

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

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

NMOCD
Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

1RP-1728

OPERATOR

☐ Initial Report **XX** Final Report

Name of Company	Plains Marketing, L. P.	Contact	Camille Bryant
Address	3112 W. US Hwy 82, Lovington, NM 88260	Telephone No.	(575) 441-0965
Facility Name	McKEE 6"	Facility Type	6" Steel Pipeline
SRS:	LF-1999-20		

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
E	29	20S	38E					Lea

Latitude 32°, 32', 49.2" North Longitude 103°, 10', 29.7" West.

NATURE OF RELEASE

Type of Release	Crude Oil	Volume of Release	50 barrels	Volume Recovered	30 barrels
Source of Release	6-inch Steel Pipeline	Date and Hour of Occurrence	09 Mar 99 @ 1545	Date and Hour of Discovery	09 Mar 99 @ 1545
Was Immediate Notice Given?	XX Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Silvia Dickey		
By Whom?	Jim Henry	Date and Hour	10 Mar 99 @ 0815		
Was a Watercourse Reached?	<input type="checkbox"/> Yes XX <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

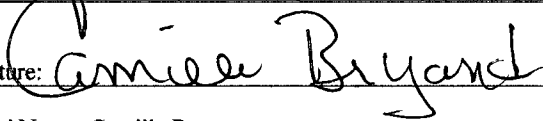
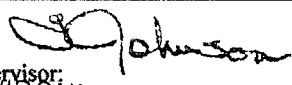
If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Internal corrosion of the 6-inch steel pipeline resulted in the release of crude oil. The pipeline was replaced the week of 22 Mar 99.

Describe Area Affected and Cleanup Action Taken.* The crude oil release site was excavated; the impacted soil placed on a poly-liner adjacent to the excavation, confirmation soil samples were collected from the floor of the excavation. Once the excavation confirmation soil samples were below NMOCD regulatory standards, blending of the stockpiled material was conducted. The blended material (<500 mg/kg TPH) was utilized as backfill and the site contoured to the original surrounding rangeland topography. Reseeding with approved BLM grass seed will be conducted as prescribed by BLM directives.

SEE ATTACHED BASIN ENVIRONMENTAL SERVICE TECHNOLOGIES CLOSURE REQUEST, DATED 09 MAY 08, 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: 	OIL CONSERVATION DIVISION	
Printed Name: Camille Bryant	Approved by District Supervisor: 	ENVIRONMENTAL ENGINEER
Title: Remediation Coordinator	Approval Date: 5.16.08	Expiration Date: —
E-mail Address: cjbryant@paalp.com	Conditions of Approval:	1RP-1728
Date: 09 May 2008	Phone: (575) 441-0965	

Basin Environmental Service Technologies, LLC

2800 Plains Highway
P. O. Box 301
Lovington, New Mexico 88260
kdutton@basinenv.com
Office: (575) 396-2378 Fax: (575) 396-1429



09 May 2008

MAY 16 2008
HOBBS OCD

Mr. Larry Johnson
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division, District 1
1625 N. French Drive
Hobbs, New Mexico 88240

Re: Closure Request, McKee 6" (231735)
Plains Marketing, L. P. Preliminary Site Investigation Report and Remediation
Plan, dated 25 October 2007
Unit E (SW ¼, NW ¼) Section 29, Township 20 South, Range 38 East
Lea County, New Mexico
Plains SRS Number: LF-1999-20
NMOCD File Number: 1RP-1728

Dear Mr. Johnson:

Basin Environmental Service Technologies, LLC (Basin), on behalf of Plains Marketing, L. P. (Plains), is submitting this request for closure of the historical McKee 6" 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 Plan, dated 25 October 2007.

In May 2007, Basin mobilized to the McKee 6" crude oil release site responding to a request from Plains to initiate remediation of the historical site. Upon arrival at the release site, Basin initiated excavation of the release point and flow path area with the impacted soil stockpiled on a 6-mil poly liner adjacent to the site. As reported on the initial C-141, dated 18 March 1999, approximately 50 barrels of crude oil were released and 30 barrels were recovered. The NMOCD ranking criteria for the historical McKee 6" release site was >19, 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 10 mg/kg for benzene, 50 mg/kg for total BTEX and 100 mg/kg for TPH-GRO/DRO.

The following NMOCD approved remedial activities were accomplished at the McKee 6" release site:

- In May and June 2007, Basin conducted excavation activities at the release point and flow path area. The final dimensions of the excavated area were approximately 140 feet long by 75 feet wide and approximately 15 feet below ground surface (bgs). The impacted soils were placed on a 6-mil poly-liner adjacent to the excavation for future remedial activities. Approximately 6000 cubic yards of clean overburden and impacted soils were excavated and stockpiled on-site. See attached Figure 2, Excavation Site Map.
- On 14 June 2007, nine (9) confirmation soil samples were collected from the floor and walls of the excavation ranging in depth from approximately 5 to 15 feet bgs. Soil samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO. Laboratory results indicated that constituent concentrations of BTEX were not detected above laboratory method detection limits for the nine (9) soil samples. Laboratory results indicated that constituent concentrations of TPH-GRO/DRO were not detected above laboratory method detection limits for four (4) of the soil samples and the remaining five (5) soil samples reported TPH-GRO/DRO constituent concentrations below NMOCD regulatory standards.
- On 14 June 2007, a delineation trench was installed adjacent to the release point on the excavation floor. Soil samples collected at depths of approximately 17 and 27 feet below the base of the excavation were submitted for analysis. Laboratory results reported that constituent concentrations of BTEX were below NMOCD regulatory standards for the two (2) soil samples. Laboratory results reported constituent concentrations of TPH-DRO/GRO exceeded NMOCD regulatory standards for the two (2) soil samples at 5180 mg/kg and 4190 mg/kg, respectively.
- On 14 and 22 August 2007, Basin installed two (2) soil borings utilizing an air rotary drill rig operated by Straub Corporation, Stanton, Texas, to evaluate the vertical extent of crude oil impact at the release point on the floor of the excavation. The two soil borings ranged in depth from approximately 30 to 65 feet bgs with a true subsurface depth of approximately 45 and 80 feet bgs, respectively. No visual observations of free phase hydrocarbons (PSH) or groundwater were encountered during the installation of the soil borings. The selected samples were analyzed for constituent concentrations of BTEX and TPH-GRO/DRO
- Soil Boring 1, as depicted on the Excavation Site Map & Soil Boring Locations (Figure 3), was installed on the floor of the excavation at a depth of approximately 30 feet bgs. The soil boring was installed to a true subsurface depth of approximately 45 feet bgs. Soil samples collected at depths of 5, 10, 20 and 30 feet below the base of the excavation were submitted for analysis. Laboratory results indicated that constituent concentrations of BTEX and TPH-

GRO/DRO were not detected above laboratory method detection limits for the four (4) soil samples.

- Soil Boring 2 was installed to further evaluate the vertical extent of crude oil impact on the excavation floor approximately eight (8) feet north northeast of SB-1 at approximately fifteen (15) feet bgs. The soil boring was installed to a true subsurface depth of approximately 80 feet bgs. Soil samples collected at depths of 5, 10, 20, 30, 40, 50, 60 and 65 feet bgs below the base of the excavation were submitted for analysis. Laboratory results indicated that constituent concentrations of BTEX were reported below NMOCD regulatory standards for five (5) soil samples and were not detected above laboratory method detection limits for the remaining three (3) soil samples. Laboratory results indicated that constituent concentrations of TPH-GRO/DRO were reported to exceed NMOCD regulatory standards for the 5, 10, 20, 30, 40 and 50 feet bgs soil samples at 1646 mg/kg, 1029 mg/kg, 1432 mg/kg, 2122 mg/kg, 2196 mg/kg and 374 mg/kg, respectively. Laboratory results indicated that constituent concentrations of TPH-GRO/DRO were reported below NMOCD regulatory standards for the remaining two (2) soil samples at 60 and 65 feet, respectively. Based on the results of the laboratory data, soil impacts appear to be limited in lateral extent and to a subsurface depth of less than 60 feet.
- A Preliminary Site Investigation Report and Remediation Plan, dated 25 October 2007, was submitted to NMOCD Hobbs District I and subsequently approved. The approved plan included no further excavation activities based on laboratory results from excavation activities and soil sampling, blend the clean overburden with the impacted stockpiled material on-site, divide the blended material into equal cell grids of approximately 500 cubic yards, collect confirmation soil samples from the grids to ensure a TPH-GRO/DRO concentration of 500 mg/kg or less has been achieved, install an impermeable 20-ml poly liner at the base of the excavation and backfill the excavation with the blended material. Upon completion of backfilling the excavation, contour the excavation to the surrounding rangeland grade and reseed the site with approved BLM grass seed.
- In November 2007, blending of the on-site stockpiled material was conducted. In November and December 2007, the blended soils were sampled at approximately 500 cubic yard increments and analyzed for constituent concentrations of BTEX and TPH-GRO/DRO to ensure TPH concentrations were at or below 500 mg/kg. In December 2007, installation of the 20-ml poly liner was completed and backfilling of the excavation was conducted with the blended soil that met the cleanup standards. Backfilling of the excavation was completed in December 2007 and the excavation contoured to the surrounding rangeland grade. Reseeding activities with approved BLM grass seed will be accomplished as directed by BLM procedures.

The remediation activities were completed in accordance with the NMOCD approved Plains Marketing, L. P., Preliminary Site Investigation Report and Remediation Plan,

dated 25 October 2007. Based on the results of the NMOCD approved remediation activities conducted at the McKee 6" release site, Basin, on behalf of Plains, requests that the NMOCD consider the soil issue at this site 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,

A handwritten signature in cursive script, appearing to read "Ken Dutton".

Ken Dutton

Basin Environmental Services

Attachments: Table 1, Soil Chemistry Results
Table 2, Soil Chemistry Results –Treated/Stockpiled Soil
Figure 2, Excavation Site Map
Figure 3, Excavation Site Map & Soil Sampling Locations
Digital Photos
NMOCD C-141 (Initial)
NMOCD C-141 (Final)

cc: Mr. Jim Amos, Carlsbad BLM Office

TABLE 1

SOIL CHEMISTRY RESULTS

PLAINS MARKETING, L.P.
 MCKEE 6-INCH
 LEA COUNTY, NEW MEXICO
 SRS: LF-1999-20
 NMOCD REF NO: 1RP- 1728

SAMPLE LOCATION	SAMPLE DEPTH (Below normal surface grade)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030				METHOD: 8015M		TOTAL TPH
				BENZENE	TOLUENE	ETHYL-BENZENE	XYLENE	GRO	DRO	
				(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	
West Wall # 2	6' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	57	6	63
West Floor # 2	15' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	1.35	1.35
North Wall # 2	6' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	1.03	1.03
North Floor # 2	15' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	<1.0	<1.0
Ramp	12' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	<1.0	<1.0
East Wall # 2	6' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	<1.0	<1.0
East Floor # 2	15' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	1.64	1.64
South Wall # 1	6' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	1.04	1.04
South Floor # 1	15' bgs	06/14/07	In-Situ	<0.010	<0.010	<0.010	<0.010	<50	<1.0	<1.0
Trench 17'	17' bgs	06/14/07	In-Situ	0.155	2.12	2.75	9.28	2040	3140	5180
Trench 27'	27' bgs	06/14/07	In-Situ	<0.010	0.342	0.467	7.51	2190	2000	4190
North Stock Pile	N/A	06/15/07	Stockpile	<0.010	0.098	0.052	1.42	614	1820	2434
South Stock Pile	N/A	06/15/07	Stockpile	<0.010	<0.010	<0.010	0.157	277	44	321
East Stock Pile	N/A	06/15/07	Stockpile	<0.010	0.047	<0.010	0.239	991	62	1053
West Stock Pile	N/A	06/15/07	Stockpile	<0.010	<0.010	<0.010	<0.010	625	36	661
N S/P	N/A	05/07/07	Stockpile					29	1300	1329

SOIL CHEMISTRY RESULTS

PLAINS MARKETING, L.P.
MCKEE 6-INCH
LEA COUNTY, NEW MEXICO
SRS: LF-1999-20
NMOCD REF NO: 1RP- 1728

[illegible]

SOIL CHEMISTRY RESULTS

**PLAINS MARKETING, L.P.
MCKEE 6-INCH
LEA COUNTY, NEW MEXICO
SRS: LF-1999-20
NMOCD REF NO: 1RP- 1728**

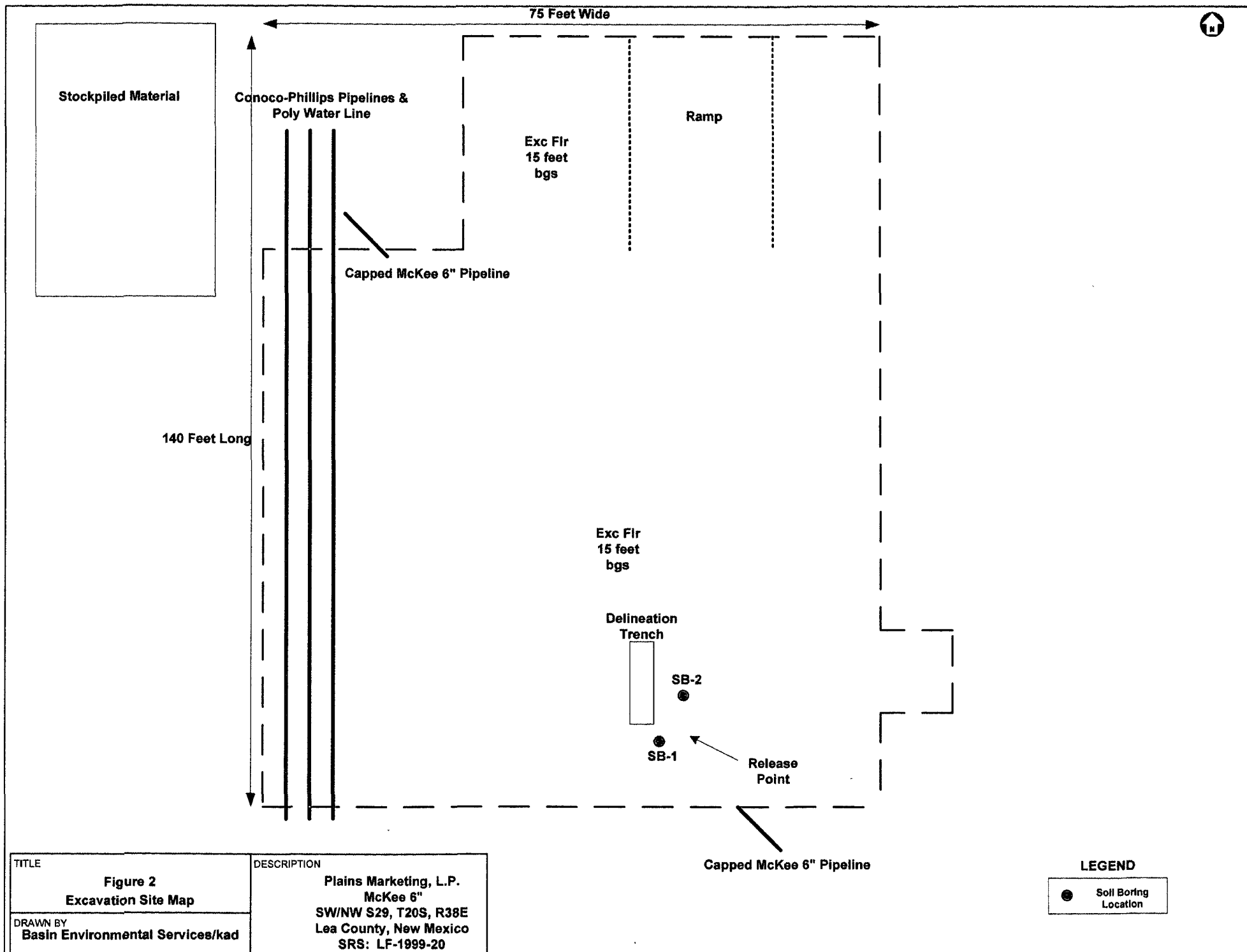
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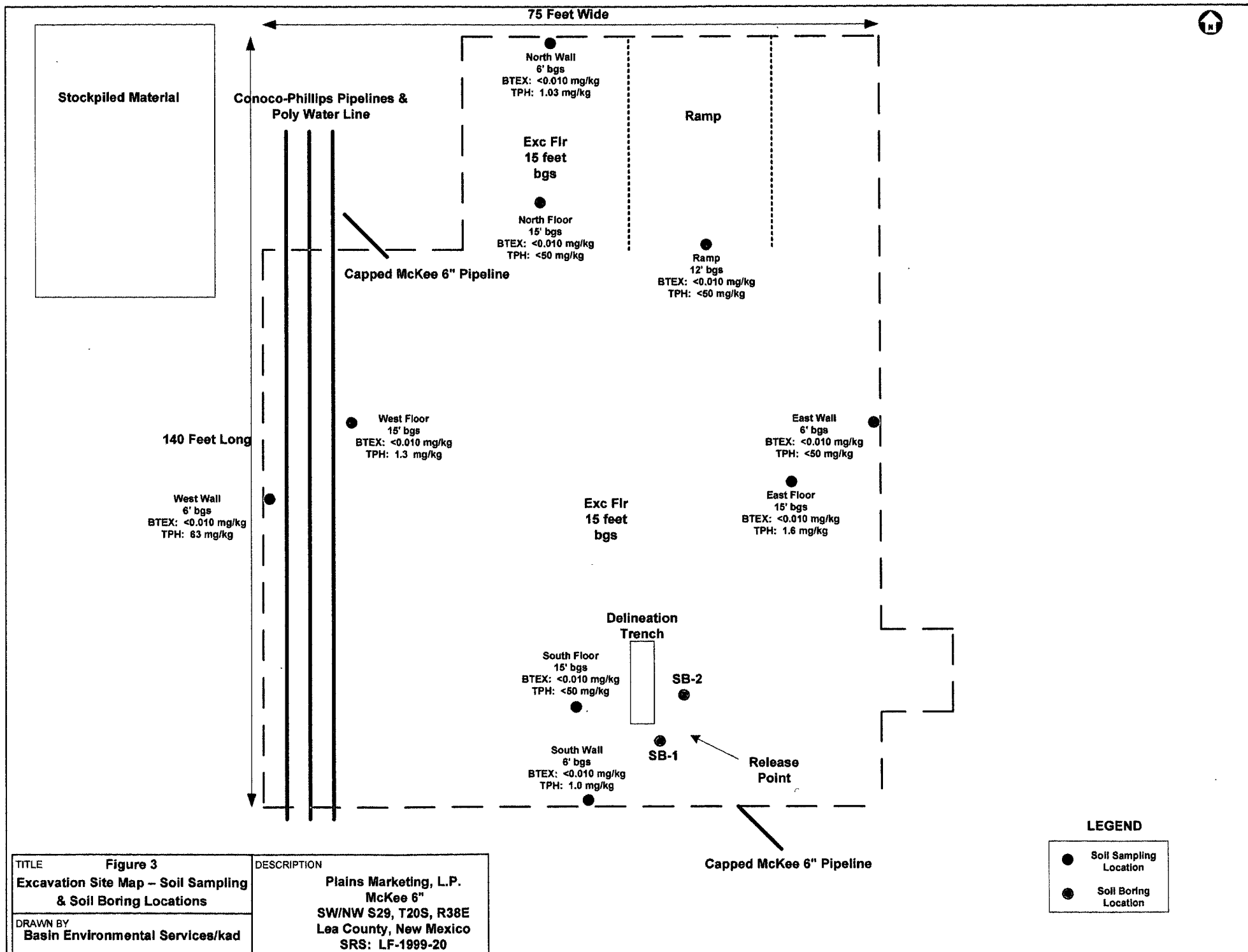
TABLE 2

SOIL CHEMISTRY RESULTS - TREATED/STOCKPILED SOIL

PLAINS MARKETING, L.P.
MCKEE 6-INCH
LEA COUNTY, NEW MEXICO
SRS: LF-1999-20
NMOCD REF NO: 1RP- 1728

[illegible]





Plains Marketing, L. P.

McKee 6"

SW/NW S29, T20S, R38E

Lea County, NM

Plains SRS: LF-1999-20

NMOC-D Ref No: 1RP-1728



Plains Marketing, L. P.

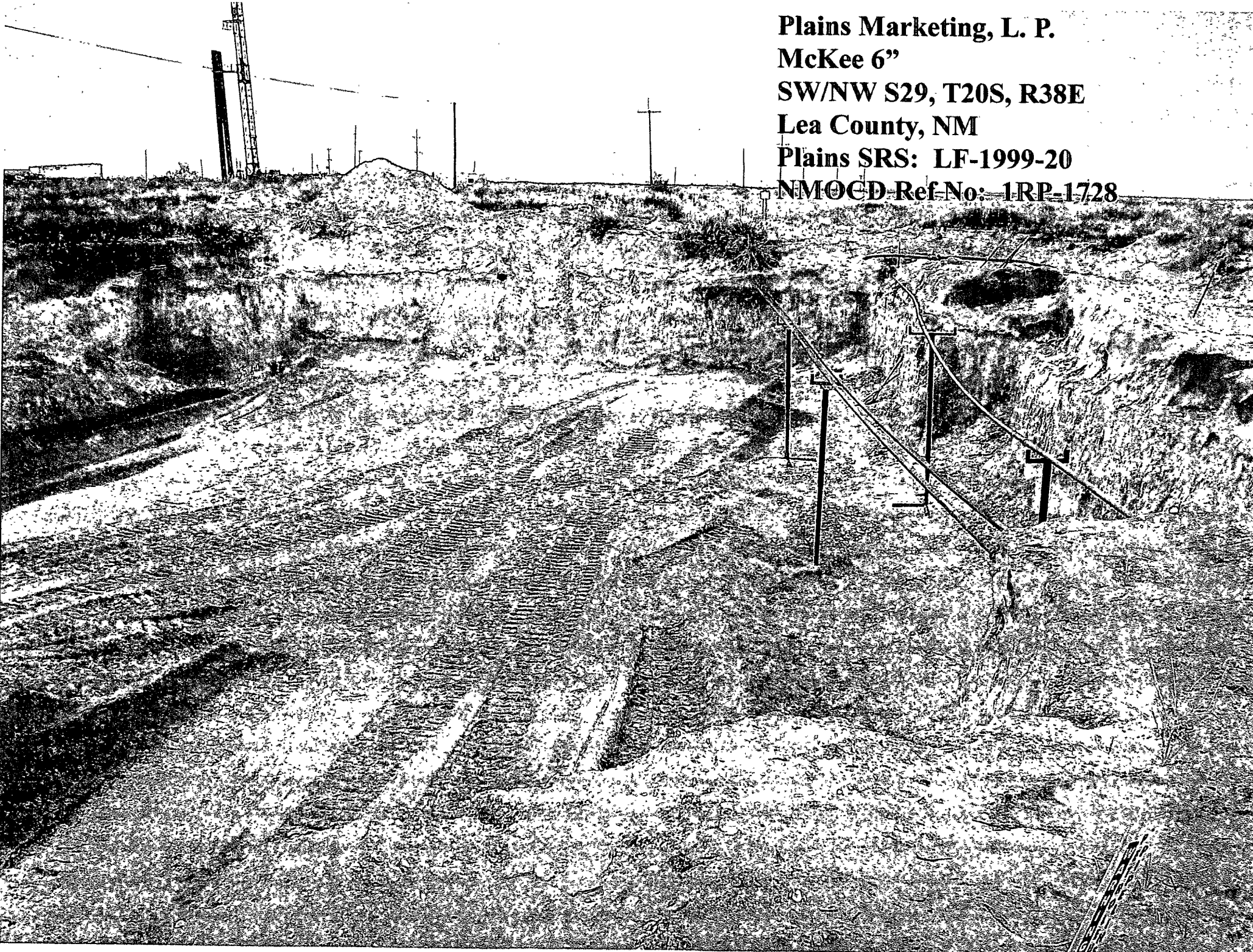
McKee 6"

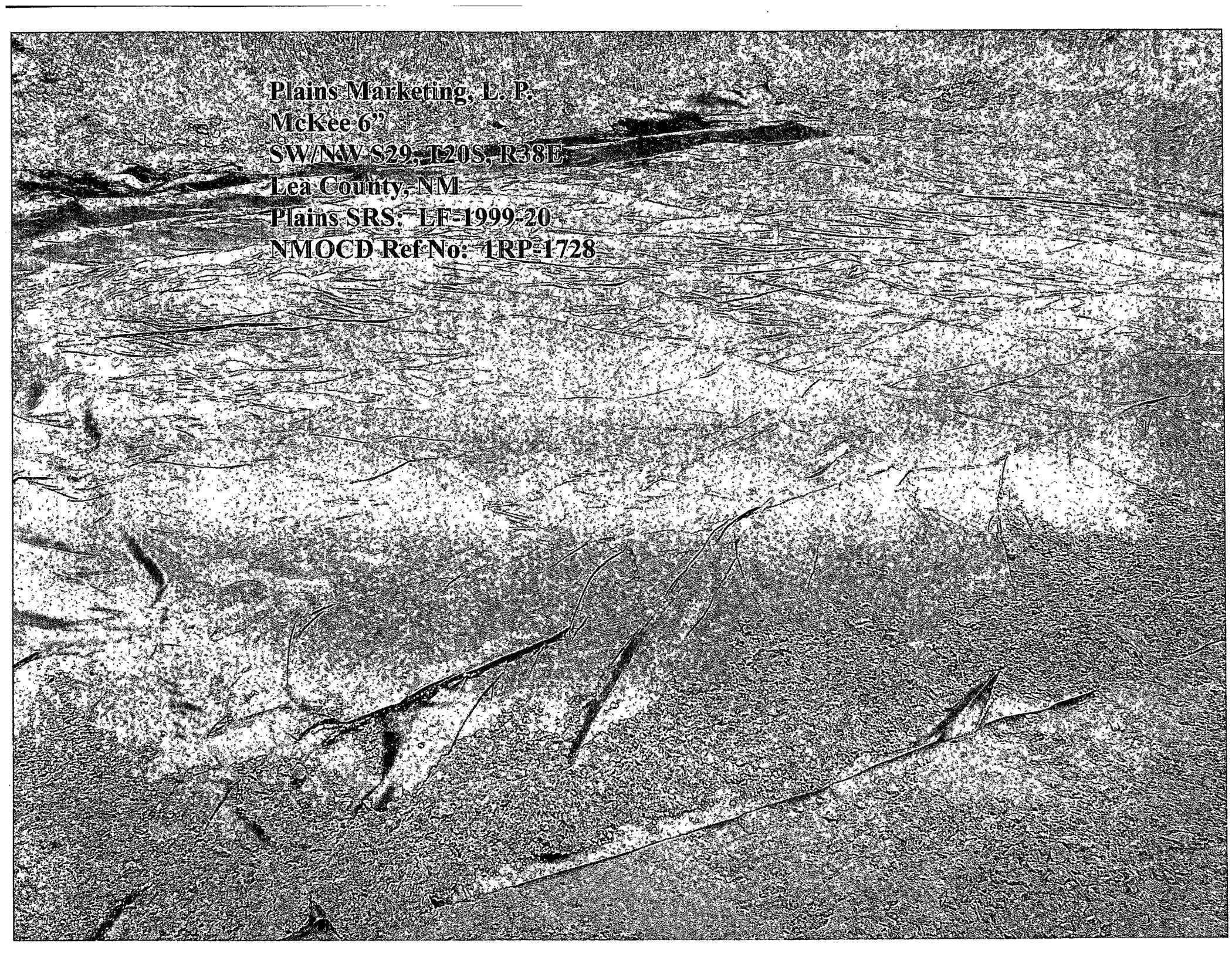
SW/NW S29, T20S, R38E

Lea County, NM

Plains SRS: LF-1999-20

NMOCD Ref No: 1RP-1728



A black and white photograph of a desert landscape. The foreground is filled with numerous small, dark, rounded rocks and pebbles of various sizes. In the middle ground, there are several low, rounded hills or mounds of earth, some of which appear to have sparse, low-lying vegetation. The background shows a range of more prominent hills or mountains under a clear sky. The overall scene is arid and rugged.

Plains Marketing, L. P.
McKee 6"
SW/NW S29, T20S, R38E
Lea County, NM
Plains SRS: LF-1999-20
NMOCD Ref No: 1RP-1728

Plains Marketing, L. P.

McKee 6"

SW/NW S29, T20S, R38E

Lea County, NM

Plains SRS: LF-1999-20

NMOCD Ref No: 1RP-1728

11/17/2007

Plains Marketing, L. P.
McKee 6"

SW/NW S29, T20S, R38E

Lea County, NM

Plains SRS: LF-1999-20

NMOCD Ref No: 1RP-1728

11/00

Plains Marketing, L. P.
McKee 6"
SW/NW S29, T20S, R38E
Lea County, NM
Plains SRS: LF-1999-20
NMOCD Ref No: 1RP-1728

11/24/2007

District II - (505) 748-1283
811 South First
Artesia, NM 87210
District III - (505) 334-6178
1000 Rio Brazos Road
Artesia, NM 87410
District IV - (505) 827-7131

Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Spill # EF-20

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 EOFF ENERGY Pipeline	Contact Lennah Frost	
Address PO Box 1660, Midland TX 79702	Telephone No. 915/684-3467	
Facility Name McKee 6" Gathering System	Facility Type Pipe Line	
Surface Owner BLM	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section 29	Township 20-S	Range 38-E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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NATURE OF RELEASE

Type of Release Crude oil	Volume of Release 50 bbl	Volume Recovered 30 bbl
Source of Release Internal Corrosion Leak	Date and Hour of Occurrence 3/9/99 3:45pm	Date and Hour of Discovery 3/9/99 3:45pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sy/Via	
By Whom? Jim Henry	Date and Hour 3/10/99 8:15 (CST) AM	
As a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary)

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)

Internal Corrosion leak. Pipe to be replaced week of 3/22/99.

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)

Area will be bioremediated on site using microbes - BLM approves

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: Lennah Frost	OIL CONSERVATION DIVISION	
Printed Name: Lennah Frost	Approved by District Supervisor:	
SR. ENV. Engr. Keer	Approval Date:	Expiration Date:
3-18-99	Conditions of Approval:	Attached <input type="checkbox"/>