

AP - 9

REPORT

DATE:

2006



AP-9
Report
2006

2006
ANNUAL MONITORING REPORT

HDO-90-23

NE ¼, NW ¼, SECTION 6, TOWNSHIP 20 SOUTH, RANGE 37 EAST
LEA COUNTY, NEW MEXICO
PLAINS EMS NUMBER: HDO-90-23
NMOCD REFERENCE AP-009

PREPARED FOR:

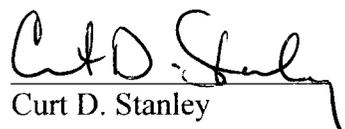
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March 2007


Curt D. Stanley
Project Manager

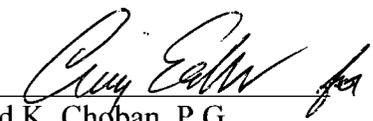

Todd K. Choban, P.G.
Vice President Technical Services

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ENCLOSED ON DATA DISK

2006 Annual Monitoring Report

2006 Tables 1 and 2 – Groundwater Elevation and BTEX Concentration Data

2006 Figures 1, 2A-2D, 3A-3D, 4

Electronic Copies of Laboratory Reports

Historic Groundwater Elevation Data Table

Historic BTEX Concentration Table

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 1 of each year. Beginning on May 29, 2004, project management responsibilities were assumed by NOVA, having previously been managed by Environmental Technology Group, Inc (ETGI). The HDO-90-23 site, which was formally the responsibility of Texas New Mexico Pipeline Company (TNM), is now the responsibility of Plains. This report is intended to be viewed as a complete document with text, figures, tables and appendices. The 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 provided on the enclosed data disk. A Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each of four quarters in calendar year 2006 to assess the levels and extent of dissolved phase constituents and Phase Separated Hydrocarbon (PSH). The groundwater monitoring events consisted of measuring static water levels in the monitor wells, checking for the presence of PSH and purging and sampling of each 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 site is located in the NE 1/4 of the NW 1/4 of Section 6, Township 20 South, Range 37 East in Lea County. The HDO 90-23 release was discovered by TNM personnel and reported on March 27, 1990. According to the release report, an estimated 750 barrels of crude oil were released and 550 barrels were recovered. The release occurred from a 14-inch Texas-New Mexico Pipeline Company (TNM) pipeline and was attributed to structural failure associated with internal pipeline corrosion. Limited excavation occurred around the release point to repair the pipeline. The Release Notification and Corrective Action (Form C-141) is provided as Appendix A.

In February 1998, nine (9) soil borings were advanced and five monitoring wells were installed by a previous contractor to assess the subsurface conditions. In September 1999, three (3) additional monitor wells were installed. In the fall of 2002, monitor wells MW-9 through MW-15 were installed. In November 2004, two (2) additional monitor wells (MW-16 and MW-17) were installed to further delineate the southeast extent of the dissolved phase plume.

On August 9, 2005, NOVA personnel discovered and documented a leaking produced water pipeline approximately 100 feet north of monitor well MW-3. The leaking pipeline was reported to NMOCD, Hobbs District office on the same day. The pipeline was identified as a Mar Oil and Gas (MAR) pipeline. A MAR employee was successful in closing an off site valve to stop the produced water flow. On August 12, 2005, MAR employees began limited excavation surrounding monitor well MW-3, stockpiling the soil on site. Since the activities of August 2005, the excavated soil has been stockpiled on site.

Currently, thirteen (13) groundwater monitor wells (MW-2 through MW-6, MW-8, MW-9 and MW-12 through MW-17) and two product recovery wells (RW-1 and RW-2) are onsite.

FIELD ACTIVITIES

A measurable thickness of PSH was detected in monitor wells MW-2, MW-3, MW-6, and MW-14 during the 2006 annual reporting period. A maximum PSH thickness of 1.11 feet in monitor well MW-6 was recorded on June 1, 2006 and is shown on Table 1. The average thickness of PSH in monitor and recovery wells containing PSH during 2006 was 0.30 feet. Approximately nine (9) gallons of PSH were recovered from the site during the 2006 reporting period. Approximately 768 gallons (18 barrels) of PSH have been recovered through automated and manual recovery methods 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 by NMOCD correspondence dated June 21, 2005.

NMOCD Approved Sampling Schedule	
MW-1	Plugged and Abandoned
MW-2	Quarterly
MW-3	Quarterly
MW-4	Semi-Annually
MW-5	Semi-Annually
MW-6	Quarterly
MW-7	Plugged and Abandoned
MW-8	Annually
MW-9	Quarterly
MW-10	Plugged and Abandoned
MW-11	Plugged and Abandoned
MW-12	Quarterly
MW-13	Quarterly
MW-14	Quarterly
MW-15	Quarterly
MW-16	Quarterly
MW-17	Quarterly

The site monitor wells were gauged and sampled on March 7, June 6, September 15, and November 20, 2006. During each sampling event, sampled monitor wells were purged of approximately three well volumes of water or until the wells were dry using a PVC bailer or electrical Grundfos pump. Groundwater was allowed to recharge and samples were obtained 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 collected in a polystyrene tank and disposed of by Key Energy, Lovington, New Mexico utilizing a licensed disposal facility (NMOCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed utilizing measurements collected during the four (4) quarterly monitoring events, are depicted on Figures 2A through 2D. 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 0.0003 feet/foot to the southeast as measured between monitor wells MW-9 and MW-2. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevation has ranged between 3,418.90 and 3,421.97 feet above mean sea level, in monitor wells MW-2 on November 20, 2006 and MW-3 on September 15, 2006, respectively.

Currently, thirteen (13) monitor wells and two (2) recovery wells are located on site.

LABORATORY RESULTS

Monitor wells MW-2 (second, third and fourth quarters), MW-6 and MW-14 contained PSH and were not sampled in one or more quarter during the reporting period.

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

Monitor well MW-2 is monitored/sampled on a quarterly schedule. Monitor well MW-2 was not sampled during the 2nd, 3rd and 4th quarters of the reporting period, due to the reported presence of PSH in the monitor well. PSH thicknesses of 0.02 feet, 0.05 feet and 0.16 feet were reported during the 2nd, 3rd and 4th quarters of 2006, respectively. Analytical results of groundwater samples collected during the 1st quarter of 2006 indicate benzene concentrations were 4.94 mg/L. This 1st quarter benzene concentration is above the NMOCD regulatory standard of 0.01 mg/L. Toluene concentrations were below laboratory method detection limits (MDL) and NMOCD regulatory standards of 0.75 mg/L, during the 1st quarter of 2006. Ethylbenzene and Xylene concentrations were 2.99 mg/L and 1.01 mg/L, respectively. Ethylbenzene and Xylene concentrations were above NMOCD regulatory standards of 0.75 mg/L and 0.62 mg/L, respectively, during the 1st quarter of the reporting period.

Monitor well MW-3 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.005 mg/L during the 2nd quarter to 0.130 mg/L during the 1st quarter of 2006. Benzene concentrations were above NMOCD regulatory standards during the 1st, 3rd, and 4th quarters of the reporting period. Toluene concentrations were below MDL and NMOCD regulatory standards during all four (4) quarters of the reporting period. Ethylbenzene concentrations ranged from <0.005 mg/L during the 2nd quarter to 0.107 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 3rd and 4th quarter to 0.019 mg/L during the 1st quarter of 2006. Xylene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period.

Monitor well MW-4 is sampled on a semi-annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 2nd and 4th quarter sampling events.

Monitor well MW-5 is sampled on a semi-annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 2nd and 4th quarter sampling events.

Monitor well MW-6 is monitored on a quarterly schedule. Monitor well MW-6 was not sampled during any of the four (4) quarters of the reporting period, due to the presence of PSH in the monitor well. PSH thicknesses of 0.81 feet, 0.88 feet, 0.89 feet, and 1.00 feet were reported during the 1st, 2nd, 3rd and 4th quarter of 2006, respectively.

Monitor well MW-8 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event.

Monitor well MW-9 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of 2006.

Monitor well MW-12 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of 2006.

Monitor well MW-13 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of 2006.

Monitor well MW-14 is monitored on a quarterly schedule. Monitor well MW-14 was not sampled during any of the four (4) quarters of the reporting period, due to the presence of PSH in the monitor well. PSH thicknesses of 0.24 feet, 0.21 feet, 0.08 feet, and 0.11 feet were reported during the 1st, 2nd, 3rd and 4th quarter of 2006, respectively.

Monitor well MW-15 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 3rd and 4th quarter to 0.0016 mg/L during the 1st quarter of 2006. Benzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Toluene, ethylbenzene and xylene constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of 2006.

Monitor well MW-16 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of 2006.

Monitor well MW-17 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of 2006.

Recovery well RW-1 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from 1.82 mg/L during the 3rd quarter to 3.75 mg/L during the 2nd quarter of 2006. Benzene concentrations were above NMOCD regulatory standards all four (4) quarters of the reporting period. Toluene concentrations ranged from <0.02 mg/L during the 1st, 3rd and 4th quarter to 0.024 mg/L during the 2nd quarter of 2006. Toluene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Ethylbenzene concentrations ranged from 0.44 mg/L during the 3rd quarter to 1.12 mg/L during the 2nd quarter of 2006. Ethylbenzene concentrations were above NMOCD regulatory standards during 1st, 2nd, and 4th quarters of the reporting period. Xylene concentrations ranged from 0.473 mg/L during the 3rd quarter to 1.050 mg/L during the 2nd quarter of 2006. Xylene concentrations were above NMOCD regulatory standards during the 1st, 2nd and 4th quarters of the reporting period.

Recovery well RW-2 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 1st quarter to 0.162 mg/L during the 3rd quarter of 2006. Benzene concentrations were above NMOCD regulatory standards during the 3rd and 4th quarters of the reporting period. Toluene concentrations ranged from <0.001 mg/L during the 1st and 4th quarter to 0.001 mg/L during the 3rd quarter of 2006. Toluene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Ethylbenzene concentrations ranged from <0.005 mg/L during the 2nd quarter to 0.15 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.01 mg/L during the 4th quarter to 0.0514 mg/L during the 3rd quarter of 2006. Xylene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period.

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 annual monitoring period of 2006. Currently, there are thirteen (13) groundwater monitor wells (MW-2 through MW-6, MW-8, MW-9 and MW-12 through MW-17) and two (2) recovery wells (RW-1 and RW-2) on-site. The most recent Groundwater Gradient Map, Figure 2D indicates a general gradient of approximately 0.0003 feet/foot to the southeast.

Monitor wells MW-2 (second, third and fourth quarters), MW-6 and MW-14 contained PSH and were not sampled during the reporting period. The average thickness of PSH in monitor and recovery wells containing PSH during 2006 was 0.30 feet.

Approximately nine (9) gallons of PSH were recovered from the site during the 2006 reporting period. Approximately 768 gallons (18 barrels) of PSH have been recovered through automated and manual recovery methods since project inception.

Review of laboratory analytical results generated from analysis of the groundwater samples obtained during the 2006 monitoring period indicates BTEX constituent concentrations are below NMOCD regulatory standards in nine (9) monitor wells.

ANTICIPATED ACTIONS

Plains respectfully requests NMOCD approval to modify the sampling schedule for the following monitor well:

- Monitor well MW-9 is currently sampled on a quarterly schedule, Plains proposes to modify the schedule to a semi-annual schedule. This upgradient monitor well was installed during the 1st quarter 2003 and has not exhibited hydrocarbon impact.
- Monitor well MW-16 is currently sampled on a quarterly schedule, Plains proposes to modify the schedule to an annual schedule. This down gradient monitor well was installed during the 4th quarter 2004 and has not exhibited hydrocarbon impact. Down gradient monitoring is maintained by monitor well MW-17.

Groundwater monitoring, quarterly sampling, manual bi-monthly PSH recovery and will continue in 2007. An Annual Monitoring report will be submitted to the NMOCD before April 1, 2008.

LIMITATIONS

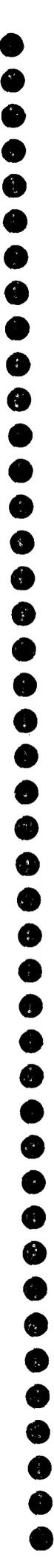
NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

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

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FIGURES

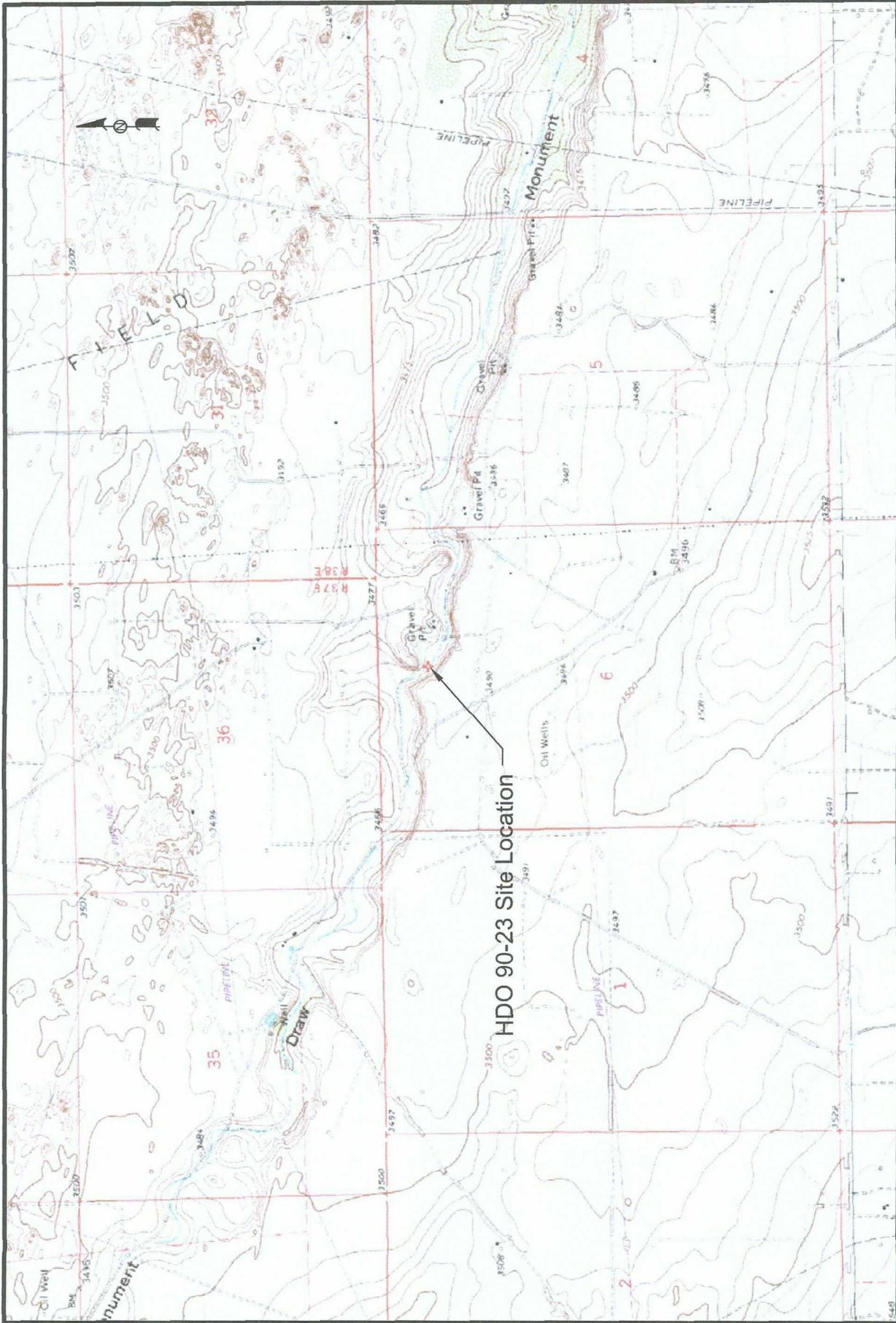


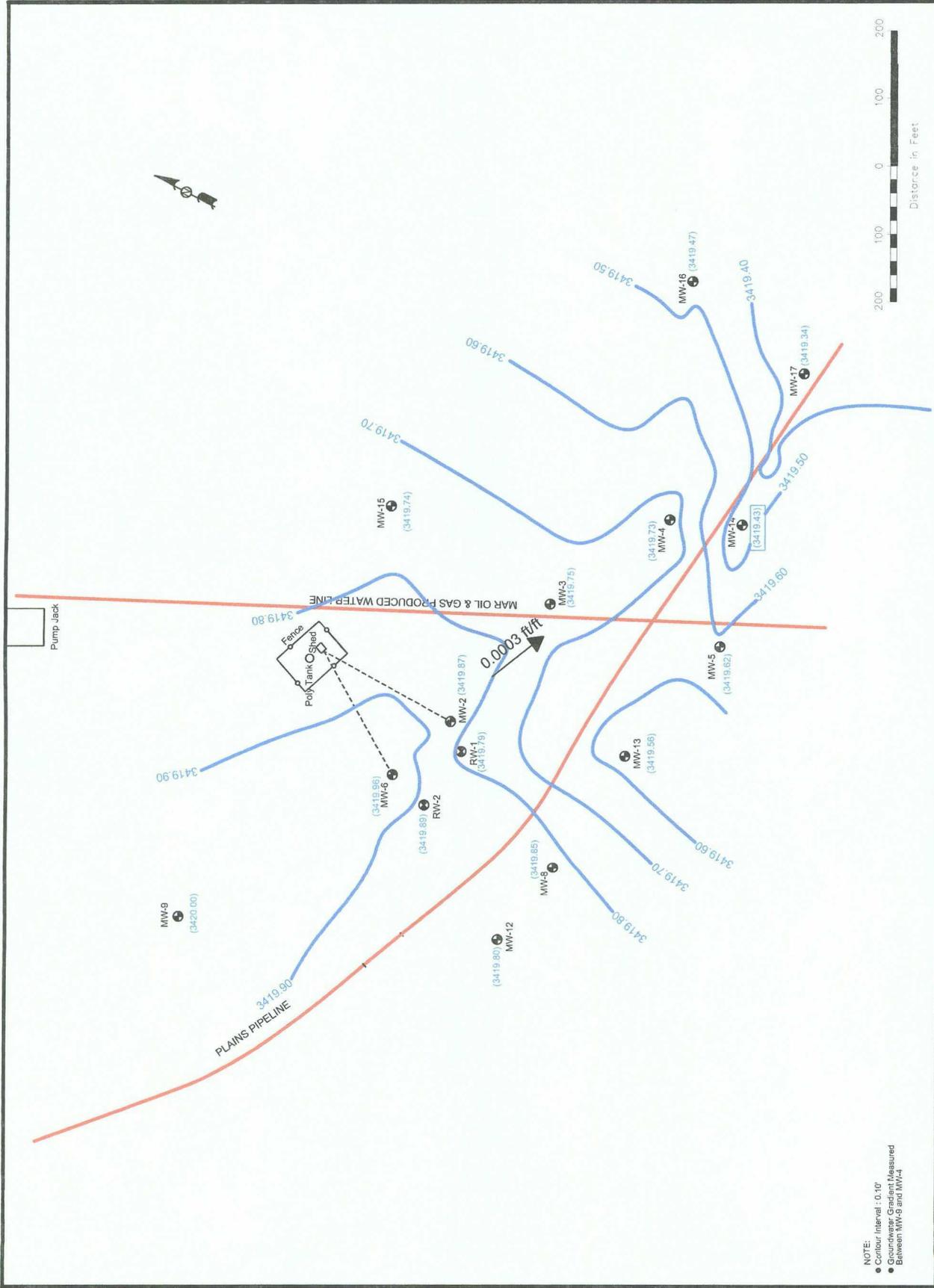
Figure 1
 Site Location Map

NOVA Safety and Environmental

Plains Marketing, L.P.
 HDO 90-23
 Lea County, NM



NE1/4 NW1/4 Sec 6 T20S R37E
 February 20, 2005
 Scale: NTS
 Prep By: CDS
 Checked By: TKC



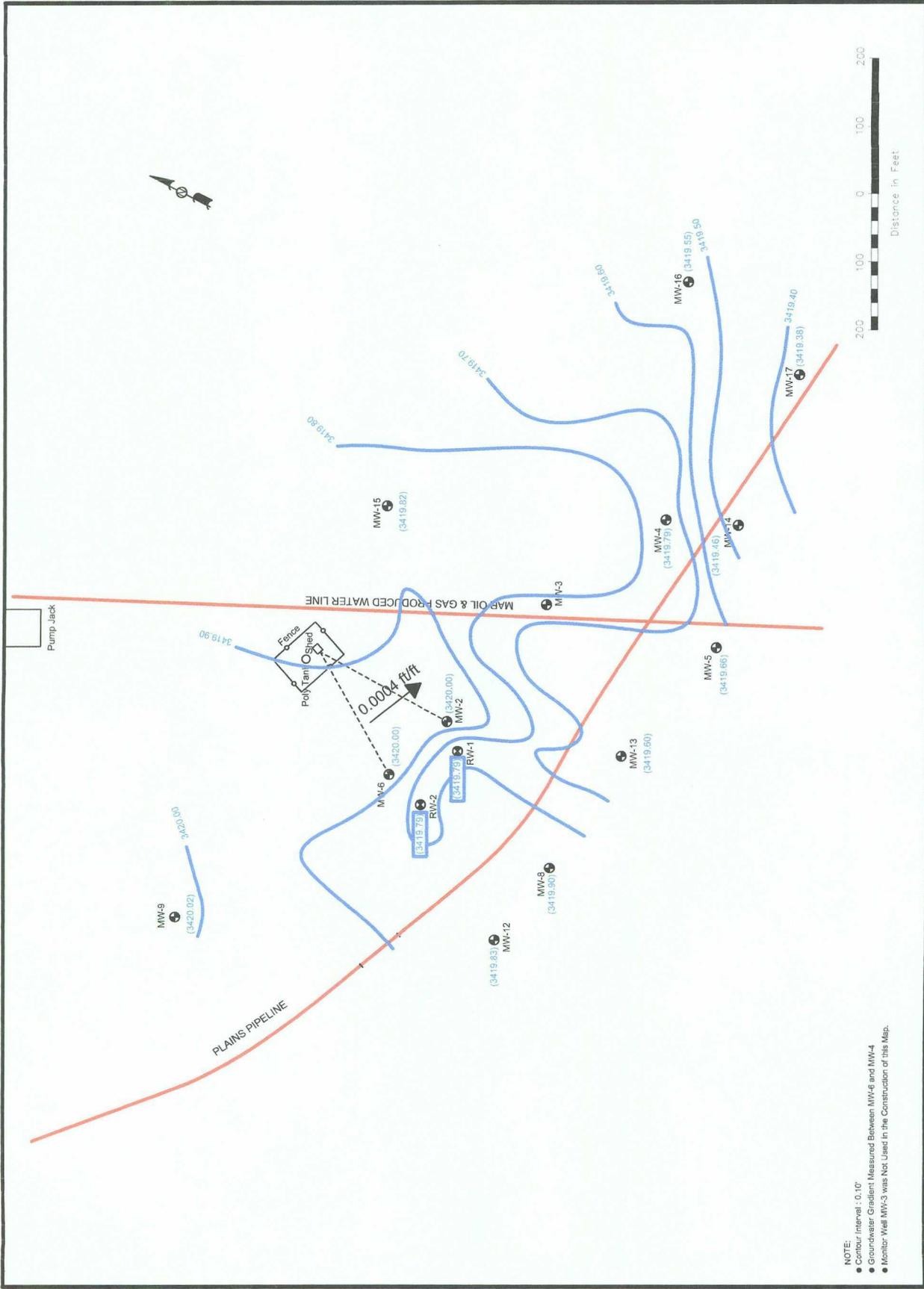
NOTE:
 ● Contour Interval - 0.10'
 ● Groundwater Gradient Measured Between MW-9 and MW-4

LEGEND:
 ● Monitor Well Location
 ● Recovery Well Location
 — Pipeline
 — Groundwater Elevation Contour
 — Groundwater Elevation in Feet

0.001 fwt Groundwater Gradient and Magnitude

Figure 2B
 Inferred Groundwater Gradient Map
 (6/6/06)
 Plains Marketing, L.P.
 HDO 90-23
 Lea County, NM

NOVA
 safety and environmental
 NOVA Safety and Environmental
 Scale: 1" = 200'
 CAD By: DSG
 Checked By: CBS
 July 3, 2008



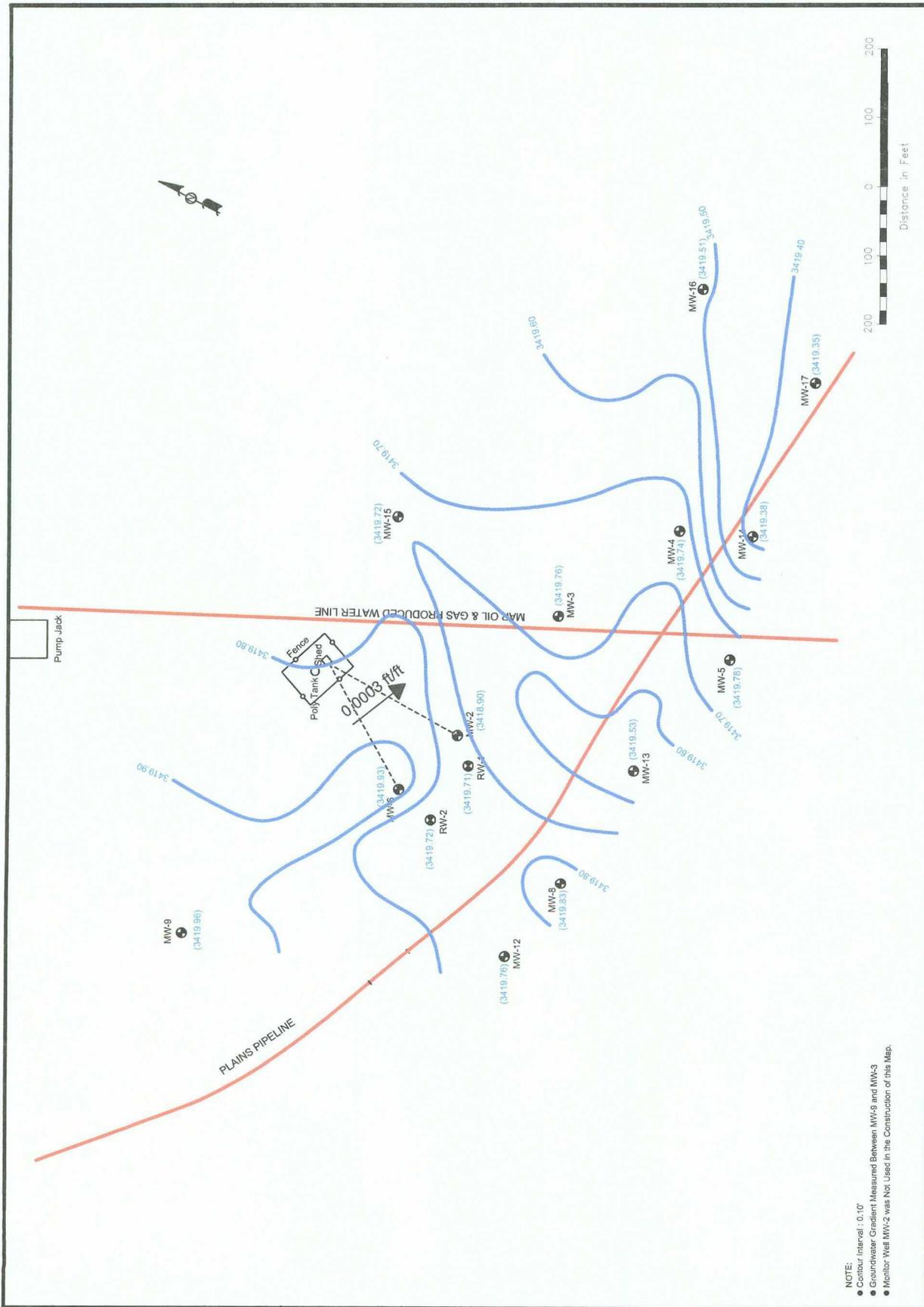
NOTE:
 ● Contour Interval : 0.10'
 ● Groundwater Gradient: Measured Between MW-6 and MW-4
 ● Monitor Well MW-3 was Not Used in the Construction of this Map.

LEGEND:
 ● Monitor Well Location
 ● Recovery Well Location
 — Pipeline
 — Groundwater Elevation Contour
 — Groundwater Elevation in Feet
 0.001 ft/ft → Groundwater Gradient and Magnitude

Figure 2C
 Inferred Groundwater
 Gradient Map
 (9/15/06)
 Plains Marketing, L.P.
 HDO 90-23
 Lea County, NM

NOVA
 safety and environmental

Scale: 1" = 200'
 CAD By: DBC
 Checked By: CDS
 November 7, 2006



NOVA Safety and Environmental
 Scale: 1" = 200'
 Checked By: CCS
 CAD By: DGC
 February 8, 2007

Figure 2D
 Inferred Groundwater
 Gradient Map
 (11/2006)
 Plains Marketing, L.P.
 HDO 90-23
 Lea County, NM

LEGEND:
 ● Monitor Well Location
 ● Groundwater Gradient and Magnitude
 ● Pipeline Well Location
 — Groundwater Elevation Contour
 — Groundwater Elevation in feet

0.001 ft/ft Groundwater Gradient and Magnitude

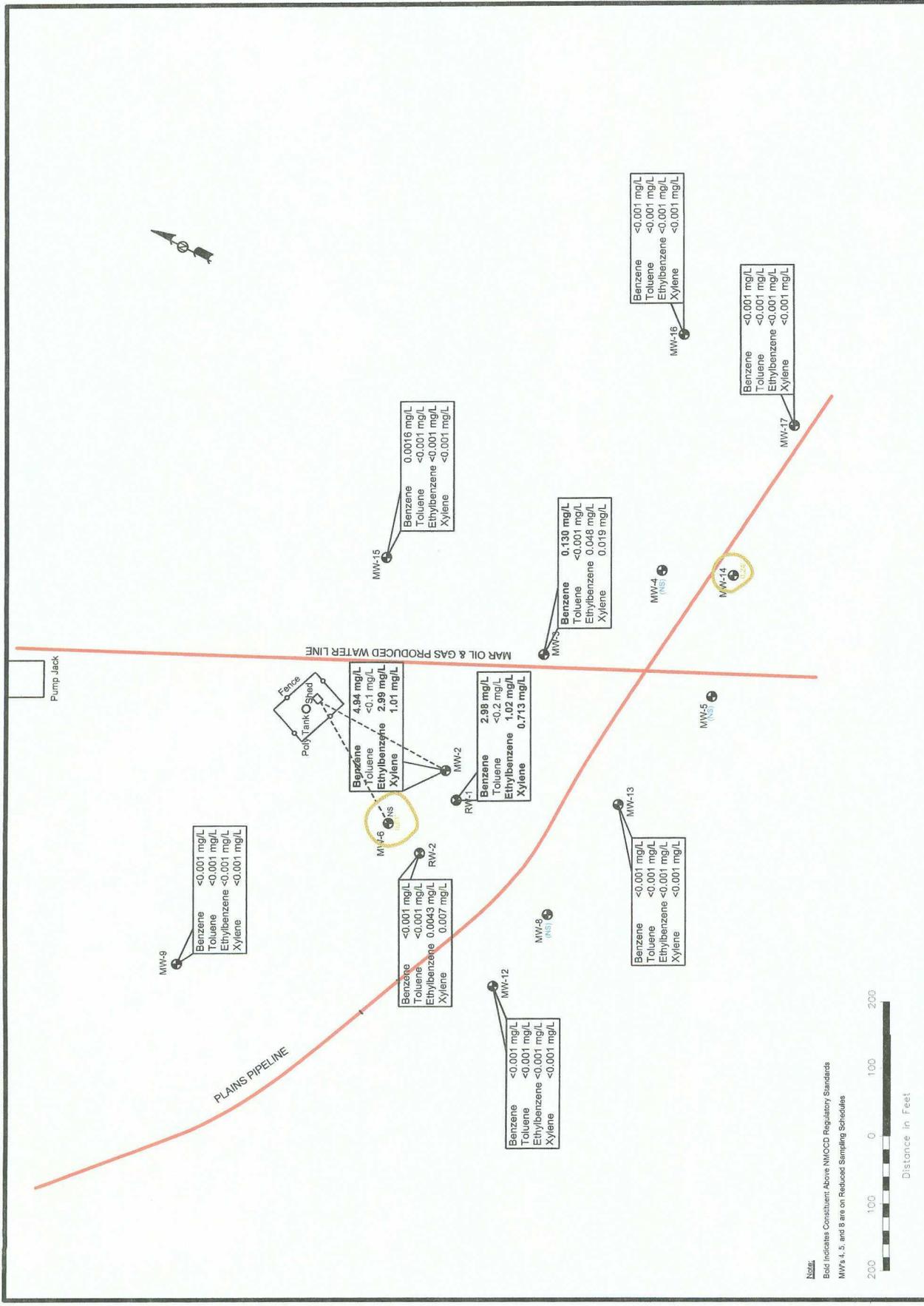


Figure 3A
 Groundwater Concentration and Inferred PSH Extent Map (03/07/06)
 Plains Marketing, L.P.
 HOO 90-23
 Lea County, NM

NOVA
 safety and environmental

Scale: 1" = 200'
 CAD By: DCC
 Checked By: GDS
 May 23, 2006

Notes:
 Bold indicates Constituent Above NMCCD Regulatory Standards
 MWs 4, 5, and 8 are on Reduced Sampling Schedule

LEGEND:
 Monitor Well Location
 Recovery Well Location
 Inferred PSH Extent
 (NS) Not Sampled
 <0.001 Constituent Concentration (mg/L)

Table 1: MW-9

Benzene	<0.001 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

Table 2: MW-12

Benzene	<0.001 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

Table 3: MW-15

Benzene	0.0016 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

Table 4: MW-16

Benzene	<0.001 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

Table 5: MW-17

Benzene	<0.001 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

Table 6: MW-2

Benzene	4.84 mg/L
Toluene	<0.1 mg/L
Ethylbenzene	2.98 mg/L
Xylene	1.01 mg/L

Table 7: MW-1

Benzene	2.98 mg/L
Toluene	<0.2 mg/L
Ethylbenzene	1.02 mg/L
Xylene	0.713 mg/L

Table 8: MW-4 (NS)

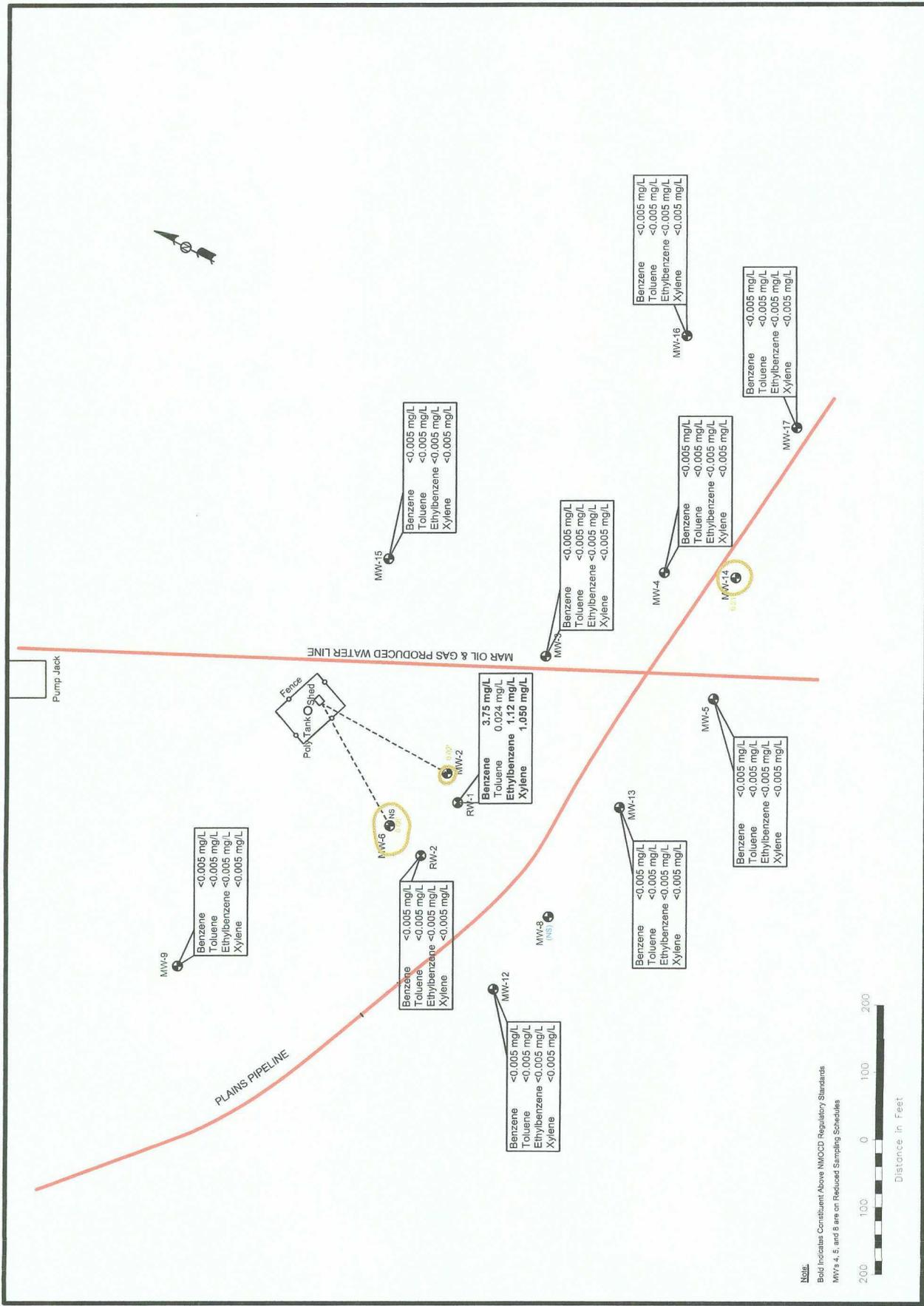
Benzene	0.130 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	0.048 mg/L
Xylene	0.019 mg/L

Table 9: MW-5 (NS)

Benzene	<0.001 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

Table 10: MW-13

Benzene	<0.001 mg/L
Toluene	<0.001 mg/L
Ethylbenzene	<0.001 mg/L
Xylene	<0.001 mg/L

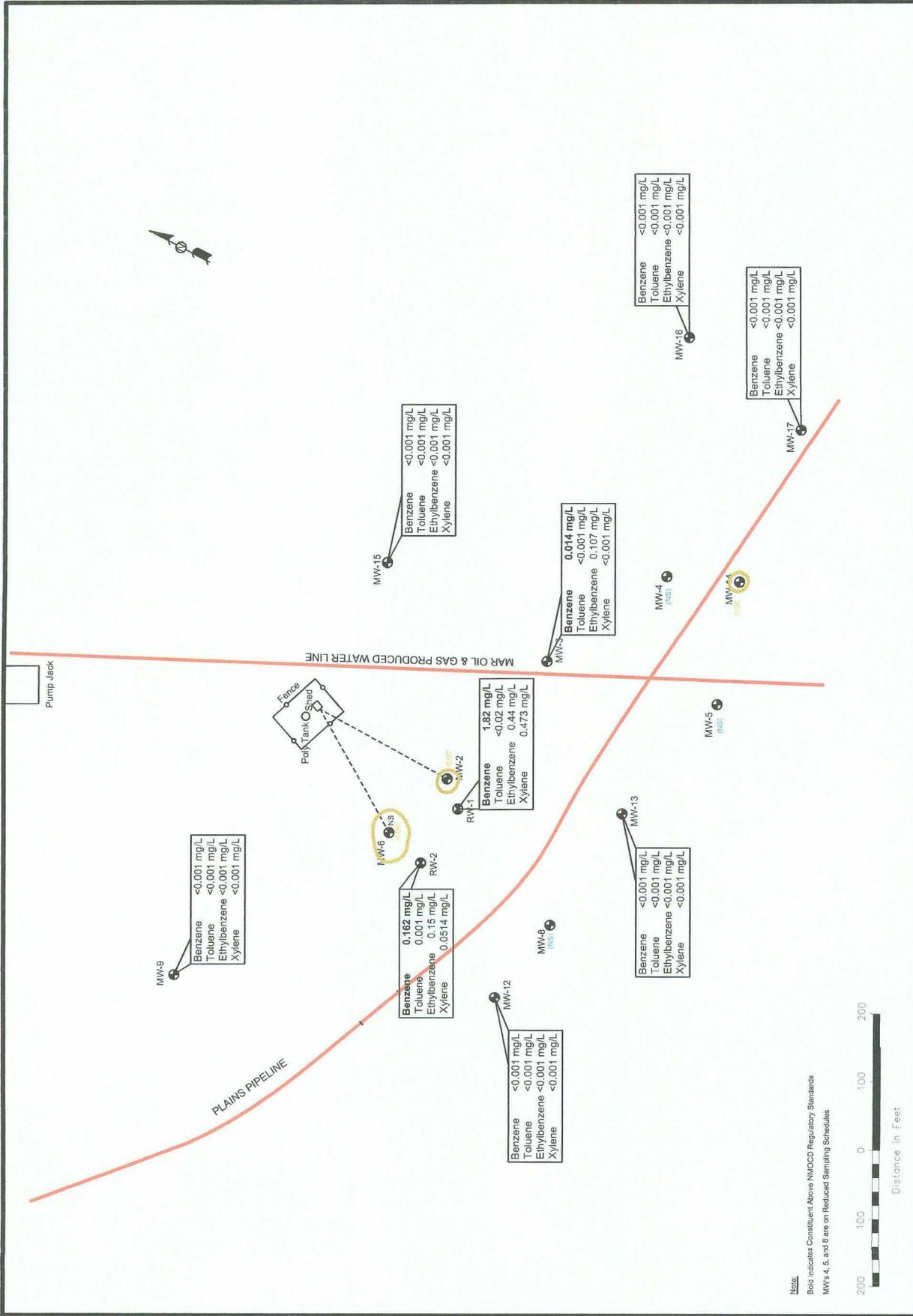


Note:
 Bold Indicates Constituent Above NMOCDD Regulatory Standards
 MWs 4, 5, and 8 are on Reduced Sampling Schedules



LEGEND:
 ● Monitor Well Location
 ● Recovery Well Location
 — Pipeline
 — Inferred FSH Extent
 (NS) Not Sampled
 mg/L Constituent Concentration (mg/L)

Figure 3B
 Groundwater Concentration
 and Inferred FSH Extent Map
 (Page 06/06)
 Plains Marketing, L.P.
 HDO 90-23
 Lea County, NM



Note:
 Bold indicates Constituent Above NMOC Regulatory Standards
 MW's 4, 5, and 8 are on Reduced Sampling Schedules

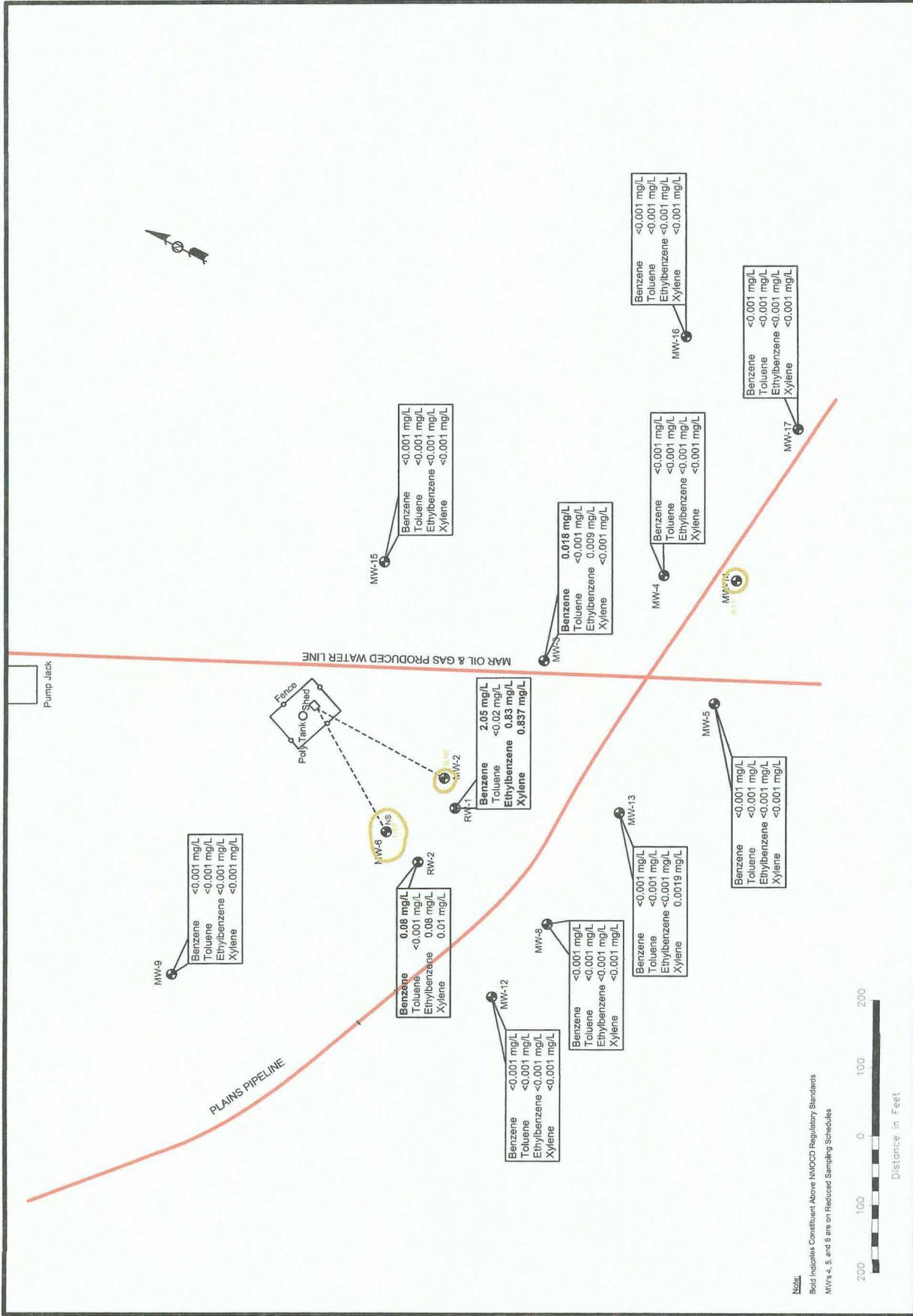


LEGEND:
 Monitor Well Location
 Recovery Well Location
 Pipeline
 Inferred PSH Extent
 (NS) Not Sampled
 <0.001 Constituent Concentration (mg/L)

Figure 3C
 Groundwater Concentration
 and Inferred PSH Extent Map
 (09/15/06)
 Plains Marketing, L.P.
 HDO 90-23
 Lees County, NM

NOVA Safety and Environmental
 Scale: 1" = 200'
 February 2, 2007
 Checked By: GDS
 DCD By: DSC
 Checked By: GDS





MW-9
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-6 (NS)
 Benzene 0.08 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene 0.08 mg/L
 Xylene 0.01 mg/L

MW-12
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-9
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-13
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene 0.0019 mg/L

MW-2
 Benzene 2.05 mg/L
 Toluene <0.02 mg/L
 Ethylbenzene 0.83 mg/L
 Xylene 0.837 mg/L

MW-1
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-5
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-4
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-3
 Benzene 0.018 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene 0.009 mg/L
 Xylene <0.001 mg/L

MW-16
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-17
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-15
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-14 (NS)
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-10 (NS)
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-11 (NS)
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-8 (NS)
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-7 (NS)
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-1
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-2
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-3
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-4
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-5
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-6
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-7
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-8
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-9
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-10
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-11
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-12
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-13
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene 0.0019 mg/L

MW-14
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-15
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-16
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

MW-17
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

RW-1
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

RW-2
 Benzene <0.001 mg/L
 Toluene <0.001 mg/L
 Ethylbenzene <0.001 mg/L
 Xylene <0.001 mg/L

Pump Jack

Fence

Poly Tank

Oil Shed

MAR OIL & GAS PRODUCED WATER LINE

PLAINS PIPELINE

Distance in Feet

200 100 0 100 200

LEGEND:

Monitor Well Location

Recovery Well Location

Inferred PSH Extant

NS Not Sampled

<0.001 Constituent Concentration (mg/L)

Note:
 Bold indicates Constituent Above NMOQ Regulatory Standards
 MWs 4, 5, and 8 are on Reduced Sampling Schedules

Figure 3D
 Groundwater Concentration
 and Inferred PSH Extant Map
 (11/2/06)
 Plains Refining, L.P.
 ID: 000002
 Lea County, NM

NOVA Safety and Environmental

NOVA
 safety and environmental

Scale: 1" = 200'
 February 2, 2007
 Checked By: CSB



TABLES

TABLE 1

2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
HDO 90 - 23
LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-2	01/11/06	3,465.44	45.42	45.50	0.08	3,420.01
	01/25/06	3,465.44	45.49	45.54	0.05	3,419.94
	02/08/06	3,465.44	45.44	45.50	0.06	3,419.99
	02/23/06	3,465.44	45.47	45.50	0.03	3,419.97
	03/07/06	3,465.44	45.43	45.44	0.01	3,420.01
	03/08/06	3,465.44	sheen	45.44	0.00	3,420.00
	03/20/06	3,465.44	sheen	45.47	0.00	3,419.97
	03/30/06	3,465.44	45.44	45.48	0.04	3,419.99
	05/03/06	3,465.44	45.47	45.55	0.08	3,419.96
	06/01/06	3,465.44	45.50	45.61	0.11	3,419.92
	06/06/06	3,465.44	45.57	45.59	0.02	3,419.87
	06/14/06	3,465.44	45.50	45.64	0.14	3,419.92
	06/29/06	3,465.44	45.54	45.58	0.04	3,419.89
	07/13/06	3,465.44	45.53	45.54	0.01	3,419.91
	07/27/06	3,465.44	45.55	45.59	0.04	3,419.88
	08/10/06	3,465.44	45.56	45.61	0.05	3,419.87
	09/15/06	3,465.44	45.43	45.48	0.05	3,420.00
10/03/06	3,465.44	45.48	45.51	0.03	3,419.96	
11/20/06	3,465.44	46.52	46.68	0.16	3,418.90	
MW-3	03/07/06	3,464.68	-	44.85	0.00	3,419.83
	06/06/06	3,464.68	sheen	44.93	0.00	3,419.75
	07/13/06	3,464.68	sheen	44.94	0.00	3,419.74
	07/27/06	3,464.68	47.61	47.63	0.02	3,417.07
	08/10/06	3,464.68	45.53	45.74	0.21	3,419.12
	09/15/06	3,464.68	-	42.71	0.00	3,421.97
	10/03/06	3,464.68	sheen	42.74	0.00	3,421.94
	11/20/06	3,464.68	-	44.92	0.00	3,419.76
MW-4	03/07/06	3,465.76	-	45.96	0.00	3,419.80
	06/06/06	3,465.76	-	46.03	0.00	3,419.73
	09/15/06	3,465.76	-	45.97	0.00	3,419.79
	11/20/06	3,465.76	-	46.02	0.00	3,419.74
MW-5	03/07/06	3,467.40	-	47.71	0.00	3,419.69
	06/06/06	3,467.40	-	47.78	0.00	3,419.62
	09/15/06	3,467.40	-	47.74	0.00	3,419.66
	11/20/06	3,467.60	-	47.82	0.00	3,419.78

TABLE 1

2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
HDO 90 - 23
LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-6	01/11/06	3,465.42	45.25	46.00	0.75	3,420.06
	01/25/06	3,465.42	45.30	46.06	0.76	3,420.01
	02/08/06	3,465.42	45.25	46.03	0.78	3,420.05
	02/23/06	3,465.42	45.26	45.99	0.73	3,420.05
	03/07/06	3,465.42	45.25	46.06	0.81	3,420.05
	03/08/06	3,465.42	45.25	46.05	0.80	3,420.05
	03/20/06	3,465.42	45.27	46.10	0.83	3,420.03
	03/30/06	3,465.42	45.27	46.06	0.79	3,420.03
	05/03/06	3,465.42	45.30	46.15	0.85	3,419.99
	06/01/06	3,465.42	45.31	46.42	1.11	3,419.94
	06/06/06	3,465.42	45.33	46.21	0.88	3,419.96
	06/14/06	3,465.42	45.31	46.39	1.08	3,419.95
	06/29/06	3,465.42	45.35	46.24	0.89	3,419.94
	07/13/06	3,465.42	45.34	46.23	0.89	3,419.95
	07/27/06	3,465.42	45.36	46.31	0.95	3,419.92
	08/10/06	3,465.42	45.38	46.32	0.94	3,419.90
	09/15/06	3,465.42	45.29	46.18	0.89	3,420.00
	10/03/06	3,465.42	45.31	46.19	0.88	3,419.98
	11/20/06	3,465.42	45.34	46.34	1.00	3,419.93
MW-8	03/07/06	3,467.61	-	47.68	0.00	3,419.93
	06/06/06	3,467.61	-	47.76	0.00	3,419.85
	09/15/06	3,467.61	-	47.71	0.00	3,419.90
	11/20/06	3,467.61	-	47.78	0.00	3,419.83
MW-9	03/07/06	3,465.74	-	45.69	0.00	3,420.05
	06/06/06	3,465.74	-	45.74	0.00	3,420.00
	09/15/06	3,465.74	-	45.72	0.00	3,420.02
	11/20/06	3,465.74	-	45.78	0.00	3,419.96
MW-12	03/07/06	3466.69	-	46.83	0.00	3,419.86
	06/06/06	3466.69	-	46.89	0.00	3,419.80
	09/15/06	3466.69	-	46.86	0.00	3,419.83
	11/20/06	3466.69	-	46.93	0.00	3,419.76
MW-13	03/07/06	3466.98	-	47.35	0.00	3,419.63
	06/06/06	3466.98	-	47.42	0.00	3,419.56
	09/15/06	3466.98	-	47.38	0.00	3,419.60
	11/20/06	3466.98	-	47.45	0.00	3,419.53

TABLE 1

2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
HDO 90 - 23
LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-14	01/11/06	3466.50	46.95	47.19	0.24	3,419.51
	01/25/06	3466.50	47.00	47.26	0.26	3,419.46
	02/08/06	3466.50	46.95	47.21	0.26	3,419.51
	02/23/06	3466.50	47.03	47.20	0.17	3,419.44
	03/07/06	3466.50	46.97	47.21	0.24	3,419.49
	03/08/06	3466.50	46.96	47.20	0.24	3,419.50
	03/20/06	3466.50	47.00	47.25	0.25	3,419.46
	03/30/06	3466.50	46.98	47.22	0.24	3,419.48
	05/03/06	3466.50	47.01	47.21	0.20	3,419.46
	06/01/06	3466.50	47.03	47.38	0.35	3,419.42
	06/06/06	3466.50	47.04	47.25	0.21	3,419.43
	06/14/06	3466.50	47.03	47.25	0.22	3,419.44
	06/29/06	3466.50	47.08	47.28	0.20	3,419.39
	07/13/06	3466.50	47.08	47.11	0.03	3,419.42
	07/27/06	3466.50	47.09	47.22	0.13	3,419.39
	08/10/06	3466.50	47.10	47.26	0.16	3,419.38
	09/15/06	3466.50	47.03	47.11	0.08	3,419.46
	10/03/06	3466.50	47.05	47.13	0.08	3,419.44
	11/20/06	3466.50	47.10	47.21	0.11	3,419.38
MW-15	03/07/06	3466.10	-	46.29	0.00	3,419.81
	06/06/06	3466.10	-	46.36	0.00	3,419.74
	09/17/06	3466.10	-	46.28	0.00	3,419.82
	11/20/06	3466.10	-	46.38	0.00	3,419.72
MW-16	03/07/06	3465.93	-	46.34	0.00	3,419.59
	06/06/06	3465.93	-	46.46	0.00	3,419.47
	09/15/06	3465.93	-	46.38	0.00	3,419.55
	11/20/06	3465.93	-	46.42	0.00	3,419.51
MW-17	03/07/06	3468.68	-	49.23	0.00	3,419.45
	06/06/06	3468.68	-	49.34	0.00	3,419.34
	09/15/06	3468.68	-	49.30	0.00	3,419.38
	11/20/06	3468.68	-	49.33	0.00	3,419.35
RW-1	01/11/06	3465.02	sheen	45.14	0.00	3,419.88
	01/25/06	3465.02	sheen	45.21	0.00	3,419.81
	02/08/06	3465.02	sheen	45.13	0.00	3,419.89

TABLE 1
2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P.
HDO 90 - 23
LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
RW-1	02/23/06	3465.02	sheen	45.15	0.00	3,419.87
	03/07/06	3465.02	-	45.16	0.00	3,419.86
	03/08/06	3465.02	sheen	45.13	0.00	3,419.89
	03/20/06	3465.02	sheen	45.16	0.00	3,419.86
	03/30/06	3465.02	-	45.08	0.00	3,419.94
	05/03/06	3465.02	sheen	45.21	0.00	3,419.81
	06/01/06	3465.02	sheen	45.22	0.00	3,419.80
	06/06/06	3465.02	-	45.23	0.00	3,419.79
	06/14/06	3465.02	sheen	45.22	0.00	3,419.80
	07/13/06	3465.02	sheen	45.52	0.00	3,419.50
	07/27/06	3465.02	-	15.46	0.00	3,449.56
	08/10/06	3465.02	sheen	45.27	0.00	3,419.75
	09/15/06	3465.02	-	45.23	0.00	3,419.79
	10/03/06	3465.02	sheen	45.25	0.00	3,419.77
	11/20/06	3465.02	-	45.31	0.00	3,419.71
RW-2	01/11/06	3465.21	sheen	45.28	0.00	3419.93
	01/25/06	3465.21	sheen	45.31	0.00	3419.90
	02/08/06	3465.21	sheen	45.28	0.00	3419.93
	02/23/06	3465.21	sheen	45.30	0.00	3419.91
	03/07/06	3465.21	-	45.26	0.00	3419.95
	03/08/06	3465.21	sheen	45.27	0.00	3419.94
	03/20/06	3465.21	sheen	45.28	0.00	3419.93
	03/30/06	3465.21	-	45.29	0.00	3419.92
	05/03/06	3465.21	sheen	45.31	0.00	3419.90
	06/01/06	3465.21	sheen	45.33	0.00	3419.88
	06/06/06	3465.21	sheen	45.32	0.00	3419.89
	06/14/06	3465.21	sheen	45.33	0.00	3419.88
	07/13/06	3465.21	sheen	45.38	0.00	3419.83
	07/27/06	3465.21	sheen	45.29	0.00	3419.92
	08/10/06	3465.21	sheen	45.48	0.00	3419.73
09/15/06	3465.21	sheen	45.42	0.00	3419.79	
10/03/06	3465.21	sheen	45.46	0.00	3419.75	
11/20/06	3465.21	sheen	45.49	0.00	3419.72	

Note: Elevations based on North American Vertical Datum of 1929.

TABLE 2

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
HDO 90-23
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8012B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE
NMOCD Regulatory Standard		0.01	0.75	0.75	0.62	
MW-2	03/07/06	4.94	<0.1	2.99	1.01	
	06/06/06	Not Sampled due to PSH in Well				
	09/15/06	Not Sampled due to PSH in Well				
	11/21/06	Not Sampled due to PSH in Well				
MW-3	03/07/06	0.130	<0.001	0.048	0.019	
	06/06/06	<0.005	<0.005	<0.005	<0.005	
	09/15/06	0.014	<0.001	0.107	<0.001	
	11/21/06	0.018	<0.001	0.009	<0.001	
MW-4	03/07/06	Not Sampled on Current Sample Schedule				
	06/06/06	<0.005	<0.005	<0.005	<0.005	
	09/15/06	Not Sampled on Current Sample Schedule				
	11/21/06	<0.001	<0.001	<0.001	<0.001	
MW-5	03/07/06	Not Sampled on Current Sample Schedule				
	06/06/06	<0.005	<0.005	<0.005	<0.005	
	09/15/06	Not Sampled on Current Sample Schedule				
	12/05/06	<0.001	<0.001	<0.001	<0.001	
MW-6	03/07/06	Not Sampled due to PSH in Well				
	06/06/06	Not Sampled due to PSH in Well				
	09/15/06	Not Sampled due to PSH in Well				
	12/05/06	Not Sampled due to PSH in Well				
MW-8	03/07/06	Not Sampled on Current Sample Schedule				
	06/06/06	Not Sampled on Current Sample Schedule				
	09/15/06	Not Sampled on Current Sample Schedule				
	11/21/06	<0.001	<0.001	<0.001	<0.001	
MW-9	03/07/06	<0.001	<0.001	<0.001	<0.001	
	06/06/06	<0.005	<0.005	<0.005	<0.005	
	09/15/06	<0.001	<0.001	<0.001	<0.001	
	11/21/06	<0.001	<0.001	<0.001	<0.001	
MW-12	03/07/06	<0.001	<0.001	<0.001	<0.001	
	06/06/06	<0.005	<0.005	<0.005	<0.005	
	09/15/06	<0.001	<0.001	<0.001	<0.001	
	11/21/06	<0.001	<0.001	<0.001	<0.001	

TABLE 2

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P.
HDO 90-23
LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8012B, 5030			
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES o - XYLENE
NMOCD Regulatory Standard		0.01	0.75	0.75	0.62
MW-13	03/07/06	<0.001	<0.001	<0.001	<0.001
	06/06/06	<0.005	<0.005	<0.005	<0.005
	09/15/06	<0.001	<0.001	<0.001	<0.001
	11/21/06	<0.001	<0.001	<0.001	0.0019
MW-14	03/07/06	Not Sampled due to PSH in Well			
	06/06/06	Not Sampled due to PSH in Well			
	09/15/06	Not Sampled due to PSH in Well			
	11/21/06	Not Sampled due to PSH in Well			
MW-15	03/07/06	0.0016	<0.001	<0.001	<0.001
	06/06/06	<0.005	<0.005	<0.005	<0.005
	09/15/06	<0.001	<0.001	<0.001	<0.001
	12/05/06	<0.001	<0.001	<0.001	<0.001
MW-16	03/07/06	<0.001	<0.001	<0.001	<0.001
	06/06/06	<0.005	<0.005	<0.005	<0.005
	09/15/06	<0.001	<0.001	<0.001	<0.001
	11/21/06	<0.001	<0.001	<0.001	<0.001
MW-17	03/07/06	<0.001	<0.001	<0.001	<0.001
	06/06/06	<0.005	<0.005	<0.005	<0.005
	09/15/06	<0.001	<0.001	<0.001	<0.001
	11/21/06	<0.001	<0.001	<0.001	<0.001
RW-1	03/07/06	2.98	<0.2	1.02	0.713
	06/06/06	3.75	0.024	1.12	1.050
	09/15/06	1.82	<0.02	0.44	0.473
	11/21/06	2.05	<0.02	0.83	0.837
RW-2	03/07/06	<0.001	<0.001	0.0043	0.007
	06/06/06	<0.005	<0.005	<0.005	<0.005
	09/15/06	0.162	0.001	0.15	0.0514
	11/21/06	0.08	<0.001	0.08	0.01

APPENDICES

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

OIL CONSERVATION DIVISION

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

NAME OF OPERATOR TEXAS-NEW MEXICO PIPE LINE CO				ADDRESS P. O. Box 2528, Hobbs, N.M. 88240			
REPORT OF	FIRE	BREAK	SPILL	LEAK	BLOWOUT	OTHER*	
				X			
TYPE OF FACILITY	DRUG WELL	PROD WELL	TANK	PIPE	GAS PLANT	OIL RY	OTHER*
			DTY	LINE X			
NAME OF FACILITY 14" Trunk Line							
LOCATION OF FACILITY (QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTION)				SEC.	TWP.	RGE.	COUNTY
NW/4 NE/4				6	21	37	Lea
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 6 Mi. NNW of Eunice & 3 Mi. N.W. of Loop 18							
DATE AND HOUR OF OCCURRENCE Unknown				DATE AND HOUR OF DISCOVERY 3/27/90 2:15 P.M.			
WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQUIRED	IF YES, NMOCC - B. Pritchard TO WHOM SCC - D. Trujillo			
	X						
BY WHOM	NMOCC - M. Criswell SCC - C. Johnson			DATE AND HOUR 3/27/90; NMOCC - 3:35 P.M. 3/28/90; SCC - 9:05 A.M.			
TYPE OF FLUID LOST	Sour Crude			QUANTITY OF LOSS	VOLUME RECOVERED		
				750 BBLs	550 BBLs		
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO	QUANTITY				
		X					
IF YES, DESCRIBE FULLY**							
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**							
External Corrosion Line clamped off							
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**							
45,000 sq ft pasture land; 40,000 sq ft equipment damage. Cattle in the area Oil soaked earth covered with fresh soil in prospects of full restoration							
DESCRIPTION OF AREA	FARMING		GRAZING		URBAN		OTHER*
			X				
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
		X			X		
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**							
55°							
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF							
SIGNED	<i>B. L. Lechnicky</i> B. L. Lechnicky TITLE Dist. Manager				DATE 3/26/90		

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

HDO 90-23

cc: Hazardous Waste Section
N.M. Environmental Improvement Div.

90-063530