

1R - 386

APPROVALS

YEAR(S):

2009

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, October 22, 2009 9:29 AM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Ron Rounsaville
Subject: Soil Closure Request Approval (1R-386) (Plains Junction 34 to Lea Station Release Site)

**RE: Soil Closure Request Approval
for the Plains Marketing, L.P.
Junction 34 to Lea Station Release Site (1R-386)
Unit Letter L, Section 21, T20S, R37E, NMPM, Lea County, New Mexico**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report and request for soil closure of the above-referenced site (dated, July, 2009). The above-referenced report, submitted in partial fulfillment of 19.15.29 NMAC (Part 29, formally, Rule 116), indicates that Plains has partially met the requirements of 19.15.29 NMAC for this site. Therefore, the OCD hereby conditionally approves the Soil Closure Report for the Junction 34 to Lea Station Release Site and no further soil remediation is required for this site.

The Junction 34 to Lea Station Release Site is still active under Remediation Plan, 1R-386, and groundwater monitoring, groundwater contamination delineation (if necessary), and groundwater remediation must continue at the Junction 34 to Lea Station Release Site.

Please be advised that OCD approval of this request does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, April 16, 2009 2:36 PM
To: Jason Henry
Cc: Britt Byerly; Jeff Dann; 'Ron Rounsaville'
Subject: RE: Plains Pipeline Site 34 Junction to Lea Station, NMOCD Reference # 1R-0386

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received the analytical results for the above-referenced site, dated April 14, 2009, and has conducted a review of the results. The results indicate that the site substantially meets the closure requirements as recommended by the OCD. Therefore, the OCD hereby conditionally approves the commencement of backfilling activities at the site as specified in the work plan:

Plains must continue to perform groundwater monitoring at the site and develop an appropriate groundwater remediation plan within 60 days after the next sampling event.

Please be advised that OCD approval of these activities does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Ron Rounsaville [mailto:rrounsaville@novatraining.cc]
Sent: Tuesday, April 14, 2009 1:57 PM
To: Hansen, Edward J., EMNRD
Cc: Britt Byerly; Jason Henry; Jeff Dann
Subject: Plains Pipeline Site 34 Junction to Lea Station, NMOCD Reference # 1R-0386

Mr. Hansen,

Persuant to our conversation on April 13, 2009, NOVA Safety & Environmental, on behalf of Plains Marketing, is submitting a soil sample location map and laboratory analytical tables of soil samples collected from the excavation activities conducted at the Plains 34 Junction to Lea Station site (NMOCD Reference # 1R-0386) for your review. As previously discussed, excavation sidewall sample results indicate Total TPH concentration levels are at or below the 100 ppm regulatory level on all sidewalls with the exception of the east sidewall area in the vicinity of sample location East Wall-2A (848.5 ppm TPH). This sample location lies immediately underneath a Southern Union Gas 10-Inch gas pipeline.

On March 25, 2009, NOVA excavated a test trench approximately 10 feet east of the Plains excavation east sidewall between the Southern Union line and an El Paso Energy pipeline to a depth of approximately 16 feet below ground surface. NOVA and Plains personel did not observe any hydrocarbon staining or odor within the test trench. The soil underneath the Southern Union line consists of very fine grained, friable silty sands, which appear

to be very unstable. Due to safety reasons, Plains prefers to not excavate any additional soil from underneath the Southern Union line so not to risk further collapsing of the wall and support of the SU gas pipeline.

Therefore, Plains is requesting NMOCD approval to leave the approximately 160 cubic yards of impacted soil in place and proceed with backfilling the excavation with the remediated soil stockpile.

Should you have any quations regarding this information, Please contact myself at 432-520-7720 or Mr. Jason Henry of Plains Marketing at 575-441-1099.

Thank You,

Ronald K. Rounsaville
Project Manager
NOVA Safety & Environmental
2057 Commerce
Midland, Texas 79703
PH: 432-520-7720
FX: 432-520-7701
Cell: 432-894-7166

This inbound email has been scanned by the MessageLabs Email Security System.

Hansen, Edward J., EMNRD

From: Ron Rounsaville [rrounsaville@novatraining.cc]
Sent: Tuesday, April 14, 2009 1:57 PM
To: Hansen, Edward J., EMNRD
Cc: Britt Byerly; Jason Henry; Jeff Dann
Subject: Plains Pipeline Site 34 Junction to Lea Station, NMOCD Reference # 1R-0386
Attachments: 34 Junct_Lea BTEX_TPH Soil Analytical.pdf; FIG3.pdf

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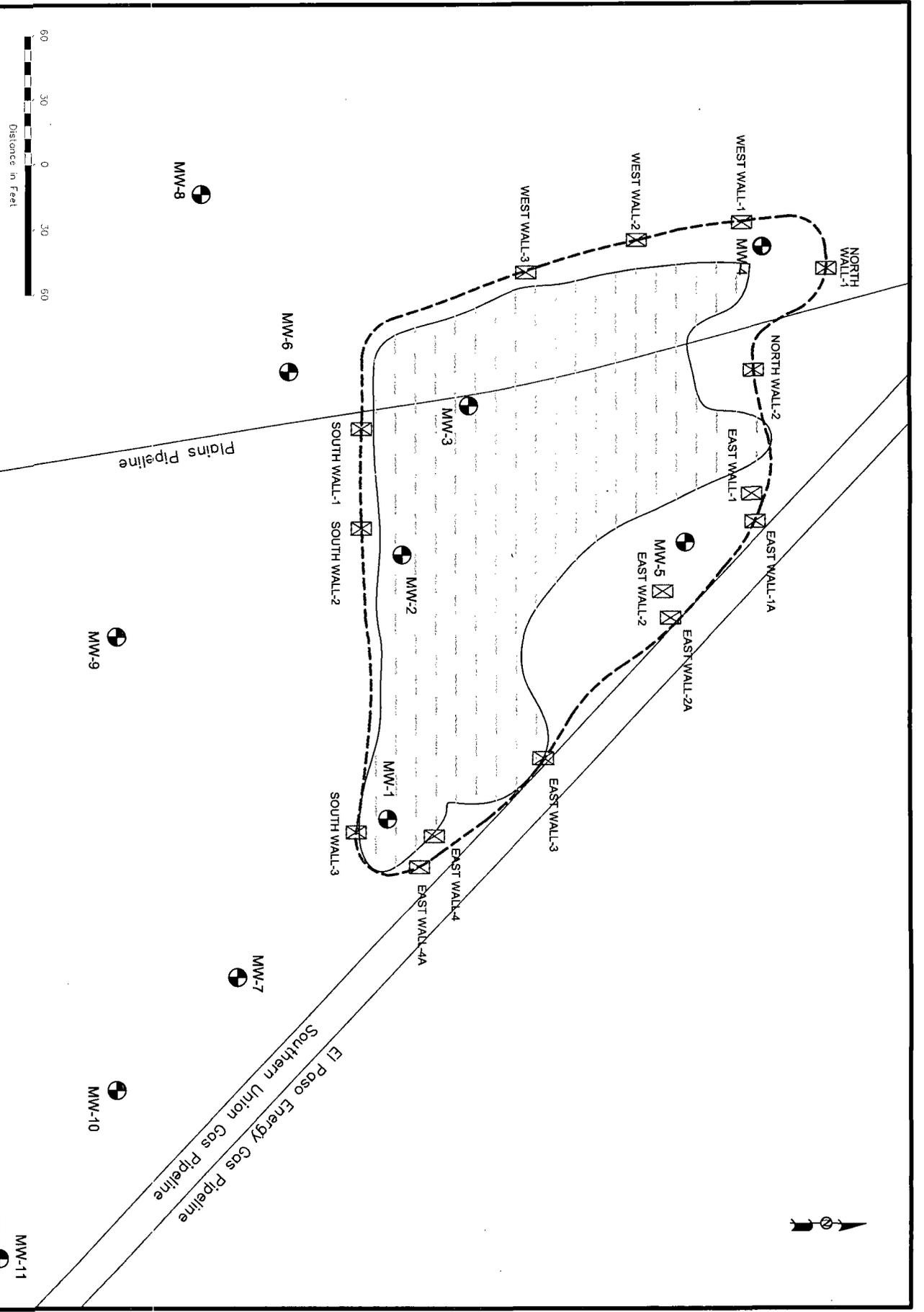
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TABLE 1
Concentrations of BTEX and TPH in Soil
34 JUNCTION to LEA STATION
Lea County, New Mexico
Ref #2002-10286
Plains Pipeline, LP

Sample Location	Sample Date	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	m,p-Xylenes (mg/Kg)	o-Xylene (mg/Kg)	Total BTEX	GRO C ₆ -C ₁₂ (mg/Kg)	DRO >C ₁₂ -C ₃₅ (mg/Kg)	Total TPH
NMOC REGULATORY STANDARD		10	-	-	-	-	50	-	-	100
SEJCT342603BH1-2	02/06/03	13.9	205.0	141.0	127.0	55.9	542.8	3,770.0	6,350.0	10,120.0
SEJCT342603BH1-5	02/06/03	0.0371	0.4450	0.5650	0.5800	0.2900	1.9171	22.3	232.0	254.3
SEJCT342603BH1-10	02/06/03	<0.020	0.0920	0.2130	0.2490	0.1270	0.6810	14.3	264.0	278.3
SEJCT342603BH1-15	02/06/03	0.0959	0.1010	0.1460	0.0793	0.0574	0.4796	401	3940	4341
SEJCT342603BH1-20	02/06/03	0.186	<0.020	0.188	0.115	<0.020	0.489	<5	<5	<10
SEJCT342603BH2-2	02/06/03	86.6	619.0	436.0	371.0	160.0	1,672.6	9,950	13,000	22,950
SEJCT342603BH2-5	02/06/03	0.191	2.85	2.09	1.46	0.616	7.207	<5	89.3	89.3
SEJCT342603BH2-10	02/06/03	0.211	0.681	8.710	10.60	0.049	20.251	336	637	973
SEJCT342603BH2-15	02/06/03	0.100	0.267	6.690	6.970	0.100	14.127	259	497	756
SEJCT342603BH3-2	02/06/03	1.36	30.00	34.90	38.70	19.00	123.96	1,150	2,550	3,700
SEJCT342603BH3-5	02/06/03	<0.020	0.0222	<0.020	<0.020	<0.020	0.0222	<5	204	204
SEJCT342603BH3-10	02/06/03	0.022	0.027	0.056	0.112	<0.020	0.217	31.8	238	270
SEJCT342603BH3-15	02/06/03	0.112	0.067	5.600	9.040	2.880	17.699	631	1,620	2,251
SEJCT342603BH4-2	02/06/03	40.80	214.00	136.00	89.40	52.50	532.70	3,760	4,770	8,530
SEJCT342603BH4-5	02/06/03	0.0658	0.0979	0.0368	0.0351	<0.020	0.2356	<5	51.6	51.6
SEJCT342603BH4-10	02/06/03	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<5	<5	<10
SEJCT342603BH4-15	02/06/03	0.125	0.054	0.109	0.062	<0.020	0.350	<5	13.4	13.4
SEJCT3421103BH6-2	02/11/03	7.61	102.00	100.00	93.10	41.30	344.01	2,470	5,230	7,700
SEJCT3421103BH6-5	02/11/03	0.523	4.670	4.090	3.750	1.770	14.803	101	436	537
SEJCT3421103BH6-10	02/11/03	<0.020	0.0227	0.1080	0.1590	0.0288	0.3185	31.3	310	341
SEJCT3421103BH6-15	02/11/03	0.117	0.209	10.10	14.60	3.590	28.616	624	741	1,365
SEJCT3421103BH8-2	02/11/03	4.340	85.00	92.60	887.80	40.80	1,110.54	3,190	5,640	8,830
SEJCT3421103BH8-5	02/11/03	0.694	1.700	2.990	0.229	0.057	5.670	663	2,780	3,443
SEJCT3421103BH8-10	02/11/03	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<5	13.1	13.1
SEJCT3421103BH8-15	02/11/03	11.60	86.80	78.70	55.30	22.80	255.20	6,520	7,410	13,930
SEJCT3421103BH7-2	02/11/03	0.610	3.500	4.790	4.740	2.360	16.000	420	9,090	9,510
SEJCT3421103BH7-5	02/11/03	<0.020	0.356	1.300	1.820	0.545	4.021	901	1,400	2,301
SEJCT3421103BH7-10	02/11/03	1.160	0.333	19.30	8.790	0.609	30.192	1,070	1,010	2,080
SEJCT3421103BH7-15	02/11/03	2.190	0.111	41.60	3.790	0.052	47.743	1,770	2,940	4,710
SEJCT3421103BH5-2	02/11/03	0.521	7.620	9.360	8.020	4.990	30.511	2,070	10,200	12,270
SEJCT3421103BH5-5	02/11/03	<0.020	0.308	1.020	0.940	0.538	2.806	<5	58.3	58.3
SEJCT3421103BH5-10	02/11/03	<0.020	0.167	0.333	0.299	0.146	0.945	7.81	105	113
SEJCT3421103BH5-15	02/11/03	<0.020	0.0810	0.1430	0.1250	0.0790	0.4280	163	745	908
LEJ34051304MW5(5')	05/13/04	<0.025	0.0696	0.1120	0.4110	0.1740	0.7666	300	1,660	1,960
LEJ34051304MW5(10')	05/13/04	0.0316	0.3020	2.150	3.120	1.7900	7.3936	851	3,990	4,841
LEJ34051304MW5(15')	05/13/04	<0.025	0.141	0.630	0.966	0.548	2.285	467	2,980.0	3,447
LEJ34051404MW7(15')	05/13/04	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<10	35.4	35.4
LEJ34051704MW6(10')	05/17/04	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<10	11.0	11.0
LEJ34051704MW6(15')	05/17/04	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<10	<10	<10
LEJ34052104MW4(5')	05/21/04	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<5	202	202
LEJ34052104MW4(15')	05/21/04	<0.020	<0.020	2.570	4.330	0.045	6.945	388	1,870	2,258
Sidewall SW-1A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	<50.0	<51.0
SW-3A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	2,410	2,410
SW-6A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	571	571
SW-8A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	92.4	92.4
SW-12A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	251	251
SW-14A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	<50.0	<51.0
SW-16A 10'	11/12/08	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	3.37	4,710	4,713.37
SW-19A 10'	11/12/08	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	3.4	5,050	5053.4
SW-22A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	1.08	107	108.08
SW-29A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	<50.0	<51.0
SW-38A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	991	991
SW-36A 10'	11/12/08	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010	<1.00	<50.0	<51.0

TABLE I
Concentrations of BTEX and TPH in Soil
34 JUNCTION to LEA STATION
Lea County, New Mexico
Ref #2002-10286
Plains Pipeline, LP

Sample Location	Sample Date	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	m,p-Xylenes (mg/Kg)	o-Xylene (mg/Kg)	Total BTEX	GRO C ₆ -C ₁₂ (mg/Kg)	DRO >C ₁₂ -C ₃₅ (mg/Kg)	Total TPH
West Wall-1, 10'	03/10/09	<0.010	<0.010	0.127	0.34		0.467	<1.00	<50.0	<50.0
West Wall-2, 12'	03/10/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
West Wall-3, 10'	03/10/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
North Wall-1, 10'	03/10/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
North Wall-2, 10'	03/10/09	<0.010	0.124	<0.010	0.373		0.497	<1.00	<50.0	<50.0
South Wall-1, 12'	03/10/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
South Wall-2, 12'	03/10/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
Soil Stockpile SS-1	11/12/08	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	398	398
SS-2	11/12/08	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	118	118
SS-3	11/12/08	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	639	639
SS-4	11/12/08	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	620	620
SS-5	11/12/08	<0.010	<0.010	<0.010	<0.010		<0.010	1.54	296	298
Soil Stockpile SS-6	03/12/09	<0.050	<0.050	<0.050	1.81		1.81	13.7	711	724.7
SS-7A	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	6.62	366	372.62
SS-7B	03/12/09	<0.020	<0.020	<0.020	0.709		0.709	12.2	297	309.2
SS-7C	03/12/09	<0.010	<0.010	<0.010	0.336		0.336	1.5	201	202.5
SS-7D	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	3.72	368	371.72
SS-7E	03/12/09	<0.010	<0.010	<0.010	0.336		0.336	5.63	172	177.63
SS-8	03/12/09	<0.0500	<0.0500	0.671	1.78		2.451	31.1	726	757.1
SS-9	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	69.5	69.5
SS-10A	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	149	149
SS-10B	03/12/09	<0.010	<0.010	<0.010	0.373		0.373	6.87	399	405.87
SS-11	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	2.54	82.5	85.04
SS-12	03/12/09	<0.010	<0.010	<0.010	0.377		0.377	26.6	438	464.6
SS-13	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	2.33	156	158.33
SS-14A	03/12/09	<0.010	<0.010	0.138	0.374		0.512	28.5	463	491.5
SS-14B	03/12/09	<0.010	<0.010	<0.010	0.0383		0.0383	35.8	352	387.8
SS-15A	03/12/09	<0.010	<0.010	0.128	0.365		0.493	31.2	380	411.2
SS-15B	03/12/09	<0.010	<0.010	<0.010	0.374		0.374	24.5	366	390.5
SS-16A	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	8	242	250
SS-16B	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	28.7	319	347.7
SS-17A	03/12/09	<0.010	<0.010	<0.010	0.346		0.346	11.8	224	235.8
SS-17B	03/12/09	<0.010	<0.010	<0.010	0.364		0.364	25.1	271	296.1
SS-18A	03/12/09	<0.010	<0.010	<0.010	0.445		0.445	41.5	474	515.5
SS-18B	03/12/09	<0.010	<0.010	0.22	0.569		0.789	75.6	424	499.6
SS-19A	03/12/09	<0.010	<0.010	<0.010	0.361		0.361	35.4	401	436.4
SS-19B	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	10.9	214	224.9
SS-20A	03/12/09	<0.010	<0.010	<0.010	0.35		0.35	13.2	292	305.2
SS-20B	03/12/09	<0.010	<0.010	<0.010	0.426		0.426	45.4	335	380.4
SS-21A	03/12/09	<0.010	<0.010	<0.010	<0.0100		<0.010	2.16	186	188.16
SS-21B	03/12/09	<0.010	<0.010	<0.010	0.372		0.372	9.92	129	138.92
SS-22A	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	70.6	70.6
SS-22B	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	82.2	82.2
SS-23A	03/12/09	<0.010	<0.010	0.13	0.416		0.546	4.1	166	170.1
SS-23B	03/12/09	<0.010	<0.010	<0.010	0.344		0.344	3.44	190	193.44
SS-23C	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	69.2	69.2
SS-23D	03/12/09	<0.010	0.123	0.124	0.382		0.629	15.5	245	260.5
SS-24A	03/12/09	<0.010	0.12	<0.010	<0.010		0.12	1.37	216	217.37
SS-24B	03/12/09	<0.010	<0.010	<0.010	<0.010		<0.010	2.65	162	164.65
Soil Stockpile SS-26A	03/13/09	<0.010	0.172	0.237	0.79		1.199	12.4	156	168.4
SS-26B	03/13/09	<0.010	0.132	0.172	0.626		0.93	9.92	199	208.92
SS-26C	03/13/09	<0.010	<0.010	0.129	0.389		0.518	<1.00	176	176
SS-26D	03/13/09	<0.010	<0.010	<0.010	<0.010		<0.010	1.41	270	271.41
SS-27A	03/13/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
SS-27B	03/13/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
SS-27C	03/13/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	55.5	55.5
SS-27D	03/13/09	<0.010	<0.010	<0.010	0.338		0.338	<1.00	62.4	62.4
South Wall SW-3	03/19/09	<0.010	0.0773	<0.010	0.186		0.2633	<1.00	103	103
East Wall EW-1	03/19/09	<0.020	<0.020	<0.020	<0.020		<0.020	<2.00	310	310
East Wall EW-2	03/19/09	<0.010	<0.010	0.224	0.418		0.642	32.6	1040	1072.6
East Wall EW-3	03/19/09	<0.010	<0.010	<0.010	<0.010		<0.010	<1.00	<50.0	<50.0
East Wall EW-4	03/19/09	<0.010	<0.010	<0.010	<0.010		<0.010	1.85	258	259.85
East Wall 1A, 12'	03/31/09	<0.010	<0.010	<0.010	<0.010		<0.010	1.62	211	212.62
East Wall 2A, 12'	03/31/09	<0.010	<0.010	<0.010	0.239		0.239	32.5	816	848.5
East Wall 4A, 10'	03/31/09	<0.010	<0.010	<0.010	<0.010		<0.010	3.26	98.8	102.06



Legend:

- Pipeline
- Monitor Well Location
- Excavation Boundary
- Sidewall Sample Locations

Distance in Feet

0 30 60

NMCCD Ref# 1R-0386

Figure 2
 Soil Sample Location Map
 34 Junction to Lea
 Plains Marketing, L.P.
 Lea County, NM

<p>ENNOVA safety and environmental</p>	Scale: 1" = 60'	Drawn By: SAT	<p>2057 Commerce Drive Midland, Texas 79703 432.520.7720 www.novasafetyandenvironmental.com</p>
	April 13, 2009	Checked By: RKR	

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 13, 2009 3:40 PM
To: 'Ron Rounsaville'
Cc: Jeff Dann; Jason Henry
Subject: RE: Texaco Skelly 'F' NMOCD Ref. 1R-420 - Plains

Dear Mr. Rounsaville:

The New Mexico Oil Conservation Division (NMOCD) has reviewed your request for extension of submittal of the Groundwater Remediation Workplan for the above-referenced site. The OCD hereby approves the request for extension of the submittal of workplan until Wednesday, April 15, 2009.

Also, please be advised that NMOCD approval of this extension for submittal does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Ron Rounsaville [mailto:rrounsaville@novatraining.cc]
Sent: Monday, April 13, 2009 2:47 PM
To: Hansen, Edward J., EMNRD
Cc: Jeff Dann; Jason Henry
Subject: Texaco Skelly 'F' NMOCD Ref. 1R-420

Mr Hansen,

NOVA Safety & Environmental, on behalf of Plains Marketing, L. P., is requesting an extension of time until April 15, 2009 to complete the requested Groundwater Remediation Workplan for the Texaco Skelly 'F' Site in Lea County, New Mexico (NMOCD Reference 1R-420).

Thank you for your consideration in this matter,

Ronald K. Rounsaville
Project Manager
NOVA Safety & Environmental
2057 Commerce
Midland, Texas 79703
PH: 432-520-7720
FX: 432-520-7701
Cell: 432-894-7166