*Basin Environmental Service Technologies, LLC*

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Effective Solutions

# REMEDIATION SUMMARY &

# SITE CLOSURE REQUEST

**SOUTHERN UNION GAS SERVICES**
**MC-16" (1RP-1511)**
**HISTORICAL RELEASE SITE**
**Lea County, New Mexico**
**Unit Letter "C" (NE/NW), Section 34, Township 22 South, Range 36 East**
**Latitude 32° 21.135' North, Longitude 103° 15.345' West**
**NMOCD Reference # 1RP-1511**

Prepared For:

Southern Union Gas Services
801 S. Loop 464
Monahans, TX 79756

Prepared By:
Basin Environmental Service Technologies, LLC
3100 Plains Highway
Lovington, New Mexico 88260

**November 2012**

Joel W. Lowry
Project Manager

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**APPENDICES**

## 1.0 INTRODUCTION & BACKGROUND INFORMATION

Basin Environmental Service Technologies, LLC (Basin), on behalf of Southern Union Gas Services (Southern Union), has prepared this *Remediation Summary & Site Closure Request* for the MC-16" Historical Release Site (1RP-1511). The legal description of the release site is Unit Letter "C" (NE/NW), Section 34, Township 22 South, Range 36 East, in Lea County, New Mexico. The geographic coordinates of the release site are 32° 21.135' North latitude and 103° 15.345' West longitude. The property affected by the release is owned by Wanda Jones. Please reference Figure 1 for a "Site Location Map".

On July 21, 2007, Southern Union discovered a release had occurred on the MC-16" Pipeline. The "Release Notification and Corrective Action Form" (Form C-141) indicated failure of a section of sixteen-inch (16") low-pressure pipeline resulted in the release of approximately sixty barrels (60 bbls) of fluid and eighty (80) mcf of natural gas. During initial response activities approximately forty barrels (40 bbls) of fluid was recovered. The release was reported to the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office on July 21, 2007. The Form C-141 indicated the release affected approximately one thousand, six hundred square feet (1,600 $ft^2$) of lease road. General photographs of the release site are provided as Appendix A. The Form C-141 is provided as Appendix C.

Previous remediation activities were conducted at the MC-16" Historical Release Site by an environmental contractor that is no longer affiliated with the site. The nature and extent of the aforementioned activities remains unclear, as environmental reports and work records are incomplete.

On June 22, 2012, at the request of Southern Union, Basin assumed remediation responsibilities at the MC-16" Historical Release Site.

## 2.0 NMOCD SITE CLASSIFICATION

A search of the New Mexico Water Rights Reporting System (NMWRRS) database maintained by the New Mexico Office of the State Engineer (NMOSE) indicated information was unavailable for Section 34, Township 22 South, Range 36 East. A depth to groundwater reference map utilized by the NMOCD indicates groundwater should be encountered at approximately two hundred fifty feet (250') below ground surface (bgs). Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

A search of the NMWRRS database indicated there are no water wells within one thousand feet (1,000') of the release. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

There are no surface water bodies within one thousand feet (1,000') of the release. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

NMOCD guidelines indicate the MC-16" Historical Release Site has an initial ranking score of zero (0) points. The soil remediation levels for a site with a ranking score of zero (0) points are as follows:

- Benzene – 10 mg/Kg (ppm)
- Benzene, toluene, ethylbenzene and xylene (BTEX) – 50 mg/Kg (ppm)
- Total petroleum hydrocarbons (TPH) – 5,000 mg/Kg (ppm)

The New Mexico Administrative Code (NMAC) does not currently specify a remediation level for chloride concentrations in soil. Chloride remediation levels are set by the NMOCD on a site-specific basis.

## 3.0 SUMMARY OF SOIL REMEDIATION ACTIVITIES

Beginning August 9, 2007, remediation activities were conducted on the MC-16" Release Site by an environmental contractor that is no longer affiliated with the site.

On August 9, 2007, six (6) soil samples (P.R. @ 6', #1 @ Surface, #1 @ 8", #1 @ 24", #2 @ Surface and #2 @ 6") were collected from the release site and submitted to Cardinal Laboratories, of Hobbs, New Mexico, for determination of TPH and chloride concentrations in accordance with EPA Methods SW 846-8015M and SM 4500 Cl-B, respectively. Laboratory analytical results indicated TPH concentrations ranged from less than the laboratory MDL for soil sample #1 @ 8" to 26,040 mg/Kg for soil sample #2 @ Surface. Chloride concentrations ranged from 90.4 mg/Kg for soil sample #2 @ 6" to 744 mg/Kg for soil sample #1 @ Surface. Table 1 summarizes the "Concentrations of Benzene, BTEX, TPH & Chloride in Soil". Soil sample locations are depicted in Figure 2, "Site & Sample Location Map". Laboratory analytical reports are provided as Appendix B. Based on Laboratory analytical reports from initial soil samples, further delineation would be required in the area represented by soil sample P.R. @ 6'.

Work records indicate an unknown volume of soil was transported off-site during remediation activities.

On October 3, 2012, Basin responded to the MC-16" Historical Release Site. During the initial investigation, no surface impact was visible, and revegitation was noted. Two (2) soil samples (TT-1 @ 5' and TT-2 @ 6') were collected from a test trench advanced adjacent to the inferred release point in an effort to collect a confirmation BTEX sample and achieve vertical delineation. Soil samples was submitted to Xenco Laboratories, Inc., of Odessa, Texas, for determination of chloride concentrations in accordance with EPA Method 300/300.1. Soil sample TT-1 @ 6' was also analyzed for BTEX constituent concentrations in accordance with EPA Method SW 846-8021b. Laboratory analytical results indicated chloride concentrations ranged from 1.02 mg/Kg for soil sample TT-1 @ 5' to 3.41 mg/Kg for soil sample TT-1 @ 6'. The BTEX concentration for soil sample TT-1 @ 6' was 0.00119. Based on these laboratory analytical results, the vertical extent of soil impact had been determined.

## 4.0 QA/QC PROCEDURES

### 4.1 Soil Sampling

Soil samples were delivered to Xenco Laboratories, Inc., of Odessa, Texas, and/or Cardinal Laboratories, of Hobbs, New Mexico, for BTEX, TPH, and/or chloride analyses using the methods described below:

- BTEX concentrations in accordance with EPA Method SW-846 8021b
- TPH concentrations in accordance with modified EPA Method SW-846 8015M
- Chloride concentrations in accordance with EPA Method SM 4500-Cl B and/or EPA Method 300/300.1

### 4.2 Decontamination of Equipment

Cleaning of the sampling equipment was the responsibility of the environmental technician. Prior to use, and between each sample, the sampling equipment was cleaned with Liqui-Nox® detergent and rinsed with distilled water.

### 4.3 Laboratory Protocol

The laboratory was responsible for proper QA/QC procedures after signing the chain-of-custody form(s). These procedures were either transmitted with the laboratory reports or are on file at the laboratory.

## 5.0 SITE CLOSURE REQUEST

Confirmation soil samples collected during remediation activites indicated concentrations of benzene, BTEX, TPH and chloride were below NMOCD regulatory remediation action levels in each of the submitted soil samples. Laboratory analytical results from the soil samples collected on October 3, 2012, indicated vertical delineation had been achieved. Based on these laboratory analytical results, Basin recommends Southern Union provide the NMOCD Hobbs District Office a copy of this *Remediation Summary & Site Closure Request* and request the NMOCD grant site closure to the MC-16" Historical Release Site.

## 6.0 LIMITATIONS

Basin Environmental Service Technologies, LLC, has prepared this *Remediation Summary & Site Closure Request* to the best of its ability. No other warranty, expressed or implied, is made or intended. Basin has examined and relied upon documents referenced in the report and on oral statements made by certain individuals. Basin has not conducted an independent examination of the facts contained in referenced materials and statements. Basin has presumed the genuineness of these documents and statements and that the information provided therein is true and accurate. Basin has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Basin 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.

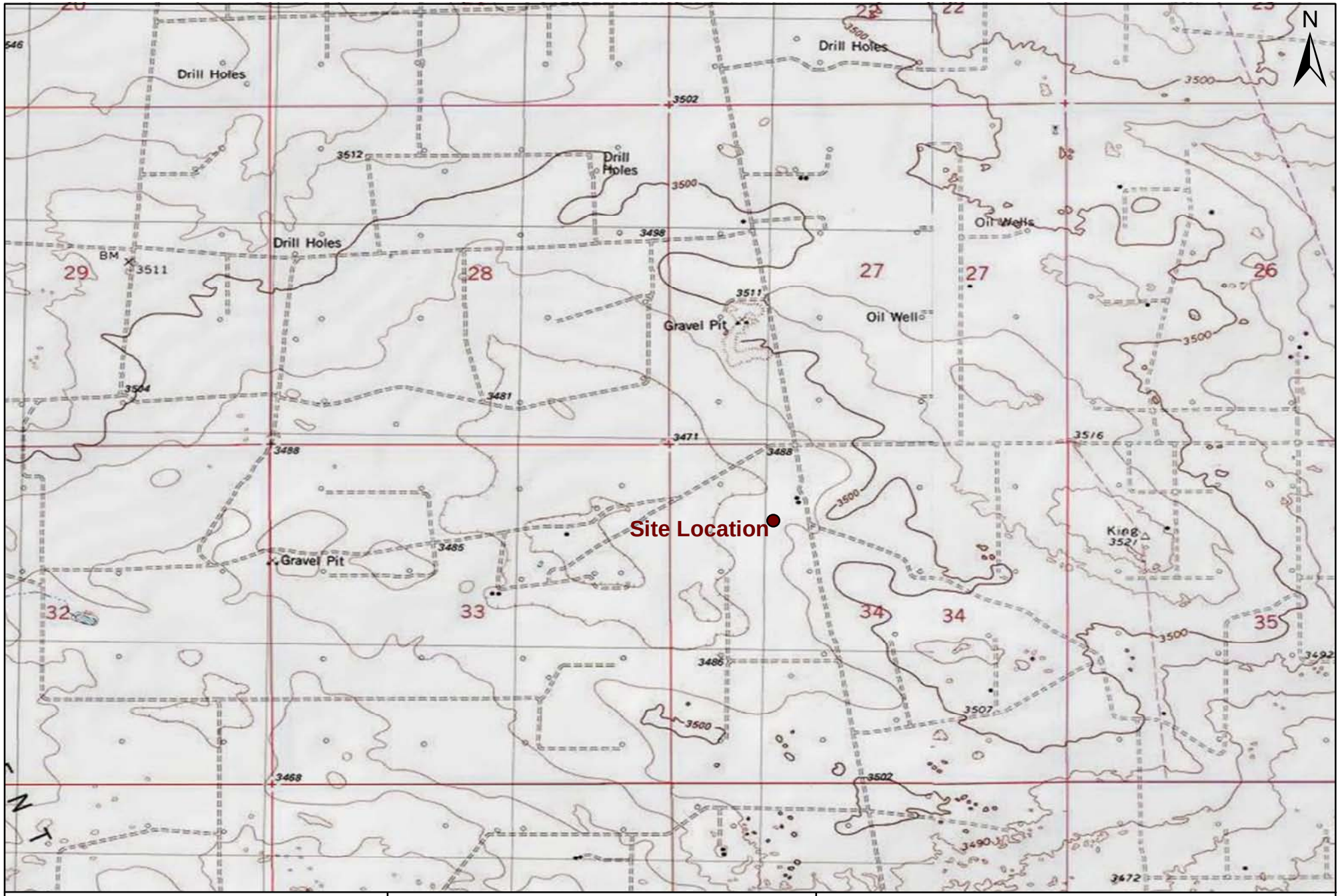
This report has been prepared for the benefit of Southern Union Gas Services. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of Basin Environmental Service Technologies, LLC, and/or Southern Union Gas Services.

## 7.0 DISTRIBUTION

Copy 1: Geoffrey Leking
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division (District 1)
1625 French Drive
Hobbs, NM 88240
GeoffreyR.Leking@state.nm.us

Copy 2: Rose Slade
Southern Union Gas Services
801 S. Loop 464
Monahans, Texas 79756
rose.slade@sug.com

Copy 3: Basin Environmental Service Technologies, LLC
P.O. Box 301
Lovington, New Mexico 88260




1,000500 0 1,000 2,000

Distance in Feet

**Figure 1**
**Site Location Map**
**Southern Union Gas Services**
**MC-16" Historical**
**Lea County, New Mexico**
**NMOCD Reference #: 1RP-1511**

Basin Environmental Service Technologies

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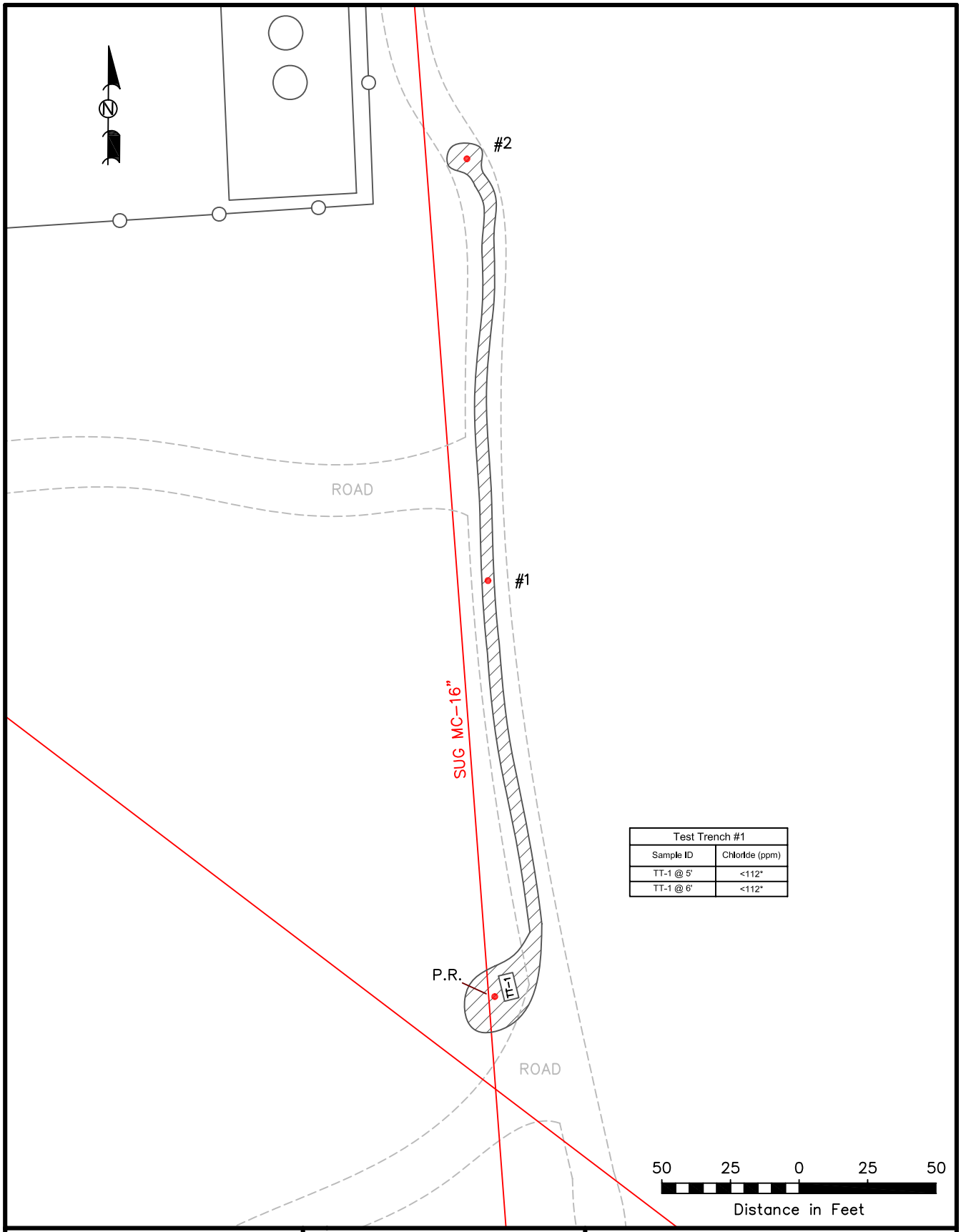
Basin Environmental Service Technologies, LLC
3100 Plains Hwy.
Lovington, NM 88260

| | |
|---|---|
| Drawn By: BJA | Checked By: JWL |
| October 16, 2012 | Scale: 1" = 2000' |




| Test Trench #1 | |
|---|---|
| Sample ID | Chloride (ppm) |
| TT-1 @ 5' | <112* |
| TT-1 @ 6' | <112* |

LEGEND:

- Sample Location
- Pipeline
- Test Trench
- Historical Flowpath
- Road
- * Chloride Field Test Result

Figure 2

Site & Sample Location Map
Southern Union Gas Services
MC-16" (RP-1511)
Lea County, NM

Basin Environmental Services

| Scale: 1" = 50' | Drawn By: JWL | Prepared By: BJA |
|---|---|---|
| October 8, 2012 | | |

**TABLE 1**

**CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL**

**SOUTHERN UNION GAS SERVICES**
**MC-16"**
**HISTORICAL RELEASE SITE**
**LEA COUNTY, NEW MEXICO**
**NMOCD REF# 1RP-1511**

| SAMPLE LOCATION | SAMPLE DEPTH (BGS) | SAMPLE DATE | SOIL STATUS | METHOD: EPA SW 846-8021B, 5030 | | | | | METHOD: 8015M | | | TOTAL TPH $C_6$-$C_{28}$ (mg/Kg) | SM 4500-Cl B |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | BENZENE (mg/Kg) | TOLUENE (mg/Kg) | ETHYL-BENZENE (mg/Kg) | TOTAL XYLENES (mg/Kg) | TOTAL BTEX (mg/Kg) | GRO $C_6$-$C_{12}$ (mg/Kg) | DRO $C_{12}$-$C_{28}$ (mg/Kg) | ORO $C_{28}$-$C_{35}$ (mg/Kg) | | CHLORIDE (mg/Kg) |
| P.R. @ 6' | 6' | 8/9/2007 | In-Situ | - | - | - | - | - | 547 | 2,580.0 | 354 | 3,481 | 585 |
| #1 @ Surface | Surface | 8/9/2007 | Excavated | - | - | - | - | - | 83.0 | 1510.0 | 264 | 1,857 | 744 |
| #1 @ 8" | 8" | 8/9/2007 | In-Situ | - | - | - | - | - | <10.6 | <10.6 | <10.6 | <10.6 | 585 |
| #1 @ 24" | 24" | 8/9/2007 | In-Situ | - | - | - | - | - | <10.8 | 13.3 | <10.8 | 13.3 | 170 |
| #2 @ Surface | Surface | 8/9/2007 | Excavated | - | - | - | - | - | 3,500 | 19,900 | 26,040 | 26,040 | 117 |
| #2 @ 6" | 6" | 8/9/2007 | In-Situ | - | - | - | - | - | <11.0 | 49.6 | 49.6 | 49.6 | 90.4 |
| | | | | | | | | | | | | | |
| TT-1 @5' | 5' | 10/3/2012 | In-Situ | - | - | - | - | - | - | - | - | - | 1.02 |
| TT-1 @ 6' | 6' | 10/3/2012 | In-Situ | <0.00107 | <0.00215 | <0.00107 | 0.00119 | 0.00119 | - | - | - | - | 3.41 |
| | | | | | | | | | | | | | |
| **NMOCD Standard** | | | | **10** | | | | **50** | | | | **5,000** | **1,000** |

- = Not analyzed.


Photograph of the advancement of Test Trench TT-1 at the MC-16” Historical Release Site.

Photograph of the advancement of Test Trench TT-1 at the MC-16” Historical Release Site.

# Analytical Report 287643

## for

## Southern Union Gas Services-Jal

**Project Manager: Tony Savoie**

**MC-16" Line**

**2007-029**

**17-AUG-07**

**12600 West I-20 East Odessa, Texas 79765**

**A Xenco Laboratories Company**

NELAC certification numbers:
Houston, TX E871002 - Miami, FL E86678 - Tampa, FL E86675

Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America

17-AUG-07

Project Manager: **Tony Savoie**
**Southern Union Gas Services-Jal**
610 Commerce
Jal, NM 88252

Reference: XENCO Report No: **287643**
**MC-16" Line**
Project Address: Site #1

**Tony Savoie**:

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 287643. 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. 287643 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**
Odessa Laboratory Director

# Certificate of Analysis Summary 287643

**Southern Union Gas Services-Jal, Jal, NM**

**Project Name: MC-16" Line**

**Project Id:** 2007-029
**Contact:** Tony Savoie
**Project Location:** Site #1

**Date Received in Lab:** Thu Aug-09-07 04:40 pm
**Report Date:** 17-AUG-07
**Project Manager:** Brent Barron, II

| *Analysis Requested* | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | ***Lab Id:*** | 287643-001 | | 287643-002 | | 287643-003 | | 287643-004 | | 287643-005 | | 287643-006 | |
| | ***Field Id:*** | P.R. @ 6' | | #1 @ Surface | | #1 @ 8" | | #1 @ 24" | | #2 @ Surface | | #2 @ 6" | |
| | ***Depth:*** | -6 ft | | -0 ft | | -8 In | | -24 In | | -0 ft | | -6 In | |
| | ***Matrix:*** | SOIL | | SOIL | | SOIL | | SOIL | | SOIL | | SOIL | |
| | ***Sampled:*** | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | |
| **Total Chloride by EPA 325.3** | ***Extracted:*** | | | | | | | | | | | | |
| | ***Analyzed:*** | Aug-16-07 10:00 | | Aug-16-07 10:00 | | Aug-16-07 10:00 | | Aug-16-07 10:00 | | Aug-16-07 10:00 | | Aug-16-07 10:00 | |
| | ***Units/RL:*** | mg/L | RL | mg/L | RL | mg/L | RL | mg/L | RL | mg/L | RL | mg/L | RL |
| Chloride | | 585 | 5.00 | 744 | 5.00 | 585 | 5.00 | 170 | 5.00 | 117 | 5.00 | 90.4 | 5.00 |



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Brent Barron
Odessa Laboratory Director

# Certificate of Analysis Summary 287643

**Southern Union Gas Services-Jal, Jal, NM**

**Project Name: MC-16" Line**

**Project Id:** 2007-029
**Contact:** Tony Savoie
**Project Location:** Site #1

**Date Received in Lab:** Thu Aug-09-07 04:40 pm
**Report Date:** 17-AUG-07
**Project Manager:** Brent Barron, II

| *Analysis Requested* | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | ***Lab Id:*** | 287643-001 | | 287643-002 | | 287643-003 | | 287643-004 | | 287643-005 | | 287643-006 | |
| | ***Field Id:*** | P.R. @ 6' | | #1 @ Surface | | #2 @ 8" | | #1 @ 24" | | #2 @ Surface | | #2 @ 6" | |
| | ***Depth:*** | 6 ft | | 0 ft | | 8 In | | 24 In | | 0 ft | | 6 In | |
| | ***Matrix:*** | SOIL | | SOIL | | SOIL | | SOIL | | SOIL | | SOIL | |
| | ***Sampled:*** | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | | Aug-09-07 11:00 | |
| **Percent Moisture** | ***Extracted:*** | | | | | | | | | | | | |
| | ***Analyzed:*** | Aug-14-07 17:55 | | Aug-14-07 16:00 | | Aug-14-07 14:05 | | Aug-14-07 12:10 | | Aug-14-07 10:15 | | Aug-14-07 08:20 | |
| | ***Units/RL:*** | % | RL | % | RL | % | RL | % | RL | % | RL | % | RL |
| Percent Moisture | | 13.5 | | 1.68 | | 6.63 | | 7.31 | | 4.36 | | 10.3 | |
| **TPH by SW8015 Mod** | ***Extracted:*** | Aug-15-07 16:12 | | Aug-15-07 16:12 | | Aug-15-07 16:12 | | Aug-15-07 16:12 | | Aug-15-07 16:12 | | Aug-15-07 16:12 | |
| | ***Analyzed:*** | Aug-16-07 11:41 | | Aug-16-07 12:10 | | Aug-16-07 12:38 | | Aug-16-07 13:07 | | Aug-16-07 13:33 | | Aug-16-07 14:03 | |
| | ***Units/RL:*** | mg/kg | RL | mg/kg | RL | mg/kg | RL | mg/kg | RL | mg/kg | RL | mg/kg | RL |
| C6-C12 Gasoline Range Hydrocarbons | | 547 | 113 | 83.0 | 10.1 | ND | 10.6 | ND | 10.8 | 3500 | 104 | ND | 11.0 |
| C12-C28 Diesel Range Hydrocarbons | | 2580 | 113 | 1510 | 10.1 | ND | 10.6 | 13.3 | 10.8 | 19900 | 104 | 49.6 | 11.0 |
| C28-C35 Oil Range Hydrocarbons | | 354 | 113 | 264 | 10.1 | ND | 10.6 | ND | 10.8 | 2640 | 104 | ND | 11.0 |
| Total TPH | | 3481 | | 1857 | | ND | | 13.3 | | 26040 | | 49.6 | |





Brent Barron
Odessa Laboratory Director

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.

# Form 2 - Surrogate Recoveries

## Project Name: MC-16" Line

**Work Order #:** 287643 **Project ID:** 2007-029

**Lab Batch #:** 702475 **Sample:** 287642-002 S / MS **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod<br>Analytes | SURROGATE RECOVERY STUDY<br>Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1-Chlorooctadecane | 40.9 | 50.0 | 82 | 70-135 | |
| 1-Chlorooctane | 41.2 | 50.0 | 82 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 287642-002 SD / MSD **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod<br>Analytes | SURROGATE RECOVERY STUDY<br>Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1-Chlorooctadecane | 40.1 | 50.0 | 80 | 70-135 | |
| 1-Chlorooctane | 41.1 | 50.0 | 82 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 287643-001 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod<br>Analytes | SURROGATE RECOVERY STUDY<br>Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1-Chlorooctadecane | 54.1 | 48.9 | 111 | 70-135 | |
| 1-Chlorooctane | 60.8 | 48.9 | 124 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 287643-002 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod<br>Analytes | SURROGATE RECOVERY STUDY<br>Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1-Chlorooctadecane | 8.01 | 49.8 | 16 | 70-135 | ** |
| 1-Chlorooctane | 4.09 | 49.8 | 8 | 70-135 | ** |

**Lab Batch #:** 702475 **Sample:** 287643-003 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod<br>Analytes | SURROGATE RECOVERY STUDY<br>Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1-Chlorooctadecane | 45.4 | 49.4 | 92 | 70-135 | |
| 1-Chlorooctane | 42.1 | 49.4 | 85 | 70-135 | |

** 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.

# Form 2 - Surrogate Recoveries

**Project Name: MC-16" Line**

**Work Order #:** 287643 **Project ID:** 2007-029

**Lab Batch #:** 702475 **Sample:** 287643-004 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod | SURROGATE RECOVERY STUDY | | | | |
|---|---|---|---|---|---|
| Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
| 1-Chlorooctadecane | 53.7 | 50.0 | 107 | 70-135 | |
| 1-Chlorooctane | 49.8 | 50.0 | 100 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 287643-005 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod | SURROGATE RECOVERY STUDY | | | | |
|---|---|---|---|---|---|
| Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
| 1-Chlorooctadecane | 111 | 49.8 | 223 | 70-135 | ** |
| 1-Chlorooctane | 36.6 | 49.8 | 73 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 287643-006 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg

| TPH by SW8015 Mod | SURROGATE RECOVERY STUDY | | | | |
|---|---|---|---|---|---|
| Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
| 1-Chlorooctadecane | 49.5 | 49.4 | 100 | 70-135 | |
| 1-Chlorooctane | 45.5 | 49.4 | 92 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 498274-1-BKS / BKS **Batch:** 1 **Matrix:** Solid

**Units:** mg/kg

| TPH by SW8015 Mod | SURROGATE RECOVERY STUDY | | | | |
|---|---|---|---|---|---|
| Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
| 1-Chlorooctadecane | 35.3 | 50.0 | 71 | 70-135 | |
| 1-Chlorooctane | 36.0 | 50.0 | 72 | 70-135 | |

**Lab Batch #:** 702475 **Sample:** 498274-1-BLK / BLK **Batch:** 1 **Matrix:** Solid

**Units:** mg/kg

| TPH by SW8015 Mod | SURROGATE RECOVERY STUDY | | | | |
|---|---|---|---|---|---|
| Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
| 1-Chlorooctadecane | 38.4 | 50.0 | 77 | 70-135 | |
| 1-Chlorooctane | 34.9 | 50.0 | 70 | 70-135 | |

** 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.

# Blank Spike Recovery

## Project Name: MC-16" Line

**Work Order #:** 287643 **Project ID:** 2007-029

**Lab Batch #:** 702475 **Sample:** 498274-1-BKS **Matrix:** Solid
**Date Analyzed:** 08/15/2007 **Date Prepared:** 08/15/2007 **Analyst:** SHE
**Reporting Units:** mg/kg **Batch #:** 1

| TPH by SW8015 Mod<br>Analytes | Blank Result [A] | Spike Added [B] | Blank Spike Result [C] | Blank Spike %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|---|
| | | BLANK /BLANK SPIKE RECOVERY STUDY | | | | |
| C6-C12 Gasoline Range Hydrocarbons | ND | 500 | 443 | 89 | 70-135 | |
| C12-C28 Diesel Range Hydrocarbons | ND | 500 | 442 | 88 | 70-135 | |

**Lab Batch #:** 702430 **Sample:** 702430 BKS **Matrix:** Water
**Date Analyzed:** 08/16/2007 **Date Prepared:** 08/16/2007 **Analyst:** IRO
**Reporting Units:** mg/L **Batch #:** 1

| Total Chloride by EPA 325.3<br>Analytes | Blank Result [A] | Spike Added [B] | Blank Spike Result [C] | Blank Spike %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|---|
| | | BLANK /BLANK SPIKE RECOVERY STUDY | | | | |
| Chloride | 14.9 | 100 | 93.6 | 79 | 80-120 | |

Blank Spike Recovery [D] = 100*[C]/[B]
All results are based on MDL and validated for QC purposes.

# Form 3 - M / MSD Recoveries

**Project Name: MC-16" Line**

**Work Order # :** 287643 **Project ID:** 2007-029

**Lab Batch ID:** 702475 **QC- Sample ID:** 287642-002 S **Batch #:** 1 **Matrix:** Soil

**Date Analyzed:** 08/16/2007 **Date Prepared:** 08/15/2007 **Analyst:** SHE

**Reporting Units:** mg/kg

| TPH by SW8015 Mod<br>Analytes | MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parent Sample Result [A] | Spike Added [B] | Spiked Sample Result [C] | Spiked Sample %R [D] | Spike Added [E] | Duplicate Spiked Sample Result [F] | Spiked Dup. %R [G] | RPD % | Control Limits %R | Control Limits %RPD | Flag |
| C6-C12 Gasoline Range Hydrocarbons | 26.8 | 573 | 507 | 84 | 573 | 517 | 86 | 2 | 70-135 | 35 | |
| C12-C28 Diesel Range Hydrocarbons | 302 | 573 | 477 | 31 | 573 | 430 | 22 | 34 | 70-135 | 35 | X |

**Lab Batch ID:** 702430 **QC- Sample ID:** 287642-002 M S **Batch #:** 1 **Matrix:** Soil

**Date Analyzed:** 08/16/2007 **Date Prepared:** 08/16/2007 **Analyst:** IRO

**Reporting Units:** mg/L

| Total Chloride by EPA 325.3<br>Analytes | MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parent Sample Result [A] | Spike Added [B] | Spiked Sample Result [C] | Spiked Sample %R [D] | Spike Added [E] | Duplicate Spiked Sample Result [F] | Spiked Dup. %R [G] | RPD % | Control Limits %R | Control Limits %RPD | Flag |
| Chloride | 308 | 200 | 542 | 117 | 200 | 510 | 101 | 15 | 80-120 | 20 | |

Matrix Spike Percent Recovery [D] = 100*(C-A)/B
Relative Percent Difference RPD = 200*(D-G)/(D+G)

Matrix Spike Duplicate Percent Recovery [G] = 100*(F-A)/E

ND = Not Detected, J = Present Below Reporting Limit, B = Present in Blank, NR = Not Requested, I = Interference, NA = Not ApplicableN = See Narrative, EQL = Estimated Quantitation Limit

# Environmental Lab of Texas

A Xenco Laboratories Company

**CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST**

12600 West I-20 East
Odessa, Texas 79765

Phone: 432-563-1800
Fax: 432-563-1713

Project Manager: TONY SAVOIE
Company Name: SMGS
Company Address: 610 COMMERCE PO BOX 1226
City/State/Zip: JAL, NM 88252
Telephone No: 505-395-2116 Fax No:
Sampler Signature: [signature] e-mail:

Project Name: MC-16" LINE
Project #: 2007-029
Project Loc: SITE #1
PO #:
Report Format: ☑ Standard ☐ TRRP ☐ NPDES

(lab use only)
ORDER #: 287643

| LAB # (lab use only) | FIELD CODE | Beginning Depth | Ending Depth | Date Sampled | Time Sampled | Field Filtered | Total # of Containers | Preservation & # of Containers: Ice | HNO3 | HCl | H2SO4 | NaOH | Na2S2O3 | None | Other (Specify) | Matrix: GW=Drinking Water SL=Sludge | GW=Groundwater SO=Soil/Solid | NP=Non-Potable Specify Other | Analyze For: TPH: 418.1 / 8015M | TPH: TX 1005 TX 1005 | Cations (Ca, Mg, Na, K) | Anions (Cl, SO4, Alkalinity) | SAR / ESP / CEC | Metals As Ag Ba Cd Cr Pb Hg Se | Volatiles | Semivolatiles | BTEX 8021B/5030 or BTEX 8260 | RCI | N.O.R.M | RUSH TAT (Pre-Schedule) 24, 48, 72 hrs | Standard TAT |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | P.R.O.C. | | 6" | 8-9-07 | 11:00 | | 1 | ✓ | | | | | | | | | S | | ✓ | | ✓ | | | | | | | | | ✓ |
| | #16 SURFACE | | 0 | " | " | | 1 | ✓ | | | | | | | | | S | | ✓ | | ✓ | | | | | | | | | ✓ |
| | #16 8" | | 8" | " | " | | 1 | ✓ | | | | | | | | | S | | ✓ | | ✓ | | | | | | | | | ✓ |
| | #16 24" | | 24" | " | " | | 1 | ✓ | | | | | | | | | S | | ✓ | | ✓ | | | | | | | | | ✓ |
| | #20 SURFACE | | 0 | " | " | | 1 | ✓ | | | | | | | | | S | | ✓ | | ✓ | | | | | | | | | ✓ |
| | #20 6" | | 6" | " | " | | 1 | ✓ | | | | | | | | | S | | ✓ | | ✓ | | | | | | | | | ✓ |

Special Instructions:

| Relinquished by | Date | Time | Received by | Date | Time |
|---|---|---|---|---|---|
| [signature] | 8-9-07 | 16 40 | | | |
| Relinquished by: | Date | Time | Received by | Date | Time |
| Relinquished by: | Date | Time | Received by FLOT: Cindrea Jam | 8.9.07 | 16 40 |

Laboratory Comments:

| | | |
|---|---|---|
| Sample Containers Intact? | Y | N |
| VOCs Free of Headspace? | Y | N |
| Labels on container(s)? | Y | N |
| Custody seals on container(s)? | Y | N |
| Custody seals on cooler(s)? | Y | N |
| Sample Hand Delivered | Y | N |

by Sampler/Client Rep. ? by Courier? UPS DHL FedEx Lone Star

4 oz glass

Temperature Upon Receipt: .5 °C

# Environmental Lab of Texas

Variance/ Corrective Action Report- Sample Log-In

Client: S.U.G.S. - Jal

Date/ Time: 8.9.07 16:40

Lab ID #: 287643

Initials: AL

**Sample Receipt Checklist**

| | | | | Client Initials |
|---|---|---|---|---|
| #1 Temperature of container/ cooler? | Yes | No | .5 °C | |
| #2 Shipping container in good condition? | Yes | No | | |
| #3 Custody Seals intact on shipping container/ cooler? | Yes | No | Not Present | |
| #4 Custody Seals intact on sample bottles/ container? | Yes | No | Not Present | |
| #5 Chain of Custody present? | Yes | No | | |
| #6 Sample instructions complete of Chain of Custody? | Yes | No | | |
| #7 Chain of Custody signed when relinquished/ received? | Yes | No | | |
| #8 Chain of Custody agrees with sample label(s)? | Yes | No | ID written on Cont / Lid | |
| #9 Container label(s) legible and intact? | Yes | No | Not Applicable | |
| #10 Sample matrix/ properties agree with Chain of Custody? | Yes | No | | |
| #11 Containers supplied by ELOT? | Yes | No | | |
| #12 Samples in proper container/ bottle? | Yes | No | See Below | |
| #13 Samples properly preserved? | Yes | No | See Below | |
| #14 Sample bottles intact? | Yes | No | | |
| #15 Preservations documented on Chain of Custody? | Yes | No | | |
| #16 Containers documented on Chain of Custody? | Yes | No | | |
| #17 Sufficient sample amount for indicated test(s)? | Yes | No | See Below | |
| #18 All samples received within sufficient hold time? | Yes | No | See Below | |
| #19 Subcontract of sample(s)? | Yes | No | Not Applicable | |
| #20 VOC samples have zero headspace? | Yes | No | Not Applicable | |

**Variance Documentation**

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

Regarding: _____

Corrective Action Taken: _____

Check all that Apply:

- ☐ See attached e-mail/ fax
- ☐ Client understands and would like to proceed with analysis
- ☐ Cooling process had begun shortly after sampling event

# Analytical Report 450296

## for

## Southern Union Gas Services- Monahans

**Project Manager: Rose Slade**

**MC-16 (RP-1511)**

**SUG Historical Releases**

**11-OCT-12**

Collected By: Client

**12600 West I-20 East Odessa, Texas 79765**

Xenco-Houston (EPA Lab code: TX00122):
Texas (T104704215-10-6-TX), Arizona (AZ0765), 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), DoD (L11-54)

Xenco-Atlanta (EPA Lab Code: GA00046):
Florida (E87429), North Carolina (483), South Carolina (98015), Kentucky (85), DoD ( L10-135)
Louisiana (04176), USDA (P330-07-00105)

Xenco-Tampa Mobile (EPA Lab code: FL01212): Florida (E84900)
Xenco-Lakeland: Florida (E84098)
Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-TX)
Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295-TX)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757)
Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)
Xenco Tucson (EPA Lab code:AZ000989): Arizona (AZ0758)

11-OCT-12

Project Manager: **Rose Slade**
**Southern Union Gas Services- Monahans**
801 South Loop 464
Monahans, TX 79756

Reference: XENCO Report No: **450296**
**MC-16 (RP-1511)**
Project Address: Lea County, New Mexico

**Rose Slade**:

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 450296. 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. The uncertainty of measurement associated with the results of analysis reported is available upon request. 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. 450296 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,

**Nicholas Straccione**
Project Manager

# Sample Cross Reference 450296

## Southern Union Gas Services- Monahans, Monahans, TX

MC-16 (RP-1511)

| Sample Id | Matrix | Date Collected | Sample Depth | Lab Sample Id |
|---|---|---|---|---|
| TT-1 @ 5' | S | 10-03-12 12:30 | | 450296-001 |
| TT-1 @ 6' | S | 10-03-12 12:40 | | 450296-002 |

# CASE NARRATIVE

***Client Name: Southern Union Gas Services- Monahans***
***Project Name: MC-16 (RP-1511)***

| | | | |
|---|---|---|---|
| *Project ID:* | *SUG Historical Releases* | *Report Date:* | *11-OCT-12* |
| *Work Order Number:* | *450296* | *Date Received:* | *10/05/2012* |

***Sample receipt non conformances and comments:***

***Sample receipt non conformances and comments per sample:***

*None*

***Analytical non conformances and comments:***
*Batch: LBA-898546 BTEX by EPA 8021B*
*SW8021BM*

*Batch 898546, Benzene, Ethylbenzene, Toluene, m,p-Xylenes , o-Xylene RPD was outside laboratory control limits.*
*Samples affected are: 450296-002*

# Certificate of Analysis Summary 450296

## Southern Union Gas Services- Monahans, Monahans, TX

## Project Name: MC-16 (RP-1511)

**Project Id:** SUG Historical Releases
**Contact:** Rose Slade
**Project Location:** Lea County, New Mexico

**Date Received in Lab:** Fri Oct-05-12 11:30 am
**Report Date:** 11-OCT-12
**Project Manager:** Nicholas Straccione

| *Analysis Requested* | | | | | | | |
|---|---|---|---|---|---|---|---|
| | ***Lab Id:*** | 450296-001 | | 450296-002 | | | |
| | ***Field Id:*** | TT-1 @ 5' | | TT-1 @ 6' | | | |
| | ***Depth:*** | | | | | | |
| | ***Matrix:*** | SOIL | | SOIL | | | |
| | ***Sampled:*** | Oct-03-12 12:30 | | Oct-03-12 12:40 | | | |
| **BTEX by EPA 8021B** | ***Extracted:*** | | | Oct-10-12 08:05 | | | |
| | ***Analyzed:*** | | | Oct-10-12 13:58 | | | |
| | ***Units/RL:*** | | | mg/kg | RL | | |
| Benzene | | | | ND | 0.00107 | | |
| Toluene | | | | ND | 0.00215 | | |
| Ethylbenzene | | | | ND | 0.00107 | | |
| m,p-Xylenes | | | | ND | 0.00215 | | |
| o-Xylene | | | | 0.00119 | 0.00107 | | |
| Total Xylenes | | | | 0.00119 | 0.00107 | | |
| Total BTEX | | | | 0.00119 | 0.00107 | | |
| **Inorganic Anions by EPA 300/300.1 SUB: E871002** | ***Extracted:*** | Oct-08-12 19:13 | | Oct-08-12 19:29 | | | |
| | ***Analyzed:*** | Oct-08-12 19:13 | | Oct-08-12 19:29 | | | |
| | ***Units/RL:*** | mg/kg | RL | mg/kg | RL | | |
| Chloride | | 1.02 | 0.979 | 3.41 | 1.01 | | |
| **Percent Moisture** | ***Extracted:*** | | | | | | |
| | ***Analyzed:*** | Oct-09-12 12:54 | | Oct-09-12 12:54 | | | |
| | ***Units/RL:*** | % | RL | % | RL | | |
| Percent Moisture | | 5.79 | 1.00 | 6.98 | 1.00 | | |





Nicholas Straccione
Project Manager

# 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 affect the recovery of the spike concentration. This condition could also affect 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 quantiation limit and above the detection limit.

**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.

* Surrogate recovered outside laboratory control limit.

**BRL** Below Reporting Limit.

**RL** Reporting Limit

**MDL** Method Detection Limit **SDL** Sample Detection Limit **LOD** Limit of Detection

**PQL** Practical Quantitation Limit **MQL** Method Quantitation Limit **LOQ** Limit of Quantitation

**DL** Method Detection Limit

**NC** Non-Calculable

+ NELAC certification not offered for this compound.

***** (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation


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|---|---|---|
| 4143 Greenbriar Dr, Stafford, TX 77477 | (281) 240-4200 | (281) 240-4280 |
| 9701 Harry Hines Blvd , Dallas, TX 75220 | (214) 902 0300 | (214) 351-9139 |
| 5332 Blackberry Drive, San Antonio TX 78238 | (210) 509-3334 | (210) 509-3335 |
| 2505 North Falkenburg Rd, Tampa, FL 33619 | (813) 620-2000 | (813) 620-2033 |
| 12600 West I-20 East, Odessa, TX 79765 | (432) 563-1800 | (432) 563-1713 |
| 6017 Financial Drive, Norcross, GA 30071 | (770) 449-8800 | (770) 449-5477 |
| 3725 E. Atlanta Ave, Phoenix, AZ 85040 | (602) 437-0330 | |

# Form 2 - Surrogate Recoveries

**Project Name:** MC-16 (RP-1511)

**Work Orders :** 450296,

**Project ID:** SUG Historical Releases

**Lab Batch #:** 898546 **Sample:** 450296-002 / SMP **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg **Date Analyzed:** 10/10/12 13:58

**SURROGATE RECOVERY STUDY**

| BTEX by EPA 8021B<br>Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1,4-Difluorobenzene | 0.0243 | 0.0300 | 81 | 80-120 | |
| 4-Bromofluorobenzene | 0.0239 | 0.0300 | 80 | 80-120 | |

**Lab Batch #:** 898546 **Sample:** 628423-1-BLK / BLK **Batch:** 1 **Matrix:** Solid

**Units:** mg/kg **Date Analyzed:** 10/10/12 09:31

**SURROGATE RECOVERY STUDY**

| BTEX by EPA 8021B<br>Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1,4-Difluorobenzene | 0.0296 | 0.0300 | 99 | 80-120 | |
| 4-Bromofluorobenzene | 0.0268 | 0.0300 | 89 | 80-120 | |

**Lab Batch #:** 898546 **Sample:** 628423-1-BKS / BKS **Batch:** 1 **Matrix:** Solid

**Units:** mg/kg **Date Analyzed:** 10/10/12 09:00

**SURROGATE RECOVERY STUDY**

| BTEX by EPA 8021B<br>Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1,4-Difluorobenzene | 0.0335 | 0.0300 | 112 | 80-120 | |
| 4-Bromofluorobenzene | 0.0343 | 0.0300 | 114 | 80-120 | |

**Lab Batch #:** 898546 **Sample:** 628423-1-BSD / BSD **Batch:** 1 **Matrix:** Solid

**Units:** mg/kg **Date Analyzed:** 10/10/12 09:15

**SURROGATE RECOVERY STUDY**

| BTEX by EPA 8021B<br>Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1,4-Difluorobenzene | 0.0297 | 0.0300 | 99 | 80-120 | |
| 4-Bromofluorobenzene | 0.0281 | 0.0300 | 94 | 80-120 | |

**Lab Batch #:** 898546 **Sample:** 450296-002 S / MS **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg **Date Analyzed:** 10/10/12 15:08

**SURROGATE RECOVERY STUDY**

| BTEX by EPA 8021B<br>Analytes | Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1,4-Difluorobenzene | 0.0319 | 0.0300 | 106 | 80-120 | |
| 4-Bromofluorobenzene | 0.0302 | 0.0300 | 101 | 80-120 | |

* 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.

# Form 2 - Surrogate Recoveries

**Project Name:** MC-16 (RP-1511)

**Work Orders :** 450296,

**Project ID:** SUG Historical Releases

**Lab Batch #:** 898546 **Sample:** 450296-002 SD / MSD **Batch:** 1 **Matrix:** Soil

**Units:** mg/kg **Date Analyzed:** 10/10/12 15:23

| BTEX by EPA 8021B<br>Analytes | SURROGATE RECOVERY STUDY<br>Amount Found [A] | True Amount [B] | Recovery %R [D] | Control Limits %R | Flags |
|---|---|---|---|---|---|
| 1,4-Difluorobenzene | 0.0321 | 0.0300 | 107 | 80-120 | |
| 4-Bromofluorobenzene | 0.0340 | 0.0300 | 113 | 80-120 | |

* 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.

# BS / BSD Recoveries

## Project Name: MC-16 (RP-1511)

**Work Order #:** 450296 **Project ID:** SUG Historical Releases

**Analyst:** KEB **Date Prepared:** 10/10/2012 **Date Analyzed:** 10/10/2012

**Lab Batch ID:** 898546 **Sample:** 628423-1-BKS **Batch #:** 1 **Matrix:** Solid

**Units:** mg/kg

**BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY**

| BTEX by EPA 8021B<br>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 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | <0.000998 | 0.0998 | 0.0987 | 99 | 0.100 | 0.0875 | 88 | 12 | 70-130 | 35 | |
| Toluene | <0.00200 | 0.0998 | 0.100 | 100 | 0.100 | 0.0862 | 86 | 15 | 70-130 | 35 | |
| Ethylbenzene | <0.000998 | 0.0998 | 0.0973 | 97 | 0.100 | 0.0859 | 86 | 12 | 71-129 | 35 | |
| m,p-Xylenes | <0.00200 | 0.200 | 0.210 | 105 | 0.201 | 0.182 | 91 | 14 | 70-135 | 35 | |
| o-Xylene | <0.000998 | 0.0998 | 0.103 | 103 | 0.100 | 0.0885 | 89 | 15 | 71-133 | 35 | |

**Analyst:** TTE **Date Prepared:** 10/08/2012 **Date Analyzed:** 10/08/2012

**Lab Batch ID:** 898337 **Sample:** 628330-1-BKS **Batch #:** 1 **Matrix:** Solid

**Units:** mg/kg

**BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY**

| Inorganic Anions by EPA 300/300.1<br>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 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | <0.996 | 99.6 | 94.5 | 95 | 102 | 98.4 | 96 | 4 | 80-120 | 20 | |

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

# Form 3 - MS Recoveries

## Project Name: MC-16 (RP-1511)

**Work Order #:** 450296
**Lab Batch #:** 898337
**Project ID:** SUG Historical Releases
**Date Analyzed:** 10/08/2012
**Date Prepared:** 10/08/2012
**Analyst:** TTE
**QC- Sample ID:** 450295-001 S
**Batch #:** 1
**Matrix:** Soil
**Reporting Units:** mg/kg

**MATRIX / MATRIX SPIKE RECOVERY STUDY**

| Inorganic Anions by EPA 300<br>Analytes | Parent Sample Result [A] | Spike Added [B] | Spiked Sample Result [C] | %R [D] | Control Limits %R | Flag |
|---|---|---|---|---|---|---|
| Chloride | <1.00 | 100 | 96.5 | 97 | 80-120 | |

**Lab Batch #:** 898337
**Date Analyzed:** 10/08/2012
**Date Prepared:** 10/08/2012
**Analyst:** TTE
**QC- Sample ID:** 450296-002 S
**Batch #:** 1
**Matrix:** Soil
**Reporting Units:** mg/kg

**MATRIX / MATRIX SPIKE RECOVERY STUDY**

| Inorganic Anions by EPA 300<br>Analytes | Parent Sample Result [A] | Spike Added [B] | Spiked Sample Result [C] | %R [D] | Control Limits %R | Flag |
|---|---|---|---|---|---|---|
| Chloride | 3.41 | 101 | 103 | 99 | 80-120 | |

Matrix Spike Percent Recovery [D] = 100*(C-A)/B
Relative Percent Difference [E] = 200*(C-A)/(C+B)
All Results are based on MDL and Validated for QC Purposes

BRL - Below Reporting Limit

# Form 3 - MS / MSD Recoveries

## Project Name: MC-16 (RP-1511)

**Work Order # :** 450296 **Project ID:** SUG Historical Releases

**Lab Batch ID:** 898546 **QC- Sample ID:** 450296-002 S **Batch #:** 1 **Matrix:** Soil

**Date Analyzed:** 10/10/2012 **Date Prepared:** 10/10/2012 **Analyst:** KEB

**Reporting Units:** mg/kg

| BTEX by EPA 8021B<br>Analytes | MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parent Sample Result [A] | Spike Added [B] | Spiked Sample Result [C] | Spiked Sample %R [D] | Spike Added [E] | Duplicate Spiked Sample Result [F] | Spiked Dup. %R [G] | RPD % | Control Limits %R | Control Limits %RPD | Flag |
| Benzene | <0.00108 | 0.108 | 0.0912 | 84 | 0.107 | 0.111 | 104 | 20 | 70-130 | 35 | |
| Toluene | <0.00216 | 0.108 | 0.0917 | 85 | 0.107 | 0.113 | 106 | 21 | 70-130 | 35 | |
| Ethylbenzene | <0.00108 | 0.108 | 0.0885 | 82 | 0.107 | 0.110 | 103 | 22 | 71-129 | 35 | |
| m,p-Xylenes | <0.00216 | 0.216 | 0.185 | 86 | 0.215 | 0.235 | 109 | 24 | 70-135 | 35 | |
| o-Xylene | 0.00119 | 0.108 | 0.0914 | 84 | 0.107 | 0.114 | 105 | 22 | 71-133 | 35 | |

Matrix Spike Percent Recovery [D] = 100*(C-A)/B
Relative Percent Difference RPD = 200*|(C-F)/(C+F)|

Matrix Spike Duplicate Percent Recovery [G] = 100*(F-A)/E

ND = Not Detected, J = Present Below Reporting Limit, B = Present in Blank, NR = Not Requested, I = Interference, NA = Not ApplicableN = See Narrative, EQL = Estimated Quantitation Limit

# Sample Duplicate Recovery

## Project Name: MC-16 (RP-1511)

**Work Order #:** 450296

**Lab Batch #:** 898410 **Project ID:** SUG Historical Releases

**Date Analyzed:** 10/09/2012 12:30 **Date Prepared:** 10/09/2012 **Analyst:** WRU

**QC- Sample ID:** 450282-010 D **Batch #:** 1 **Matrix:** Soil

**Reporting Units:** %

| Percent Moisture<br>Analyte | SAMPLE / SAMPLE DUPLICATE RECOVERY<br>Parent Sample Result [A] | Sample Duplicate Result [B] | RPD | Control Limits %RPD | Flag |
|---|---|---|---|---|---|
| Percent Moisture | 5.52 | 5.05 | 9 | 15 | |

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

BRL - Below Reporting Limit

LAB Order ID # 450296



Xenco

| | |
|---|---|
| Company Name: Basin Environmental Service Technologies | Phone #: 575-396-2378 |
| Address: P.O. 301 Lovington, NM, 88260 | Fax #: 575-396-1429 |
| Contact Person: Rose Slade (SUG) Joel Lowry (Basin) | E-mail: pm@basinenv.com rose.slade@sug.com |
| Invoice to: Southern Union Gas Services | |
| Project #: SUG Historical Releases | Project Name: MC-16 (RP-1511) |
| Project Location: (include state) Lea County, New Mexico | Sampler Signature: Bobby K Blackwood Jr. |

**ANALYSIS REQUEST (Circle or Specify Method No.)**

| LAB # (LAB USE ONLY) | FIELD CODE | # CONTAINERS | Volume/Amount | MATRIX: WATER | SOIL | AIR | SLUDGE | PRESERVATIVE METHOD: HCL | $HNO_3$ | $H_2SO_4$ | NaOH | ICE | NONE | SAMPLING: DATE | TIME | MTBE 8021B / 602 / 8260B / 624 | BTEX 8021B / 602 / 8260B / 624 | TPH 418.1 / TX1005 / DRO / TVHC | PAH 8270C / 625 | Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B / 200.7 | TCLP Metals Ag As Ba Cd Cr Pb Se Hg | TCLP Volatiles | TCLP Semi Volatiles | TCLP Pesticides | RCI | GC/MS Vol. 8260B / 624 | GC/MS Semi. Vol. 8270C/625 | PCB's 8082 / 608 | Pesticides 8081A / 608 | BOD, TSS, pH | Moisture Content | Cl, F, $SO_4$, $NO_3$-N, $NO_2$-N, $PO_4$-P, Alkalinity Cl | Na, Ca, Mg, K, TDS, EC | | | Turn Around Time if different from standard | Hold |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | TT-1 @ 5' | 1 | | | X | | | | | | | X | | 10/3 | 1230 | | | | | | | | | | | | | | | X | | | | | |
| | TT-1 @ 6' | 1 | | | X | | | | | | | X | | 10/3 | 1240 | | | | | | | | | | | | | | | X | | | | | |
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| Relinquished by: | Company: | Date: | Time: | Received by: | Company: | Date: | Time: | |
|---|---|---|---|---|---|---|---|---|
| Bobby K Blackwood Jr. | | 10/5 | 7:15 | Troy Nahr | | 10/5 | 0715 | INST ____ OBS ____ °C COR ____ °C |
| Troy Nahr | | 10/5/12 | 1130 | | | | | INST ____ OBS ____ °C COR ____ °C |
| | | | | Shawne Smith | | 10/5/12 | 1130 | INST ____ OBS ____ °C COR ____ °C |

**LAB USE ONLY**

Intact Y / N

Headspace Y / N /NA

Log-in Review

**REMARKS:**

1.5

☐ Dry Weight Basis Required

☐ TRRP Report Required

☐ Check If Special Reporting Limits Are Needed

Carrier #

Submittal of samples constitutes agreement to Terms and Conditions

ORIGINAL COPY

# XENCO Laboratories

## Prelogin/Nonconformance Report- Sample Log-In

**Client:** Southern Union Gas Services- Monahan

**Date/ Time Received:** 10/05/2012 11:30:00 AM

**Work Order #:** 450296

**Acceptable Temperature Range: 0 - 6 degC**
**Air and Metal samples Acceptable Range: Ambient**

**Temperature Measuring device used :**

| Sample Receipt Checklist | Comments |
|---|---|
| #1 *Temperature of cooler(s)? | 7.5 |
| #2 *Shipping container in good condition? | **Yes** |
| #3 *Samples received on ice? | **Yes** |
| #4 *Custody Seals intact on shipping container/ cooler? | **Yes** |
| #5 Custody Seals intact on sample bottles? | **Yes** |
| #6 *Custody Seals Signed and dated? | **Yes** |
| #7 *Chain of Custody present? | **Yes** |
| #8 Sample instructions complete on Chain of Custody? | **Yes** |
| #9 Any missing/extra samples? | **No** |
| #10 Chain of Custody signed when relinquished/ received? | **Yes** |
| #11 Chain of Custody agrees with sample label(s)? | **Yes** |
| #12 Container label(s) legible and intact? | **Yes** |
| #13 Sample matrix/ properties agree with Chain of Custody? | **Yes** |
| #14 Samples in proper container/ bottle? | **Yes** |
| #15 Samples properly preserved? | **Yes** |
| #16 Sample container(s) intact? | **Yes** |
| #17 Sufficient sample amount for indicated test(s)? | **Yes** |
| #18 All samples received within hold time? | **Yes** |
| #19 Subcontract of sample(s)? | **Yes** |
| #20 VOC samples have zero headspace (less than 1/4 inch bubble)? | **Yes** |
| #21 <2 for all samples preserved with HNO3,HCL, H2SO4? | **Yes** |
| #22 >10 for all samples preserved with NaAsO2+NaOH, ZnAc+NaOH? | **Yes** |

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

| Analyst: | PH Device/Lot#: |
|---|---|

**Checklist completed by:** _____ Date: _____

**Checklist reviewed by:** _____ Date: _____

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

AUG 2007
Received

Form C-141
Revised October 10, 2003

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

mc-16"

# Release Notification and Corrective Action

## OPERATOR

☒ Initial Report ☐ Final Report

| | | | |
|---|---|---|---|
| Name of Company | Southern Union Gas Services, Ltd. | Contact | Tony Savoie |
| Address | P.O. Box 1226 Jal, N.M. 88252 | Telephone No. | 505-395-2116 |
| Facility Name | Lea County Field Dept. | Facility Type | Natural Gas Gathering |

| | | |
|---|---|---|
| Surface Owner: Wanda Jones | Mineral Owner: Fee | Lease No. |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| C | 34 | 22S | 36E | | | | | Lea |

**Latitude N32 21.135 Longitude W103 15.345**

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release : Crude Oil, Produced water, and Natural Gas | Volume of Release: 60 Bbls Fluid and 80 MCF Nat. Gas | Volume Recovered 40 Bbls crude Oil and produced water |
| Source of Release : 16" Natural Gas Pipeline | Date and Hour of Occurrence not known | Date and Hour of Discovery 7/21/07 Time: 7:00 p.m. |
| Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required | If YES, To Whom? NMOCD on call representative | |
| By Whom? Tony Savoie | Date and Hour: 7/21/07 7:15 p.m. | |
| Was a Watercourse Reached? ☐ Yes ☒ No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
A 16" Natural Gas gathering line developed a leak due to excess fluid delivered by a producer caused the line to pressure up and leak fluid and natural gas. Crews began shutting the line in at 7:45 pm. Approximately 40 bbls of fluid was recovered before the line was shut in and allowed to blow down. A 200 ft. section of the 16" line was replaced on 7/23/07.

Describe Area Affected and Cleanup Action Taken. All of the affected area was contained to the lease road measuring approximately 1600 square feet. The final remediation will follow the NMOCD guidelines for the remediation of leaks and spills.

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: Tony Savoie | OIL CONSERVATION DIVISION |
| Printed Name: Tony Savoie John A. Savoie | Approved by District Supervisor: ENVIRONMENTAL ENGINEER |
| Title: Remediation Supervisor | Approval Date: 8-2-07 Expiration Date: 10-2-07 |
| E-mail Address: tony.savoie@sug.com | Conditions of Approval: SUBMIT FINAL C-141 & SUPPORTING DOCUMENTATION BY ✓ Attached ☐ |
| Date: 7/31/07 Phone: 505-395-2116 | |

* Attach Additional Sheets If Necessary

RP#1511

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

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1220 South St. Francis Dr.
Santa Fe, NM 87505

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 | Southern Union Gas Services, Ltd. | Contact | Crystal Callaway |
| Address | 801 S. Loop 464, Monahans, TX, 79756 | Telephone No. | 817-302-9407 |
| Facility Name: MC-16" (RP-1511) Lea County Field Dept. | | Facility Type | Natural Gas Gathering |

| | | |
|---|---|---|
| Surface Owner Wanda Jones | Mineral Owner: Fee | Lease No. |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| C | 34 | 22S | 36E | | | | | Lea |

**Latitude N32 21.135 Longitude W103 15.345**

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release Crude Oil, Produced water and Natural Gas | Volume of Release 60 Bbls Fluid and 80 MCF Nat. Gas | Volume Recovered 40 bbls crude oil and produced water |
| Source of Release 16" Natural Gas Pipeline | Date and Hour of Occurrence Not known | Date and Hour of Discovery 7/21/07 Time: 7:00 p.m. |
| Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required | If YES, To Whom? NMOCD on call representative | |
| By Whom? Tony Savoie | Date and Hour: 7/21/07 | |
| Was a Watercourse Reached? ☐ Yes ☒ No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken:
A 16" Natural Gas gathering line developed a leak due to excess fluid delivered by a producer caused the line to pressure up and leak fluid and natural gas. Crews began shutting the line in at 7:45 pm. Approximately 40 bbls of fluid was recovered before the line was shut in and allowed to blow down. A 200 ft. section of the 16" line was replaced on 7/23/07.

Describe Area Affected and Cleanup Action Taken. All of the affected area was contained to the lease road measuring approximately 1600 square feet. The final remediation will follow the NMOCD Guidelines for the remediation of leaks and spills.

**On or around August 9, 2007 remediation activities were conducted at the MC-16" Release Site by an environmental contractor that is no longer affiliated with the site. On October 3, 2012, the site was revisited in an effort to determine if soil exhibiting benzene, BTEX, TPH and chloride concentrations above NMOCD regulatory standards remained in-situ and collect confirmation soil samples. Laboratory analytical reports from the confirmation soil samples suggested previous remediation activities met the requirements of the NMOCD.**

**Please see the attached Basin Environmental Services Technologies *Remediation Summary and Site Closure Request* for details of remedial activities and the site investigation.**

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: Crystal Callaway | OIL CONSERVATION DIVISION |
| Printed Name: Crystal Callaway | Approved by District Supervisor: |
| Title: Senior Environmental Remediation Specialist | Approval Date: / Expiration Date: |
| E-mail Address: Crystal.Callaway@Regencygas.com | Conditions of Approval: |
| Date: 11/14/2014 Phone: 817-302-9407 | |