

Basin Environmental Service Technologies, LLC

P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com
Office: (505) 396-2378 Fax: (505) 396-1429



PRELIMINARY SITE INVESTIGATION REPORT and REMEDIATION/WORK PLAN

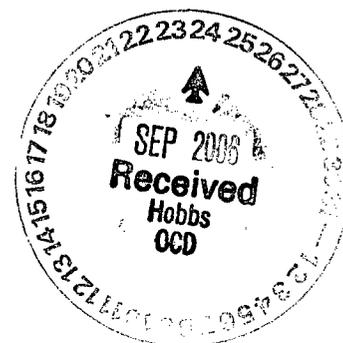
*POGO
LEASE*

**PLAINS MARKETING, L.P. (231735)
Covington A Federal # 1 Sump
Lea County, New Mexico
Plains SRS # 2006-270**

**UNIT C (NE/NW), Section 25, Township 22S, Range 32E
Latitude 32°, 22', 40.0" North, Longitude 103°, 37', 49.0" West**

Prepared For:

Plains Marketing, L.P.
333 Clay Street
Suite 1600
Houston, Texas 77002



Prepared By:

Basin Environmental Service Technologies, LLC

12 September 2006


Ken Dutton

Basin Environmental Service Technologies, LLC

IRP-1008

TABLE OF CONTENTS

Introduction	1
Summary of Field Activities	1
New Mexico Oil Conservation Division (NMOCD) Soil Classification	2
Archeological Survey Results	2
Distribution of Hydrocarbons in the Unsaturated Zone	2
Recommendations for Remediation/Closure	3
Limitations	3
Distribution	4

Tables

Table 1:	Soil Chemistry
----------	----------------

Figures

Figure 1:	Site Location Map
Figure 2:	Excavation Site Map
Figure 3:	Excavation Site Map – Confirmation Soil Sampling Locations
Figure 4:	Digital Photos

Appendices

Appendix A:	New Mexico Office of the State Engineer Water Well Database Report
Appendix B:	Environmental Laboratory of Texas Analytical Results
Appendix C:	BLM Undesirable Event Report
Appendix D:	NMOCD C-141

INTRODUCTION

Basin Environmental Service Technologies, LLC (Basin), responded to a crude oil release for Plains Marketing, L.P. (Plains), located at the Pogo Covington A Federal # 1 Tank Battery caliche pad on 18 August 2006. The crude oil release was contained and excavation of the impacted caliche was initiated and was stockpiled on a 6-ml poly-liner adjacent to the excavation. The Covington A Federal # 1 Sump is located on land owned by United States Department of the Interior, Bureau of Land Management (BLM).

This site is located in Unit C (NE¼/NW¼) Section 25, Township 22 South, Range 32 East, in Lea County, New Mexico (topographic Site Location Map is attached as Figure 1). The site latitude is 32°, 22', 40.0" North and site longitude is 103°, 37', 49.0" West. The site is characterized by an operational tank battery located in a pasture utilized for cattle grazing. The L-shaped visible surface stained area includes the release point covering an area approximately 22 feet long by 14 feet wide (east to west) and approximately 50 feet long by 25 feet wide (north to south). Approximately 10 barrels of crude oil were released from the crude oil release and 5 barrels were recovered.

An Emergency One-Call was initiated 18 August 2006 and all responding companies either cleared or marked their respective lines. Subsequent renewals of the one-call have been accomplished as required.

Mr. James Amos, BLM, Carlsbad, New Mexico Office was verbally notified 21 August 2006. Ms Pat Caperton, New Mexico Oil Conservation Division (NMOCD), Hobbs, New Mexico District 1, was verbally notified of the release on 18 August 2006. A BLM Undesirable Event report was prepared and delivered to Mr. James Amos on 21 August 2006 (see Appendix C, BLM Undesirable Event Report). A C-141 form, dated 22 August 2006 was completed by Plains and submitted to the NMOCD, Hobbs, New Mexico Office (see Appendix D, NMOCD C-141).

SUMMARY OF FIELD ACTIVITIES

On 18 August 2006, Basin mobilized to the Pogo Covington A Federal # 1 Tank Battery to contain a crude oil release from the sump under the direction of Plains operations personnel. The crude oil release was contained and upon arrival at the site, Basin initiated excavation of the release point and flow path areas located on the Pogo Tank Battery caliche pad, with the excavated caliche placed on a 6-ml poly-liner for future remedial action. The L-shaped excavated area is approximately 22 feet long by 14 feet wide (east to west) and approximately 50 feet long by 25 feet wide (north to south) and ranges from approximately 1 foot to 2.5 feet below ground surface (bgs) (see Figure 2, Excavation Site Map). Approximately 100 cubic yards of impacted caliche has been stockpiled on-site commensurate with remediation activities.

On 31 August 2006, confirmation soil samples were collected from the floor of the excavated area. The four (4) confirmation soil samples collected were field screened with a Photoionization Detector (PID), (see Figure 3, Excavation Site Map - Soil Sampling Locations) and were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – gasoline range organics/diesel range organics (TPH-GRO/DRO). Laboratory results of the four (4) confirmation soil samples indicated that constituent concentrations of BTEX and TPH-GRO/DRO were not detected above laboratory method detection limits (see Table 1, Soil Chemistry Table). Based on the laboratory results, no further excavation activities were required.

NEW MEXICO OIL CONSERVATION DIVISION (NMOCD) SOIL CLASSIFICATION

A search of the New Mexico State Engineers database revealed no groundwater depth information for that section. However, Section 14 in the same Township and Range contains groundwater information revealing an average depth to groundwater of 350 feet bgs. There are no surface water bodies or water wells within 1000 feet of the release site. Based on this data, the site has an NMOCD Ranking Score of 0-9, which sets the remediation levels at:

Benzene:	10 ppm
BTEX:	50 ppm
TPH:	5000 ppm

ARCHEOLOGICAL SURVEY RESULTS

Mr. James Amos, Carlsbad BLM, was contacted by Plains personnel concerning whether an archeological survey was warranted due to the crude oil release being located on federal lands, contained on the Pogo Tank Battery caliche pad and not the surrounding dunal pastureland. Mr. Amos stated that since the crude oil release impacted the Pogo Tank Battery caliche pad; an archeological survey was not warranted.

DISTRIBUTION OF HYDROCARBONS IN THE UNSATURATED ZONE

The final dimensions of the L-shaped excavation that includes the release point and flow path areas are approximately 22 feet long by 14 feet wide (east to west) and approximately 50 feet long by 25 feet wide (north to south) with depths ranging from approximately 1 foot to 2.5 feet bgs. Approximately 100 cubic yards of impacted caliche has been stockpiled on-site commensurate with remediation activities.

On 31 August 2006, four (4) confirmation soil samples were collected from the floor of the excavation, ranging in depth from approximately 1 foot to 2.5 feet bgs; field screened with a PID and submitted for analysis. Laboratory data sheets and chain-

of-custody forms are attached (Appendix B). Laboratory results indicate that constituent concentrations of BTEX and TPH-GRO/DRO were not detected above laboratory method detection limits for the four (4) soil samples. Based on the laboratory results, no further excavation was warranted.

RECOMMENDATIONS FOR REMEDIATION/CLOSURE

Approximately 100 cubic yards of impacted caliche was excavated and stockpiled on-site resulting from the emergency response and remediation activities. Based on the results of the remedial activities conducted, Plains requests approval to transport the impacted caliche to the Plains Lea Station Landfarm (LSLF). A permit (NMOCD Form C-138) will be obtained from the NMOCD Santa Fe Office for the transporting of the contaminated soils to LSLF. The backfill material will be obtained from Mr. Danny Berry and the excavation will be contoured to match the original tank battery caliche pad grade. Upon completion of backfilling and contouring, Plains will submit a request for closure to NMOCD pursuant to *NMOCD Guidelines for Remediation of Leaks, Spills, and Releases (1993)*.

LIMITATIONS

Basin Environmental Service Technologies, LLC, has prepared this Preliminary Investigation Report and Remediation/Closure Plan to the best of its ability. No other warranty, expressed or implied, is made or intended.

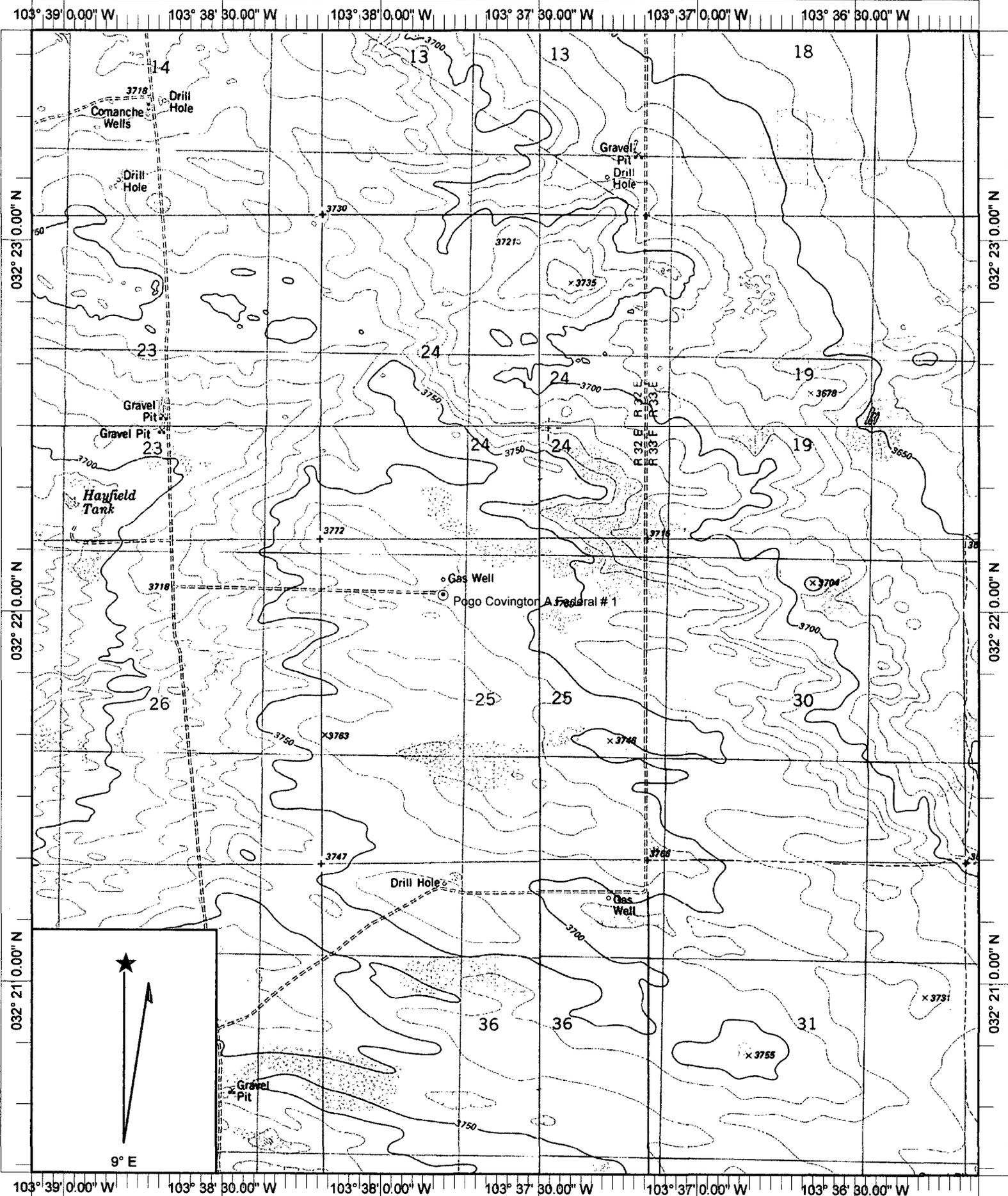
Basin Environmental Service Technologies, LLC, has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. Basin Environmental Service Technologies, LLC, has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. Basin Environmental Service Technologies, LLC, has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Basin Environmental Service Technologies, LLC, 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 Marketing, L.P. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express consent of Basin Environmental Service Technologies, LLC, and Plains Marketing, L.P.

DISTRIBUTION

- Copy 1: Jeff Dann
Plains All American
333 Clay Street
Suite 1600
Houston, Texas 77002
jpdann@paalp.com
- Copy 2: Camille Reynolds
Plains All American
3112 West Highway 82
Lovington, New Mexico 88260
cjreynolds@paalp.com
- Copy 3: Mr. Larry Johnson
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240
Larry.Johnson@state.nm.us
- Copy 4: Mr. James Amos
U. S. Department of the Interior
Bureau of Land Management
620 E. Greene St.
P. O. Box 1778
Carlsbad, New Mexico 88220
James_Amos@nm.blm.gov
- Copy 5: Basin Environmental Service Technologies LLC
P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com

Copy 3

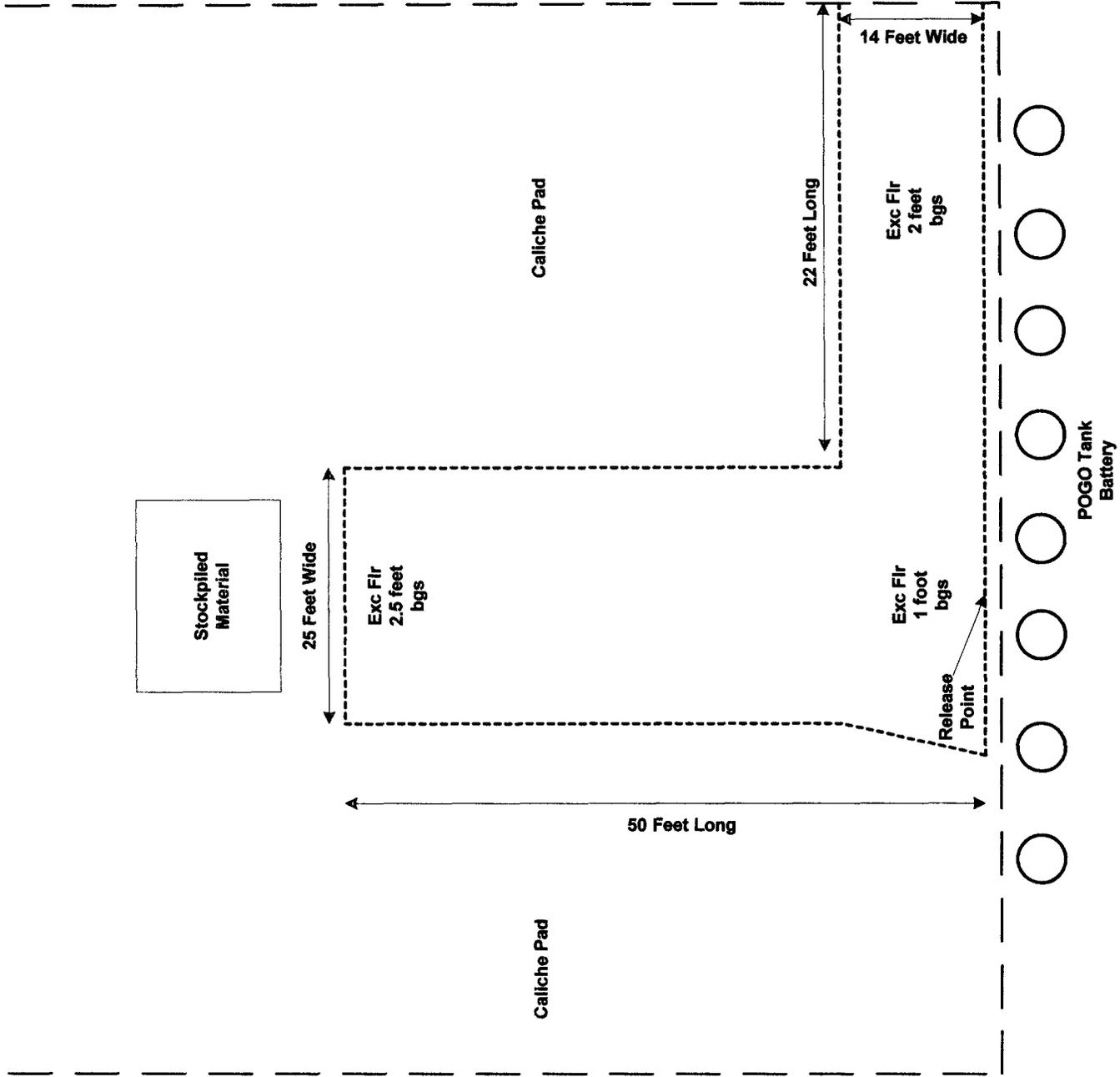


Name: BOOTLEG RIDGE
 Date: 9/12/2006
 Scale: 1 inch equals 2000 feet
 Location: 032° 22' 01.33" N 103° 37' 36.32" W
 Caption: Figure 1
 Plains Marketing, L. P., Pogo
 Covington A Federal A # 1
 Copyright (C) 1999, Maptech, Inc.



Plains Marketing, L.P.
 Covington A Federal # 1 Sump
 NE/NW S25, T22S, R32E
 Lea County, New Mexico
 SRS: 2006-270

TITLE	Figure 2 Excavation Site Map
DRAWN BY	Basin Environmental Services kad



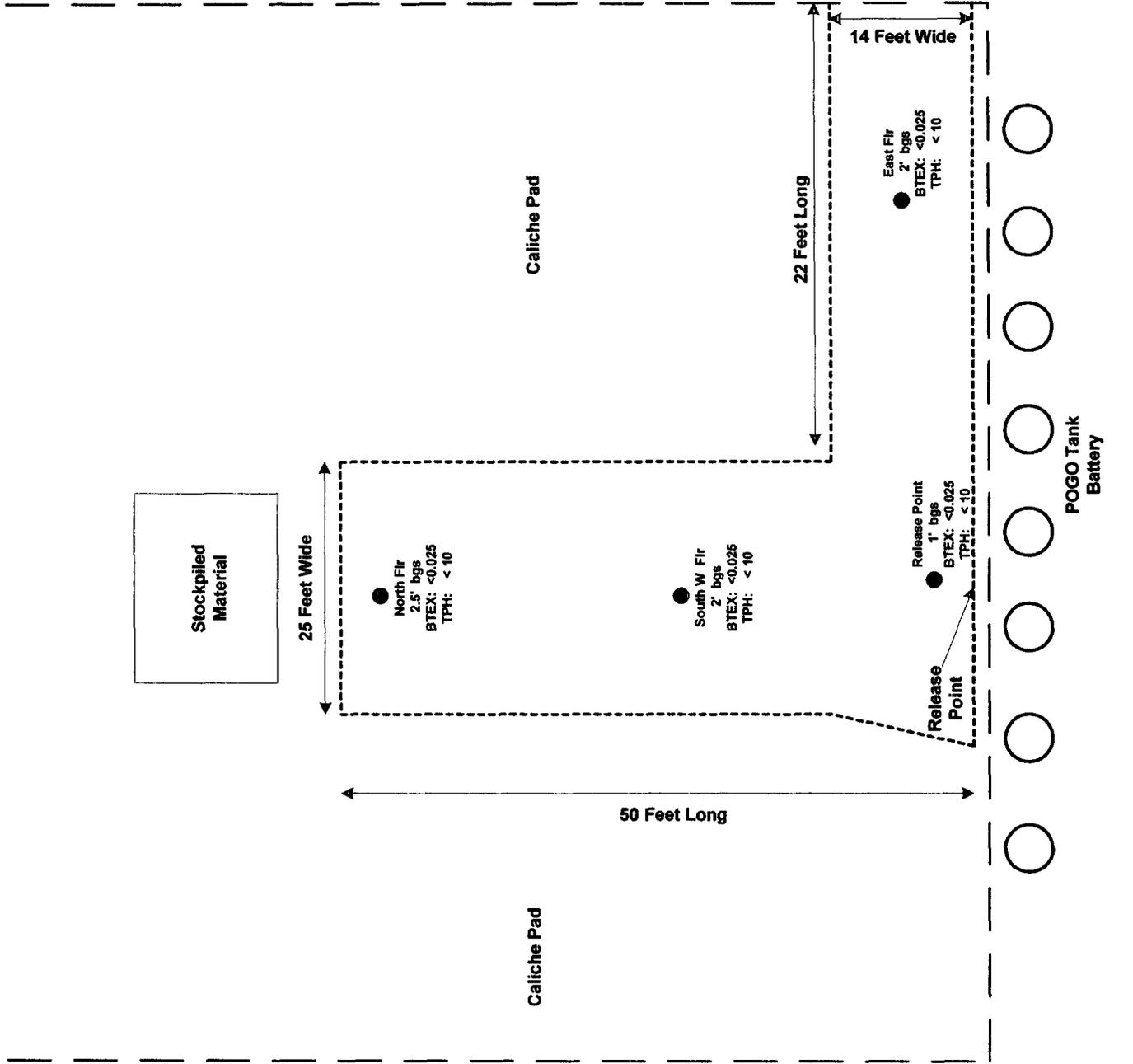
LEGEND

Excavated Area	-----
----------------	-------



Plains Marketing, L.P.
 Covington A Federal # 1 Sump
 NE/NW S25, T22S, R32E
 Lea County, New Mexico
 SRS: 2006-270

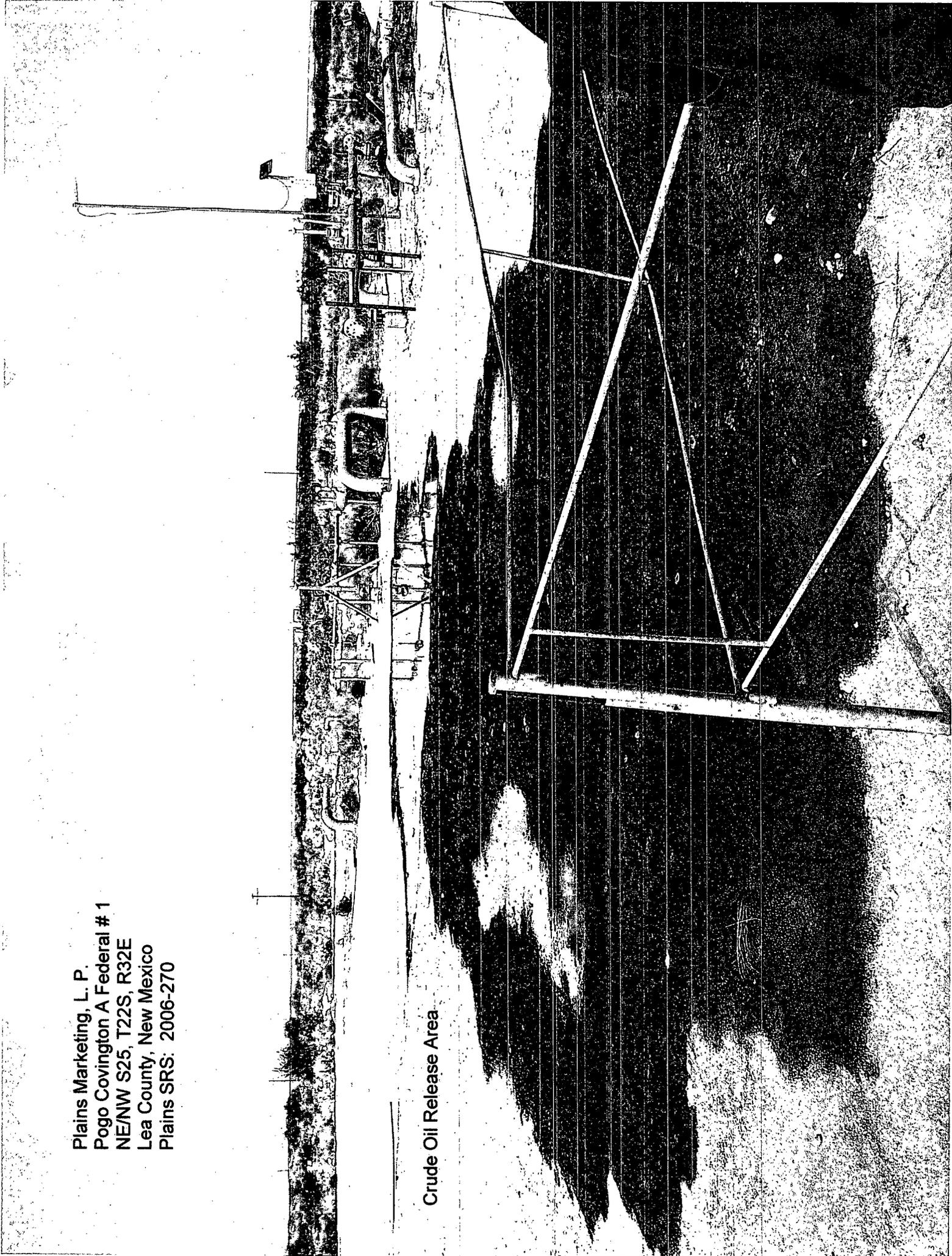
TITLE **Figure 3**
Excavation Site Map - Confirmation
Soil Sampling Locations
 DRAWN BY
Basin Environmental Services
 kad



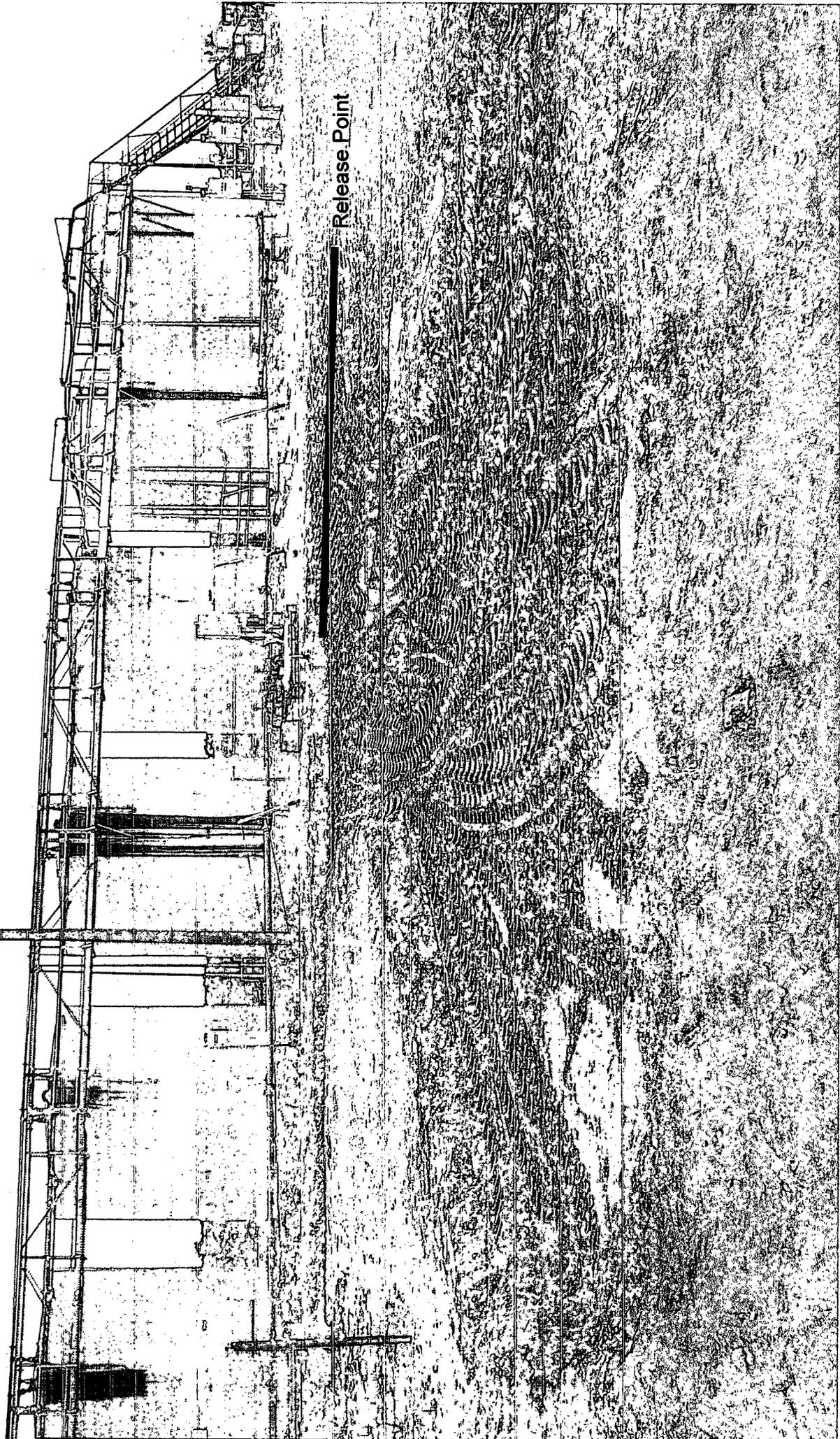
LEGEND
 - - - - - Excavated Area
 ● Sampling Locations

Plains Marketing, L. P.
Pogo Covington A Federal # 1
NE/NW S25, T22S, R32E
Lea County, New Mexico
Plains SRS: 2006-270

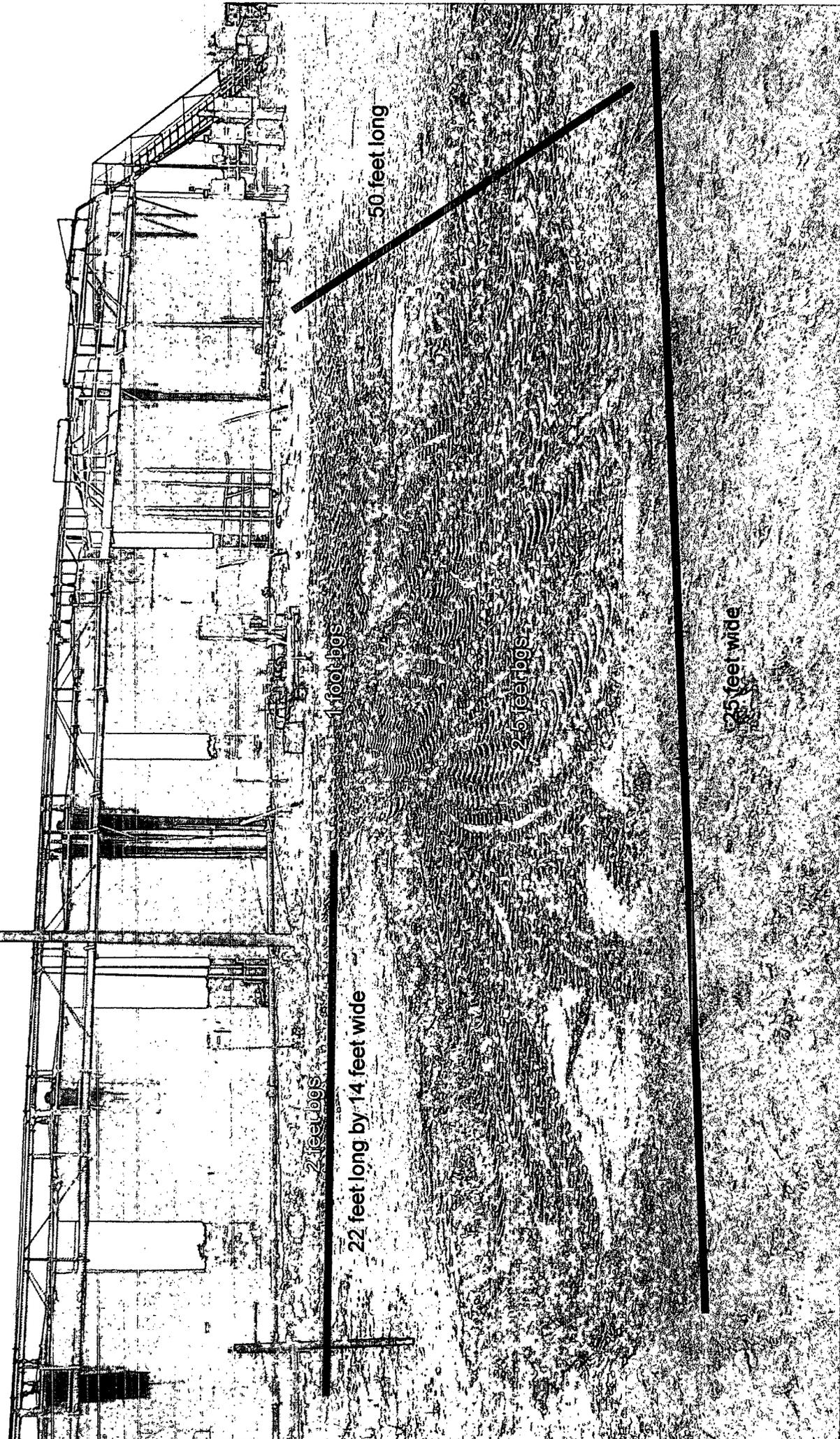
Crude Oil Release Area



Plains Marketing, L.P.
Pogo Covington A Federal # 1
NE/NW S25, T22S, R32E
Lea County, New Mexico
Plains SRS: 2006270



Plains Marketing, L. P.
Pogo Covington A Federal #1
NE/NW S25, T22S, R32E
Lea County, New Mexico
Plains SRS: 2006-270



New Mexico Office of the State Engineer
POD Reports and Downloads

Township: 22S Range: 32E Sections: 25

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) Non-Domestic Domestic All

POD / SURFACE DATA REPORT 09/08/2006

DB File Nbr	(acre ft per annum) Use	Diversion	Owner	POD Number	(quarters are 1=NW 2=NE 3=SE 4=SW) (quarters are biggest to Source	Tws	Rng	§
No Records found, try again								

New Mexico Office of the State Engineer
POD Reports and Downloads

Township: 22S Range: 32E Sections: 13,14,15,16,17,18

NAD27 X: Y: Zone: Search Radius:

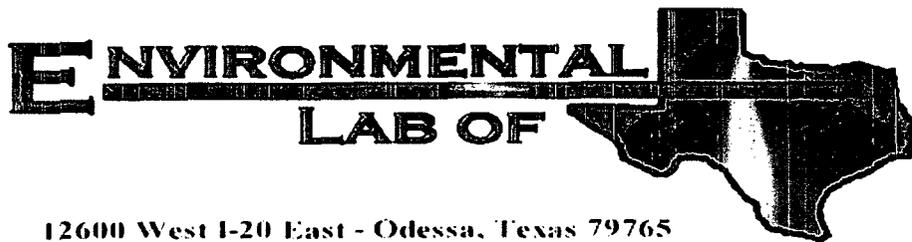
County: Basin: Number: Suffix:

Owner Name: (First) (Last) Non-Domestic Domestic All

AVERAGE DEPTH OF WATER REPORT 09/08/2006

Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	(Depth Water in Feet)		
								Min	Max	Avg
C	22S	32E	14				2	340	360	350

Record Count: 2



12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Camille Reynolds

Plains All American EH & S

1301 S. County Road 1150

Midland, TX 79706-4476

Project: Pogo Covington A Fed. #1

Project Number: SRS# 2006-270

Location: Lea Co., NM

Lab Order Number: 6I01001

Report Date: 09/08/06

Plains All American EH & S
1301 S. County Road 1150
Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
Project Number: SRS# 2006-270
Project Manager: Camille Reynolds

Fax: (432) 687-4914

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
East FI	6I01001-01	Soil	08/31/06 11:00	08-31-2006 17:00
Release Point	6I01001-02	Soil	08/31/06 11:05	08-31-2006 17:00
South W. PI	6I01001-03	Soil	08/31/06 11:10	08-31-2006 17:00
North FI	6I01001-04	Soil	08/31/06 11:15	08-31-2006 17:00

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
East F1 (6101001-01) Soil									
Benzene	ND	0.0250	mg/kg dry	25	EI60603	09/06/06	09/06/06	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
<i>Surrogate: a,a,a-Trifluorotoluene</i>		104 %	80-120		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		111 %	80-120		"	"	"	"	
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EI60111	09/01/06	09/01/06	EPA 8015M	
Carbon Ranges C12-C28	ND	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbons	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		77.0 %	70-130		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		95.4 %	70-130		"	"	"	"	
Release Point (6101001-02) Soil									
Benzene	ND	0.0250	mg/kg dry	25	EI60603	09/06/06	09/06/06	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
<i>Surrogate: a,a,a-Trifluorotoluene</i>		108 %	80-120		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		110 %	80-120		"	"	"	"	
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EI60111	09/01/06	09/01/06	EPA 8015M	
Carbon Ranges C12-C28	ND	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbons	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		77.6 %	70-130		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		86.6 %	70-130		"	"	"	"	
South W. PI (6101001-03) Soil									
Benzene	ND	0.0250	mg/kg dry	25	EI60603	09/06/06	09/06/06	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
<i>Surrogate: a,a,a-Trifluorotoluene</i>		106 %	80-120		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		93.5 %	80-120		"	"	"	"	
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EI60111	09/01/06	09/01/06	EPA 8015M	

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

**Organics by GC
 Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
South W. PI (6101001-03) Soil									
Carbon Ranges C12-C28	ND	10.0	mg/kg dry	1	EI60111	09/01/06	09/01/06	EPA 8015M	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbons	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		81.2 %	70-130		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		89.8 %	70-130		"	"	"	"	
North FI (6101001-04) Soil									
Benzene	ND	0.0250	mg/kg dry	25	EI60603	09/06/06	09/06/06	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
<i>Surrogate: a,a,a-Trifluorotoluene</i>		98.0 %	80-120		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		107 %	80-120		"	"	"	"	
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EI60111	09/01/06	09/01/06	EPA 8015M	
Carbon Ranges C12-C28	ND	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbons	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		79.0 %	70-130		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		87.8 %	70-130		"	"	"	"	

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

**General Chemistry Parameters by EPA / Standard Methods
 Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
East Fl (6I01001-01) Soil									
% Moisture	5.5	0.1	%	1	EI60501	09/01/06	09/05/06	% calculation	
Release Point (6I01001-02) Soil									
% Moisture	5.6	0.1	%	1	EI60501	09/01/06	09/05/06	% calculation	
South W. Pl (6I01001-03) Soil									
% Moisture	6.0	0.1	%	1	EI60501	09/01/06	09/05/06	% calculation	
North Fl (6I01001-04) Soil									
Chloride	J [2.04]	5.00	mg/kg	10	EI60718	09/07/06	09/07/06	EPA 300.0	J
% Moisture	5.7	0.1	%	1	EI60501	09/01/06	09/05/06	% calculation	

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch EI60111 - Solvent Extraction (GC)

Blank (EI60111-BLK1)		Prepared & Analyzed: 09/01/06								
Carbon Ranges C6-C12	ND	10.0	mg/kg wet							
Carbon Ranges C12-C28	ND	10.0	"							
Carbon Ranges C28-C35	ND	10.0	"							
Total Hydrocarbons	ND	10.0	"							
Surrogate: 1-Chlorooctane	40.4		mg/kg	50.0		80.8	70-130			
Surrogate: 1-Chlorooctadecane	47.6		"	50.0		95.2	70-130			

LCS (EI60111-BS1)		Prepared & Analyzed: 09/01/06								
Carbon Ranges C6-C12	471	10.0	mg/kg wet	500		94.2	75-125			
Carbon Ranges C12-C28	432	10.0	"	500		86.4	75-125			
Carbon Ranges C28-C35	ND	10.0	"	0.00			75-125			
Total Hydrocarbons	903	10.0	"	1000		90.3	75-125			
Surrogate: 1-Chlorooctane	53.3		mg/kg	50.0		107	70-130			
Surrogate: 1-Chlorooctadecane	48.9		"	50.0		97.8	70-130			

Calibration Check (EI60111-CCV1)		Prepared & Analyzed: 09/01/06								
Carbon Ranges C6-C12	205		mg/kg	250		82.0	80-120			
Carbon Ranges C12-C28	252		"	250		101	80-120			
Total Hydrocarbons	457		"	500		91.4	80-120			
Surrogate: 1-Chlorooctane	50.5		"	50.0		101	70-130			
Surrogate: 1-Chlorooctadecane	51.2		"	50.0		102	70-130			

Matrix Spike (EI60111-MS1)		Source: 6101001-01		Prepared & Analyzed: 09/01/06						
Carbon Ranges C6-C12	511	10.0	mg/kg dry	529	ND	96.6	75-125			
Carbon Ranges C12-C28	461	10.0	"	529	ND	87.1	75-125			
Carbon Ranges C28-C35	ND	10.0	"	0.00	ND		75-125			
Total Hydrocarbons	972	10.0	"	1060	ND	91.7	75-125			
Surrogate: 1-Chlorooctane	55.6		mg/kg	50.0		111	70-130			
Surrogate: 1-Chlorooctadecane	51.6		"	50.0		103	70-130			

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

**Organics by GC - Quality Control
 Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch EI60111 - Solvent Extraction (GC)

Matrix Spike Dup (EI60111-MSD1)

Source: 6I01001-01

Prepared & Analyzed: 09/01/06

Carbon Ranges C6-C12	502	10.0	mg/kg dry	529	ND	94.9	75-125	1.78	20	
Carbon Ranges C12-C28	457	10.0	"	529	ND	86.4	75-125	0.871	20	
Carbon Ranges C28-C35	ND	10.0	"	0.00	ND		75-125		20	
Total Hydrocarbons	959	10.0	"	1060	ND	90.5	75-125	1.35	20	
Surrogate: 1-Chlorooctane	53.4		mg/kg	50.0		107	70-130			
Surrogate: 1-Chlorooctadecane	49.0		"	50.0		98.0	70-130			

Batch EI60603 - EPA 5030C (GC)

Blank (EI60603-BLK1)

Prepared & Analyzed: 09/06/06

Benzene	ND	0.0250	mg/kg wet							
Toluene	ND	0.0250	"							
Ethylbenzene	ND	0.0250	"							
Xylene (p/m)	ND	0.0250	"							
Xylene (o)	ND	0.0250	"							
Surrogate: a,a,a-Trifluorotoluene	44.3		ug/kg	40.0		111	80-120			
Surrogate: 4-Bromofluorobenzene	38.2		"	40.0		95.5	80-120			

LCS (EI60603-BS1)

Prepared & Analyzed: 09/06/06

Benzene	1.40	0.0250	mg/kg wet	1.25		112	80-120			
Toluene	1.49	0.0250	"	1.25		119	80-120			
Ethylbenzene	1.05	0.0250	"	1.25		84.0	80-120			
Xylene (p/m)	2.98	0.0250	"	2.50		119	80-120			
Xylene (o)	1.42	0.0250	"	1.25		114	80-120			
Surrogate: a,a,a-Trifluorotoluene	41.8		ug/kg	40.0		104	80-120			
Surrogate: 4-Bromofluorobenzene	42.7		"	40.0		107	80-120			

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch EI60603 - EPA 5030C (GC)

Calibration Check (EI60603-CCV1)

Prepared & Analyzed: 09/06/06

Benzene	48.4		ug/kg	50.0		96.8	80-120			
Toluene	52.4		"	50.0		105	80-120			
Ethylbenzene	57.4		"	50.0		115	80-120			
Xylene (p/m)	113		"	100		113	80-120			
Xylene (o)	56.9		"	50.0		114	80-120			
Surrogate: a,a,a-Trifluorotoluene	42.1		"	40.0		105	80-120			
Surrogate: 4-Bromofluorobenzene	43.3		"	40.0		108	80-120			

Matrix Spike (EI60603-MS1)

Source: 6I01001-02

Prepared & Analyzed: 09/06/06

Benzene	1.30	0.0250	mg/kg dry	1.32	ND	98.5	80-120			
Toluene	1.39	0.0250	"	1.32	ND	105	80-120			
Ethylbenzene	1.22	0.0250	"	1.32	ND	92.4	80-120			
Xylene (p/m)	2.92	0.0250	"	2.65	ND	110	80-120			
Xylene (o)	1.32	0.0250	"	1.32	ND	100	80-120			
Surrogate: a,a,a-Trifluorotoluene	41.9		ug/kg	40.0		105	80-120			
Surrogate: 4-Bromofluorobenzene	45.8		"	40.0		114	80-120			

Matrix Spike Dup (EI60603-MSD1)

Source: 6I01001-02

Prepared & Analyzed: 09/06/06

Benzene	1.27	0.0250	mg/kg dry	1.32	ND	96.2	80-120	2.36	20	
Toluene	1.39	0.0250	"	1.32	ND	105	80-120	0.00	20	
Ethylbenzene	1.30	0.0250	"	1.32	ND	98.5	80-120	6.39	20	
Xylene (p/m)	3.03	0.0250	"	2.65	ND	114	80-120	3.57	20	
Xylene (o)	1.42	0.0250	"	1.32	ND	108	80-120	7.69	20	
Surrogate: a,a,a-Trifluorotoluene	42.3		ug/kg	40.0		106	80-120			
Surrogate: 4-Bromofluorobenzene	46.5		"	40.0		116	80-120			

Plains All American EH & S
 1301 S. County Road 1150
 Midland TX, 79706-4476

Project: Pogo Covington A Fed. #1
 Project Number: SRS# 2006-270
 Project Manager: Camille Reynolds

Fax: (432) 687-4914

**General Chemistry Parameters by EPA / Standard Methods - Quality Control
 Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI60501 - General Preparation (Prep)										
Blank (EI60501-BLK1) Prepared: 09/01/06 Analyzed: 09/05/06										
% Solids	100		%							
Duplicate (EI60501-DUP1) Source: 6I01001-01 Prepared: 09/01/06 Analyzed: 09/05/06										
% Solids	94.4		%		94.5			0.106	20	
Duplicate (EI60501-DUP2) Source: 6I01017-01 Prepared: 09/01/06 Analyzed: 09/05/06										
% Solids	86.8		%		88.2			1.60	20	
Batch EI60718 - Water Extraction										
Blank (EI60718-BLK1) Prepared & Analyzed: 09/07/06										
Chloride	ND	0.500	mg/kg							
LCS (EI60718-BS1) Prepared & Analyzed: 09/07/06										
Chloride	9.65	0.500	mg/kg	10.0		96.5	80-120			
Calibration Check (EI60718-CCV1) Prepared & Analyzed: 09/07/06										
Chloride	10.2		mg/L	10.0		102	80-120			
Duplicate (EI60718-DUP1) Source: 6I07003-01 Prepared & Analyzed: 09/07/06										
Chloride	1.54	5.00	mg/kg		1.59			3.19	20	J
Matrix Spike (EI60718-MS1) Source: 6I07003-01 Prepared & Analyzed: 09/07/06										
Chloride	103	5.00	mg/kg	100	1.59	101	80-120			

Plains All American EH & S
1301 S. County Road 1150
Midland TX, 79706-4476

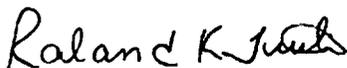
Project: Pogo Covington A Fed. #1
Project Number: SRS# 2006-270
Project Manager: Camille Reynolds

Fax: (432) 687-4914

Notes and Definitions

J Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By:



Date:

9/8/2006

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas
 Variance/ Corrective Action Report- Sample Log-In

Client: Plains
 Date/ Time: 8/31/06 17:00
 Lab ID #: WJ01001
 Initials: CK

Sample Receipt Checklist

Client Initials

	Yes	No		
#1 Temperature of container/ cooler?			1.5	°C
#2 Shipping container in good condition?	Yes	No		
#3 Custody Seals intact on shipping container/ cooler?	Yes	No	Not Present	
#4 Custody Seals intact on sample bottles/ container?	Yes	No	Not Present	
#5 Chain of Custody present?	Yes	No		
#6 Sample instructions complete of Chain of Custody?	Yes	No		
#7 Chain of Custody signed when relinquished/ received?	Yes	No		
#8 Chain of Custody agrees with sample label(s)?	Yes	No	ID written on Cont./ Lid	
#9 Container label(s) legible and intact?	Yes	No	Not Applicable	
#10 Sample matrix/ properties agree with Chain of Custody?	Yes	No		
#11 Containers supplied by EL0T?	Yes	No		
#12 Samples in proper container/ bottle?	Yes	No	See Below	
#13 Samples properly preserved?	Yes	No	See Below	
#14 Sample bottles intact?	Yes	No		
#15 Preservations documented on Chain of Custody?	Yes	No		
#16 Containers documented on Chain of Custody?	Yes	No		
#17 Sufficient sample amount for indicated test(s)?	Yes	No	See Below	
#18 All samples received within sufficient hold time?	Yes	No	See Below	
#19 VOC samples have zero headspace?	Yes	No	Not Applicable	

Variance Documentation

Contact: _____ Contacted by: _____ Date/ Time: _____

Regarding: _____

Corrective Action Taken:

- Check all that Apply:
- See attached e-mail/ fax
 - Client understands and would like to proceed with analysis
 - Cooling process had begun shortly after sampling event

Jeanne McMurrey

From: "Ken Dutton" <kdutton@basinenv.com>
To: "Jeanne" <jeanne@elabtxas.com>
Cc: "Camille Reynolds" <cjreynolds@paalp.com>
Sent: Thursday, September 07, 2006 8:52 AM
Subject: Pogo Covington A Federal # 1

Jeanne,

Please run a chloride analysis (EPA 300.0) on the North Floor soil sample collected from the Pogo Covington A Federal # 1 site.

thxs

Ken

--

This message has been scanned for viruses and dangerous content by Basin Broadband, and is believed to be clean.

9/7/2006

UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Land Management
New Mexico State Office

REPORT OF UNDESIRABLE EVENT

DATE OF OCCURRENCE/DISCOVERY: 8-18-2006 TIME OF OCCURRENCE: 11:15

DATE REPORTED TO BLM: 8-21-06 TIME REPORTED: 11:00

BLM OFFICE REPORTED TO: (FIELD/DISTRICT/OTHER) Carrizosa Office (Jim Amos)

LOCATION: (1/4 1/4) NE, NW SECTION 25 T. 22S R. 32E MERIDIAN New Mexico Home

COUNTY: Lea STATE: New Mexico WELL NAME _____

OPERATOR: COMPANY NAME Plains Marketing PHONE NO. (505) 441-0925

CONTACT PERSON'S NAME Camille Reynolds

SURFACE OWNER: BLM MINERAL OWNER: _____
(FEDERAL/INDIAN/FEE/STATE)

LEASE NO.: _____ RIGHT-OF-WAY NO.: TOM-92530

UNIT NAME / COMMUNITIZATION AGREEMENT NO. Carrizosa A Federal #1 Sump

TYPE OF EVENT, CIRCLE APPROPRIATE ITEM (S):

BLOWOUT, FIRE, FATALITY, INJURY, PROPERTY DAMAGE, (OIL SPILL), SALTWATER SPILL, OIL AND SALTWATER SPILL, TOXIC FLUID SPILL, HAZARDOUS MATERIAL SPILL, UNCONTROLLED FLOW OF WELLBORE FLUIDS, OTHER (SPECIFY):

CAUSE OF EVENT: Sump valve on pump vibrated open

HazMat Notified: (for spills) N/A

Law Enforcement Notified: (for thefts) N/A

CAUSE AND EXTENT OF PERSONAL INJURIES/CAUSE OF DEATH(S):

N/A
Safety Officer Notified: _____

EFFECTS OF EVENT: Crude oil impacted surface soil

ACTION TAKEN TO CONTROL EVENT: Value closed

LENGTH OF TIME TO CONTROL BLOWOUT OR FIRE: N/A

VOLUMES DISCHARGED: OIL 10 barrels WATER 0 GAS 0

OTHER AGENCIES NOTIFIED: OCD - Hobbs Office - PAT
Caperton

ACTION TAKEN OR TO BE TAKEN TO PREVENT RECURRENCE: _____

FINAL INVESTIGATION:
TEAM NAME(S) _____

FIELD INSPECTION DATE _____

SUMMARY OF RESULTS OF INSPECTION _____

RESOURCE LOSS WAS (CIRCLE ITEM): **AVOIDABLE** **UNAVOIDABLE**

DATE OF MEMO NOTIFYING MINEALS MANAGEMENT SERVICE THAT LOSS WAS AVOIDABLE:

DATE/TIME/PERSON NOTIFIED:
DISTRICT OFFICE _____

STATE OFFICE _____

WASHINGTON OFFICE _____

SUMMARY OF RESULTS OF RECLAMATION/CORRECTIVE ACTION:

REMARKS: _____

SIGNATURE OF AUTHORIZED OFFICER _____

DATE: _____ **TITLE:** _____

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Plains Marketing, LP	Contact Camille Reynolds	
Address 3112 West US Hwy. 82, Lovington, NM	Telephone No. 505-441-0965	
Facility Name Covington A Federal #1 Sump	Facility Type Station	
Surface Owner BLM	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter C	Section 25	Township 22S	Range 32E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
------------------	---------------	-----------------	--------------	---------------	------------------	---------------	----------------	---------------

Latitude 32°22'40.0" Longitude 103°37'49.0"

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 10 barrels	Volume Recovered 5 barrels
Source of Release Sump valve on pump	Date and Hour of Occurrence 8/18/2006 @ 11:15	Date and Hour of Discovery 8/18/2006 @ 11:30
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Pat Caperton	
By Whom? Camille Reynolds	Date and Hour 8/18/2006 @ 15:45	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

RECEIVED
9-22-06
h
h

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Sump valve on pump vibrated open. The valve was closed to mitigate the release. The pressure on the line is approximately 20 psi and the gravity of the sweet crude oil is 41. The oil has an H2S content of <10 ppm. This was a surface release.

Describe Area Affected and Cleanup Action Taken.* The impacted soil was excavated and stockpiled on plastic. Aerial extent of surface impact was 1,450 square feet.

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.

Signature: <i>Camille Reynolds</i>	OIL CONSERVATION DIVISION	
Printed Name: Camille Reynolds	Approved by District Supervisor: <i>[Signature]</i>	
Title: Remediation Coordinator	Approval Date: <u>9.22.06</u>	Expiration Date: <u>—</u>
E-mail Address: <u>cjreynolds@paalp.com</u>	Conditions of Approval: <u>—</u>	Attached <input type="checkbox"/>
Date: <u>8/22/06</u>	Phone: <u>505-441-0965</u>	

* Attach Additional Sheets If Necessary