REMEDIATION PROGRESS REPORT AND CLOSURE PROPOSAL

RECEIVED
APR 04 2011
HOBBSOCD

SKELLY BAKER HISTORICAL RELEASE
NMOCD REF. #1RP-2638
EPI REF. #8-24-2010

UL-F (SE1/4 OF THE NW1/4) OF SECTION 27, T22S, R37E
~5 MILES SOUTH OF
EUNICE, LEA COUNTY, NEW MEXICO
LATITUDE: N32° 22' 00.253" LONGITUDE: W103° 09' 18.343"

APRIL 2011

PREPARED BY:
ENVIRONMENTAL PLUS, INC.
P.O. BOX 1558
2100 AVENUE "O"
EUNICE, NEW MEXICO 88231

PREPARED FOR:

PLAINS
ALL AMERICAN

1RP-1210-2638
PLWS 1028851314

RCVD UPDATED VERSION 05/25/11

ENVIRONMENTAL PLUS, INC.
CONSULTING AND REMEDIAL CONSTRUCTION

04 April 2011

Mr. Geoffrey Leking
Environmental Engineer
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

RE: Remediation Progress Report and Closure Proposal
Plains Pipeline, L.P. – Skelly Baker Historical Release
UL-F (SE1/4 of the NW1/4) of Section 27, T22S, R37E
Latitude: 32° 22' 00.253"; Longitude: 103° 09' 18.343W
NMOCD Ref. #1RP-2638; EPI Ref #8-24-2010

Dear Mr. Leking:

The following *Remediation Progress Report and Closure Proposal* serves as a condensed update on remedial activities undertaken and closure proposal for the above referenced Site.

Remediation Progress:

What started as a project involving shallow excavation for removal of asphaltine and discolored ground areas evolved into one approximately twenty (20) feet deep covering a surface area of 12,401 square feet. From 24 August thru 30 December 2010, approximately 6,064 cubic yards of TPH contaminated material were excavated and transported to either EPI's Land Farm or Plain's Lea Station Land Farm for reclamation. In general, east and west sidewalls of the excavation are void of TPH concentrations in excess of NMOCD Remedial Threshold Goals (NMOCD Goals) of 1,000 mg/Kg. A small section of the north sidewall still contains TPH concentration above NMOCD Goals. It was not excavated as it holds a 4"X4" wooden brace structure supporting an active steel pipeline. Although the south sidewall contains areas of elevated TPH concentrations, it is contiguous with an active Pump Station which precludes additional excavation activities in the southerly direction.

Bottom of the excavation is void of TPH concentration in excess of NMOCD Goals on the east and center sections. However, the west section does contain TPH concentrations which are over NMOCD Goals (Ref. *Figure 3* for location and *Table 3* for values).

Closure Proposal:

West end of the excavation bottom will be excavated to width and depth needed for removal of TPH concentrations greater than NMOCD Goals. During excavation activities, the trackhoe will always be in the 20-foot sector for safety reasons. Soil samples will be routinely collected via trackhoe bucket and field tested for TPH concentrations. Once field tests confirm the westerly section is free of TPH concentration above NMOCD Goals, soil samples will be collected, properly bottled, labeled and remitted to an independent laboratory under Chain-of-Custody

P.O. Box 1558 2100 Avenue "O" Eunice, New Mexico 88231
Telephone (575) 394-3481 FAX (575) 394-2601

ENVIRONMENTAL PLUS, INC.

protocol for analyses of BTEX and TPH concentrations. Upon receipt of laboratory analysis confirming westerly bottom is below NMOCD Goals, the entire excavation bottom area will be backfilled with clean top soil free of deleterious material, large rocks and/or clods. Depth of initial backfill will be determined by height needed to excavate contaminated sector on the north sidewall.

Permanent steel pipe support(s) will be constructed to hold the over head steel pipeline and wooden braces removed. The northerly sector of contaminated sidewall will be excavated laterally until soil sample field tests from confirm TPH concentrations are below NMOCD Goals. Soil samples will be collected from the north sidewall and remitted to an independent laboratory for BTEX and TPH concentrations as detailed in the previous paragraph. Upon receipt of laboratory analysis confirming the northerly wall is below NMOCD Goals, backfilling of the excavation will resume.

Backfilling will continue until the entire excavation is closed. Upon completion of backfill activities, the entire disturbed area will be contoured to blend with existing pasture area and protected against wind/water erosion. Disturbed areas will be disced and deep drill seeded with a mixture approved by the property owner. However, it is recommended completing this activity in late spring 2011 when ground conditions are more conducive to vegetative growth.

Following completion of remediation activities, EPI will provide a detailed *Final Closure Report* to Plains Pipeline, L.P. and NMOCD personnel.

Plains Pipeline, L.P. and EPI personnel would welcome an opportunity to briefly discuss the *Closure Proposal* at your earliest convenience. However, should you have questions, concerns or need additional technical data, please contact me at (575) 394-3481 (office), (575) 441-7802 (cellular) or via e-mail at dduncanepi@gmail.com. Official communications should be directed to Mr. Jason Henry at (806) 592-8305 (office), (575) 441-1099 (cellular) or via e-mail at jhenry@paalp.com with correspondence addressed to:

Mr. Jason Henry
Remediation Coordinator
Plains Pipeline, L.P.
2530 State Highway #214
Denver City, Texas 79323

Sincerely,

ENVIRONMENTAL PLUS, INC.,

David P. Duncan
Civil Engineer
EPI Project Manager

Cc: Jason Henry, Remediation Coordinator – Plains Pipeline, L.P.
Roger Boone, Operations Manager - EPI

Encl.: Figure 1 - Area Map
Figure 3 – Excavation Map and Soil Sample Locations
Table 3 – Summary of Soil Sample Field Analyses and Laboratory Analytical Results
Attachment I – Photographs
Attachment II – Laboratory Analytical Results (1-31-11)
Attachment III – Copy of Initial NMOCD Form C-141

FIGURES

FIGURE 1

AREA MAP

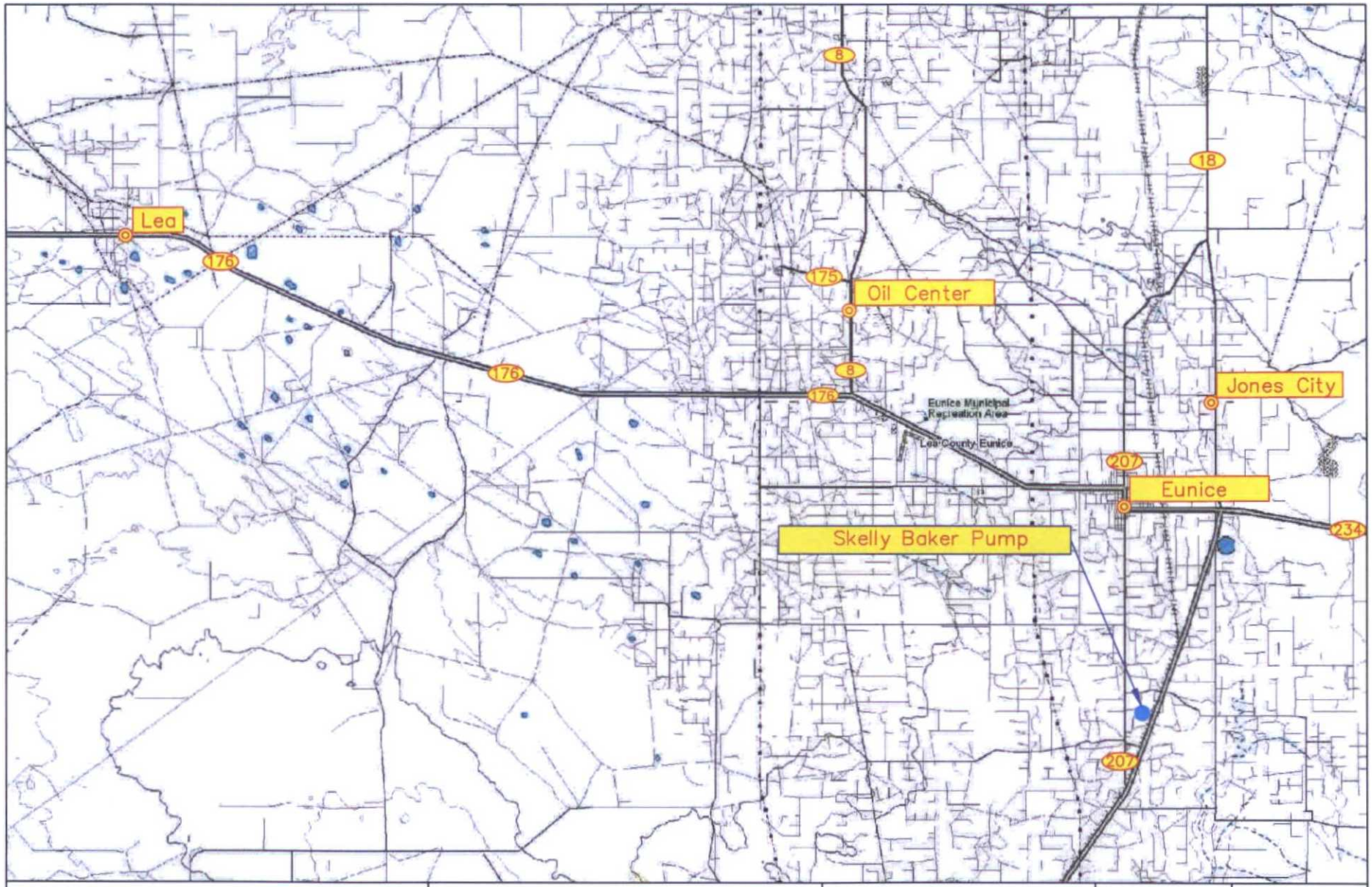


Figure 1
Area Map
Plains Pipeline Co.
Skelly Baker Pump

Lea County, New Mexico
UL–F(SE1/4 of NW1/4 Sect. 27, T22S, R37E
N 32 °22' 00.253" W 103 °09' 18.343"
Elevation: 3,363 feet amsl

DWG By: J. Smith
April 2011

REVISED:

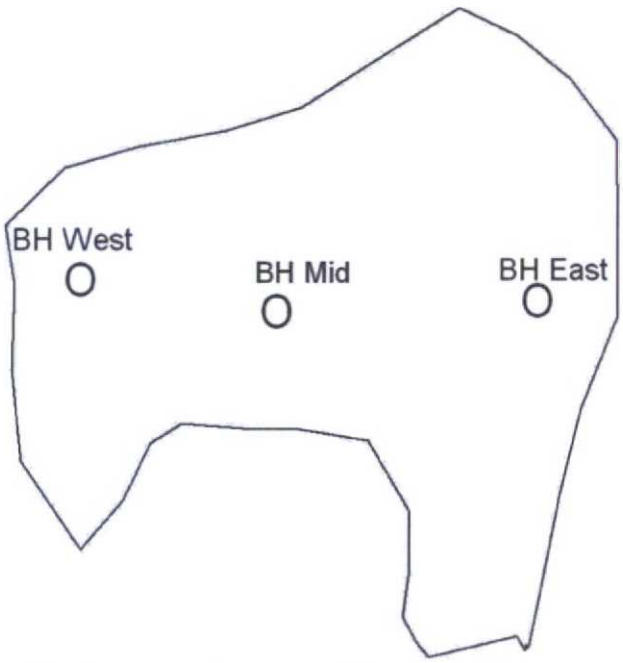
SHEET
1 of 1

FIGURE 3

EXCAVATION MAP AND SOIL SAMPLE LOCATIONS

Figure 3

Skelly Baker Booster



Release Area= 12,401 ft.sq.

Soil Samples Collected 1/31/2011

Lat/Long
WGS 1984

N

Scale 1:500
0 60.00
Feet

R032917A.ssf
3/29/2011
GPS Pathfinder® Office
Trimble.

TABLES

TABLE 3

SUMMARY OF SOIL SAMPLE FIELD ANALYSES AND LABORATORY ANALYTICAL RESULTS

TABLE 3

Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results

Plains Pipeline, L.P.

Skelly Baker Compressor Station (EPI Ref. #2010-0001)

UL-F (SE1/4 of the SW1/4) of Section 27, T22S, R37E; Lea County, New Mexico

Sample I.D.	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO (C6-C12) (mg/Kg)	DRO (>C12-C28) (mg/Kg)	ORO (>C28-C35) (mg/Kg)	Total Hydrocarbons (nC6-nC28) (mg/Kg)	Paint Filter Liquids Test	Chloride (mg/Kg)
SW-1 (N)	1.5	Excavated	23-Sep-10	98.2	--	--	--	--	--	--	374	1,420	37.3	1,831	--	
SW-1 (N)	2	In Situ	27-Sep-10	0.4	--	--	--	--	--	--	ND	140	ND	140	--	--
SW-2 (W)	1.5	In Situ	23-Sep-10	11.8	--	--	--	--	--	--	ND	169	27.6	197	--	--
SW-3 (S)	1.5	In Situ	23-Sep-10	27.3	--	--	--	--	--	--	ND	74.4	16.9	91.3	--	--
SW-4 (E)	1.5	In Situ	23-Sep-10	25.1	--	--	--	--	--	--	ND	1,320	ND	1,320	--	--
BH-1	3.5	In Situ	23-Sep-10	122	--	--	--	--	--	--	923	2,770	84.0	3,777	--	--
BH-1	2.5	In Situ	5-Oct-10	16.6	--	--	--	--	--	--	ND	132	ND	132	--	--
BH-2	2.5	In Situ	5-Oct-10	21.7	--	--	--	--	--	--	ND	ND	ND	ND	--	--
BH-3	2.5	In Situ	5-Oct-10	28.1	--	--	--	--	--	--	ND	247	ND	247	--	--
BH-4	2.5	In Situ	5-Oct-10	12.2	--	--	--	--	--	--	ND	ND	ND	ND	--	--
BH-5	4.5	In Situ	5-Oct-10	171.0	--	--	--	--	--	--	2,050	4,660	89.0	6,799	--	--
BH-6	4.5	In Situ	5-Oct-10	132.0	--	--	--	--	--	--	1,000	3,680	ND	4,680	--	--
BH-7	2.5	In Situ	5-Oct-10	22.8	--	--	--	--	--	--	ND	54.1	ND	54.1	--	--
BH-8	2.0	In Situ	5-Oct-10	15.6	--	--	--	--	--	--	ND	ND	ND	ND	--	--
BH-9	2.0	In Situ	5-Oct-10	44.2	--	--	--	--	--	--	184	1,620	ND	1,804	--	--
BH-10	2.0	In Situ	5-Oct-10	23.7	--	--	--	--	--	--	ND	642	ND	642	--	--

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Plains Pipeline, L.P.

Skelly Baker Compressor Station (EPI Ref. #2010-0001)

UL-F (SE1/4 of the SW1/4) of Section 27, T22S, R37E; Lea County, New Mexico

Sample I.D.	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO (C6-C12) (mg/Kg)	DRO (>C12-C28) (mg/Kg)	ORO (>C28-C35) (mg/Kg)	Total Hydrocarbons (nC6-nC28) (mg/Kg)	Paint Filter Liquids Test	Chloride (mg/Kg)
BH-11	2.0	In Situ	5-Oct-10	32.9	--	--	--	--	--	--	ND	ND	ND	ND	--	--
BH-12	2.0	In Situ	5-Oct-10	29.6	--	--	--	--	--	--	ND	ND	ND	ND	--	--
SW-1	3.0	In Situ	5-Oct-10	91.6	--	--	--	--	--	--	760	3,880	90.2	4,730	--	--
SW-2	3.0	In Situ	5-Oct-10	42.9	--	--	--	--	--	--	ND	317	ND	317	--	--
SW-3	3.0	In Situ	5-Oct-10	55.7	--	--	--	--	--	--	296	1,580	26.5	1,903	--	--
SW -4	3.0	In Situ	5-Oct-10	18.8	--	--	--	--	--	--	30.4	255	ND	285	--	--
SW-5 (W)	3.0	In Situ	12-Oct-10	--	--	--	--	--	--	--	958	4,080	107	5,145	Pass	ND
WSW-1	10.0	In Situ	22-Nov-10	404	--	--	--	--	--	--	1940	5,350	ND	7,290	N/A	13.0
NWSW-1	10.0	In Situ	22-Nov-10	371	--	--	--	--	--	--	605	1,810	17.0	2,432	N/A	--
NESW-1	10.0	In Situ	22-Nov-10	208	--	--	--	--	--	--	1,120	3,940	49.4	5,109	N/A	--
ESW-1	10.0	In Situ	22-Nov-10	98.2	--	--	--	--	--	--	109	1,830	21.0	1,960	N/A	10.6
EBH-1	15.0	In Situ	22-Nov-10	336	--	--	--	--	--	--	1,080	3,500	27.7	4,608	N/A	--
MBH-1	15.0	In Situ	22-Nov-10	522	--	--	--	--	--	--	1,140	2,970	21.5	4,132	N/A	--
WBH-1	15.0	In Situ	22-Nov-10	269	--	--	--	--	--	--	746	2,550	29.4	3,325	N/A	ND
SESW	5.0	In Situ	8-Dec-10	34.4	--	--	--	--	--	--	ND	715	117	832	N/A	--
ESWS	5.0	In Situ	8-Dec-10	28.9	--	--	--	--	--	--	ND	ND	ND	ND	N/A	--
ESWN	10.0	In Situ	8-Dec-10	14.9	--	--	--	--	--	--	ND	ND	ND	ND	N/A	--

TABLE 3

Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results

Plains Pipeline, L.P.

Skelly Baker Compressor Station (EPI Ref. #2010-0001)

UL-F (SE1/4 of the SW1/4) of Section 27, T22S, R37E; Lea County, New Mexico

Sample I.D.	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO (C6-C12) (mg/Kg)	DRO (>C12-C28) (mg/Kg)	ORO (>C28-C35) (mg/Kg)	Total Hydrocarbons (nC6-nC28) (mg/Kg)	Paint Filter Liquids Test	Chloride (mg/Kg)
NSWE	10.0	In Situ	8-Dec-10	5.8	--	--	--	--	--	--	ND	34.0	ND	34.0	N/A	--
NSWM	10.0	Eccavated	8-Dec-10	1,002	--	--	--	--	--	--	2,040	5,350	294	7,684	N/A	--
NSWM-A	11.0	In Situ	13-Dec-10	11.0	--	--	--	--	--	--					N/A	--
NSWW	10.0	In Situ	8-Dec-10	16.8	--	--	--	--	--	--	ND	ND	ND	ND	N/A	--
WSW-1	10.0	In Situ	8-Dec-10	22.0	--	--	--	--	--	--	ND	535	64.3	599	N/A	--
SWSW	10.0	Excavated	8-Dec-10	194	--	--	--	--	--	--	595	4,380	219	5,194	N/A	--
SWSW-A	10.0	In Situ	13-Dec-10	16.1	--	--	--	--	--	--						--
MS	10.0	In Situ	8-Dec-10	25.8	--	--	--	--	--	--	ND	45.6	ND	45.6	N/A	--
ME	10.0	Excavated	8-Dec-10	120	--	--	--	--	--	--	122	738	28.3	888	N/A	--
ME-A	10.0	In Situ	13-Dec-10	7.6	--	--	--	--	--	--						--
BH-E	19.0	Excavated	13-Dec-10	42.4	--	--	--	--	--	--	--	--	--	--	--	--
BH-EA	20.0	In Situ	31-Jan-00	--	--	--	--	--	--	--	44.5	243	ND	288	N/A	--
BH-M	19.0	Excavated	13-Dec-10	569	--	--	--	--	--	--	--	--	--	--	--	--
BH-MA	20.0	In Situ	31-Jan-11	--	--	--	--	--	--	--	44.5	399	N/D	444	N/A	--
BH-W	19.0	Excavated	13-Dec-10	223	--	--	--	--	--	--	--	--	--	--	--	--
BH-WA	20.0	In Situ	31-Jan-11	--	--	--	--	--	--	--	456	1,900	42.0	2,398	N/A	--
NMOCD Remedial Thresholds				100		10				50				1,000		250

Bolded values are in excess of NMOCD Remediation Threshold Goals

Excavation Nomenclature; BH - Bottom Hole; SW - Sidewall (E - East Sidewall;W - West Sidewall; N - North Sidewall; S - South Sidewall); ND = Nondetect; - - = Not Analyzed; N/A = Applicable

ATTACHMENTS

ATTACHMENT I

PHOTOGRAPHS

Photograph No. 1 – Looking northerly at asphaltine and historic overflow area

Photograph No. 2 – Looking westerly at active Pump Station adjacent to historic overflow area

Photograph No. 3 – Looking southerly at Pump Station and partially remediated historic overflow area

Photograph No. 4 – Looking northerly at initial excavated area and active pipeline supported with wooden brace

Photograph No. 5 – Looking northeasterly at excavation, active lines and wooden brace

Photograph No. 6 – Looking westerly at excavation, active pipeline supported by wooden brace and southerly wall adjacent to Pump Station

ATTACHMENT II

LABORATORY ANALYTICAL RESULTS (1-31-11)

Analytical Report 405290

for

PLAINS ALL AMERICAN EH&S

Project Manager: Jason Henry

Skelly Baker Pump Station

Skelly Baker Pump Historical

03-FEB-11

Celebrating 20 Years of commitment to excellence in Environmental Testing Services

12600 West I-20 East Odessa, Texas 79765

Xenco-Houston (EPA Lab code: TX00122):
Texas (T104704215-10-6-TX), Arizona (AZ0738), Arkansas (08-039-0), Connecticut (PH-0102), Florida (E871002)
Illinois (002082), Indiana (C-TX-02), Iowa (392), Kansas (E-10380), Kentucky (45), Louisiana (03054)
New Hampshire (297408), New Jersey (TX007), New York (11763), Oklahoma (9218), Pennsylvania (68-03610)
Rhode Island (LAO00312), USDA (S-44102)

Xenco-Atlanta (EPA Lab Code: GA00046):
Florida (E87429), North Carolina (483), South Carolina (98015), Utah (AALI1), West Virginia (362), Kentucky (85)
Louisiana (04176), USDA (P330-07-00105)

Xenco-Miami (EPA Lab code: FL01152): Florida (E86678), Maryland (330)
Xenco-Tampa Mobile (EPA Lab code: FL01212): Florida (E84900)
Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-TX)
Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295-TX)
Xenco-Corpus Christi (EPA Lab code: TX02613): Texas (T104704370)
Xenco-Boca Raton (EPA Lab Code: FL01273):
Florida(E86240),South Carolina(96031001), Louisiana(04154), Georgia(917)
North Carolina(444), Texas(T104704468-TX), Illinois(002295), Florida(E86349)

Xenco Phoenix (EPA Lab Code: AZ00901):
Arizona(AZ0757), Texas(104704435-10-2), Nevada(NAC-445A), DoD(65816)
Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)
Xenco Tucson (EPA Lab code:AZ000989): Arizona (AZ0758)

XENCO Laboratories

03-FEB-11

Project Manager: **Jason Henry**
PLAINS ALL AMERICAN EH&S
1301 S. COUNTY ROAD 1150
Midland, TX 79706

Reference: XENCO Report No: **405290**
Skelly Baker Pump Station
Project Address: UL-F, Sec 27, T22S, R37E

Jason Henry:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 405290. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. Estimation of data uncertainty for this report is found in the quality control section of this report unless otherwise noted. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 405290 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Brent Barron, II
Odessa Laboratory Manager

XENCO Laboratories

Sample Cross Reference 405290

PLAINS ALL AMERICAN EH&S, Midland, TX

Skelly Baker Pump Station

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BH-EA (20')	S	Jan-31-11 08:10		405290-001
BH-MA (20')	S	Jan-31-11 08:18		405290-002
BH-WA (20')	S	Jan-31-11 08:24		405290-003

CASE NARRATIVE

Client Name: PLAINS ALL AMERICAN EH&S
Project Name: Skelly Baker Pump Station

Project ID:	*Skelly Baker Pump Histori*	*Report Date:*	*03-FEB-11*
Work Order Number:	*405290*	*Date Received:*	*01/31/2011*

Sample receipt non conformances and Comments:

None

Sample receipt Non Conformances and Comments per Sample:

None

Certificate of Analysis Summary 405290

PLAINS ALL AMERICAN EH&S, Midland, TX

Project Name: Skelly Baker Pump Station

Project Id: Skelly Baker Pump Historical
Contact: Jason Henry
Project Location: UL-F, Sec 27, T22S, R37E

Date Received in Lab: Mon Jan-31-11 02:45 pm
Report Date: 03-FEB-11
Project Manager: Brent Barron, II

Analysis Requested									
	Lab Id:	405290-001		405290-002		405290-003			
	Field Id:	BH-EA (20')		BH-MA (20')		BH-WA (20')			
	Depth:								
	Matrix:	SOIL		SOIL		SOIL			
	Sampled:	Jan-31-11 08:10		Jan-31-11 08:18		Jan-31-11 08:24			
Percent Moisture	***Extracted:***								
	Analyzed:	Jan-31-11 17:00		Jan-31-11 17:00		Jan-31-11 17:00			
	Units/RL:	%	RL	%	RL	%	RL		
Percent Moisture		9.24	1.00	4.80	1.00	11.5	1.00		
TPH by SW8015 Mod	***Extracted:***	Feb-02-11 10:15		Feb-02-11 10:15		Feb-02-11 10:15			
	Analyzed:	Feb-02-11 13:45		Feb-02-11 14:03		Feb-02-11 14:21			
	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL		
C6-C12 Gasoline Range Hydrocarbons		44.5	16.5	44.5	15.8	456	16.9		
C12-C28 Diesel Range Hydrocarbons		243	16.5	399	15.8	1900	16.9		
C28-C35 Oil Range Hydrocarbons		ND	16.5	ND	15.8	42.0	16.9		
Total TPH		288	16.5	444	15.8	2400	16.9		

Brent Barron, II
Odessa Laboratory Manager

Final 1.000

XENCO Laboratories

Flagging Criteria

X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.

B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.

D The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.

E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.

F RPD exceeded lab control limits.

J The target analyte was positively identified below the MQL and above the SQL.

U Analyte was not detected.

L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.

H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

K Sample analyzed outside of recommended hold time.

JN A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit

PQL Practical Quantitation Limit

* Outside XENCO's scope of NELAC Accreditation.

XENCO Laboratories

Form 2 - Surrogate Recoveries

Project Name: Skelly Baker Pump Station

Work Orders : 405290,

Project ID: Skelly Baker Pump Historical

Lab Batch #: 842208 **Sample:** 594767-1-BKS / BKS **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 02/02/11 12:50

TPH by SW8015 Mod Analytes	SURROGATE RECOVERY STUDY Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	85.6	101	85	70-135	
o-Terphenyl	39.6	50.3	79	70-135	

Lab Batch #: 842208 **Sample:** 594767-1-BSD / BSD **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 02/02/11 13:09

TPH by SW8015 Mod Analytes	SURROGATE RECOVERY STUDY Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	86.7	100	87	70-135	
o-Terphenyl	38.3	50.0	77	70-135	

Lab Batch #: 842208 **Sample:** 594767-1-BLK / BLK **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 02/02/11 13:27

TPH by SW8015 Mod Analytes	SURROGATE RECOVERY STUDY Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	72.6	100	73	70-135	
o-Terphenyl	36.3	50.1	72	70-135	

Lab Batch #: 842208 **Sample:** 405290-001 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 02/02/11 13:45

TPH by SW8015 Mod Analytes	SURROGATE RECOVERY STUDY Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	76.5	99.9	77	70-135	
o-Terphenyl	38.7	50.0	77	70-135	

Lab Batch #: 842208 **Sample:** 405290-002 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 02/02/11 14:03

TPH by SW8015 Mod Analytes	SURROGATE RECOVERY STUDY Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	78.9	100	79	70-135	
o-Terphenyl	41.1	50.0	82	70-135	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = 100 * A / B

All results are based on MDL and validated for QC purposes.

XENCO Laboratories

Form 2 - Surrogate Recoveries

Project Name: Skelly Baker Pump Station

Work Orders : 405290,

Project ID: Skelly Baker Pump Historical

Lab Batch #: 842208 **Sample:** 405290-003 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 02/02/11 14:21

TPH by SW8015 Mod Analytes	SURROGATE RECOVERY STUDY Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	88.8	99.7	89	70-135	
o-Terphenyl	46.0	49.9	92	70-135	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = 100 * A / B

All results are based on MDL and validated for QC purposes.

XENCO Laboratories

BS / BSD Recoveries

Project Name: Skelly Baker Pump Station

Work Order #: 405290
Analyst: BEV
Lab Batch ID: 842208
Sample: 594767-1-BKS
Units: mg/kg

Date Prepared: 02/02/2011
Batch #: 1

Project ID: Skelly Baker Pump Historical
Date Analyzed: 02/02/2011
Matrix: Solid

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

TPH by SW8015 Mod Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
C6-C12 Gasoline Range Hydrocarbons	<50.1	1010	890	88	1000	932	93	5	70-135	35	
C12-C28 Diesel Range Hydrocarbons	<50.1	1010	794	79	1000	882	88	11	70-135	35	

Relative Percent Difference RPD = 200*|(C-F)/(C+F)|
Blank Spike Recovery [D] = 100*(C)/[B]
Blank Spike Duplicate Recovery [G] = 100*(F)/[E]
All results are based on MDL and Validated for QC Purposes

Sample Duplicate Recovery

Project Name: Skelly Baker Pump Station

Work Order #: 405290

Lab Batch #: 842216 **Project ID:** Skelly Baker Pump Historical

Date Analyzed: 01/31/2011 17:00 **Date Prepared:** 01/31/2011 **Analyst:** ASA

QC- Sample ID: 405290-001 D **Batch #:** 1 **Matrix:** Soil

Reporting Units: %

Percent Moisture Analyte	SAMPLE / SAMPLE DUPLICATE RECOVERY				
	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Percent Moisture	9.24	9.21	0	20	

Spike Relative Difference RPD 200 * | (B-A)/(B+A) |
All Results are based on MDL and validated for QC purposes.
BRL - Below Reporting Limit

Environmental Plus, Inc.

P.O. Box 1558, 2100 Avenue O, Eunice, NM 88231
(575) 394-3481 FAX: (575) 394-2601

Chain of Custody Form

LAB: XENCO (ELT)

Company Name	Environmental Plus, Inc.
EPI Project Manager	David P. Duncan
Mailing Address	P.O. BOX 1558
City, State, Zip	Eunice New Mexico 88231
EPI Phone#/Fax#	575-394-3481 / 575-394-2601
Client Company	Plains Pipeline, LP
Facility Name	Skelly Baker Pump Station
Location	UL - F, Sec 27, T22S, R37E
Project Reference	*Skelly Baker Pump Historical*
EPI Sampler Name	Danny Deaton

Bill To

PLAINS ALL AMERICAN PIPELINE, L.P.

Attn: ENV Accounts Payable
PO Box 4648,
Houston, TX 77210-4648

LAB I.D.	SAMPLE I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUND WATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	PRESERV.: ACID/BASE	ICE/COOL	OTHER	SAMPLING: DATE	TIME	ANALYSIS REQUEST: TPH (8015M)
405290															
1	BH-EA (20')	G	1			X					X		31-Jan-11	8:10	X
2	BH-MA (20')	G	1			X					X		31-Jan-11	8:18	X
3	BH-WA (20')	G	1			X					X		31-Jan-11	8:24	X
4															
5															
6															
7															
8															
9															
10															

Sampler Relinquished:	01/31/11 Time	Received By:	E-mail results to: dduncanepl@gmail.com and JHenry@paalp.com
Relinquished by:	01/31/11 Time 19:45	Received By: (lab staff) Andrea Elam 1-31-11 14:45	NOTE: Please list following on all Invoices: INCIDENT NUMBER: SRS - Skelly Baker Pump Historical
Delivered by:	Sample Cool & Intact (Yes) No	Checked By:	4.16°C w/label 4 oz glass

XENCO Laboratories

XENCO Laboratories
Atlanta, Boca Raton, Corpus Christi, Dallas
Houston, Miami, Odessa, Philadelphia
Phoenix, San Antonio, Tampa

Document Title: Sample Receipt Checklist
Document No.: SYS-SRC
Revision/Date: No. 01, 5/27/2010
Effective Date: 6/1/2010 Page 1 of 1

Prelogin / Nonconformance Report - Sample Log-In

Client: EPI / Plains
Date/Time: 1.31.11 14:45
Lab ID #: 405290
Initials: AE

Sample Receipt Checklist

1. Samples on ice?	Blue	(Water)	No	
2. Shipping container in good condition?	(Yes)	No	None	
3. Custody seals intact on shipping container (cooler) and bottles?	Yes	No	(N/A)	
4. Chain of Custody present?	(Yes)	No		
5. Sample instructions complete on chain of custody?	(Yes)	No		
6. Any missing / extra samples?	Yes	(No)		
7. Chain of custody signed when relinquished / received?	(Yes)	No		
8. Chain of custody agrees with sample label(s)?	(Yes)	No		
9. Container labels legible and intact?	(Yes)	No		
10. Sample matrix / properties agree with chain of custody?	(Yes)	No		
11. Samples in proper container / bottle?	(Yes)	No		
12. Samples properly preserved?	(Yes)	No	N/A	
13. Sample container intact?	(Yes)	No		
14. Sufficient sample amount for indicated test(s)?	(Yes)	No		
15. All samples received within sufficient hold time?	(Yes)	No		
16. Subcontract of sample(s)?	Yes	No	(N/A)	
17. VOC sample have zero head space?	(Yes)	No	N/A	

18. Cooler 1 No.	Cooler 2 No.	Cooler 3 No.	Cooler 4 No.	Cooler 5 No.
lbs 4.6 °C	lbs °C	lbs °C	lbs °C	lbs °C

Nonconformance Documentation

Contact:_____ Contacted by:_____ Date/Time:_____

Regarding: _____

Corrective Action Taken: _____

Check all that apply:
- ☐ Cooling process has begun shortly after sampling event and out of temperature condition acceptable by NELAC 5.5.8.3.1.a.1.
- ☐ Initial and Backup Temperature confirm out of temperature conditions
- ☐ Client understands and would like to proceed with analysis

ATTACHMENT III

COPY OF INITIAL NMOCD FORM C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

RECEIVED
APR 04 2011
HOBBSOCD

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Plains Pipeline, LP	Contact	Jason Henry
Address	2530 Hwy 214 – Denver City, Tx 79323	Telephone No.	(575) 441-1099
Facility Name	Skelly Baker Pump Historical	Facility Type	Pump Station and pipeline

Surface Owner Ed Johnston	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	27	22S	37E					Lea

Latitude N 32.366885° Longitude W 103.154997°

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release Unknown	Volume Recovered Unknown
Source of Release Pump Station Piping	Date and Hour of Occurrence Unknown	Date and Hour of Discovery March 2010
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

RECEIVED
OCT 15 2010
HOBBSOCD

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Source of release is unknown due to the historic nature; suspected cause is the crude oil pump station that is near the historic staining.

Describe Area Affected and Cleanup Action Taken.*

Historic release of crude resulted in area of asphaltines measuring approximately 50' x 200'. The impacted soil will be disposed of at a NMOCD permitted facility and clean backfill will be purchased from the landowner.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Jason Henry	OIL CONSERVATION DIVISION
Printed Name: Jason Henry	Approved by District Supervisor: ENVIRONMENTAL ENGINEER
Title: Remediation Coordinator	Approval Date: 10.15.10 / Expiration Date: 12.15.10
E-mail Address: jhenry@paalp.com	Conditions of Approval: Attached ☐
Date: 10-15-2010 Phone: (575) 441-1099	SUBMIT FINAL C-141 w/ DOCS BY / IRP# 10.10.2638

* Attach Additional Sheets If Necessary