GW - 351

WORK PLANS

Oct. 2010

Basin Environmental Services, LLC

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Effective Solutions

October 2010

Mr. Edward Hansen
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Annual Report (2009) – Response Action Plan
for the Plains Marketing, L. P. (231735)
Lea Station Landfarm (GW-351)
Unit Letters D & E, Section 28, T20S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Hansen:

Basin Environmental Services Technologies, LLC (Basin), on behalf of Plains Marketing, L. P. (Plains), has prepared the following action plan in response to the letter received September 22, 2010, from the New Mexico Oil Conservation Division (NMOCD). The letter requested that a response action plan be prepared that addresses chloride concentrations reported in the 2009 Annual Report, which identified three samples above previously established background concentrations within the vadose zone of G-1, G-3, and G-4 of Cell G. A copy of the above referenced letter is attached.

Laboratory analytical results from soil samples collected during the first semi-annual sampling event conducted on June 9 and 10, 2010, indicated chloride concentrations for soil samples Cell G VZ G-1, Cell G VZ G-3 and Cell G VZ G-4 were 8.87, 8.7 and 6.58 mg/Kg, respectively, which are within the normally occurring background range. A table summarizing the analytical results from the vadose zone soil samples is attached.

Pursuant to a telephone conversation conducted on September 28, 2010, regarding the NMOCD letter received September 22, 2010, Plains will collect additional soil samples from the vadose zone (4' -5' below ground surface) in the regions of G-1, G-3 and G-4 of Cell G. Additional soil samples will be collected during the second semi-annual sampling event scheduled for November 2010, and analyzed for chloride concentrations by EPA Method 300. Laboratory analytical results from each sampling event will be submitted to the NMOCD in the *2010 Annual Report*. As of May 19, 2009, no soil has been transferred into Cell G at Lea Station Landfarm.

If you have any additional questions regarding this matter, please contact myself or Camille Bryant at 575.396.2378, or Plains representative, Jason Henry at 575.441.1099.

Respectfully Submitted,

Joel W. Lowry
Basin Environmental Services

<jwlowry@basinenv.com>

From: Camille J. Bryant <cjbryant@basin-consulting.com>
To: jwlowry@basinenv.com
Date: Oct 14 '10 8:23am
Subject: FW: Lea Station Landfarm (GW-351) Annual Report - 2009 - Response Action Plan Required

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Wednesday, September 22, 2010 11:32 AM
To: Jason Henry
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Camille J. Bryant
Subject: Lea Station Landfarm (GW-351) Annual Report - 2009 - Response Action Plan Required

RE: Annual Report (2009) – Response Action Plan Required

for the Plains Marketing, L.P.

Lea Station Landfarm (GW-351)

Unit Letters D & E, Section 28, T20S, R37E, NMPM, Lea County, New Mexico

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has reviewed the submitted Annual Report - 2009, dated March 2010, for the above-referenced site. The Report indicates that vadose zone soil chloride concentrations in Cell G have exceeded background concentrations. Therefore, please submit a response action plan, including, but not limited to, additional chloride samples in the vadose zone (e.g., at depths of 3'-4' and 4'-5') in G-1, G-3 and G-4. Also, the plan should include discontinuance of the acceptance of additional soils at Cell G until the chloride concentrations are at or below the background concentrations. Please submit the plan to the OCD for review and approval within 45 days.

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

Edward J. Hansen

Hydrologist

Environmental Bureau

TABLE 4

2010 CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN THE VADOSE ZONE

PLAINS MARKETING, L.P.
LEA STATION LAND FARM
LEA COUNTY, NEW MEXICO
PLAINS SRS: 2004-00061
NMOCD #GW-351

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030						METHOD: 8015M			TOTAL	EPA 300
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M,P-XYLENES (mg/Kg)	O-XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C_6-C_{12} (mg/Kg)	DRO C_{12}-C_{28} (mg/Kg)	ORO C_{28}-C_{35} (mg/Kg)	TPH C_6-C_{35} (mg/Kg)	Chloride (mg/kg)
Cell A VZ G 1 (3'-4')	3' - 4'	6/9/2010	<0.0012	<0.0024	<0.0012	<0.0024	<0.0012	<0.0024	<17.8	<17.8	<17.8	<17.8	8.53
Cell A VZ G 2 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.7	<15.7	<15.7	<15.7	9.82
Cell A VZ G 3 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.4	<15.4	<15.4	<15.4	7.81
Cell A VZ G 4 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.6	<15.6	<15.6	<15.6	<5.21
Cell A VZ G 5 (3'-4')	3' - 4'	6/9/2010	<0.0012	<0.0023	<0.0012	<0.0023	<0.0012	<0.0023	<17.3	<17.3	<17.3	<17.3	7.6
Cell B VZ G 1 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.4	<15.4	<15.4	<15.4	14.9
Cell B VZ G 2 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.5	<15.5	<15.5	<15.5	6.29
Cell B VZ G 3 (3'-4')	3' - 4'	6/9/2010	<0.0011	<0.0022	<0.0011	<0.0022	<0.0011	<0.0022	<15.9	<15.9	<15.9	<15.9	6.39
Cell B VZ G 4 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.4	<15.4	<15.4	<15.4	6.42
Cell B VZ G 5 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.3	<15.3	<15.3	<15.3	5.64
Cell C VZ G 1 (3'-4')	3' - 4'	6/9/2010	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<15.9	<15.9	<15.9	<15.9	<5.30
Cell C VZ G 2 (3'-4')	3' - 4'	6/9/2010	<0.0011	<0.0022	<0.0011	<0.0022	<0.0011	<0.0022	<15.8	<15.8	<15.8	<15.8	<5.27
Cell C VZ G 3 (3'-4')	3' - 4'	6/9/2010	<0.0012	<0.0024	<0.0012	<0.0024	<0.0012	<0.0024	<17.7	<17.7	<17.7	<17.7	15.8
Cell C VZ G 4 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.5	<15.5	<15.5	<15.5	<5.14
Cell C VZ G 5 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.4	<15.4	<15.4	<15.4	8.71
Cell D VZ G 1 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.7	<15.7	<15.7	<15.7	<5.21
Cell D VZ G 2 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.3	<15.3	<15.3	<15.3	13.1
Cell D VZ G 3 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.0	<15.0	<15.0	<15.0	<5.01
Cell D VZ G 4 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.6	<15.6	<15.6	<15.6	5.94
Cell D VZ G 5 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.2	<15.2	<15.2	<15.2	22.7
Cell E VZ G 1 (3'-4')	3' - 4'	6/9/2010	<0.0011	<0.0022	<0.0011	<0.0022	<0.0011	<0.0022	<16.6	<16.6	<16.6	<16.6	<5.50
Cell E VZ G 2 (3'-4')	3' - 4'	6/9/2010	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<15.7	<15.7	<15.7	<15.7	<5.26
Cell E VZ G 3 (3'-4')	3' - 4'	6/9/2010	<0.0011	<0.0022	<0.0011	<0.0022	<0.0011	<0.0022	<16.5	<16.5	<16.5	<16.5	6.87
Cell E VZ G 4 (3'-4')	3' - 4'	6/9/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.3	<15.3	<15.3	<15.3	5.38
Cell F VZ G 1 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<14.9	<14.9	<14.9	<14.9	<5.01
Cell F VZ G 2 (3'-4')	3' - 4'	6/10/2010	<0.0011	<0.0023	<0.0011	<0.0023	<0.0011	<0.0023	<17.0	<17.0	<17.0	<17.0	<5.69
Cell F VZ G 3 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.7	<15.7	<15.7	<15.7	<5.22
Cell F VZ G 4 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.3	<15.3	<15.3	<15.3	7.9
Cell F VZ G 5 (3'-4')	3' - 4'	6/10/2010	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<15.9	<15.9	<15.9	<15.9	18.2
Cell G VZ G 1 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.2	<15.2	<15.2	<15.2	8.87
Cell G VZ G 2 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.6	<15.6	<15.6	<15.6	10.9
Cell G VZ G 3 (3'-4')	3' - 4'	6/10/2010	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<15.9	<15.9	<15.9	<15.9	8.7
Cell G VZ G 4 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<15.0	<15.0	<15.0	<15.0	6.58
Cell G VZ G 5 (3'-4')	3' - 4'	6/10/2010	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<16.0	<16.0	<16.0	<16.0	6.79
Cell H VZ G 1 (3'-4')	3' - 4'	6/10/2010	<0.0011	<0.0022	<0.0011	<0.0022	<0.0011	<0.0022	<16.3	<16.3	<16.3	<16.3	11.4
Cell H VZ G 2 (3'-4')	3' - 4'	6/10/2010	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<15.6	<15.6	<15.6	<15.6	<5.24
Cell H VZ G 3 (3'-4')	3' - 4'	6/10/2010	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<15.8	<15.8	<15.8	<15.8	<5.26
Background	**3' - 4'**	**1/16/2004**	**<0.02**	**<0.02**	**<0.02**	**<0.04**	**<0.02**	**<0.04**	**<5**	**<2.5**		**<5**	**10.6**