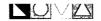


REPORTS



2006 ANNUAL MONITORING REPORT /R-120 Report 2006

MONUMENT 11

LEA COUNTY, NEW MEXICO
SE ¼ NE ¼ SECTION 30, TOWNSHIP 19 SOUTH, RANGE 37 EAST
PLAINS EMS NUMBER: TNM MONUMENT-11
NMOCD Reference Number 1R-120

Prepared For:

PLAINS MARKETING, L.P. 333 CLAY STREET, SUITE 1600 HOUSTON, TEXAS 77002



Prepared By:

NOVA Safety and Environmental 2057 Commerce Street

Midland, Texas 79703

March, 2007

Curt D. Stanley

Project Manager

Todd K. Choban

Vice President Technical Services

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INTRODUCTION

On behalf of Plains Marketing, L.P., (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1st of each year. Beginning on May 29, 2004, project management responsibilities for the Monument 11 site (the site) were assumed by NOVA. The site was previously managed by Environmental Technology Group, Inc (ETGI). The site, was formerly the responsibility of Enron Oil Trading and Transportation (EOTT), is now the responsibility of Plains. This report is intended to be viewed as a complete document with text, figures, tables, and appendices. This report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2006 only. However, historic data tables as well as 2006 laboratory analytical reports are presented on the enclosed disk. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each quarter of 2006 to assess the levels and extent of dissolved phase constituents and for the presence of Phase Separated Hydrocarbon (PSH) constituents. Each groundwater monitoring event consisted of measuring static water levels in monitor wells, checking for the presence of PSH on the water column and purging and sampling of each scheduled well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

The legal description of the site is SE ¼ NE ¼ Section 30, Township 19 South, Range 37 East. No information with respect to the release date, volume of crude oil released and recovered, excavation dimensions or pipeline repair is available as this release occurred while the pipeline was operated by Texas New Mexico Pipeline Company (TNM). The Release Notification and Corrective Action Form (C-141) is provided as Appendix A. The initial site investigation, which consisted of the installation of four (4) groundwater monitor wells (MW-1 through MW-4), was conducted by previous consultants.

Six (6) groundwater monitor wells (MW-1 through MW-6) are currently on-site. Gauging occurs monthly for monitor well MW-4, the only monitor well to display measurable thicknesses of PSH in 2006.

FIELD ACTIVITIES

A measurable thickness of PSH was observed in monitor well MW-4 during the 2006 reporting period. Monitor well MW-4 exhibited a sheen throughout the reporting period and measurable PSH (greater than 0.01 feet) during the 2nd, 3rd and 4th quarter sampling events. Less than one (1) gallon of PSH was recovered from the site during all of 2006. Approximately 13 gallons (0.36 barrels) of product have been recovered since project inception.

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule, which was approved by the NMOCD in correspondence dated April 28, 2004 and amended in NMOCD correspondence dated June 22, 2005:

NMOCD Approved Sampling Schedule									
MW-1	Quarterly								
MW-2	Annually								
MW-3	Annually								
MW-4	Quarterly								
MW-5	Quarterly								
MW-6	Quarterly								

The site monitor wells were gauged and sampled on March 10, June 12, September 12, and November 28, 2006. During each sampling event, monitor wells not containing PSH were purged of approximately three (3) well volumes of water or until the wells failed to produce water using a PVC bailer or electric Grundfos pump. Groundwater was allowed to recharge and samples were collected using disposable Teflon samplers. Water samples were collected in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was contained in a polystyrene tank and disposed of by Key Energy of Hobbs, New Mexico utilizing a licensed disposal facility (OCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed from measurements collected during the four (4) quarterly monitoring events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2006 is provided as Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.019 feet/foot to the southeast as measured between groundwater monitor wells MW-5 and MW-1. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3598.43 and 3604.81 feet above mean sea level, in MW-1 on December 28, 2006 and MW-5 on September 12, 2006, respectively.

LABORATORY RESULTS

Groundwater samples collected during the 2006 monitoring events were delivered to Trace Analysis, Inc., of Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8021b. A listing of BTEX constituent concentrations for 2006 is summarized in Table 2. Copies of the laboratory reports for 2006 are provided on the enclosed disk. The quarterly groundwater sample results for benzene and BTEX constituent concentrations are depicted on Figures 3A-3D.

Monitor well MW-1 is sampled on a quarterly schedule and analytical results indicate benzene, toluene, ethylbenzene and xylene concentrations were below laboratory method detection limits (MDL) of 0.001 mg/L. BTEX constituent concentrations were below NMOCD regulatory limits during all four quarters of the 2006 reporting period.

Monitor well MW-2 is sampled on an annual schedule and analytical results indicate benzene, toluene, ethylbenzene and xylene concentrations were below MDL of 0.001 mg/L. BTEX constituent concentrations were below NMOCD regulatory limits during the 4th quarter sampling event (the first three (3) quarters were not sampled due to NMOCD approved sample reduction).

Monitor well MW-3 is sampled on an annual schedule and analytical results indicate benzene, toluene, ethylbenzene and xylene concentrations were below MDL of 0.001 mg/L. BTEX constituent concentrations were below NMOCD regulatory limits during the 4th quarter sampling even (the first three (3) quarters were not sampled due to NMOCD approved sample reduction).

Monitor well MW-4 is sampled on a quarterly schedule and analytical results indicate benzene and toluene concentrations were below MDL of 0.001 mg/L, ethylbenzene concentrations ranged from 0.001 to 0.010 mg/L and xylene concentrations ranged from 0.006 to 0.095 mg/L. A PSH thickness of 0.07 feet and 0.16 feet was recorded in monitor well MW-4 during the 2nd quarter and 4th quarter, respectively. Monitor well MW-4 was not sampled during the 2nd and 4th quarters of the reporting period. BTEX constituent concentrations were below NMOCD regulatory limits during the 1st and 3rd quarters of the 2006 reporting period.

Monitor well MW-5 is sampled on a quarterly schedule and analytical results indicate benzene, toluene, ethylbenzene and xylene concentrations were below MDL of 0.001 mg/L. BTEX constituent concentrations were below NMOCD regulatory limits during all four quarters of the 2006 reporting period.

Monitor well MW-6 is sampled on a quarterly schedule and analytical results indicate benzene, toluene, ethylbenzene and xylene concentrations were (MDL) of 0.001 mg/L during the 1st, 2nd and 4th quarters and MDL of 0.005 mg/L during the 3rd quarter of 2006. BTEX constituent concentrations were below NMOCD regulatory limits during all four quarters of the 2006 reporting period.

Review of laboratory analytical results of the groundwater samples obtained during the 2006 monitoring period indicate the benzene and total BTEX constituent concentrations remain below applicable NMOCD standards in all monitor well samples submitted for analysis.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of monitoring activities for the 2006 annual monitoring period. Currently, there are six (6) groundwater monitor wells (MW-1 through MW-6) on-site. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.019 feet/foot to the southeast.

Gauging data for the reporting period indicates PSH impact appears to be limited to monitor well MW-4. Monitor well MW-4 exhibited a sheen throughout the reporting period. PSH thicknesses ranged from a sheen to 0.16 feet. Less than one (1) gallon of PSH was recovered from the site during 2006 reporting period. Approximately 13 gallons (0.36 barrels) of PSH have been recovered by manual recovery methods since project inception.

Review of laboratory analytical results of the groundwater samples obtained during the 2006 monitoring period indicate the benzene and total BTEX constituent concentrations were below the applicable NMOCD standard in all monitor wells during the reporting period. Based on the laboratory analytical data from groundwater samples collected from monitor well MW-4, the sheen and measurable PSH observed in this monitor well has not resulted in the elevation of BTEX constituent concentrations above the NMOCD criteria during the 2006 reporting period.

ANTICIPATED ACTIONS

Groundwater monitoring and annual reporting will continue in 2007.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report 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 consent of NOVA and/or Plains.

DISTRIBUTION

Copy 1 Ben Stone

New Mexico Energy, Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Drive

Santa Fe, NM 87505

Copy 2: Larry Johnson and Patricia Caperton

New Mexico Energy, Minerals and Natural Resources Department

Oil Conservation Division, District 1

1625 French Drive Hobbs, NM 88240

(Data disk only per Larry Johnson)

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Plains Marketing, L.P. 3112 Highway 82 Lovington, NM

cjreynolds@paalp.com

Copy 4: Jeff Dann

Plains Marketing, L.P.

333 Clay Street Suite 1600

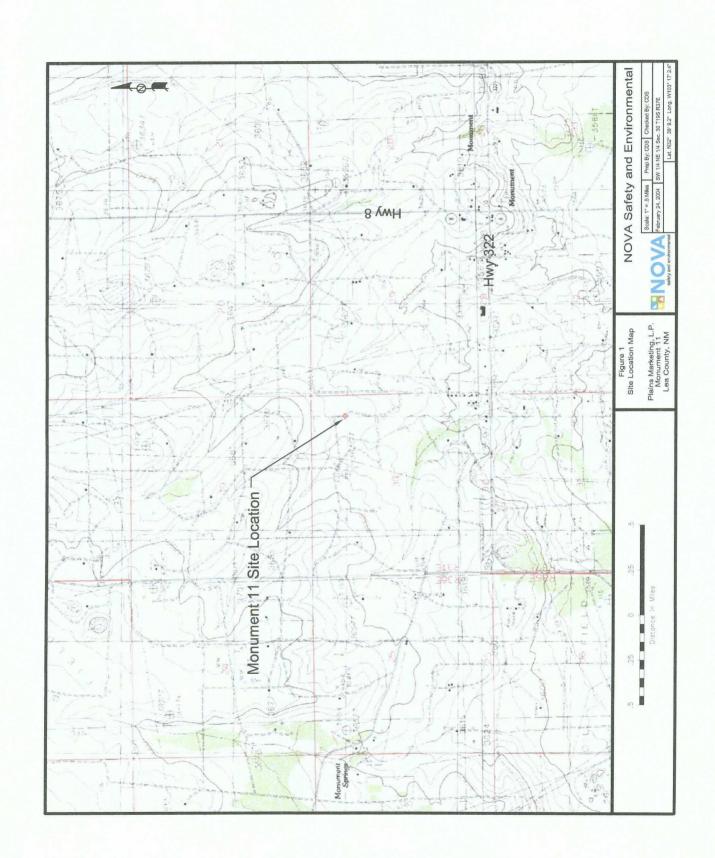
Houston, TX 77002 jpdann@paalp.com

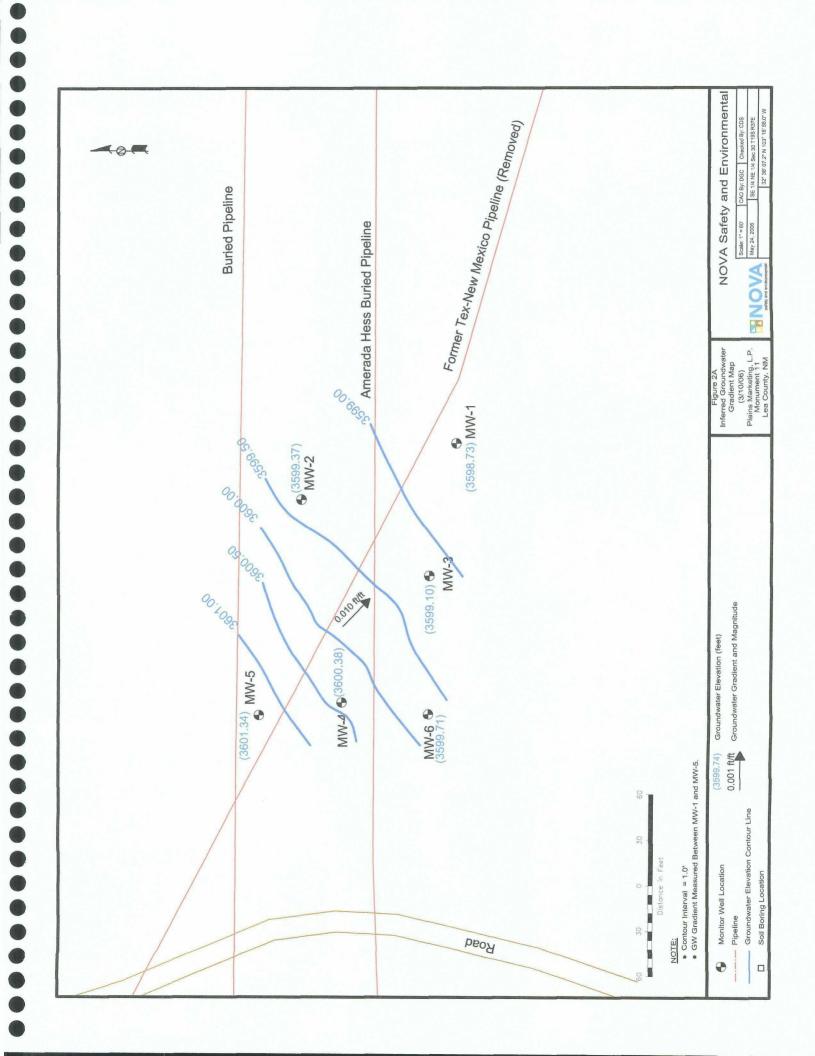
Copy 5: NOVA Safety and Environmental

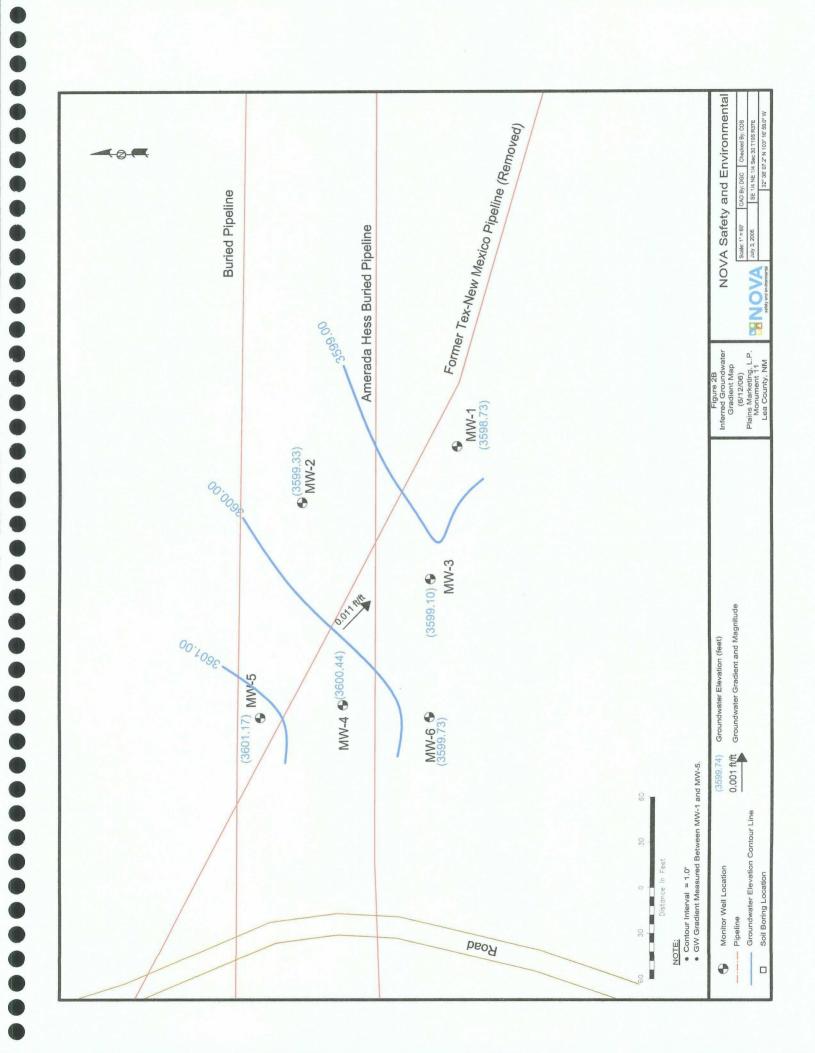
2057 Commerce Street Midland, TX 79703

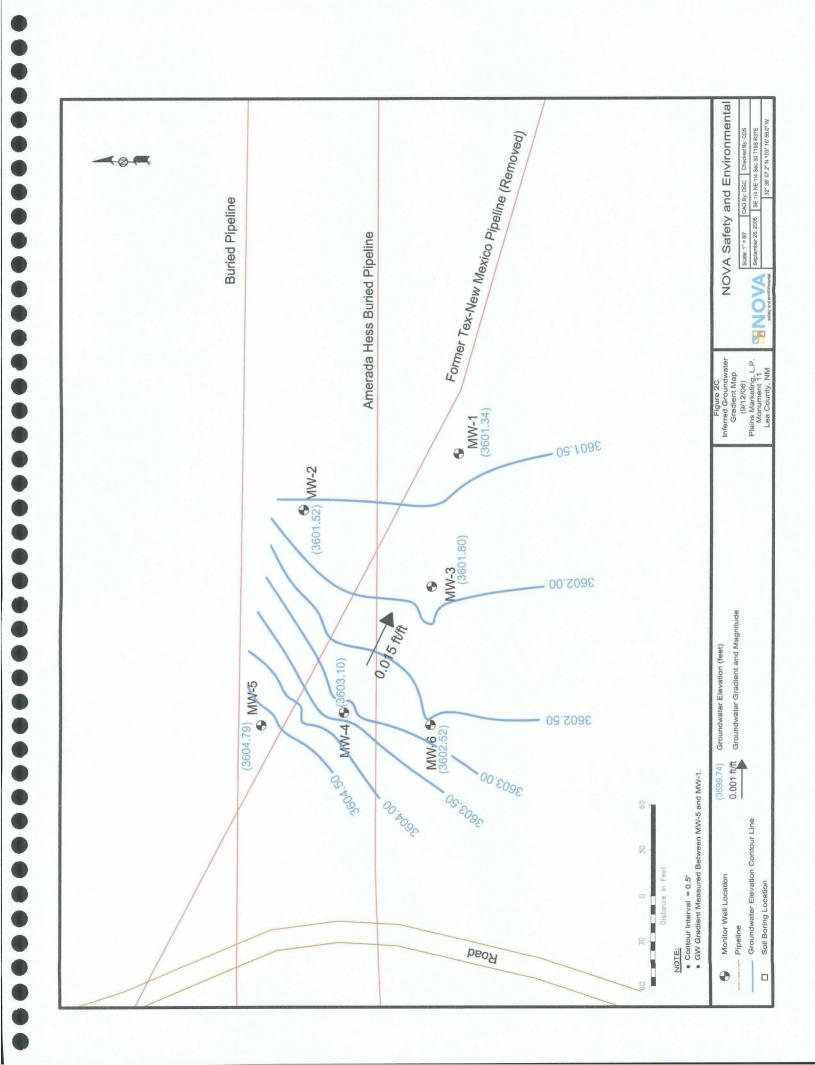
cstanley@novatraining.cc

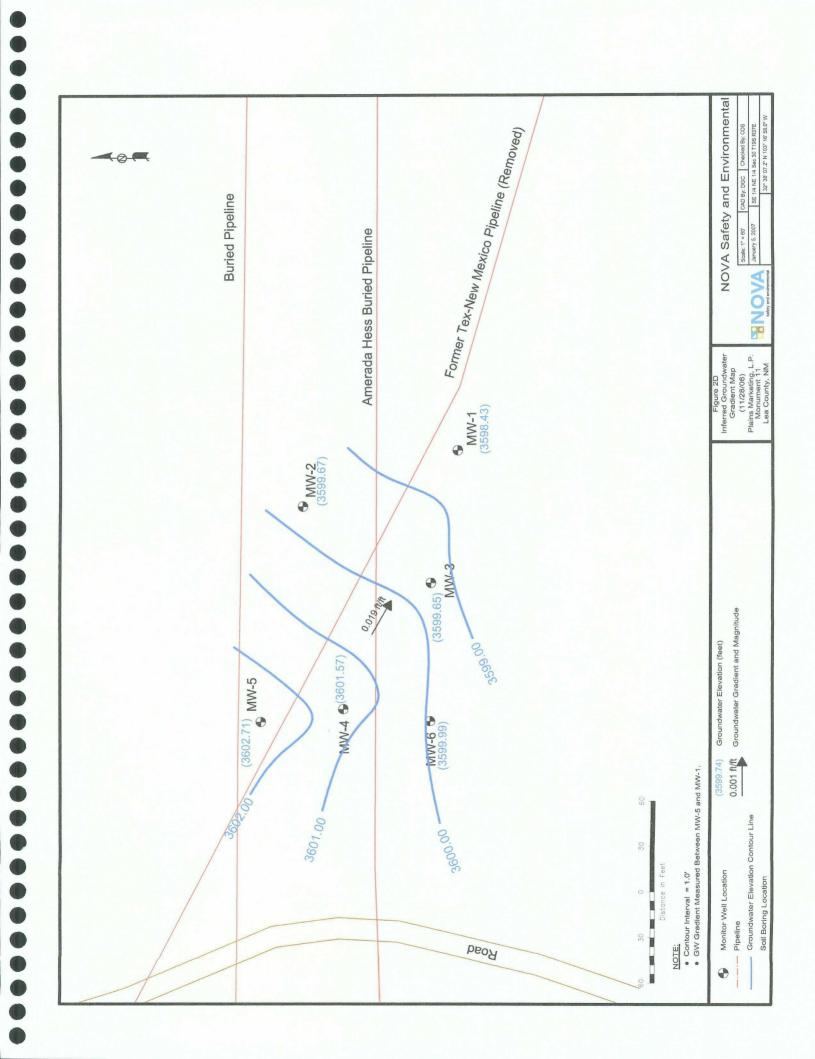
FIGURES

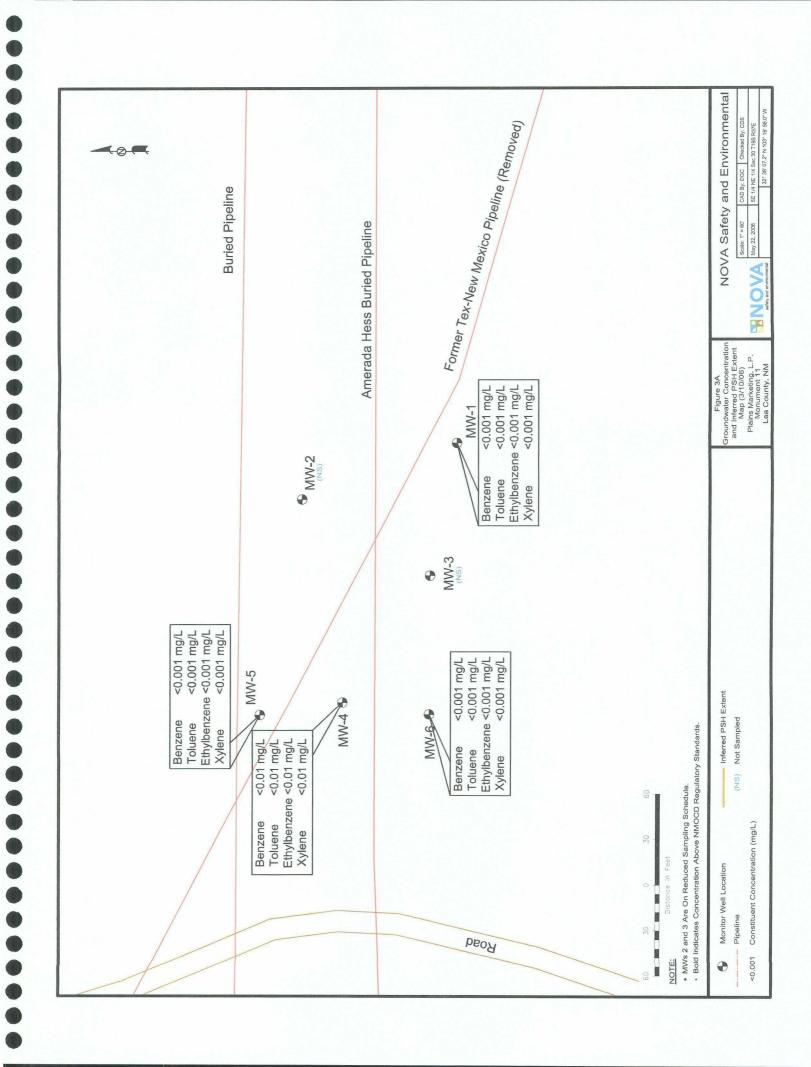


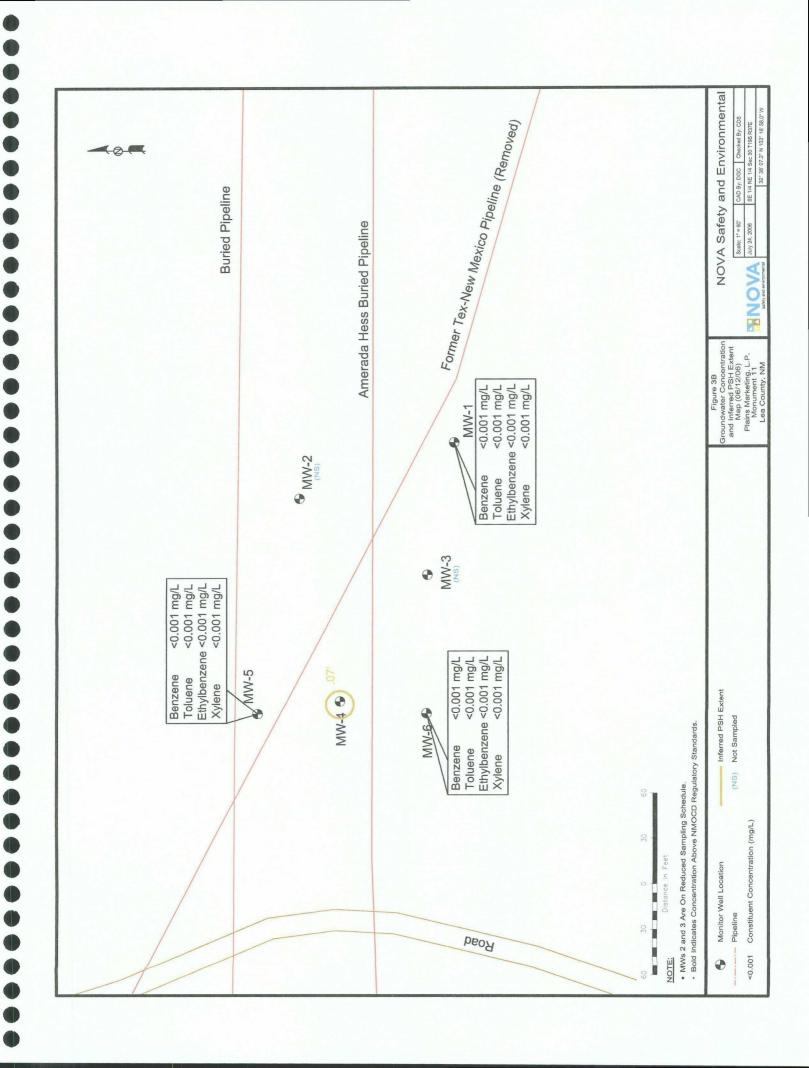


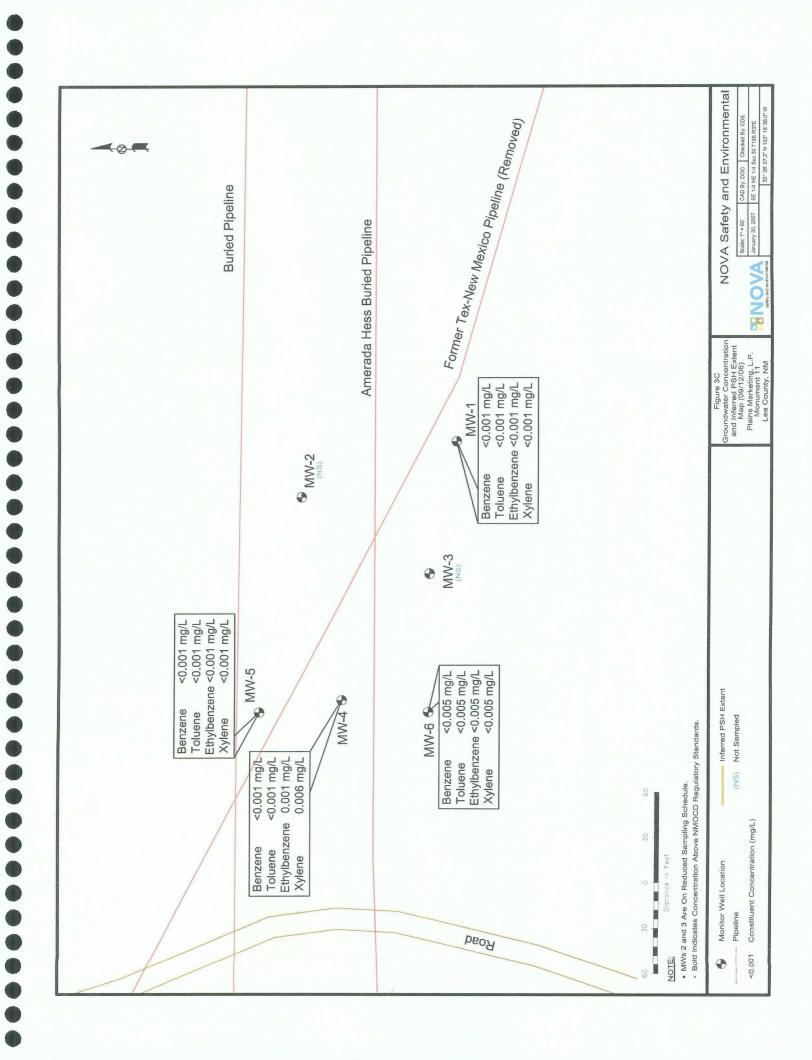


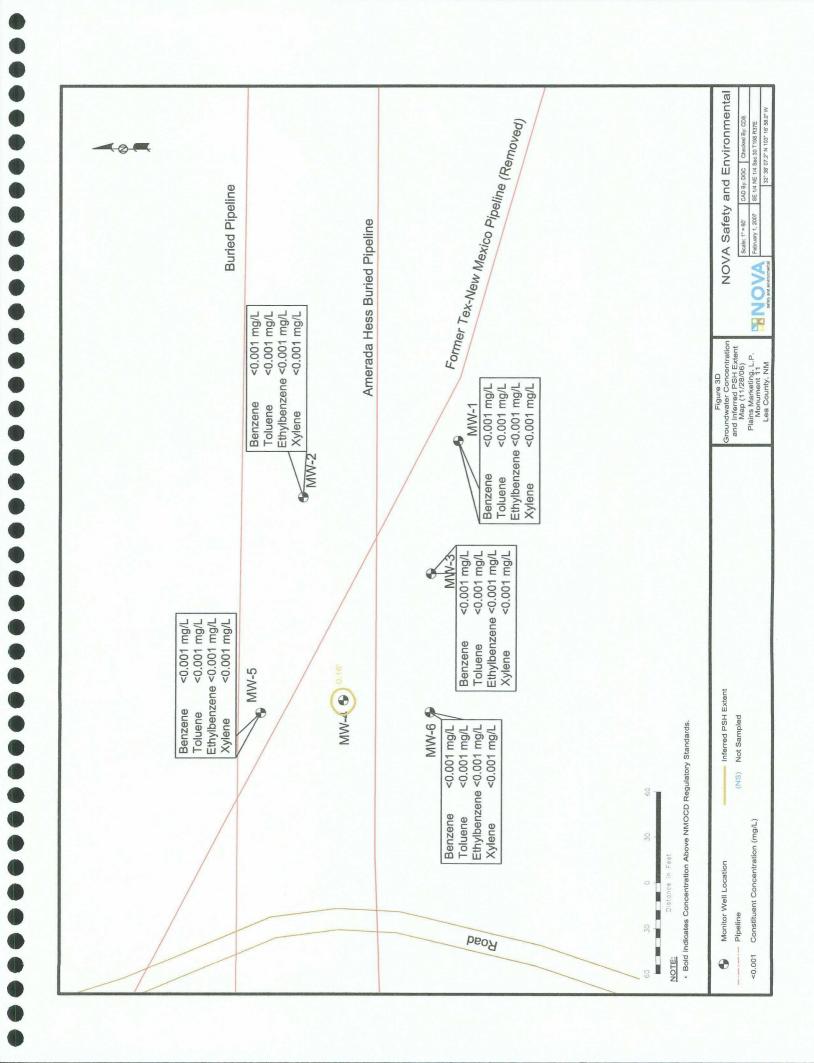












TABLES

TABLE 1 2006 GROUNDWATER ELEVATION DATA

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PLAINS MARKETING, L.P. MONUMENT 11 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION		
MW-1	03/10/06	3,624.90	_	26.17	0.00	3,598.73		
212 11	06/12/06	3,624.90	<u> </u>	26.17	0.00	3,598.73		
	07/13/06	3,624.90	SHEEN	26.16	0.00	3,598.74		
	07/21/06	3,624.90	-	26.23	0.00	3,598.67		
	08/09/06	3,624.90		26.25	0.00	3,598.65		
	09/12/06	3,624.90		23.66	0.00	3,601.24		
	09/16/06	3,624.90	SHEEN	23.56	0.00	3,601.34		
	10/04/06	3,624.90		23.79	0.00	3,601.11		
	10/31/06	3,624.90	SHEEN	24.62	0.00	3,600.28		
	11/15/06	3,624.90	SHEEN	24.60	0.00	3,600.30		
	11/28/06	3,624.90	-	26.47	0.00	3,598.43		
MW-2	03/10/06	3,624.91	_	25.54	0.00	3,599.37		
312111	06/12/06	3,624.91		25.58	0.00	3,599.33		
	09/12/06	3,624.91		23.39	0.00	3,601.52		
	11/28/06	3,624.91		25.24	0.00	3,599.67		
		- 7						
MW-3	03/10/06	3,623.90	-	24.89	0.00	3,599.01		
272 77	06/12/06	3,623.90		24.89	0.00	3,599.01		
	09/12/06	3,623.90	_	22.19	0.00	3,601.71		
	11/28/06	3,623.90		24.34	0.00	3,599.56		
						,		
MW-4	01/18/06	3,624.02	sheen	23.70	0.00	3,600.32		
	02/15/06	3,624.02	sheen	23.70	0.00	3,600.32		
	03/10/06	3,624.02	sheen	23.64	0.00	3,600.38		
	03/20/06	3,624.02	sheen	23.59	0.00	3,600.43		
	04/19/06	3,624.02	23.57	23.63	0.06	3,600.44		
	06/12/06	3,624.02	23.57	23.64	0.07	3,600.44		
	07/13/06	3,624.02	23.56	23.64	0.08	3,600.45		
	07/21/06	3,624.02	sheen	23.69	0.00	3,600.33		
	08/09/06	3,624.02	sheen	23.71	0.00	3,600.31		
	09/12/06	3,624.02	sheen	20.92	0.00	3,603.10		
	09/16/06	3,624.02	sheen	20.79	0.00	3,603.23		
	10/04/06	3,624.02	sheen	21.14	0.00	3,602.88		
	10/31/06	3,624.02	21.80	21.96	0.16	3,602.20		
	11/15/06	3,624.02	21.76	21.91	0.15	3,602.24		
	11/28/06	3,624.02	22.43	22.59	0.16	3,601.57		
MW-5	03/10/06	3,625.24	_	23.90	0.00	3,601.34		

TABLE 1 2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P. MONUMENT 11 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-5	06/12/06	3,625.24	-	24.07	0.00	3,601.17
	09/12/06	3,625.24	-	20.43	0.00	3,604.81
	11/28/06	3,625.24	-	22.53	0.00	3,602.71
MW-6	03/10/06	3,623.71	- ·	24.00	0.00	3,599.71
	06/12/06	3,623.71	-	23.98	0.00	3,599.73
	09/12/06	3,623.71		21.19	0.00	3,602.52
	11/28/06	3,623.71		23.72	0.00	3,599.99

TABLE 2

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P. MONUMENT 11 LEA COUNTY, NEW MEXICO

All concentrations are in mg/L

All concentrations are in mg/L SW 846 - 8260												
SAMPLE	SAMPLE											
DATE	DATE	BENZENE	TOLUENE	ETHYL- BENZENE	m, p - XYLENES	o - XYLENE						
MW-1	03/10/06	< 0.001	< 0.001	< 0.001	< 0.001							
	06/12/06	< 0.001	< 0.001	< 0.001	< 0.001							
	09/12/06	< 0.001	<0.001	< 0.001	< 0.001							
	11/28/06	< 0.001	< 0.001	< 0.001	< 0.001							
MW-2	03/10/06	Not Sampled	on Current S	Sample Schedu	le							
	06/12/06	Not Sampled on Current Sample Schedule										
	09/12/06	Not Sampled	l on Current S	Sample Schedu	le							
	11/28/06	< 0.001	< 0.001	< 0.001	<0.0	001						
MW-3	03/10/06	Not Sampled	on Current S	Sample Schedu	ile							
	06/12/06	Not Sampled on Current Sample Schedule										
	09/12/06	Not Sampled on Current Sample Schedule										
	11/28/06	< 0.001	< 0.001	< 0.001	< 0.001							
MW-4	03/10/06	< 0.01	< 0.01	< 0.01	< 0.01							
	06/12/06	Not Sampled due to PSH in Well										
	09/12/06	< 0.001	< 0.001	0.001	0.006							
	11/28/06	Not Sampled due to PSH in Well										
MW-5	03/10/06	< 0.001	< 0.001	< 0.001	<0.0	001						
	06/12/06	< 0.001	< 0.001	< 0.001	<0.0	001						
	09/12/06	< 0.001	< 0.001	< 0.001	<0.0	001						
	11/28/06	< 0.001	< 0.001	< 0.001	< 0.001							
MW-6	03/10/06	< 0.001	< 0.001	< 0.001	<0.0	001						
	06/12/06	< 0.001	< 0.001	< 0.001	<0.0	001						
	09/12/06	< 0.005	< 0.005	< 0.005	<0.0	005						
	11/28/06	< 0.001	< 0.001	< 0.001	<0.0	001						

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APPENDICES

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

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

State of New Mexico **Energy Minerals and Natural Resources**

Submit 2 Copies to appropriate

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

District Office in accordance with Rule 116 on back side of form

Form C-141

Revised October 10, 2003

						والمناسبة								
Release Notification and Corrective Action														
	OPERA	OPERATOR x Initial Report						Final Report						
Name of Company Plains Pipeline, LP							Contact:		Camille	e Reyn	olds			
						Telephone N	√o.	505-44	1-0965	5				
						Facility Typ	e:	Pipelin	ie					
Surface Owner: Mineral Owner New Mexico State Land Office										Lease No.				
LOCATION OF RELEASE														
Unit Letter A	Section 30	Township 19S	Range 37E	Feet from	the N	North	h/South Line	Feet f	from the	East/V	Vest Line	County Lea		!
			Latit	ude <u>32 de</u>	grees 38	3 ' 9.	.2" Longitud	e <u>103 c</u>	degrees 1	7' 2.4"				
					NATU	IRE	E OF RELI							·
Type of Rele		wn						Volume of Release: Unknown Volume Recovered Unknown						
Source of Re	lease:							Date and Hour of Occurrence Unknown				covery		
Was Immedia	ate Notice (If YES, To	If YES, To Whom?						
		Y	es \square N	No 🗌 Not	t Require	ed								
By Whom?							Date and H	Date and Hour						
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.								
☐ Yes ☒ No														
If a Watercon	ırse was Im	pacted, Descr	ibe Fully.*	*										
		•	-											
1														
Describe Cau	ise of Probl	lem and Reme	dial Action	n Taken.*										
Describe Are	a Affected	and Cleanup A	Action Tal	cen.*										

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.

NOTE: Texas-New Mexico Pipeline was the owner/operator of the pipeline system at the time of the release, initial response information is

OIL CONSERVATION DIVISION Signature: Approved by District Supervisor: Camille Reynolds Printed Name: Title: Remediation Coordinator Approval Date: **Expiration Date:** Conditions of Approval: E-mail Address: cjreynolds@paalp.com Attached Date: 3/21/2005 Phone: (505)441-0965

•

unavailable.

^{*} Attach Additional Sheets If Necessary