

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, L. P.	Contact	Camille Reynolds
Address	3112 W. U. S. Hwy 82, Lovington, NM 88260	Telephone No.	(505) 441-0965
Facility Name	Covington A Federal # 1 Sump	Facility Type	Station

Surface Owner	BLM	Mineral Owner		Lease No.	
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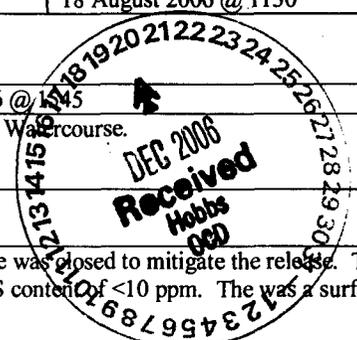
**LOCATION OF RELEASE**

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

Latitude 32° 22' 40.0" North Longitude 103° 37' 49.0" West.

**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	18 August 2006 @ 1115	Date and Hour of Discovery	18 August 2006 @ 1130
Was Immediate Notice Given?	XX Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Pat Caperton		
By Whom?	Camille Reynolds	Date and Hour	18 August 2006 @ 1145		
Was a Watercourse Reached?	<input type="checkbox"/> Yes XX <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			



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. The was a surface release.

Describe Area Affected and Cleanup Action Taken.\* Per the approved NMOCD Plains Marketing, L. P., Preliminary Site Investigation & Remediation/Work Plan, dated 12 September 2006, the crude oil release site was excavated, the impacted caliche placed on a poly-liner adjacent to the excavation and confirmation soil samples were collected from the floor & walls of the excavation. Once the excavation confirmation soil samples were below NMOCD regulatory standards and the stockpiled caliche was transported to the Plains Lea Station Land Farm. Backfill material (caliche) was obtained from a nearby landowner and the site was backfilled with the caliche and contoured to the original tank battery pad grade.

**SEE ATTACHED BASIN ENVIRONMENTAL SERVICE TECHNOLOGIES CLOSURE REQUEST, DATED 15 DECEMBER 2006, WITH ATTACHMENTS FOR DETAILS OF REMEDIAL ACTIVITIES CONDUCTED.**

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>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Camille Reynolds	Approved by District Supervisor: <i>ENW/KO ENGR</i> <i>[Signature]</i>	
Title: Remediation Coordinator	Approval Date: <i>12-20-06</i>	Expiration Date:
E-mail Address: cjreynolds@paalp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 18 December 2006	Phone: (505) 441-0965	

# Basin Environmental Service Technologies, LLC

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



15 December 2006

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

Re: Closure Request, Pogo Covington A Federal # 1 Sump (231735)  
Plains Marketing, L. P. Preliminary Site Investigation Report and  
Remediation/Work Plan, dated 12 September 2006  
Unit C (NE ¼, NW ¼) Section 25, Township 22 South, Range 32 East  
Lea County, New Mexico  
Plains SRS: 2006-270  
NMOCD File Number: 1RP-1008

Dear Mr. Johnson:

Basin Environmental Services (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for closure of the Covington A Federal # 1 Sump remediation site at the above referenced location. Soil remediation activities were successfully accomplished as proposed in the New Mexico Oil Conservation Division (NMOCD) approved Preliminary Site Investigation Report and Remediation/Work Plan, dated 12 September 2006.

Basin Environmental Service Technologies, LLC (Basin) mobilized to a crude oil release on 18 August 2006, located at the Pogo Covington A Federal # 1 Sump. The equipment malfunction was repaired and the impacted Pogo Tank Battery caliche pad was excavated and stockpiled on a 6-mil poly-liner adjacent to the site. As reported on the C-141, dated 22 August 2006, approximately 10 barrels of crude oil were released and 5 barrels recovered. The NMOCD ranking criteria for the Pogo Covington A Federal # 1 Sump release site was 0-9 which sets the soil 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 Pogo Covington A Federal # 1 Sump crude oil release site:

- 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-mil poly-liner adjacent to the site. 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 ranged 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 was 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.
- A Preliminary Site Investigation Report and Remediation/Work Plan, dated 12 September 2006, was submitted to NMOCD, Hobbs District I and subsequently approved. The approved plan proposed transporting approximately 100 cubic yards of impacted caliche to the Plains Lea Station Landfarm (LSLF) and obtaining clean backfill caliche from a nearby landowner.
- In October 2006, Plains submitted a NMOCD Form C-138, which was approved by NMOCD, to transport the impacted caliche to the LSLF. Approximately 100 cubic yards of impacted caliche was transported to the LSLF. Clean caliche backfill material was obtained from a nearby landowner and the excavation was contoured to match the original tank battery caliche pad grade.

The remediation activities were completed in accordance with the NMOCD approved Plains Marketing, L. P., Preliminary Site Investigation Report and Remediation/Work Plan, dated 12 September 2006. Based on the results of the NMOCD approved remediation activities conducted at the Pogo Covington A Federal # 1 Sump 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)*.

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

Sincerely,



Ken Dutton

Basin Environmental Services

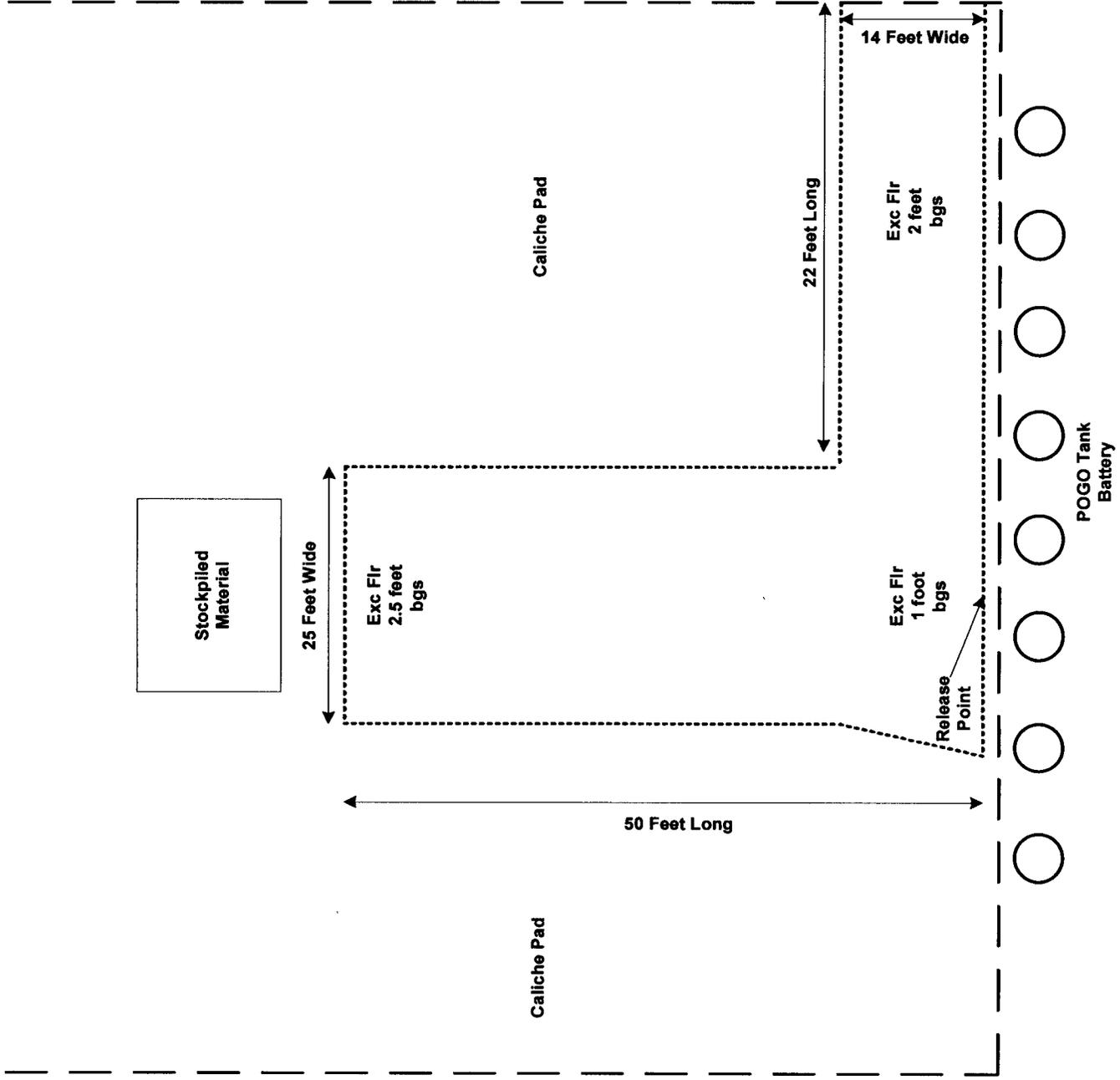
Attachments: Figure 2, Excavation Site Map  
Figure 3, Excavation Site Map – Soil Sampling Locations  
Table 1, Soil Chemistry  
Digital Photographs  
NMOCD C-141 (Initial)  
NMOCD C-141 (Final)

Cc: Mr. Jim Amos (BLM)



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



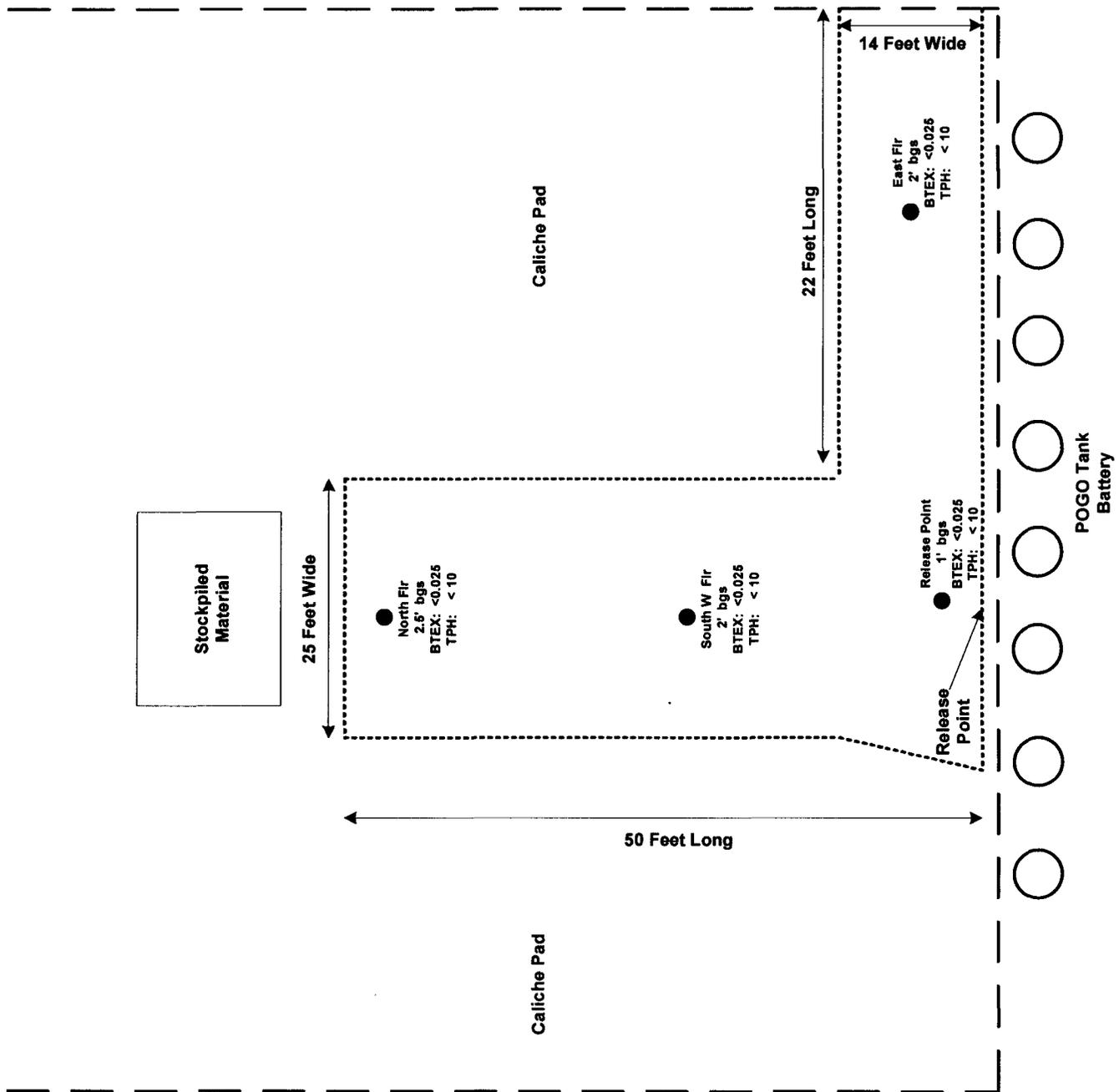
LEGEND

Excavated Area	-----
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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

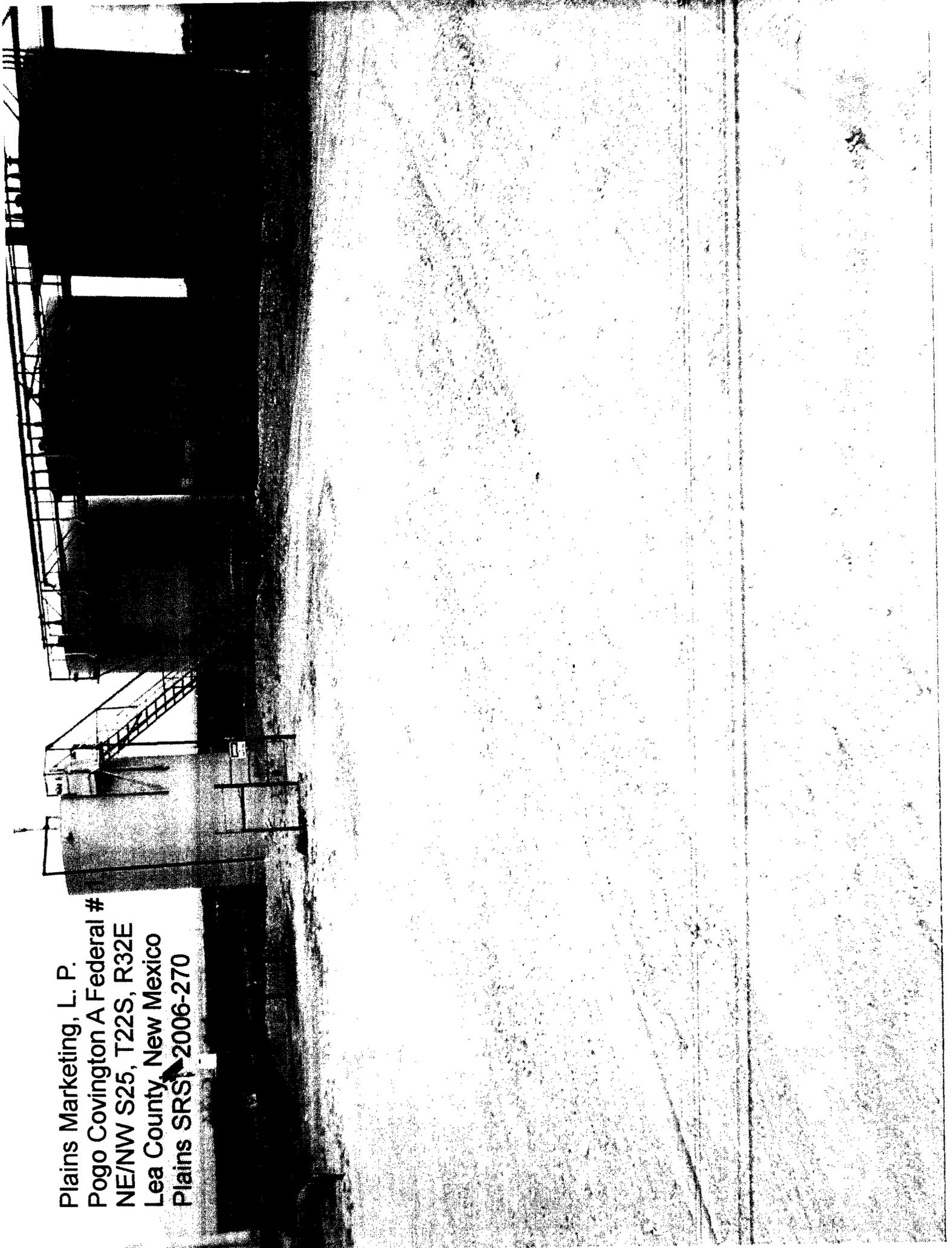


LEGEND

Excavated Area	-----
Sampling Locations	●



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



Plains Marketing, L. P.  
Pogo Covington A Federal # 1  
NE/NW S25, T22S, R32E



Plains Engineering, L.P.

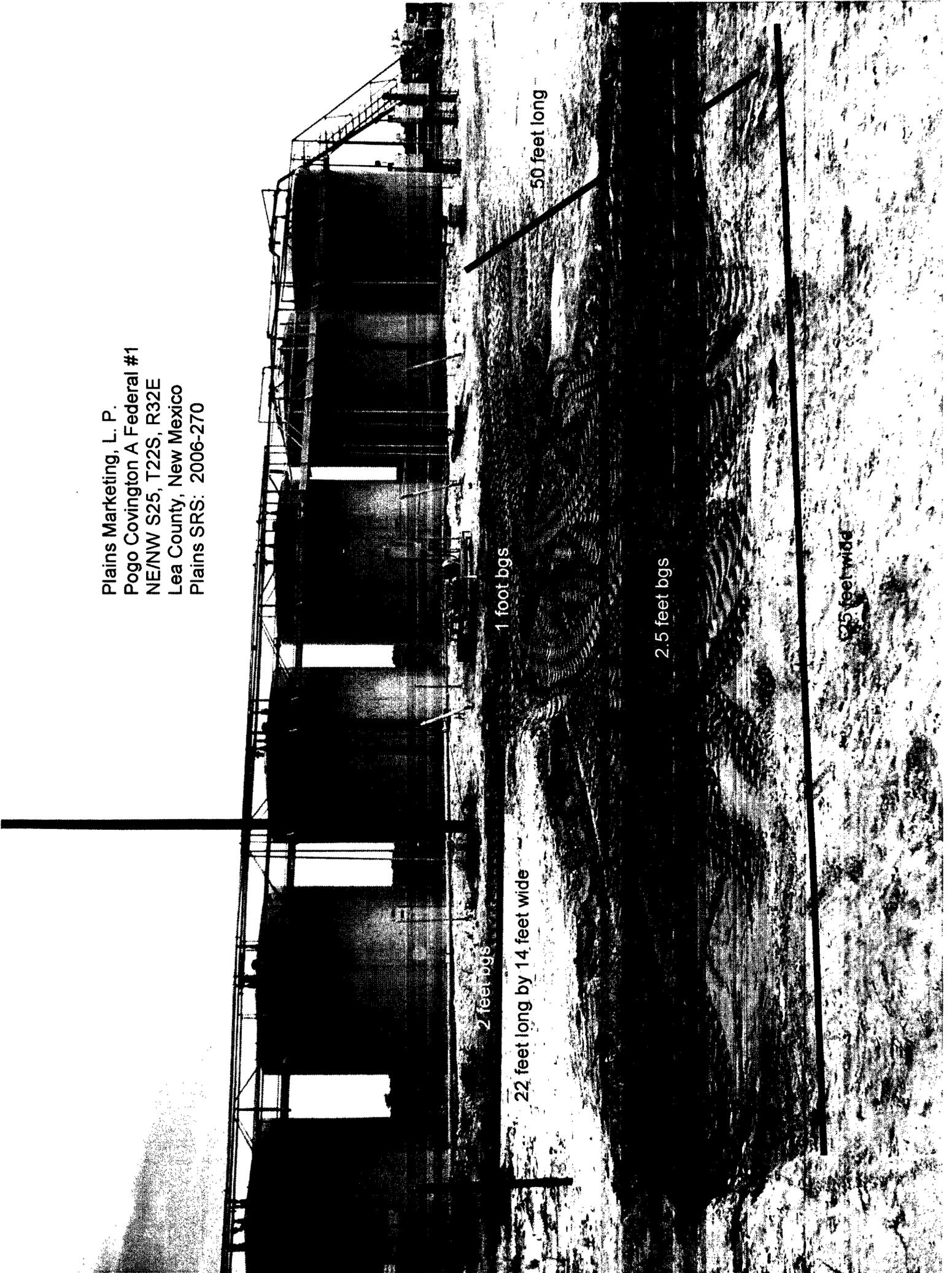
Pogo Covington A Federal # 1

NE 1/4-926, T22S, R32E

Lea County, New Mexico

Plains SRS# 2006-270

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



2 feet bgs

22 feet long by 14 feet wide

1 foot bgs

50 feet long

2.5 feet bgs

25 feet wide

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



Release Point