Basin Environmental Service Technologies, LLC

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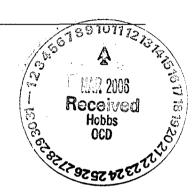
Office: (505) 396-2378

Fax: (505) 396-1429



10 March 2006

Mr. Larry Johnson New Mexico Oil Conservation Division Hobbs District 1 1625 N. French Drive Hobbs, New Mexico 88240



Re: Closure Request, Young Deep to Lynch 10" Idle BLM (231735)

Plains Marketing, L. P. (C-141, dated 13 July 2005)

Plains Marketing, L. P. (Preliminary Site Investigation Report and

Remediation/Closure plan, dated 25 July 2005)

Basin Environmental email confirming verbal approval, dated 05 August 2005

Unit K (NE ¼, SW ¼) Section 18, Township 20 South, Range 34 East

Lea County, New Mexico

Dear Mr. Johnson:

Basin Environmental Services (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for closure of the Young Deep to Lynch 10" Idle BLM remediation site at the above referenced location. Remediation activities were successfully accomplished as proposed in the New Mexico Oil Conservation Division (NMOCD) approved Preliminary Site Investigation Report and Remediation/Closure Plan, dated 25 July 2005. The only remaining task to be completed is reseeding with an approved Bureau of Land Management (BLM) grass seed and monitoring the growth of the grass to ensure vegetation has been established. Reseeding of the Young Deep to Lynch 10" Idle BLM release site is projected to be in the spring of 2006. Hydrating, monitoring the growth process and reporting results to BLM will be adhered to until vegetation has been restored and BLM releases Plains.

Basin responded and clamped the pipeline release on 07 July 2005, located on the Young Deep to Lynch 10" Idle BLM Pipeline. The impacted soils were excavated and stockpiled on a 6-mil poly-liner adjacent to the site. As reported on the C-141, dated 13 July 2005, approximately 8 barrels of crude oil were released and 0 barrels recovered. NMOCD ranking criteria for the Young Deep to Lynch 10" Idle BLM release site is 0-9, which sets the remediation levels for benzene, toluene, ethylbenzene, and xylenes

(BTEX), and total petroleum hydrocarbons – gasoline range organics/diesel range organics (TPH-GRO/DRO) at 50 mg/kg for total BTEX and 5000 mg/kg for TPH-GRO/DRO.

The following NMOCD approved remedial activities were accomplished at the Young Deep to Lynch 10" Idle BLM pipeline release site:

- In July 2005, Basin conducted excavation activities at the release point and flow path. The excavation is approximately 60 feet long by 40 feet wide and 12 feet below ground surface (bgs). The impacted soils were placed on a 6-ml poly-liner adjacent to the excavation for future remedial activities. Approximately 1100 cubic yards of impacted soil was excavated and stockpiled on-site. The Young Deep to Lynch Idle 10" BLM Pipeline was de-oiled under the direction of Plains Operations personnel following the crude oil release.
- On 14 July 2005, confirmation soil samples were collected from the walls and floor of the excavation. The soil samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results of the soil samples collected from the floor and walls of the excavation indicate that BTEX and TPH-GRO/DRO concentrations are below NMOCD regulatory standards and no further excavation was necessary. Laboratory results are in Table 1, Soil Chemistry Table.
- On 04 August 2005, a proposed Preliminary Site Investigation Report and Remediation/Closure Plan, dated 25 July 2005, was submitted to NMOCD and verbally approved. The approved plan proposed blending the impacted soil; divided into equal grid cells of approximately 350 cubic yards and collecting soil samples from each grid to ensure TPH concentrations were below 5000 mg/kg. Once laboratory results confirmed the blended soils were below NMOCD standards, backfilling of the blended material would be initiated. The backfilled excavation would be contoured to the original rangeland grade surrounding the site and reseeded with approved BLM grass seed.
- In August 2005, the blending of the impacted soil was conducted. Cells were divided into approximately 350 cubic yards and confirmation soil samples were collected 13 September 2005 and analyzed for BTEX and TPH-GRO/DRO concentrations. Laboratory results of the soil samples collected from the grid cells indicate the blended soils were below NMOCD regulatory standards.
- In September and October 2005, backfilling of the Young Deep to Lynch 10" Idle BLM excavation site with the blended soil was initiated and completed with the site being contoured to the surrounding pastureland. Reseeding of the site is projected to be in the spring of 2006 to coincide with the beginning of the growing season and spring precipitation to enhance the establishment and root growth of the grass seed. Hydrating, monitoring the growth process and reporting

results to BLM will be adhered to until the vegetation is established and BLM releases Plains.

The remediation activities were completed in accordance with the NMOCD approved (Basin email, 05 August 2005) Plains Marketing, L. P., Remediation/Closure Plan, dated 25 July 2005. Based on the results of the NMOCD approved remediation activities conducted at the Young Deep to Lynch Abandoned 10" BLM release site, Basin, on behalf of Plains, requests that the NMOCD consider this site as eligible for closure under the New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills and Releases (1993).

Respectively request Basin and Plains be provided correspondence stating no further remedial action is required at the Young Deep to Lynch Abandoned 10" BLM release site.

Should you have any questions or comments, please contact me at (505) 441-2124.

Sincerely,

Basin Environmental Services

Attachments: Site Map

Table 1, Soil Chemistry Table

NMOCD C-141 (Initial) NMOCD C-141 (Final)

Cc:

Mr. Jim Amos, BLM

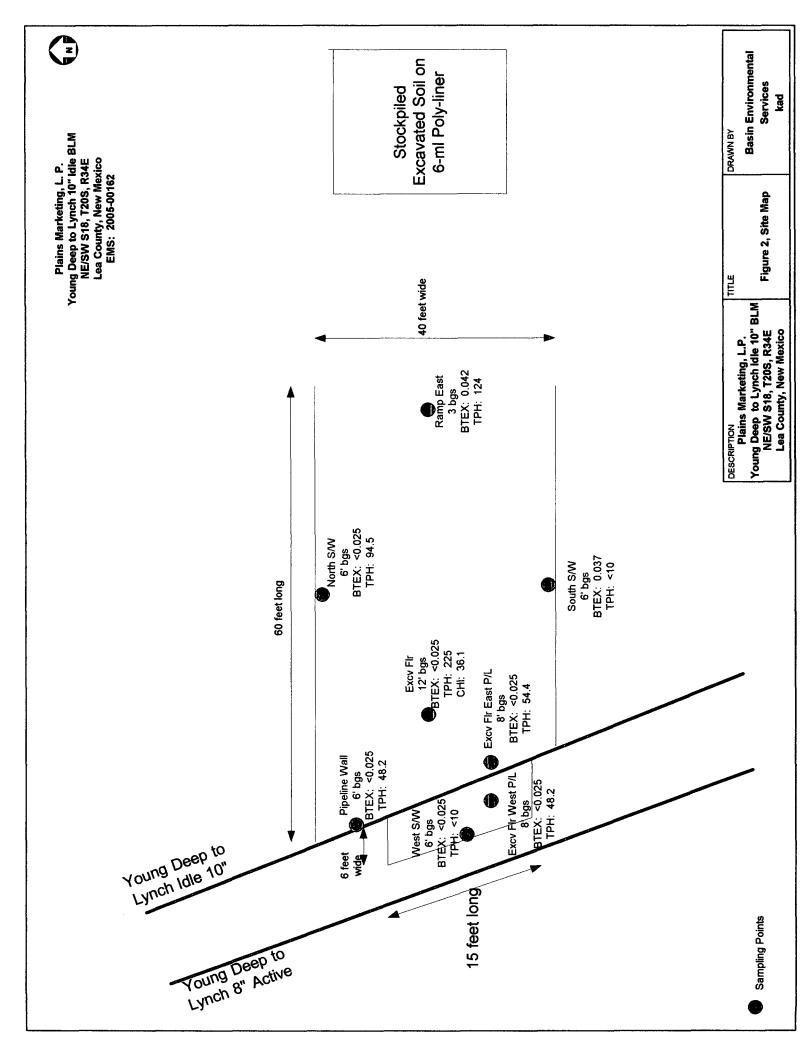


TABLE 1

SOIL CHEMISTRY

PLAINS MARKETING, L.P. YOUNG DEEP TO LYNCH IDLE 10" BLM LEA COUNTY, NEW MEXICO EMS: 2005-00162

SAMPLE	SAMPLE SAMPLE	SAMPLE		METHOD: E	METHOD: EPA SW 846-8021B, 5030	3021B, 5030		METHOD: 8015M	8015M	TOTAL	TOTAL CHLORIDES
LOCATION	DEPTH	DATE	BENZENE	BENZENE TOLUENE	ETHYL-	M,P-	O-XYLENE	GRO	DRO	TPH	
	(Below				BENZENE XYLENES	XYLENES					
	Normat										
	Surface Grade)								· · · · · · · · · · · · · · · · · · ·		
			(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
South S/W	e, pds	07/14/05	<0.025	<0.025	<0.025	0.037	<0.025	<10	<10	<10	
North S/W	e' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	94.5	94.5	
Ramp East	3' bgs	07/14/05	<0.025	<0.025	<0.025	0.042	<0.025	<10	124	124	
EXCV FLR	12' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	225	225	36.1
West S/W	e, pas	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10	
Pipeline Wall	e' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	48.2	48.2	
EXCV FLR East P/L	8' bgs	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	56.4	56.4	
EXCV FLR West P/L	8, pds	07/14/05	<0.025	<0.025	<0.025	<0.025	<0.025	<10	48.2	48.2	
Stockpile		07/14/05	<0.025	0.079	0.388	1.09	0.390	825	2050	5880	
								m			
G1		09/13/05	<0.025	<0.025	<0.025	0.041	<0.025	58.8	1070	1130	
62		09/13/05	<0.025	<0.025	<0.025	<0.025	<0.025	45.1	658	703	
<u>G3</u>		09/13/05	<0.025	<0.025	<0.025	<0.025	<0.025	59.8	069	750	
G4		09/13/05	<0.025	<0.025	<0.025	<0.025	<0.025	12.7	275	288	
NMOCD CRITERIA			10		TOTAL	BTEX 50				2000	

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Form C-141 Revised October 10, 2003

Release Notification and Corrective Action

						OPERA	TOR		x Initia	al Report	☐ Fi	nal Repor	
Name of Co	mpany Pla	ains Marketii		Contact Camille Reynolds									
							Telephone No. 505-441-0965						
Facility Na	ne Young	Deep to Lyn	Facility Type 10 th Steel Pipeline										
Surface Owner BLM Mineral Owner						Lease No.							
	LOCATION OF RELEASE Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line County												
Unit Letter K	Section 18	Township 20S	Range 34E	Feet from the	North/	n/South Line Feet from the East/West Line				County Lea			
		Latitud	ie_32°34	1'15.8"		Longitude	103° 36' 02.7"	·		_			
NATURE OF RELEASE													
Type of Rele	ase Crude (Oil				Volume of	Release 8 barrels	3		Recovered			
Source of Release 10" Steel Pipeline							lour of Occurrence 5 @ 11:15	>e		Hour of D 05 @ 11:30			
Was Immediate Notice Given? Yes No Not Required If YES, To Whom? Larry Johnson												41516	
By Whom? Camille Reynolds Date and Hour 07/07/2005@ 15:50													
Was a Watercourse Reached? ☐ Yes ☒ No ☐ Yes ☒ No ☐ If a Watercourse was Impacted, Describe Fully.*											_		
Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of the 10 inch pipeline resulted in release of crude oil. The line is idle so information concerning volume and pressure on line is unavailable. Describe Area Affected and Cleanup Action Taken.* The impacted soil was excavated and stockpiled on plastic. Aerial extent of surface impact was 432 square feet.											was 432		
regulations a public health should their or the enviro	all operators a or the envi operations l nment. In a	are required to ironment. The have failed to addition, NM(o report and acceptant acc	e is true and comp nd/or file certain r ce of a C-141 repo y investigate and r ptance of a C-141	release n ort by the remediate	otifications a e NMOCD n e contaminat	nd perform corre parked as "Final R ion that pose a the	ctive act Report" o reat to g	ions for rel loes not rel round wate	leases which lieve the operation	h may ende erator of list water huma	inger ability in health	
federal, state, or local laws and/or regulations. OIL CONSERVATION DIVISION													
Signature:		rele	1/2c	proble		Approved by District Supervisor:							
Printed Nam Title: Remed									Dota				
							Approval Date: Expiration [Date:	Date:		
E-mail Address: cjreynolds@paalp.com Conditions of Approval: Attached Date: 07/13/05 Phone:505-441-0965													
Attach Add	itional She	ets If Necess	arv										