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REPORTS

DATE: 2004

1R-124

MONUMENT 18 NW ¼ NW ¼ SECTION 7, TOWNSHIP 20 SOUTH, RANGE 37 EAST LEA COUNTY, NEW MEXICO PLAINS MARETING, L.P. EMS NUMBER: TNM MONUMENT 18-KNOWN

ANNUAL MONITORING REPORT

2004 ---

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Prepared For:

PLAINS MARKETING, L.P. 333 CLAY STREET, SUITE 1600 HOUSTON, TEXAS 77002

Prepared By:

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April, 2005

Haskell

Rebecca Haskell Project Manager

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Vice-President Technical Services

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ENCLOSED ON DATA DISK

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2004 Annual Monitoring Report 2004 Tables 1 and 2 – Groundwater Elevation and BTEX Concentration Data 2004 Figures 1, 2A-2D, and 3A-3D Electronic Copies of Laboratory Reports Historic Table 1 and 2 – Groundwater Elevation and BTEX Concentration Table

INTRODUCTION

On behalf of Plains Marketing, L.P., (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. Beginning on May 29, 2004, project management responsibilities were assumed by NOVA, having previously been managed by Environmental Technology Group, Inc. (ETGI). The Monument 18 site, formally the responsibility of Enron Oil Trading and Transportation (EOTT) is now the responsibility of Plains. This report is intended to be viewed as a complete document with figures, attachments, tables and text. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2004 only. For reference, the Site Location Map is provided as Figure 1. Cumulative tables and laboratory data are provided on the attached compact disk.

Groundwater monitoring was conducted during four (4) quarterly events in calendar year 2004 to assess the levels and extent of dissolved phase and Phase-Separated Hydrocarbon (PSH) constituents. The groundwater monitoring events consisted of measuring static water levels in the monitor wells, checking for the presence of PSH, and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

No information with respect to the release date or volume of crude oil released and recovered is available as the release occurred while the pipeline was operated by Texas New Mexico Pipeline Company (TNM). The initial site investigation consisted of the installation of eight groundwater monitor wells (MW-1 through MW-8) and was conducted by other environmental consultants. NOVA installed two new monitor wells (MW-9 and MW-10) on November 04, 2004.

Currently there are ten monitor wells (MW-1 through MW-10) on this site. Recovery of PSH at the site is achieved using passive recovery and is monitored on a weekly basis.

FIELD ACTIVITIES

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule, which was approved by the NMOCD in correspondence dated April 28, 2004:

	NMOCD APPROVED SA	MPLING SCHEDULE	
Location	Schedule	Location	Schedule
MW-1	Quarterly	MW-6	Annually
MW-2	Annually	MW-7	Annually
MW-3	Quarterly	MW-8	Annually
MW-4	Quarterly	MW-9	Quarterly
MW-5	Semi-Annually	MW-10	Quarterly

The site monitor wells were gauged and sampled on March 08, May 25, August 31, and December 13, 2004. Monitor wells MW-9, and MW-10 were installed on November 04, 2004 and sampled on November 10, 2004. During each sampling event the monitor wells were purged of approximately three well volumes of water or until the wells were dry using a new rope and disposable polyethylene bailer or electrical Grundfos Pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected in clean glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Key Energy utilizing a licensed disposal facility (NMOCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, which were constructed from measurements collected during the four (4) quarterly monitoring events, are depicted on Figures 2A through 2D, the Inferred Groundwater Gradient Maps. Groundwater elevation data for 2004 is provided as Table 1. Historic groundwater elevation data beginning at project inception is enclosed on the attached data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.001 ft./ft. to the southeast. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevations ranged between 3524.15 to 3525.99 feet above mean sea level, in MW-5 on March 8, 2004 and in MW-6 on December 13, 2004, respectively.

A measurable thickness of PSH was measured in monitor wells MW-1, MW-3, and MW-4 during the reporting period. PSH thickness went from 2.73 feet in MW-1 in March 2004 to 0.81 feet by December 2004. PSH thickness in MW-3 went from 0.37 feet in March 2004 to a sheen by October 2004. PSH thickness in MW-4 went from 0.03 feet in March 2004 to 0.21 feet in September 2004 and back down to a sheen by October 2004. PSH data for the 2004 gauging events can be found in Table 1. Recovery of PSH at the site is achieved using passive recovery and is monitored on a weekly basis. The 2004 gauging data is provided in Table 1.

LABORATORY RESULTS

Groundwater samples collected during the first three quarterly monitoring events were delivered to AnalySys Inc., Austin, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW846-8260b. Fourth quarter sample analysis was performed by Trace Analysis, Inc., of Lubbock, Texas for determination of BTEX constituent concentrations by EPA Method SW846-8021b. The 2004 BTEX constituent concentrations are summarized on Table 2. Historical BTEX constituent concentrations and copies of the laboratory reports for 2004 are provided on the attached data disk. The quarterly groundwater sample results for benzene and BTEX concentrations are depicted on Figures 3A-3D.

Review of laboratory analytical results of the groundwater samples obtained during the 2004 monitoring period indicate that benzene and BTEX concentrations were below NMOCD regulatory standards in five (5) monitor wells. Benzene and BTEX concentrations were below regulatory standards in monitor well MW-4 in December and in monitor wells MW-9 and MW-

10 in November. Measurable thicknesses of PSH were detected in three (3) monitor wells during the annual monitoring period. Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of monitoring activities for the 2004 annual monitoring period. Currently, there are 10 groundwater monitor wells (MW-1 through MW-10) on-site. Recovery of PSH at the site is achieved using passive recovery and is monitored on a weekly basis. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.001 ft./ft. to the southeast.

As discussed above, three (3) monitor wells contained measurable PSH thicknesses in 2004. Throughout 2004 PSH amounts have decreased in thickness. In monitor well MW-1, the average PSH thickness in 2003 was 2.78 feet and during 2004 it decreased to 1.32 feet. The minimum thickness of PSH in monitor well MW-1 during 2003 was 2.72 feet and in 2004 it was 0.50 feet. PSH has taken a considerable decrease in thickness in monitor wells MW-3 and MW-4. Both monitor wells MW-3 and MW-4 have had measurable PSH thicknesses since project inception. However, there were no measurable thicknesses of PSH during the last quarter of 2004. Monitor wells MW-3 and MW-4 contained only a sheen during the last quarter of the reporting period.

As discussed above benzene and BTEX constituent concentrations are below NMOCD regulatory standards in five (5) monitor wells during 2004. Benzene and BTEX concentrations were below regulatory standards in monitor well MW-4 in December and in monitor wells MW-9 and MW-10 in November. There were three well locations that contained measurable amounts of PSH during the annual monitoring period and were not sampled during at least one sampling event.

The Release Notification and Corrective Action Form (C-141) is provided as Appendix A.

ANTICIPATED ACTIONS

Quarterly monitoring and sampling will continue in 2005. Passive product recovery and gauging will continue on a weekly schedule and will be adjusted according to site conditions.

Plains is requesting permission from the NMOCD to plug and abandon monitor well MW-2 due to the following conditions.

- The regional groundwater gradient is southeast and gradient control along the southeast perimeter of the leak zone is provided by MW-5 and MW-8.
- MW-2 has not displayed concentrations of dissolved phase impact above the NMOCD Regulatory Limit in nineteen (19) consecutive quarters since 1999.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of NOVA and/or Plains.

DISTRIBUTION

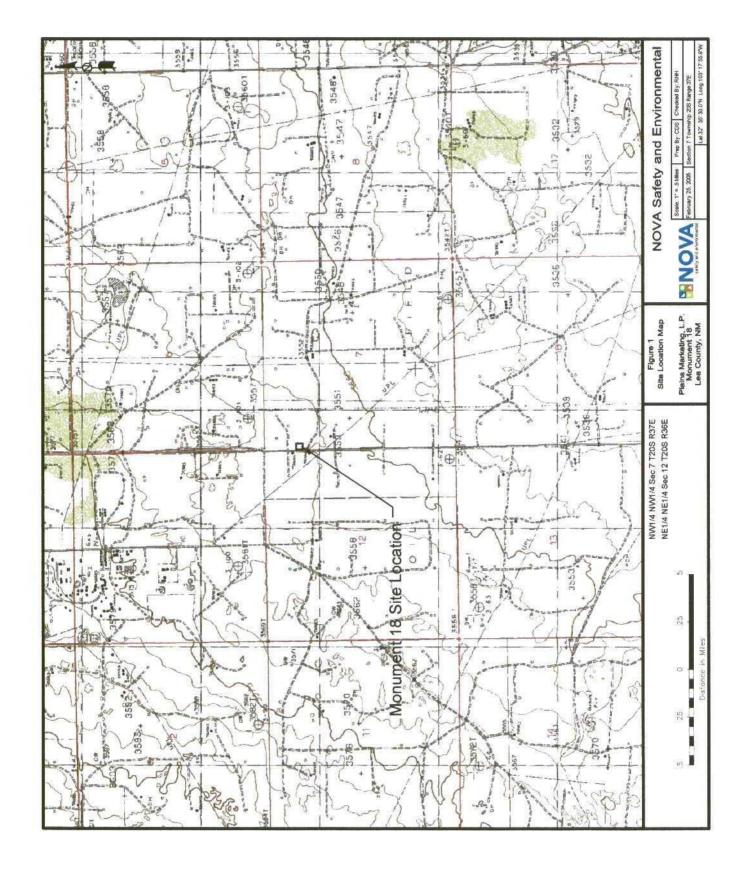
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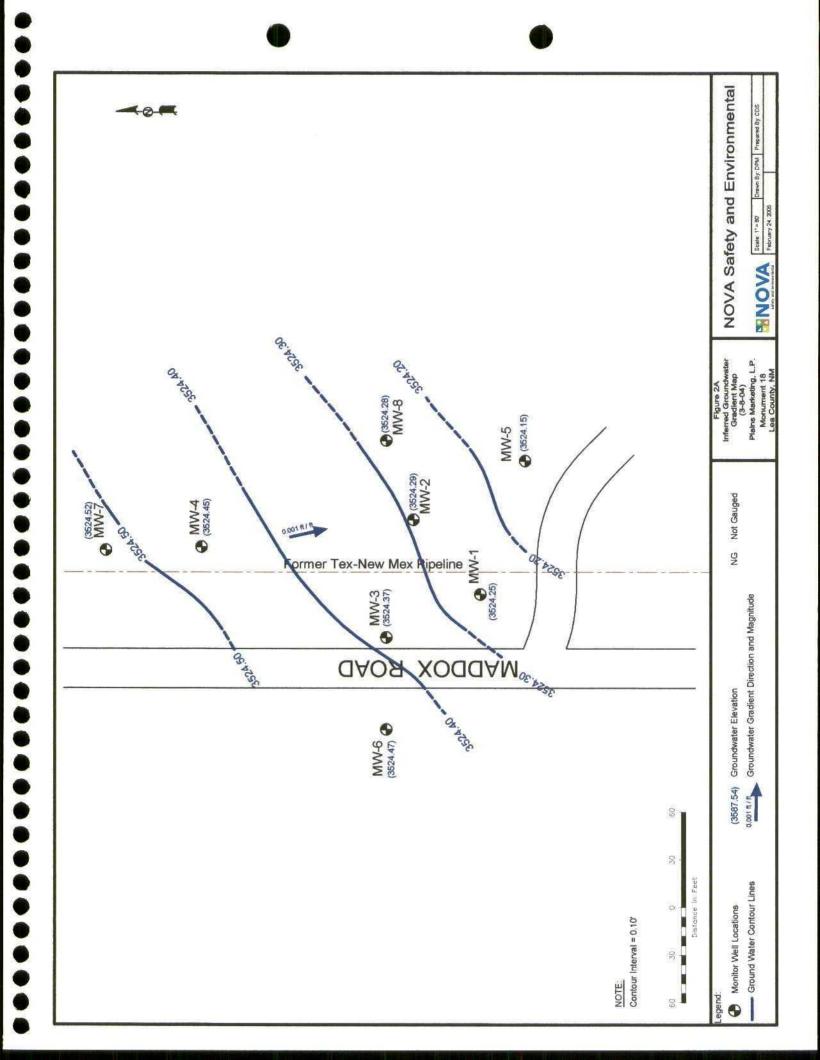
Copy 1	Ed Martin New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505
Copy 2:	Paul Sheeley and Larry Johnson New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, District 1 1625 French Drive Hobbs, NM 88240
Copy 3:	Camille Reynolds Plains Marketing, L.P. 3112 Highway 82 Lovington, NM cjreynolds@paalp.com
Copy 4:	Jeff Dann Plains Marketing, L.P. 333 Clay Street Suite 1600 Houston, TX 77002 jpdann@paalp.com
Copy 5:	NOVA Safety and Environmental 2057 Commerce Street Midland, TX 79703 rhaskell@novatraining.cc

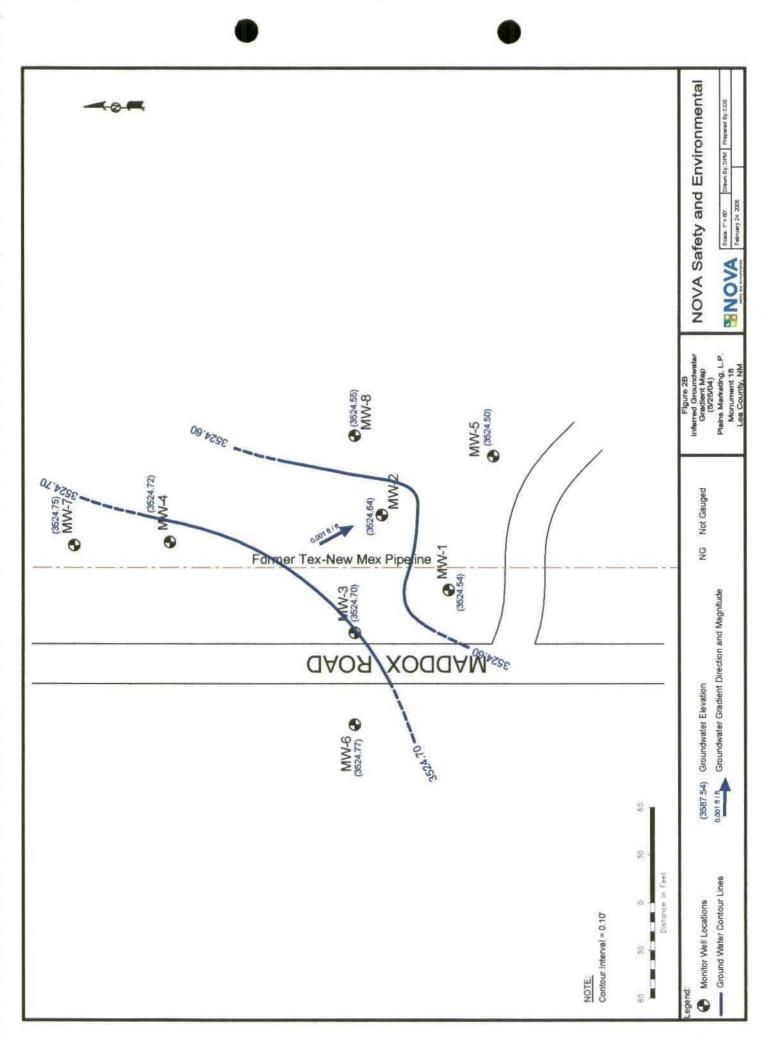
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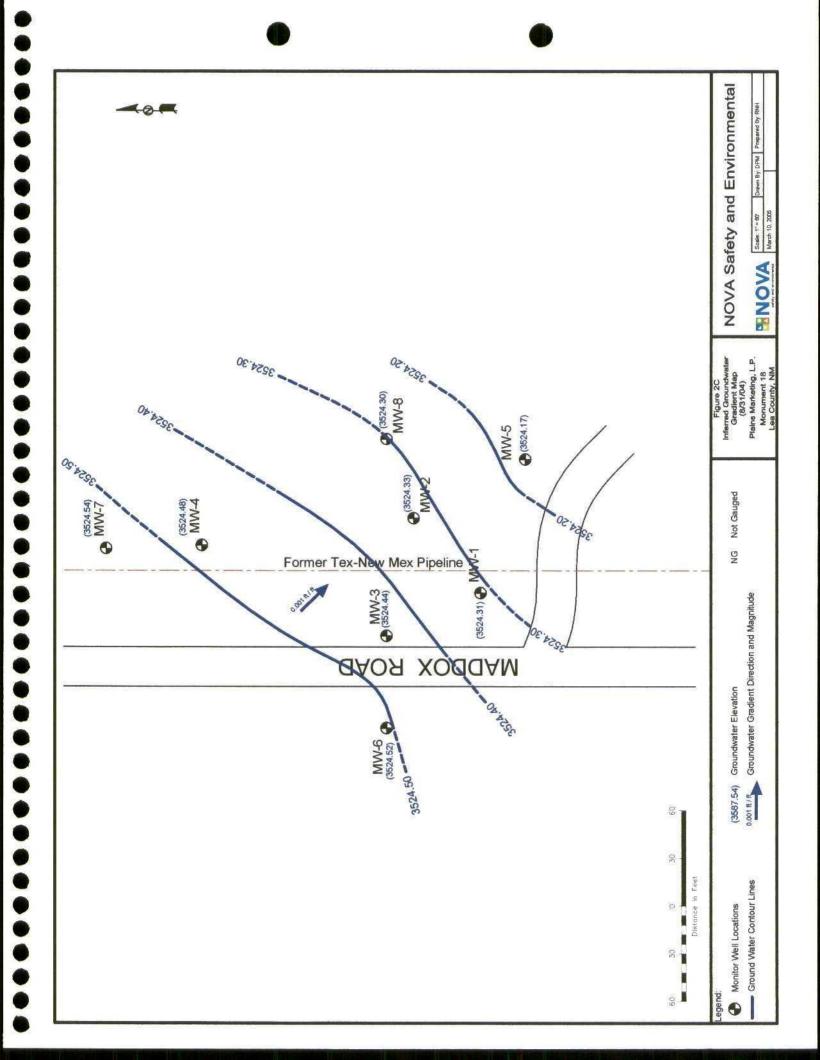
Figures

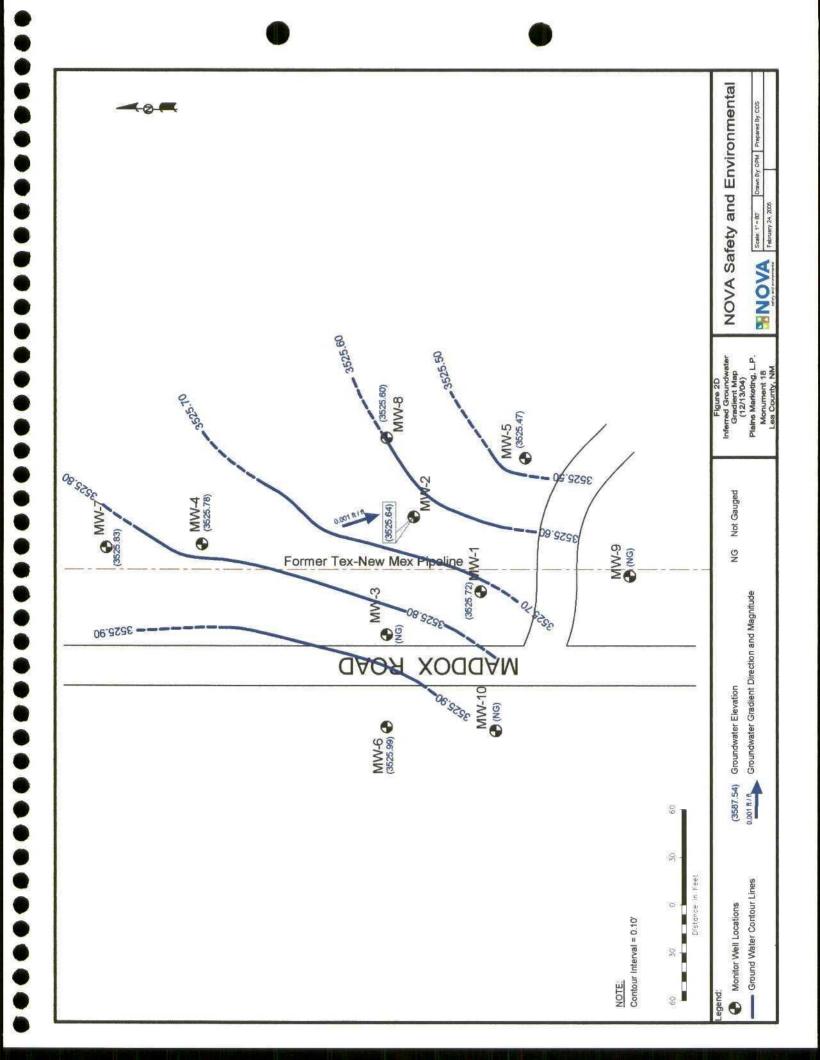
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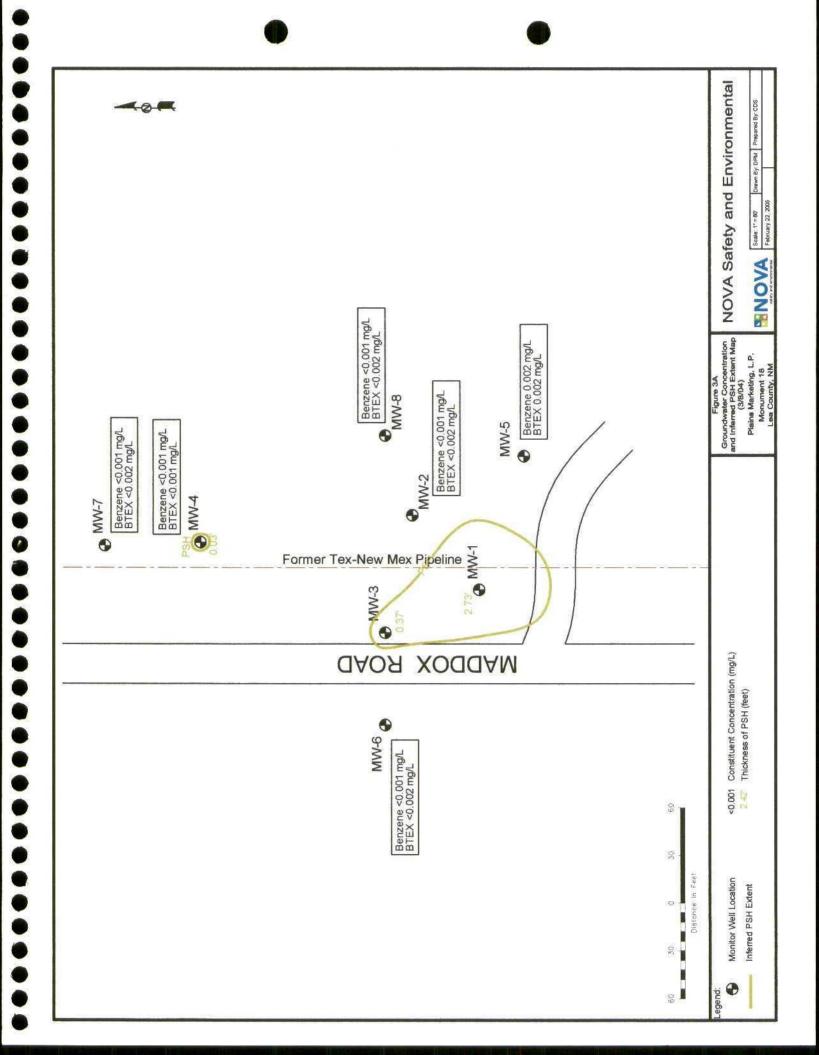


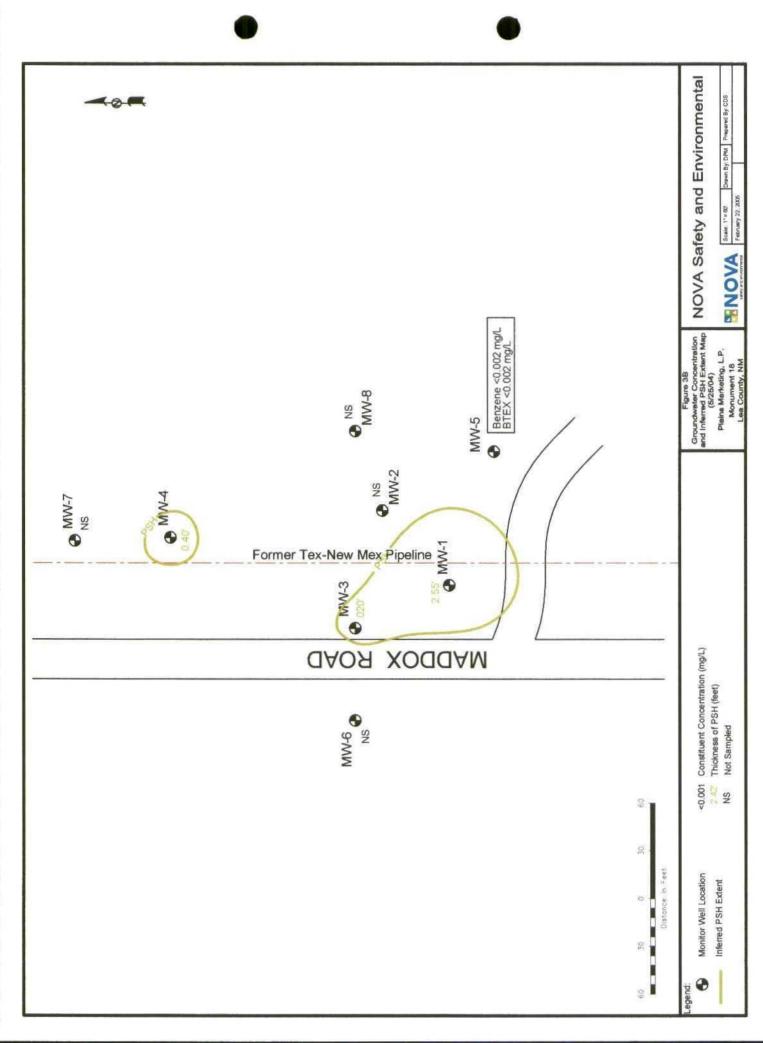


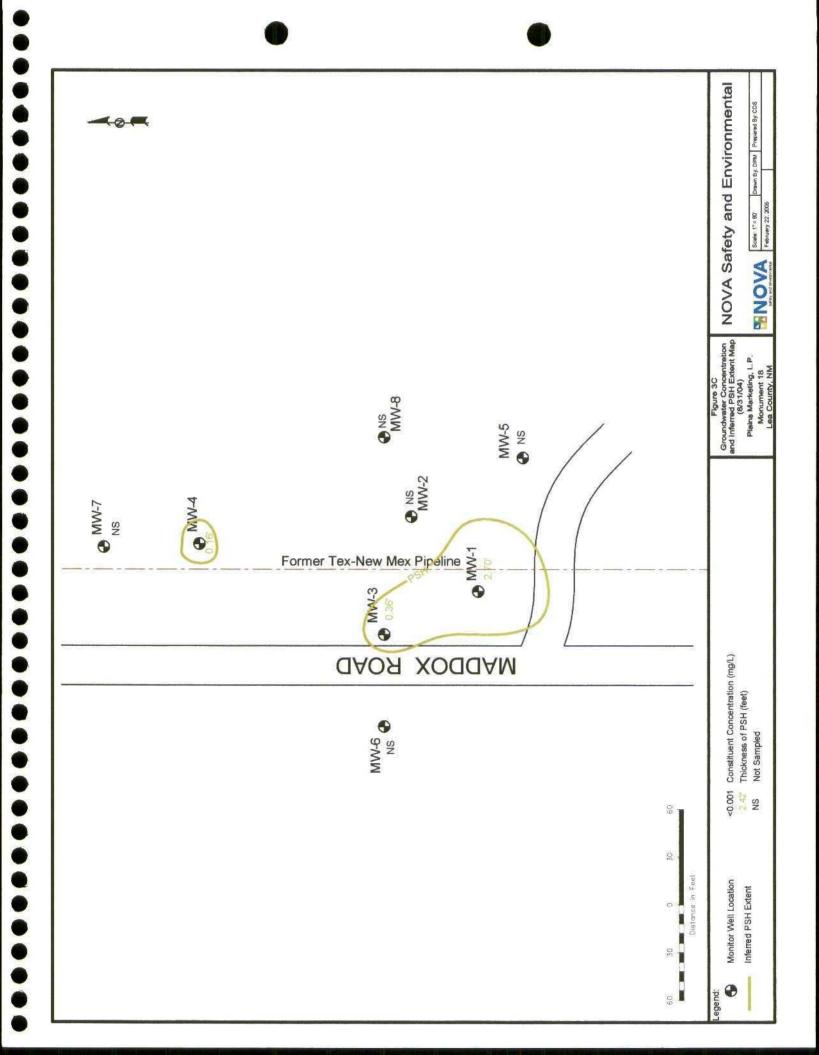


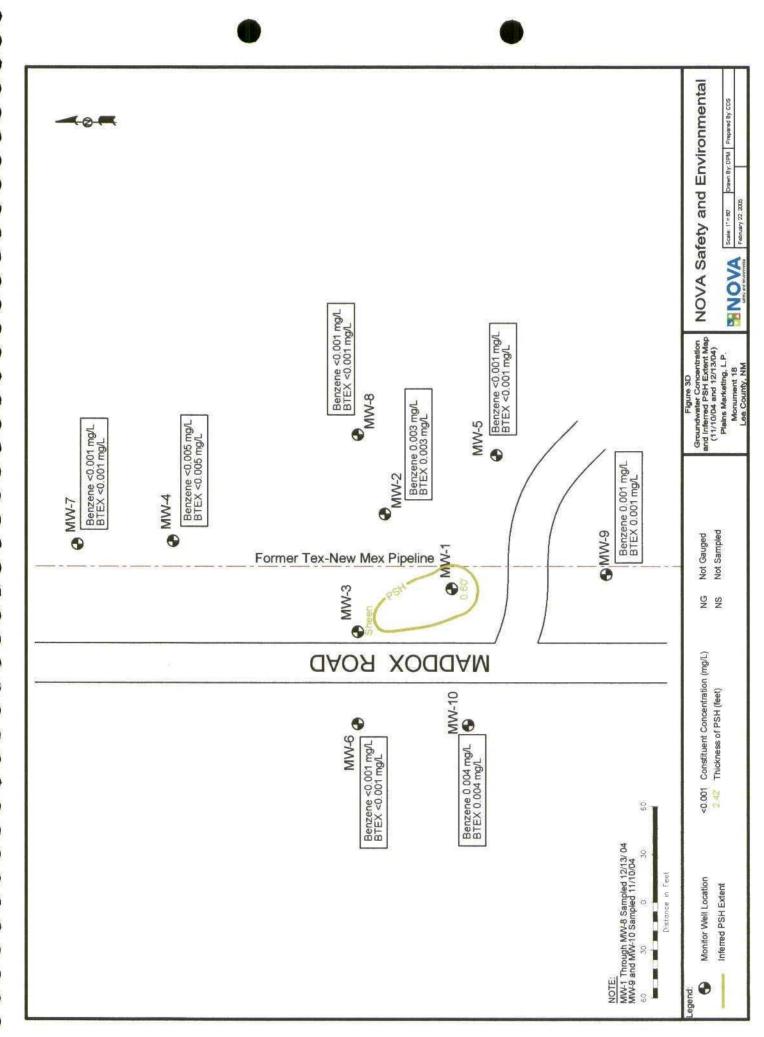












Tables

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TABLE 1

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GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P. MONUMENT 18 LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW-1	03/08/04	3,558.71	34.05	36.78	2.73	3,524.25
	05/25/04	3,558.71	33.79	36.34	2.55	3,524.54
	08/31/04	3,558.71	34.00	36.70	2.70	3,524.31
	09/14/04	3,558.71	34.05	36.80	2.75	3,524.25
	09/21/04	3,558.71	34.14	36.22	2.08	3,524.26
	10/14/04	3,558.71	33.23	34.10	0.87	3,525.35
	10/21/04	3,558.71	33.30	34.15	0.85	3,525.28
	10/28/04	3,558.71	33,44	34.05	0.61	3,525.18
	11/04/04	3,558.71	33.40	34.40	1.00	3,525.16
	11/11/04	3,558.71	33.44	33.94	0.50	3,525.20
	11/17/04	3,558.71	33.43	34.55	1.12	3,525.11
	11/30/04	3,558.71	32.98	33.60	0.62	3,525.64
	12/07/04	3,558.71	32.91	33.60	0.69	3,525.70
	12/15/04	3,558.71	32.90	33.50	0.60	3,525.72
	12/13/04	3,558.71	32.90	33.50	0.60	3,525.72
	12/28/04	3,558.71	32.97	33.78	0.81	3,525.62
MW - 2	03/08/04	3,559.64	ND	35.35	0.00	3,524.29
	05/25/04	3,559.64	ND	35.00	0.00	3,524.64
	08/31/04	3,559.64	ND	35.31	0.00	3,524.33
	12/13/04	3,559.64	ND	34.00	0.00	3,525.64
	10.00					
MW-3	03/08/04	3,558.53	34.10	34.47	0.37	3,524.37
	05/25/04	3,558.53	33.80	34.00	0.20	3,524.70
	08/31/04	3,558.53	34.04	34.40	0.36	3,524.44
	09/14/04	3,558.53	34.07	34.33	0.26	3,524.42
	09/21/04	3,558.53	34.07	34.42	0.35	3,524.41
	10/14/04	3,558.53	sheen	33.04	0.00	3,525.49
	10/21/04	3,558.53	sheen	33.15	0.00	3,525.38
	10/28/04	3,558.53	sheen	33.16	0.00	3,525.37
	11/04/04	3,558.53	sheen	33.30	0.00	3,525.23
	11/11/04	3,558.53	sheen	33.30	0.00	3,525.23
	11/17/04	3,558.53	sheen	33.32	0.00	3,525.21
	11/30/04	3,558.53	sheen	32.75	0.00	3,525.78
	12/07/04	3,558.53	sheen	32.70	0.00	3,525.83
	12/15/04	3,558.53	sheen	32.60	0.00	3,525.93
	12/28/04	3,558.53	sheen	32.72	0.00	3,525.81
Area and a second second					and an and	
MW-4	03/08/04	3,558.14	33.69	33.72	0.03	3,524.45
	05/25/04	3,558.14	33.42	33.45	0.03	3,524.72
	08/31/04	3,558.14	33.64	33.80	0.16	3,524.48
	09/14/04	3,558.14	33.66	33.85	0.19	3,524.45
	09/21/04	3,558.14	33.66	33.87	0.21	3,524.45
	10/14/04	3,558.14	sheen	32.80	0.00	3,525.34
	10/21/04	3,558.14	sheen	32.80	0.00	3,525.34
	10/28/04	3,558.14	sheen	32.83	0.00	3,525.31
	11/04/04	3,558.14	sheen	32.87	0.00	3,525.27

TABLE 1

GROUNDWATER ELEVATION DATA FOR 2004

PLAINS MARKETING, L.P. MONUMENT 18 LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
	11/11/04	3,558.14	sheen	32.87	0.00	3,525.27
	11/17/04	3,558.14	sheen	32.91	0.00	3,525.23
	11/30/04	3,558.14	sheen	32.47	0.00	3,525.67
	12/07/04	3,558.14	sheen	32.41	0.00	3,525.73
	12/13/04	3,558.14	ND	32.36	0.00	3,525.78
	12/15/04	3,558.14	sheen	32.36	0.00	3,525.78
	12/28/04	3,558.14	sheen	32.40	0.00	3,525.74
MW-5	03/08/04	3,560.07	ND	35.92	0.00	3,524.15
	05/25/04	3,560.07	ND	35.57	0.00	3,524.50
	08/31/04	3,560.07	ND	35.90	0.00	3,524.17
	12/13/04	3,560.07	ND	34.60	0.00	3,525.47
						101 - C
MW-6	03/08/04	3,557.64	ND	33.17	0.00	3,524.47
	05/25/04	3,557.64	ND	32.87	0.00	3,524.77
	08/31/04	3,557.64	ND	33.12	0.00	3,524.52
	12/13/04	3,557.64	ND	31.65	0.00	3,525.99
MW-7	03/08/04	3,558.65	ND	34.13	0.00	3,524.52
	05/25/04	3,558.65	ND	33.90	0.00	3,524.75
	08/31/04	3,558.65	ND	34.11	0.00	3,524.54
	12/13/04	3,558.65	ND	32.82	0.00	3,525.83
MW-8	03/08/04	3,559.30	ND	35.02	0.00	3,524.28
	05/25/04	3,559.30	ND	34.75	0.00	3,524.55
	08/31/04	3,559.30	ND	35	0.00	3,524.30
	12/13/04	3,559.30	ND	33.7	0.00	3,525.60
	Sie.			5,741,000		
MW-9	11/08/04	3,559.94	ND	34.87	0.00	3,525.07
	11/10/2004	3,559.94	ND	34.87	0.00	3,525.07
998 C						
MW-10	11/8/2004	3,558.06	ND	32.75	0.00	3,525.31
	11/10/2004	3,558.06	ND	32.77	0.00	3,525.29

* Has not been surveyed as of date of this report

TABLE 2

CONCENTRATIONS OF BTEX IN GROUNDWATER FOR 2004

PLAINS MARKETING, L.P.

MONUMENT 18

LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L.

SAMPLE	SAMPLE	SW 846-8012B, 5030						
LOCATION	DATE	RENZENE	TOLUENE	ETHYL-	m, p -	0 -		
	DATE	DENZENE	IOLUENE	BENZENE	XYLENES	XYLENE		
Regulatory Limit		0.01 mg/L	0.75 mg/L			mg/L		
MW-2	03/08/04	< 0.001	< 0.001	< 0.001	< 0.002	< 0.001		
	12/13/04	0.003	< 0.001	< 0.001	< 0.001			
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MW-4	12/13/04	< 0.005	< 0.005	< 0.005	< 0.005			
				1				
MW-5	03/08/04	0.002	< 0.001	< 0.001	< 0.002	< 0.001		
	05/25/04	< 0.001	< 0.001	< 0.001	< 0.002	< 0.001		
	12/13/04	< 0.001	< 0.001	< 0.001	<0	.001		
MW-6	03/08/04	< 0.001	< 0.001	< 0.001	< 0.002	< 0.001		
	12/13/04	< 0.001	< 0.001	< 0.001	<0.	001		
MW-7	03/08/04	< 0.001	< 0.001	< 0.001	< 0.002	< 0.001		
	12/13/04	< 0.001	< 0.001	< 0.001	< 0.001			
					Marchine Contractor			
MW-8	03/08/04	< 0.001	< 0.001	< 0.001	< 0.002	< 0.001		
	12/13/04	< 0.001	< 0.001	< 0.001	< 0.001			
MW-9	11/10/04	0.001	< 0.001	< 0.001	<0.	001		
	Sheen a							
MW-10	11/10/04	0.004	< 0.001	< 0.001	<0.	001		

Appendices

Appendix A Notification of Release and Corrective Action

1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 1301 W. Grand Avenue, Artesia, NM 88210		State of New Mexico Energy Minerals and Natural Resources Oil Conservation Division			Form C-141 Revised October 10, 2003		
District III	Oil Cons				Submit 2 Copies to appropriate		
1000 Rio Brazos Road, Aztec, NM 87410 District IV		h St. Francis Dr.			District Office in accordance with Rule 116 on back		
1220 S. St. Francis Dr., Santa Fe, NM 87505 Santa Fe)5		side of form		
Re	lease Notification	on and Co	rrective A	ction			
		OPERA		x Initia	l Report 🔲 Final Repo		
			Contact: Camille Reynolds				
Address:3705 E. Hwy 158, MidlFacility NameMonument # 1		Facility Type	Telephone No.505-441-0965Facility Type:Pipeline				
	Mineral Owner						
Surface Owner: Jim B Cooper	ľ		Lease N	0.			
				,, _,, _	<u> </u>		
Unit Letter Section Township Range		ON OF REL	Feet from the	East/West Line	County		
D_{-} 7 20S 37E	1 1	ui/south Enic			Lea		
Lati	tude 32 degrees 35' 30).0" Longitude	103 degrees 1'	<u>7' 55.9"</u>			
	NATUR	E OF RELE	LASE				
Type of Release:		Volume of		Volume R			
Source of Release:		Date and H Unknown	our of Occurrenc	ence Date and Hour of Discovery			
Was Immediate Notice Given?		If YES, To					
Yes 🗌	No 🗌 Not Required						
By Whom? Was a Watercourse Reached?		Date and H		1 177			
	🖾 No	IT YES, VO	lume Impacting t	ne watercourse.			
If a Watercourse was Impacted, Describe Full	v.*						
	,.						
	· 70 1 4			Technology and			
Describe Cause of Problem and Remedial Act	ion Taken.*						
Describe Area Affected and Cleanup Action 7	e owner/operator of the	pipeline system	at the time of th	ie release, initial re	esponse information is		
NOTE: Texas-New Mexico Pipeline was the							
NOTE: Texas-New Mexico Pipeline was the unavailable.							
NOTE: Texas-New Mexico Pipeline was the unavailable.							
NOTE: Texas-New Mexico Pipeline was the unavailable. I hereby certify that the information given abore regulations all operators are required to report public health or the environment. The accepta	and/or file certain release ance of a C-141 report by	e notifications an the NMOCD ma	d perform correct orked as "Final R	tive actions for rele eport" does not reli	ases which may endanger eve the operator of liability		
NOTE: Texas-New Mexico Pipeline was the unavailable. I hereby certify that the information given abore regulations all operators are required to report public health or the environment. The accepta should their operations have failed to adequate	and/or file certain release ance of a C-141 report by ely investigate and remed	e notifications an the NMOCD ma iate contamination	d perform correc irked as "Final R on that pose a thr	tive actions for rele eport" does not reli eat to ground water	ases which may endanger eve the operator of liability , surface water, human health		
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NOTE: Texas-New Mexico Pipeline was the unavailable. I hereby certify that the information given abore regulations all operators are required to report public health or the environment. The accepta should their operations have failed to adequate or the environment. In addition, NMOCD acc	and/or file certain release ance of a C-141 report by ely investigate and remed ceptance of a C-141 report	e notifications an the NMOCD ma iate contamination	d perform correc irked as "Final R on that pose a thr e the operator of	tive actions for rele eport" does not reli eat to ground water	eases which may endanger eve the operator of liability , surface water, human health ompliance with any other		
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