

AP - 37

APPROVALS

YEAR(S):

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, November 30, 2011 1:19 PM
To: 'Jason Henry'
Cc: Leking, Geoffrey R, EMNRD; Jeffrey P Dann; Kyle Waggoner
Subject: Recommendations Approval (AP-37) - Plains Lovington Deep 6-Inch Release Site

**RE: Annual Monitoring Report (2010) for the Plains Marketing's
Lovington Deep 6-Inch Release Site (AP-37)
Unit Letter H, Section 3, T18S, R37E, NMPM, Lea County, New Mexico
Recommendations Approval**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has received Plains' report (including proposed "Recommendations") the above-referenced site (dated February 2011). The above-referenced report, submitted in partial fulfillment of 19.15.30.19 NMAC (Rule 30.19, formally, Rule 19.K), indicates that Plains has partially met the requirements of 19.15.30.9 NMAC for this site. Therefore, the OCD hereby conditionally approves the Recommendations for the Lovington Deep 6-Inch Release Site:

Plains must sample on an annual basis for PAHs in groundwater monitoring wells, MW-10, MW-12, and MW-18.

Plains must sample on an annual basis for PAHs in groundwater monitoring wells, MW-1, MW-4, MW-5, MW-6 and MW-7. However, if it can be demonstrated that the past eight quarterly sampling events for these respective wells have indicated BTEX concentrations at or below their respective standards, then PAH sampling will not be required for the respective wells.

Please be advised that OCD approval of this report 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



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 5, 2006

Ms. Camille Reynolds
Plains All American
3112 West Highway 82
Lovington, NM 88260

RE: 2005 Annual Monitoring Report
Plains Pipeline, L.P.
Lovington Deep 6"
Plains Ref: 2005-10312
NMOCD File Number AP-037

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division has received and reviewed the above report, which is hereby accepted and approved with the following understandings and conditions:

1. Plains will increase site visitation from semi-monthly to weekly to implement a more aggressive PSH (phase-separated hydrocarbons) recovery, until such time as the proposed automated recovery system is in place.
2. All groundwater-monitoring wells will be gauged semi-monthly for water levels and the presence or absence of PSH..
3. Plains will sample the groundwater monitoring well network quarterly and analyze for BTEX quarterly and PAH annually in monitoring wells that do not contain PSH.
4. Plains will install at least one additional groundwater monitoring well at the site to further delineate the lateral extent of groundwater impacts.
5. Plains will submit analyses results for samples taken from the stockpiled soil at the site. Upon NMOCD approval, backfilling activities may commence.
6. Plains will install three to five additional recovery wells and install an automated product recovery system.

Plains All American
Lovington Deep 6" AP-037
April 5, 2006
Page 2 of 2

NMOCD approval of this report does not relieve Plains of liability should its activities at this site 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.

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script, appearing to read "Ed Martin".

Edwin E. Martin
Environmental Bureau

Copy: NMOCD, Hobbs
Iain Olness, EPI



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

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Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

October 20, 2005

Ms. Camille Reynolds
Plains Pipeline
3112 West Highway 82
Lovington, NM 88260

Re: Plains Pipeline Soil Closure Report Dated September 16, 2005
Lovington Deep 6" Release Site
EMS No. 2002-10312
SE/4 NE/4 Section 6, Township 17 South, Range 36 East
NMOCD Reference AP-037

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the report shown above submitted on behalf of Plains Pipeline, L.P. (Plains) by Environmental Plus, Inc. This report is approved with the following understanding and conditions:

1. The soil phase at this site can be closed, and the barrier proposed in the Stage 1 and Stage 2 Abatement Plan Revision #1 dated August 2004 (Abatement Plan) may be installed.
2. The excavation may then be backfilled utilizing the stockpiled soils.
3. Plains' recommendation that the sampling strategy outlined in the Abatement Plan be suspended is not approved. Such sampling shall be completed prior to installation of the barrier.
4. Successful completion of the sampling required, installation of the barrier, backfilling and installation of the covering cap shall be described in the next annual report for this site.

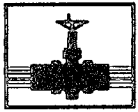
NMOCD approval of this report does not relieve Plains of future liability at this site should its operations further harm to the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other local, state or federal governmental entity.

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, NM



**PLAINS
PIPELINE**

September 23, 2005

RECEIVED

SEP 29 2005

OIL CONSERVATION
DIVISION

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Plains Pipeline Soil Closure Report
Lovington Deep 6" Release Site
EMS No.: 2002-10312
SE/4, NE/4 Section 6, T17S, R36E
Lea County, New Mexico

AP-37

Dear Mr. Martin:

Please find attached for your approval the Soil Closure Report, dated September 16, 2005, for the Lovington Deep 6" release site located in the SE/4, NE/4, Section 6, T17S, and R36E in Lea County, New Mexico. The Soil Closure Report details activities to be conducted for soil remediation at the site.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds

Camille Reynolds
Remediation Coordinator
Plains All American Pipeline

Cc: Larry Johnson, NMOCD, Hobbs Office
Mr. Darr Angell, PO Box 190, Lovington, NM

Enclosure



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 13, 2005

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

Re: Plains All American Pipeline, L.P.
Stage 1 and Stage 2 Abatement Plan
Revision #1 for the
Lovington Deep 6" Site (Ref. #2002-10312)
NMOCD Ref. # AP-037
SE/4 NE/4 of Section 6, T17S, R36E
Lea County New Mexico

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the above report. This report is hereby approved with the following understandings and conditions:

1. The Hobbs NMOCD office will be notified at least 72 hours in advance of all sampling events.
2. In reference to section 5.5.7 of the plan, it has been determined that the public notice requirements of NMOCD Rule 19 have been previously met and no further action regarding this section of the plan is required.
3. All references to "Link" or "Link Energy" in the plan are understood to mean Plains All American Pipeline, L.P. (Plains).
4. All contaminated materials will be disposed of at an NMOCD-approved surface waste management facility.
5. Per section 4.3.5.3 of the report, it is understood that Plains intends to install additional monitor wells at the site. Plains will submit a report, and obtain NMOCD approval, showing the locations of the proposed wells prior to installation.
6. Per section 5.5 of the report, it is understood that Plains will aggressively recover phase-separated hydrocarbons from the groundwater using an eductor type circulating recovery system, and that contaminated groundwater will be remediated using groundwater sparging until groundwater is remediated to levels below NMOCD regulatory limits.
7. Quarterly monitoring reports mentioned in section 5.5.6 of the report will include a recap of all other activities at the site for the previous quarter and include any analyses of soils as may


have been necessary. Substitute the word annual for quarterly in this section. The NMOCD feels that annual reports will be sufficient to monitor the progress at the site.

8. Section 5.2.2 of the report describes the construction and installation of a clay barrier to prevent further migration of contaminants by isolating the remaining source. Plains will notify the Hobbs NMOCD office 72 hours in advance of the commencement of the installation of the clay barrier, and will subsequently notify the Hobbs NMOCD office 72 hours in advance of any backfilling operations at the site.

NMOCD approval of this plan does not relieve Plains from liability should its operations at this site prove insufficient to protect groundwater, human health or the environment. Nor does it relieve Plains of its responsibility to comply with the rules and regulations of any other federal, state, county, or local governmental agency.

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

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read 'Roger C. Anderson', with a long horizontal flourish extending to the right.

Roger C. Anderson
Environmental Bureau Chief

Cc: NMOCD, Hobbs
Patrick B. McMahon of Heidel, Samberson, Newell, Cox & McMahon
Pat McCasland, Environmental Plus, Inc.



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

1R-383

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.

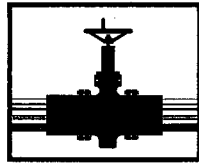
This approval does not relieve Plains Marketing, L.P. of any future liability at these sites should it prove that Plains' operations have caused harm to public health or the environment. Nor does it relieve Plains of its obligation to comply with the rules and regulations of any other governmental agency.

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



PLAINS

MARKETING, L.P.

September 20, 2004

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Plains Marketing, L.P. (formerly Link Energy) Remediation Sites
Various Locations in Lea County

Dear Mr. Martin:

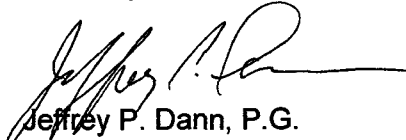
Based on the results of our ongoing groundwater monitoring and sampling program at several of our remediation and groundwater monitoring sites in Lea County, we have identified the need for additional groundwater monitor and/or recovery wells at the flowing sites.

Site Name	Plains EMS No.	Site Location	Number of Wells
Jct 34 to Lea	2002-10286	Section 21, T20S, R37E	3
Livingston Line-Bob McCasland	2001-11043	Section 3, T21S, R37E	2
Hugh Gathering	2002-10235	Section 11, T21S, R37E	1
C. S. Caylor	2002-10250	Section 6, T17S, R37E	5
Lovington Deep 6-Inch	2002-1-312	Section 6, T21S, R36E	6
Kimbrough Sweet	2000-10757	Section 3, T18S, R37E	2
8" Moore to Jal #1	2002-10270	Section 16, T17S, R37E	3
8" Moore to Jal #2	2002-10273	Section 16, T17S, R37E	3
Darr Angell #1	Darr Angell #1	Section 11, T15S, R37E	1
Darr Angell #4	2001-10876	Section 2/11, T15S, R37E	2
Red Byrd #1	Red Byrd #1	Section 1, T19S, R36E	5
HDO 90-23	HDO 90-23	Section 6, T20S, R37E	2
Monument 6" Pipeline	2001-11056	Section 5, T20S, R37E	3
Texaco Skelly F	2002-11229	Section 21, T20S, R37E	1
SPS-11	SPS-11	Section 18, T18S, R36E	2
Monument #11	TNM Mon #11	Section 30, T19S, R37E	2
Monument #2	TNM Mon #2	Section 6, T20S, R37E	1
Monument #17	TNM Mon #17	Section 29, T19S, R37E	1
Monument #18	TNM Mon #18	Section 7, T20S, R37E	2
98-05A	TNM 98-05A	Section 26, T21S, R37E	1
LF-59	LF-59	Section 32, T19S, R37E	2

The proposed well locations are illustrated on the attached site maps. Plains requests your approval of the proposed monitor well locations at the above-referenced sites. We anticipate commencement of drilling activities the week of October 4, 2004.

Should you have any questions or comments concerning this information, please contact me at (713) 646-4657.

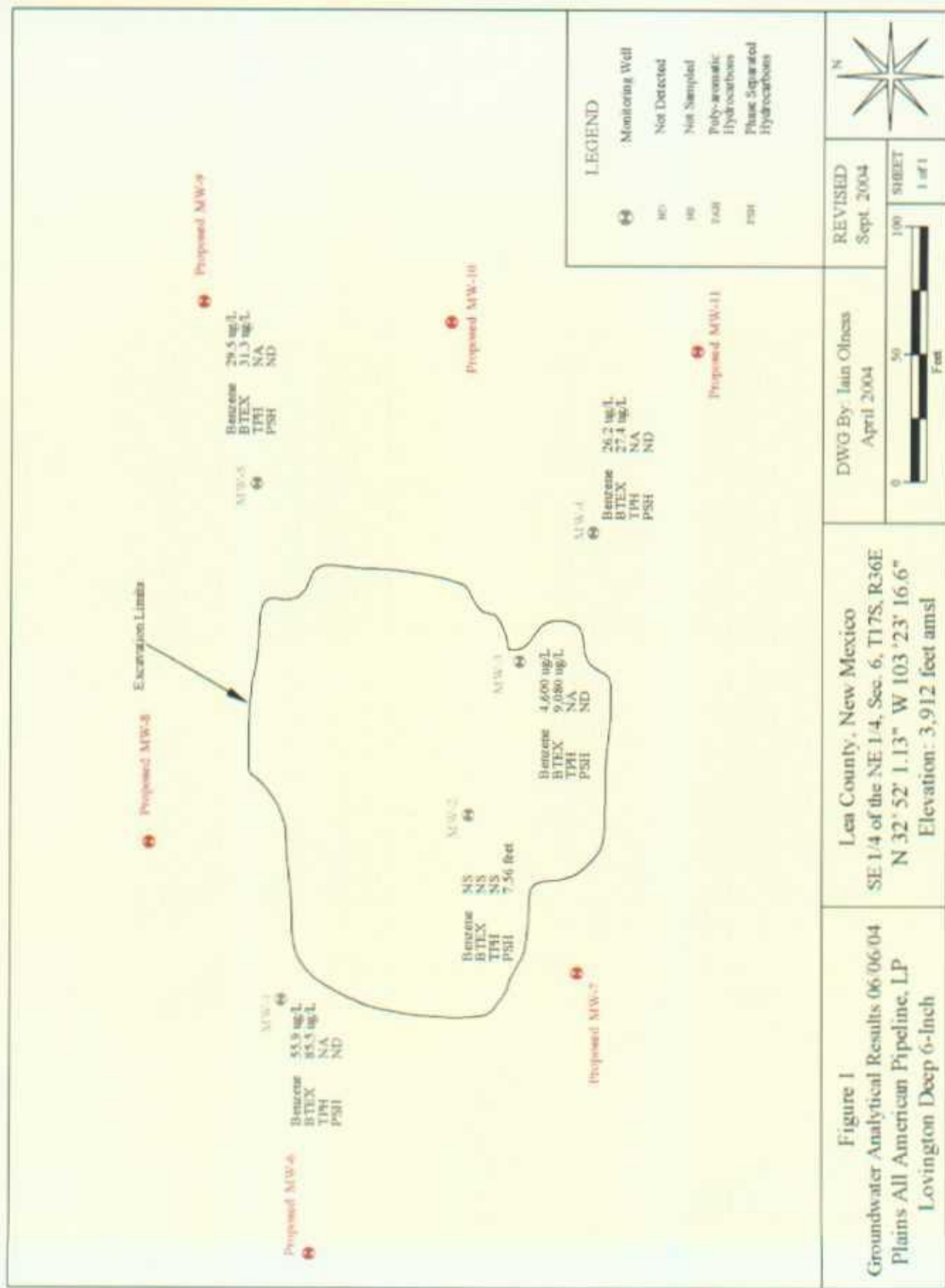
Sincerely,

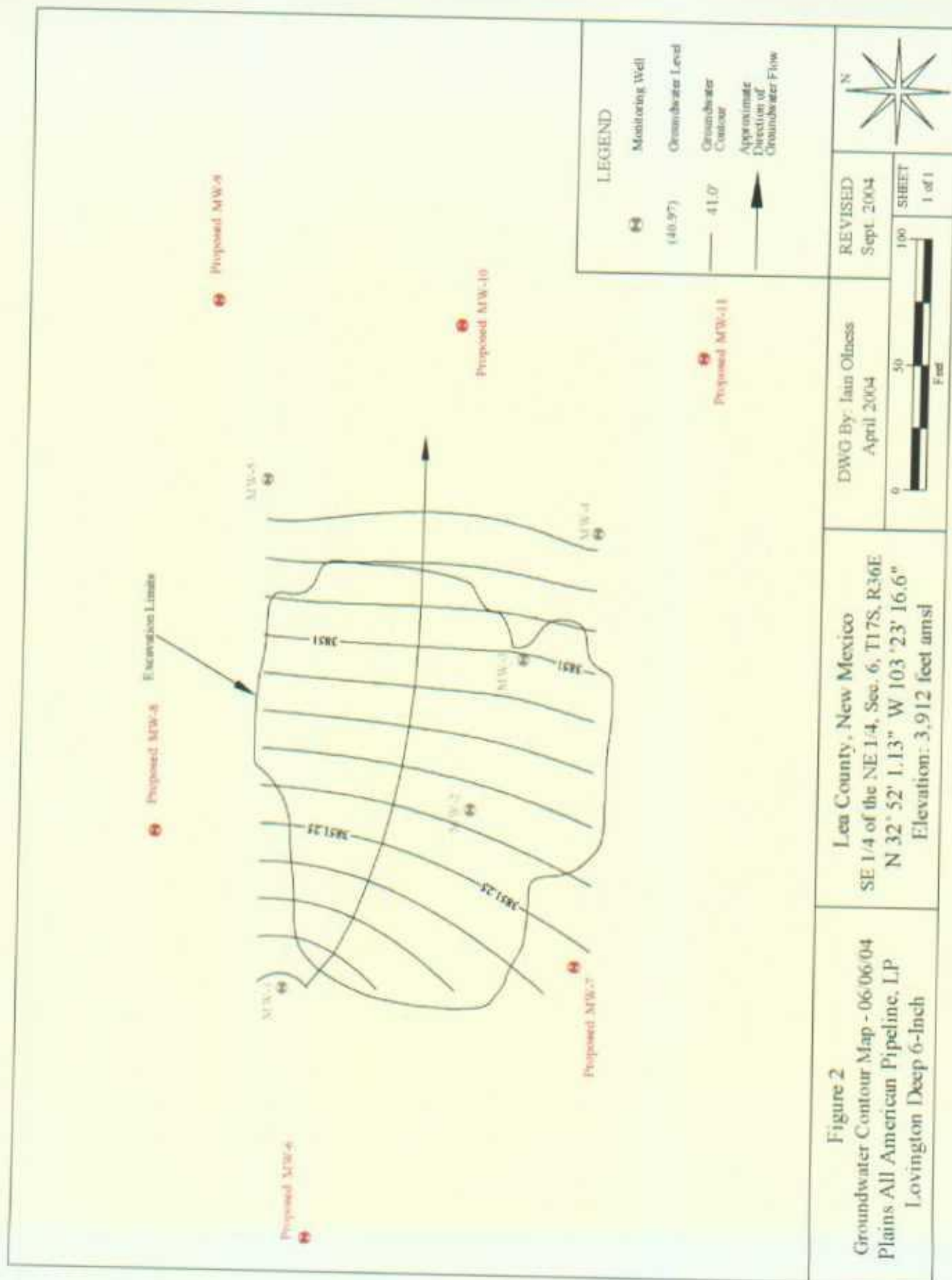


Jeffrey P. Dann, P.G.
Sr. Environmental Specialist
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM
Camille Reynolds, Plains
Todd Choban, Nova
Pat McCasland, EPI

File: c:\jeff-files\OCD-DrillingSchOct2004







NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

January 23, 2004

CERTIFIED MAIL

RETURN RECEIPT NO: 7001 1940-0004 7923 4320

Mr. Frank Hernandez
Link Energy, LLC
P.O. Box 1660
Midland, TX 79703

**RE: Stage 1 and Stage 2 Abatement Plan Proposals
Lovington Deep 6"
Lea County, New Mexico**

Dear Mr. Hernandez:

The New Mexico Oil Conservation Division (OCD) has reviewed Link Energy, LLC's (Link) December 12, 2003 "Stage 1 and Stage 2 Abatement Plan for the Lovington Deep 6". These documents contain Link's proposed Stage 1 and Stage 2 abatement plans for investigation and remediation of contamination related to a crude oil leak at Link's Lovington Deep 6" line leak located in Unit H of Section 06, Township 17 South, Range 36 East, Lea County, New Mexico.

The OCD has determined that the above referenced Stage 1 and Stage 2 Abatement Plan Proposals are **administratively complete**. Before the OCD can complete a technical review of the Stage 1 and Stage 2 proposals, the OCD requires that:

1. Link issue, by January 31, 2004, the Stage 1 notice of publication in the Albuquerque Journal and Hobbs News-Sun pursuant to OCD Rule 19.G.(2).
2. Prior to issuing public notice, Link shall issue written notice of the Stage 1 proposal pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G(1)(d) can be found at www.emnrd.state.nm.us/oed/Bureaus/enviromn.htm.

3. Link provide the OCD with proof of publication and proof of written notice by February 29, 2004. Proof of notice shall include a map of the surface owners of record within one (1) mile of the perimeter of the site and shall identify compliance with each of the provisions of OCD Rule 19.G.

If you have any questions, please contact Ed Martin at (505) 476-3492.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long horizontal flourish extending to the right.

Roger C. Anderson
Environmental Bureau Chief

RCA/eem

Enclosures

cc: Larry Johnson, Hobbs OCD District Office