

AP - 52

**STAGE 1 & 2
WORKPLANS**

DATE:

3-5-08

Hansen, Edward J., EMNRD

From: Camille J Reynolds [cjreynolds@paalp.com]
Sent: Tuesday, March 04, 2008 2:14 PM
To: Hansen, Edward J., EMNRD
Subject: Plains CS Cayler Release Site (AP-052)

Attachments: Cayler Addendum Letter.doc; CS Cayler-Proposed Well PDF (03-03-2008).pdf



Cayler Addendum CS Cayler-Proposed
Letter.doc (74... Well PDF (0...

Mr. Hansen,

Please find attached below for your approval the Abatement Plan Amendment as requested for the Plains CS Cayler Release Site NMOCD Ref# AP-052. This is a response to the recommendations set forth in the NMOCD e-mail dated February 20. A hard copy will follow.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American

office: 505/396-3341
fax: 505/396-2754
cellular: 505/441-0965

<<Cayler Addendum Letter.doc>> <<CS Cayler-Proposed Well PDF (03-03-2008).pdf>>

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March 5, 2008

Mr. Edward Hansen
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Plains Pipeline, L.P. C.S. Cayler (Plains SRS#2002-10250)
NMOCD Reference # AP-052 (OLD 1R-0382)
UL-B (NW¼ of the NE¼) of Section 6, T17S, R37E
Latitude: 32° 52' 2.45"N and Longitude: 103° 17' 17.73"W
Landowner: Robert C. Rice
Lea County, New Mexico

Dear Mr. Hansen:

Plains Pipeline, L.P. (Plains) submits this response to the email sent by New Mexico Oil Conservation Division (OCD) dated February 20, 2008. This Addendum corresponds to the Stage 1 and Stage 2 Abatement Plan dated September 5, 2006. The recommendations are reiterated below followed by the Plains response.

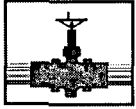
1. "The soil remediation programs must specify that the soils intended for use as backfill will have a TPH concentration of no more than 100 mg/kg."

Response: A layer of imported sand will be utilized to cushion the 20-mil polyethylene liner being placed in the excavation. To protect the liner from punctures or tearing another layer of sand will be placed on top of the liner. The stockpiled rock will be placed in the excavation followed by the attenuation cell soil, if determined to be acceptable.

The excavated soils in the attenuation cell that have TPH concentrations less than 100 mg/kg will be utilized for backfill material, if approved by the OCD. The remaining soil, that exhibits TPH concentrations above 100 mg/kg, will be transported offsite to licensed disposal facility. If additional soil is required, Plains will purchase it locally.

2. "The groundwater remediation program must specify that a more aggressive non-aqueous phase liquid (NAPL) removal program (which may include recovery wells). This must also include the method(s) for treatment and/or disposal of the oil and groundwater removed."

Response: Plains will install one monitor well southeast of monitor well MW-12 in March 2008, as requested by the OCD. Plains is experiencing on-going negotiation and logistical delays in their efforts to ascertain viable groundwater disposal options.



PLAINS PIPELINE

Additionally, Plains continues to research the optimum remediation method to achieve the OCD's request. At this time, it is anticipated that approximately two or three total fluid pumps will be utilized in the source area to accommodate a more aggressive NAPL removal program. Subsequent to researching the treatment and/or disposal options, a specific Work Plan will be provided to the OCD for approval. The options being researched for groundwater treatment and/or disposal are as follows:

- ! Set approximately two to four frac tanks onsite to gravity separate the NAPL and groundwater and utilize vacuum trucks for disposal
 - ! Install a groundwater remediation system that will treat the groundwater onsite for re-injection into the shallow aquifer, upon approval
 - ! Utilize a commercial injection well, upon approval, and pump the removed groundwater to the well for disposal
 - ! Utilize carbon vessels to treat the removed groundwater and irrigate the surrounding area with the treated groundwater, upon approval
3. "The abatement schedule must be revised to include the more aggressive NAPL removal program."

Response: Plains will install one additional monitor well as requested during March 2008. Upon approval from the OCD, Plains will immediately schedule and implement the soil backfill plan. Due to the complex nature of evaluating and designing a groundwater remediation system, Plains requests a 45 day extension in order to further evaluate site-specific groundwater remediation and/or disposal options for this site.

If you have any questions or require further information, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains Pipeline

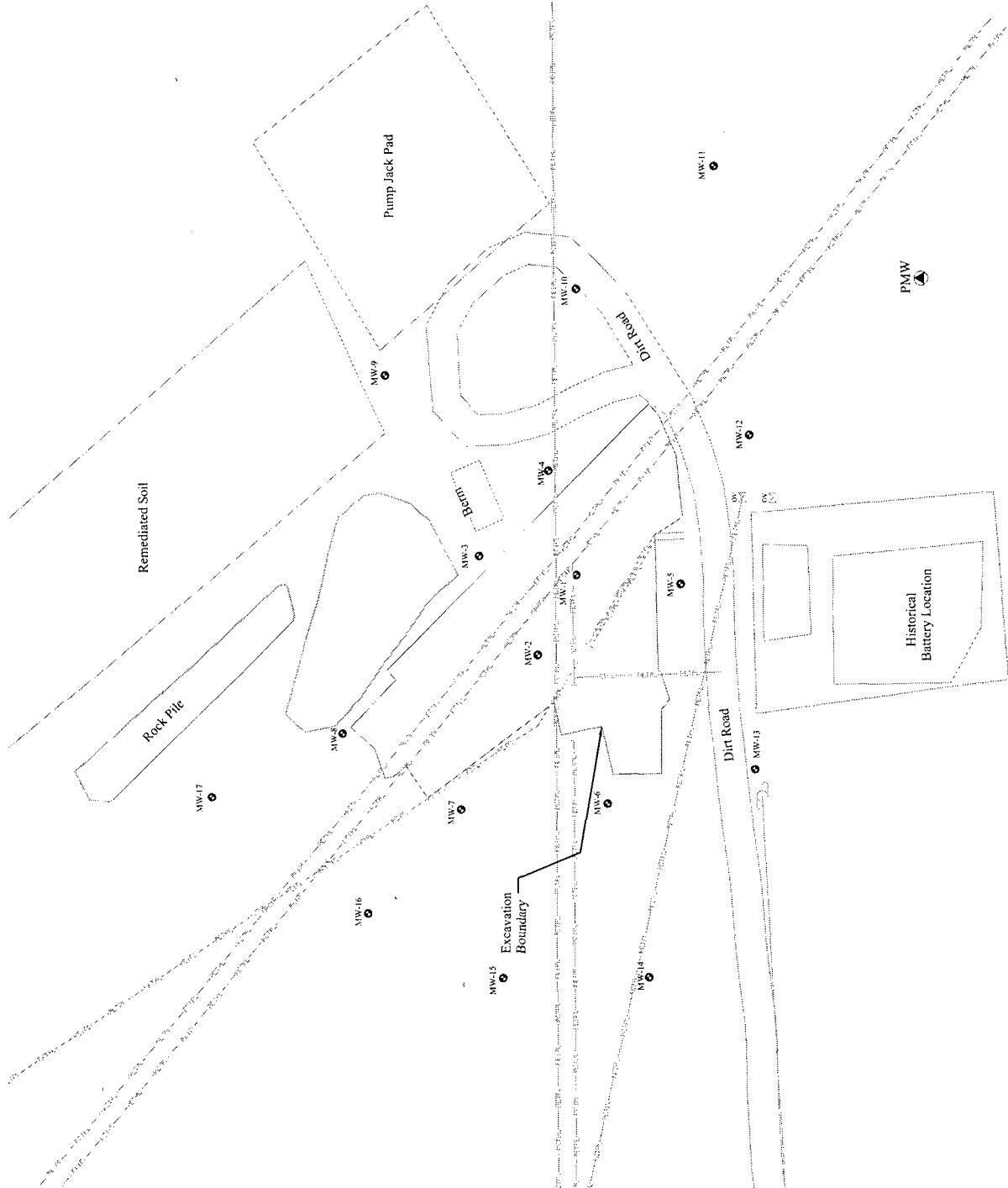
Enclosure



0 50 100
Scale in Feet

Legend

- Monitor Well
- Proposed Well
- Pipeline
- Valve
- Fence line



C.S. Cayler (PLAINS044SPL)

SRS # 2002-10250

Lea County, New Mexico

Proposed Monitor Well Location

Date: 03/03/2008

Scale: 1" = 100'

Drawn By: WDR

