

AP - 017

APPROVALS

YEAR(S):

2006-1999



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

May 2, 2006

Ms. Camille Reynolds
Plains Marketing, L.P.
3112 West Highway 82
Lovington, NM 88260

RE: 2005 Annual Monitoring Reports
Various Plains Marketing, L.P. Sites

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the Annual Monitoring Reports shown below. All are accepted and approved with the understandings and conditions, if any, shown:

1. **TNM 97-17**; NE/4 SW/4 Section 21, Township 20 South, Range 37 East; EMS number TNM 97-17, NMOCD file AP-017; quarterly gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Site Restoration Work Plan and Soil Closure Strategy Report" by June 30, 2006.
2. **Bob Durham**; NW/4 NW/4 Section 32, Township 19 South, Range 37 East; EMS number TNM LF2000-07; NMOCD file AP-0016; quarterly monitoring and sampling will continue in 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007.
3. **Monument 17**; SE/4 NW/4 Section 29, Township 19 South, Range 37 East; EMS number TNM Monument-17-Known; NMOCD file 1R-0123; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by June 30, 2006.
4. **Monument 10**; SE/4 NE/4 Section 30, Township 19 South, Range 37 East; EMS number TNM monument-10; NMOCD file 1R-0119; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by June 30, 2006.
5. **Lea Station to Monument 6 Inch**; NE/4 SE/4 Section 5, Township 20 South, Range 37 East; EMS number 2001-11056; NMOCD file 1R-0404; monitor well gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring

Report due by April 1, 2007. The NMOCD expects a separate report on additional soil investigation/remediation by September 30, 2006.

6. **Monument Barber 10-Inch Sour**; SW/4 SW/4 Section 32, Township 19 South, Range 37 East; EMS number 2000-10655; NMOCD file 1R-0388; monitor well gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a work plan, by June 30, 2006, to address further excavation of the sidewalls of the existing excavation for possible soil closure at the site.
7. **Monument 18**; NW/4 NW/4 Section 7, Township 20 South, Range 37 East; EMS number TNM Monument 18-Known; NMOCD file 1R-0124; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by September 30, 2006.
8. **Monument 2**; SW/4 SW/4 Section 6, Township 20 South, Range 37 East and the NW/4 NW/4 Section 7, Township 20 South, Range 37 East; EMS number TNM Monument 2-Known; NMOCD file 1R-0110; monitor well gauging and sampling, and product recovery will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007. The NMOCD expects a "Soil Investigation Work Plan" by September 30, 2006.
9. **LF-59**; NW/4 SW/4 Section 32, Township 19 South, Range 37 East; EMS number TNM-LF-59; NMOCD file 1R-0103; monitor well gauging and sampling will continue throughout 2006, the results of which will be reported in the 2006 Annual Monitoring Report due by April 1, 2007.

NMOCD approval of these reports does not relieve Plains of liability should its operations at any of these sites prove to have been harmful to public health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other governmental agency.

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

NEW MEXICO OIL CONSERVATION DIVISION



Edwin E. Martin
Environmental Bureau

Copy: NMOCD, Hobbs
Curt Stanley, NOVA



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

March 6, 2001

CERTIFIED MAIL

RETURN RECEIPT NO: 5051-4171

Mr. Glenn Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: STAGE 2 GROUND WATER ABATEMENT PLAN (AP-17)
TNM-97-17 SITE**

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following EOTT Energy Pipeline Limited Partnership (EOTT) documents:

- November 22, 2001 "STAGE 2 GROUND WATER ABATEMENT PLAN (AP-17) TNM 97-17 SITE" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc..
- September 14, 2000 "NOTICE OF PUBLICATION, GROUNDWATER ABATEMENT PLAN (AP-17), TNM-97-17 SITE, LEA COUNTY, NEW MEXICO" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc.
- April 27, 2000 "NOTICE OF PUBLICATION, GROUNDWATER ABATEMENT PLAN (AP-17), TNM-97-17 SITE, LEA COUNTY, NEW MEXICO" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc.
- January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN, TNM-97-17" and accompanying December 1999 "ADDITIONAL SUBSURFACE INVESTIGATION REPORT AND STAGE 2 ABATEMENT PLAN, EOTT ENERGY CORP, TNM 97-17 RELEASE SITE, LEA COUNTY, NEW MEXICO".

These documents contain the results of EOTT's Stage 1 Investigations, a Stage 2 Abatement Plan and proof of public notification for ground water contamination resulting from a crude oil pipeline spill at the TNM 97-17 site.

The Stage 2 Abatement Plan Proposal as contained in the above-referenced documents is approved with the following conditions:

1. In addition to the proposed quarterly benzene, toluene, ethylbenzene and xylene sampling, on an annual basis EOTT shall sample and analyze ground water from all monitor wells for concentrations of polynuclear aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and quality assurance/quality control (QA/QC).
2. All wastes generated will be disposed of at an OCD approved facility.
3. EOTT shall submit the annual report on monitoring and remediation activities to the OCD by April 1 of each year. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report shall contain:
 - a. A description of all remediation and monitoring activities which occurred during the past calendar year including conclusions and recommendations.
 - b. A quarterly water table map showing the location of the spill, pipeline, monitor wells and other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - c. Summary tables of all past and present ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - d. Summary tables of the quarterly free product thickness in each monitor well, the quarterly volume of free product recovered and the cumulative volume of free product recovered to date.
 - e. The results of all soil remediation and monitoring activities including copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. Isopleth maps for contaminants of concern at the site.
 - g. The disposition of all wastes generated.
4. EOTT shall notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve EOTT of responsibility should the plan fail to adequately remediate or monitor contamination related to EOTT's activities, 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 or comments, please contact Bill Olson at (505) 827-7154.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

xc: Chris Williams, OCD Hobbs District Office
Beth Aldrich, Environmental Technology Group, Inc.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

September 7, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-707

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

**RE: TNM-97-17 SITE
LEA COUNTY, NEW MEXICO**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) July 21, 1999 "TNM-97-17, SITE, LEA COUNTY, NEW MEXICO". This document contains EOTT's plan to remediate the source area of a crude oil pipeline spill at the TNM-97-17 site. The document also recommends installation of a monitor well at the source of the contamination upon completion of the soil remediation work.

The above referenced work plan is **approved with the following conditions:**

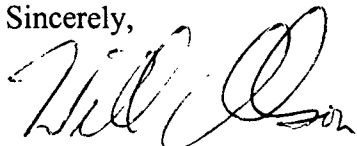
1. The proposed source monitor well shall be installed downgradient and directly adjacent to the source of the leak.
2. EOTT shall complete the new monitor well as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - 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. On a quarterly basis ground water from all site monitor wells shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
 - 4. On an annual basis ground water from all site monitor wells shall be purged, sampled and analyzed for concentrations of polycyclic aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and QA/QC procedures.
 - 5. All wastes generated during the investigation and remediation activities shall be disposed of at an OCD approved facility.
 - 6. EOTT shall submit the results of the remediation, investigation and the quarterly monitoring to the OCD in an annual report. The annual report shall be submitted to the OCD Santa Fe Office by June 1, 2000 with a copy provided to the OCD Hobbs District Office and shall include the following information:
 - a. A description of all investigation, remediation and monitoring activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well and soil boring.
 - c. A quarterly water table potentiometric map showing the location of the spills, excavated areas, monitor wells, soil borings, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - d. Isopleth maps for contaminants of concern which were observed during the investigations.
 - e. Summary tables of all soil and ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data taken within the past year.
 - f. The disposition of all wastes generated.
 - g. The composition of any materials used for insitu bioremediation of contaminants.

Please be advised that OCD approval does not relieve EOTT of liability should the work plan fail to adequately investigate and remediate contamination related to EOTT, 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 or comments, please contact me at (505) 827-7154.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Olson", written in a cursive style.

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office



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 13, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-656

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

RE: TNM-97-17 SITE
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 9, 1999 "SUBSURFACE INVESTIGATION REPORT, TNM-97-17, UNIT L, SECTION 21, TOWNSHIP 20 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO, KEI JOB NO. 810051-1" which was submitted on behalf of TNMPLC by their consultant KEI. This document contains the results of TNMPLC's installation of a soil boring and ground water monitoring wells at the site of a crude oil pipeline spill at the TNM-97-17 Site. The document also recommends installation of a monitor well at the source of the contamination and quarterly monitoring of ground water quality.

The investigations conducted to date are satisfactory and the recommendations as contained in the above referenced report are **approved with the following conditions:**

1. The proposed source monitor well shall be installed downgradient and directly adjacent to the source of the leak.
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 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - 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.

Ms. Lennah Frost

May 13, 1999

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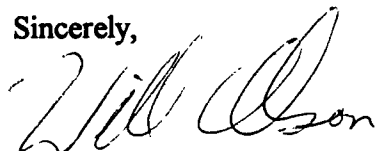
- c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
3. No less than 48 hours after the well is developed, ground water from the monitor well 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) procedures.
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 and the quarterly monitoring to the OCD in an annual report. The annual report shall be submitted to the OCD Santa Fe Office by June 1, 2000 with a copy provided to the OCD Hobbs District Office and shall include the following information:
- a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A quarterly water table potentiometric map showing the location of the spills, excavated areas, monitor wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - d. Isopleth maps for contaminants of concern which were observed during the investigations.
 - e. Summary tables of all ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
 - f. The disposition of all wastes generated.

Ms. Lennah Frost
May 13, 1999
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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 activities, 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 or comments, 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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