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APPROVALS

YEAR(S):



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

October 14, 2004

Mr. Jeffrey P. Dann
Plains All American L.P.
P.O. Box 4648
Houston, TX 77210-4648

18-120

Dear Mr. Dann:

The New Mexico Oil Conservation Division (NMOCD) has received your letter, dated September 20, 2004, identifying the need for additional groundwater monitor and/or recovery wells at various sites. This request is hereby approved.

This approval does not relieve Plains Marketing, L.P. of any future liability at these sites should it prove that Plains' operations have caused harm to public health or the environment. Nor does it relieve Plains of its obligation to comply with the rules and regulations of any other governmental agency.

If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Cc: Larry Johnson, NMOCD, Hobbs
Camille Reynolds, Plains, Midland



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 5, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-649

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: MONUMENT SITE #11
LEA COUNTY, NEW MEXICO**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) understands that the EOTT Energy Pipeline Limited Partnership (EOTT) is the current operator of the above referenced pipeline site which was previously operated by the Texas-New Mexico Pipe Line Company (TNMPLC). The OCD has reviewed TNMPLC's March 4, 1999 "SOIL BORING B11-10, MONUMENT SITE 11, UNIT A, SECTION 30, TOWNSHIP 19 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO, KEI JOB NO. 610057-2-11" which was submitted on behalf of TNMPLC by their consultant KEI. This document contains the results of TNMPLC's investigation of the vertical extent of contamination related to a crude oil pipeline spill at the Monument Site #11. The document also contains TNMPLC's recommendations for installation of monitor wells to determine the extent of ground water contamination at the site.

The above referenced recommendations are **approved** with the following conditions:

1. EOTT shall install an additional monitor well at boring location B11-10 to determine the ground water quality at the source of the contamination.
2. EOTT shall complete the new monitor wells as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with feet of the well screen above the water table and 10 feet of the well screen below the water table.

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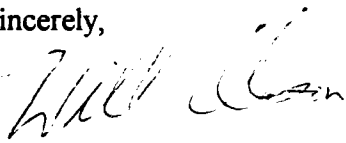
- b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
3. No less than 48 hours after the wells are developed, ground water from all monitor wells at each site shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene, polycyclic aromatic hydrocarbons (PAH), , total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC).
4. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
5. EOTT shall submit the results of the investigation to the OCD by July 2, 1999. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
 - a. A description of the investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table map showing the location of the spills, excavated areas, monitor wells, recovery wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.
 - d. Isopleth maps for contaminants observed during the investigations.
 - e. Summary tables of all ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. The disposition of all wastes generated.

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Please be advised that OCD approval does not relieve EOTT of liability should the investigation actions fail to adequately define the extent of contamination related to EOTT's pipeline, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Monica Slentz, KEI

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