE LOCATION	SAMPLE DEPTH	SOIL STATUS	Methods: EPA SW 846-8015M				Methods: EPA SW 846-8020				
				C ₆ -C ₁₂	C ₁₂ -C ₂₈	C ₂₈ - C ₃₅	Total TPH C ₆ -C ₃₅	Benzene	Toluene	Ethylbenzene	Total Xylenes	
NMOCD REGULATORY STANDARD					-	-	100	10	-	-	-	50
MAIN EXCAVATION AREA												
08/17/10	West Wall-1, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
08/17/10	West Wall-2, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
08/17/10	West Wall-3, 10'	10'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
08/17/10	NW Wall, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
08/17/10	NE Wall, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
08/17/10	East Wall-1, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
08/17/10	East Wall-2, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
08/17/10	East Wall-3, 10'	10'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
09/10/10	N Cent Wall, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
09/10/10	E Wall-4, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
09/10/10	E Wall-5, 20'	20'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
09/10/10	E Wall-6, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
09/10/10	W Wall-4, 20'	20'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
09/10/10	W Wall-5, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
09/10/10	W Wall-6, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
10/18/10	S. Wall-1, 10'	10'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
10/18/10	S. Wall-2, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
10/18/10	S. Wall-3, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
10/18/10	S. Wall-4, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
10/18/10	S. Wall-5, 20'	20'	In-Situ	11.0		<50.0	<50.0	<0.0200	<0.0200	<0.0200		0.175
11/30/10	S Wall-6, 15'	15'	In-Situ	<2.00		<50.0	<50.0					
11/30/10	S Wall-7, 12'	12'	In-Situ	<2.00		<50.0	<50.0					
11/30/10	SW Corner, N Wall-1, 15'	15'	In-Situ	<2.00		<50.0	<50.0					
11/30/10	SW Corner, N Wall-2, 20'	20'	Excavated	108		484	592					
12/06/10	SW Corner, N Wall-2B, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
12/14/10	SW Corner, FLR-1, 15'	15'	Excavated	10.5		703	713.5					
12/14/10	SW Corner, FLR-2, 20'	20'	Excavated	<2.00		122	122					
12/22/10	SW Corner, FLR-1B, 16'	16'	In-Situ	<2.00		<50.0	<50.0					
12/22/10	SW Corner, FLR-2B, 21'	21'	In-Situ	<2.00		<50.0	<50.0					

Table 1

CONCENTRATIONS OF TPH AND BTEX IN SOIL

PLAINS MARKETING, L.P.

SOUTH MONUMENT GATHERING SOUR

Lea County, New Mexico

Plains SRS# 2001-11193

All concentrations are in mg/kg

SAMPLE DATE	SAMPLE LOCATION	SAMPLE DEPTH	SOIL STATUS	Methods: EPA SW 846-8015M				Methods: EPA SW 846-8020				
				C ₆ -C ₁₂	C ₁₂ -C ₂₈	C ₂₈ - C ₃₅	Total TPH C ₆ -C ₃₅	Benzene	Toluene	Ethylbenzene	Total Xylenes	
NMOCD REGULATORY STANDARD					-	-	100	10	-	-	-	50
FLOWPATH EXCAVATION - SOUTH AREA												
09/16/10	SFP, S. Wall-1, 12'	12'	In-Situ	<2.00		<50.0	<50.0					
09/16/10	SFP, E. Wall-1, 10'	10'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
09/16/10	SFP, W. Wall-1, 12'	12'	In-Situ	<2.00		<50.0	<50.0					
09/16/10	SFP, S. Floor-1, 15'	15'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
09/16/10	SFP, S. Floor-2, 12'	12'	In-Situ	<2.00		<50.0	<50.0					
09/16/10	SFP, E. Wall-2, 9'	9'	In-Situ	<2.00		<50.0	<50.0					
09/16/10	SFP, W. Wall-2, 8'	8'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
FLOWPATH EXCAVATION - MID AREA												
09/21/10	SFP, W. Wall-3, 8'	8'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, S. Floor-3, 10'	10'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, E. Wall-3, 8'	8'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, S. Floor-4, 10'	10'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, E. Wall-4, 8'	8'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, W. Wall-4, 9'	9'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, E. Wall-5, 8'	8'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, S. Floor-5, 10'	10'	In-Situ	<1.00		<50.0	<50.0					
09/21/10	SFP, W. Wall-5, 8'	8'	In-Situ	<1.00		<50.0	<50.0					
FLOWPATH EXCAVATION - MID AREA												
10/05/10	MFP, W. Wall-6, 3'	3'	In-Situ	<4.00		62.9	62.9					
10/05/10	MFP, Floor-6, 4'	4'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		0.0217
10/05/10	MFP, E. Wall-6, 3'	3'	In-Situ	<2.00		<50.0	<50.0					
10/05/10	MFP, W. Wall-8, 12'	12'	In-Situ	<2.00		<50.0	<50.0	<0.020	<0.0200	<0.0200		<0.0200
10/05/10	MFP, Floor-8, 14'	14'	In-Situ	4.66		<50.0	<50.0					
10/05/10	MFP, E. Wall-8, 11'	11'	In-Situ	<2.00		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
10/05/10	MFP, W. Wall-9, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
10/05/10	MFP, Floor-9, 12'	12'	In-Situ	2.47		<50.0	<50.0	<0.0200	<0.0200	<0.0200		<0.0200
10/05/10	MFP, E. Wall-9, 10'	10'	In-Situ	<2.00		<50.0	<50.0					
10/05/10	MFP, W. Wall-7, 18'	18'	In-Situ	<1.00		<50.0	<50.0					
10/05/10	MFP, Floor-7, 20'	20'	In-Situ	<1.00		<50.0	<50.0	<0.0100	<0.0100	<0.0100		<0.0100
10/05/10	MFP, E. Wall-7, 18'	18'	In-Situ	<1.00		<50.0	<50.0					
FLOWPATH EXCAVATION - MID AREA												
02/18/11	Mid Flow Path W. Wall-10, 13'	13'	In-Situ	<2.00		84.8	84.8					
02/18/11	Mid Flow Path E. Wall-10, 13'	13'	In-Situ	<2.00		<50.0	<50.0					
02/18/11	Mid Flow Path Floor-10, 15'	15'	In-Situ	<2.00		<50.0	<50.0					

Table 1

CONCENTRATIONS OF TPH AND BTEX IN SOIL

PLAINS MARKETING, L.P.

SOUTH MONUMENT GATHERING SOUR

Lea County, New Mexico

Plains SRS# 2001-11193

All concentrations are in mg/kg

SAMPLE DATE	SAMPLE LOCATION	SAMPLE DEPTH	SOIL STATUS	Methods: EPA SW 846-8015M				Methods: EPA SW 846-8020				
				C ₆ -C ₁₂	C ₁₂ -C ₂₈	C ₂₈ - C ₃₅	Total TPH C ₆ -C ₃₅	Benzene	Toluene	Ethylbenzene	Total Xylenes	
NMOC REGULATORY STANDARD					-	-	100	10	-	-	-	50
03/01/11	Mid Flow Path Floor-11, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
03/01/11	Mid Flow Path E Wall-11, 17'	17'	In-Situ	<2.00		<50.0	<50.0					
03/01/11	Mid Flow Path W Wall-11, 17'	17'	In-Situ	<2.00		<50.0	<50.0					
03/07/11	Mid Flow Path Floor-12, 21'	21'	In-Situ	<2.00		<50.0	<50.0					
03/07/11	Mid Flow Path E Wall-12, 19'	19'	In-Situ	11.3		<50.0	<50.0					
03/07/11	Mid Flow Path W Wall-12, 19'	19'	In-Situ	<2.00		<50.0	<50.0					
03/11/11	Mid Flow Path W Wall-13, 21'	21'	In-Situ	<2.00		<50.0	<50.0					
03/11/11	Mid Flow Path E Wall-13, 21'	21'	In-Situ	<2.00		<50.0	<50.0					
03/11/11	Mid Flow Path Floor-13, 25'	25'	In-Situ	<2.00		<50.0	<50.0					
FLOWPATH EXCAVATION - NORTH AREA												
02/18/11	N Flow Path FLR-1N, 3'	3'	In-Situ	<2.00		<50.0	<50.0					
02/18/11	N Flow Path FLR-2N, 3'	3'	Excavated	227		250	477					
02/18/11	N Flow Path FLR-3N, 3.5'	3.5'	In-Situ	<2.00		<50.0	<5.00					
02/18/11	N Flow Path W Wall-3N, 3'	3'	In-Situ	<2.00		<50.0	<50.0					
02/18/11	N Flow Path E Wall-3N, 3'	3'	In-Situ	<2.00		<50.0	<50.0					
02/21/11	N Flow Path FLR-4N, 13'	13'	In-Situ	<2.00		<50.0	<50.0					
02/21/11	N Flow Path W Wall-4N, 11'	11'	In-Situ	<2.00		<50.0	<50.0					
02/21/11	N Flow Path E Wall-4N, 11'	11'	In-Situ	<2.00		<50.0	<50.0					
03/15/11	N Flow Path E Wall-2N, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
03/15/11	N Flow Path W Wall-2N, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
03/15/11	N Flow Path FLR-2N, 25'	25'	In-Situ	<2.00		<50.0	<50.0					
03/16/11	N Flow Path N Wall-2N, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
03/16/11	N Flow Path S Wall-2N, 20'	20'	Excavated	85.5		592	677.5					
03/25/11	N Flow Path S Wall-2NB, 20'	20'	In-Situ	<2.00		<50.0	<50.0					
IMPACTED SOIL STOCKPILE EXCAVATION AREA												
12/06/10	Floor F-1, 10'		In-Situ	<2.00		<50.0	<50.0					
12/06/10	Floor F-2, 10'		In-Situ	<2.00		<50.0	<50.0					
12/06/10	East Wall, EW-1, 8'		In-Situ	<2.00		<50.0	<50.0					
12/06/10	South Wall, SW-1, 8'		In-Situ	3.69		69.7	73.39					
12/06/10	North Wall, NW-1, 8'		In-Situ	<2.00		<50.0	<50.0					
12/06/10	South Wall, SW-2, 6'		In-Situ	<2.00		<50.0	<50.0					
12/06/10	West Wall, WW-1, 7'		In-Situ	<2.00		<50.0	<50.0					

Table 1

CONCENTRATIONS OF TPH AND BTEX IN SOIL

PLAINS MARKETING, L.P.

SOUTH MONUMENT GATHERING SOUR

Lea County, New Mexico

Plains SRS# 2001-11193

All concentrations are in mg/kg

SAMPLE DATE	SAMPLE LOCATION	SAMPLE DEPTH	SOIL STATUS	Methods: EPA SW 846-8015M				Methods: EPA SW 846-8020				
				C ₆ -C ₁₂	C ₁₂ -C ₂₈	C ₂₈ - C ₃₅	Total TPH C ₆ -C ₃₅	Benzene	Toluene	Ethylbenzene	Total Xylenes	
NMOCD REGULATORY STANDARD					-	-	100	10	-	-	-	50
EXCAVATED SOIL STOCKPILES												
10/05/10	Mid Flow Path SP-1			<1.00		<50.0	<50.0	<0.0100	<0.0100	<0.0100	<0.0100	
12/14/10	Mid Flow Path, SP-2			<2.00		<50.0	<50.0					
12/14/10	Mid Flow Path, SP-3			<2.00		<50.0	<50.0					
12/02/10	N Stockpile - A			<2.00		<50.0	<50.0					
12/02/10	N Stockpile - B			<2.00		<50.0	<50.0					
12/14/10	N Stockpile - C			<2.00		<50.0	<50.0					
12/14/10	N Stockpile - D			<2.00		<50.0	<50.0					

APPENDICES

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

District I
625 N. French Dr., Hobbs, NM 88240
District II
301 W. Grand Avenue, Artesia, NM 88210
District III
000 Rio Brazos Road, Aztec, NM 87410
District IV
220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company Plains Marketing, LP	Contact Camille Reynolds	
Address 5805 East Hwy. 80, Midland, TX 79706	Telephone No. 505-441-0965	
Facility Name South Monument Gathering Sour	Facility Type 6" Steel Pipeline	
Surface Owner Jimmie Cooper	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter B	Section 5	Township 20S	Range 37E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32° 36' 29.0" Longitude 103° 16' 26.8"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 1200 barrels	Volume Recovered 910 barrels
Source of Release 6" Steel Pipeline	Date and Hour of Occurrence 11-20-01	Date and Hour of Discovery 11-20-01
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Paul Sheeley	
By Whom? Frank Hernandez	Date and Hour 11-20-01@16:15	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of 6 inch steel pipeline resulted in crude oil release. Clamp was applied to the line to mitigate the release.

Describe Area Affected and Cleanup Action Taken.* The crude oil was vacuumed up and the impacted soil was excavated and stockpiled on plastic. Initial response activities included excavation and stockpiling of approximately 5,000 to 7,000 cubic yards of soil. Future response activities will include a soil and groundwater investigation and preparation of a remedial action plan.

NOTE: This information was obtained from historical EOTT files, Plains acquired EOTT/Link Energy on April 1, 2004 and Plains assumes this information to be correct.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION		
Signature:	Approved by District Supervisor:	
Printed Name: Camille Reynolds	Approval Date:	Expiration Date:
Title: Remediation Coordinator	Conditions of Approval:	
E-mail Address: cjreynolds@paalp.com	Attached <input type="checkbox"/>	
Date: 12-29-04	Phone: 505-441-0965	

Attach Additional Sheets If Necessary

APPENDIX B
Laboratory Analytical Reports
(On the attached CD)

APPENDIX C

Photographs

Client: Plains Marketing, L.P.
Location: Lea County, New Mexico

Project Name: S. Monument Gathering Sour
Photographer: Ron Rounsaville

Photograph No. 1

Direction: Northeast

Description: View of
the Main Excavation
Area.



Photograph No. 2

Direction: Southwest

Description: View of
the southwest corner of
the Main Excavation
Area.



Client: Plains Marketing, L.P.
Location: Lea County, New Mexico

Project Name: S. Monument Gathering Sour
Photographer: Ron Rounsaville

Photograph No. 3

Direction: Southwest

Description: View of the oil stained southwest corner of the Main Excavation Area.



Photograph No. 4

Direction: South

Description: View of the southern end of the South Flow Path Excavation area.



Client: Plains Marketing, L.P.
Location: Lea County, New Mexico

Project Name: S. Monument Gathering Sour
Photographer: Ron Rounsaville

Photograph No. 5

Direction: West

Description: View to the west of the southwest corner excavation area.



Photograph No. 6

Direction: South

Description: View to the south of the southwest corner sump excavation.



Client: Plains Marketing, L.P.
Location: Lea County, New Mexico

Project Name: S. Monument Gathering Sour
Photographer: Ron Rounsaville

Photograph No. 7

Direction: North

Description: View to the north of the northwest corner floor sump excavation adjacent to the west wall.



Photograph No. 8

Direction: Southwest

Description: View of the PSH Recovery well installed within the southwest corner sump.

