Administrative/Environmental Order



AE Order Number Banner

Report Description

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App Number: pJXK1603348630

1RP - 2752

SOUTHERN UNION GAS SERVICES LTD

3/8/2016

рJXK160334863D 2752

Basin Environmental Service Technologies, LLC

3100 Plains Highway		HOBBS OCD	-
P. O. Box 301 Lovington, New Mexico 882	60	AUG 0 6 2013	Effective Solutions
Office: (575) 396-2378	Fax: (575) 396-1429	RECEIVED	$\overline{}$
GeoffLeking		and are proper mw-	-1 ben PIA
New Mexico Energy, Minerals New Mexico Oil Conservation	and Natural Resources Depa Division (District 1)	artment apple to variate	Contra
1625 French Drive Hobbs, New Mexico 88240		Environmental Spacia	list

NMOCD-DIST 1

Re: Permission to P&A Dry Monitor Well 8/6/13 Line 290 (East of Jal South) (NMOCD Reference # 1RP-11-11-2752) Unit Letter D, Section 34, Township 25 South, Range 37 East Lea County, New Mexico

Mr. Leking,

This email has been prepared in regard to Regency Field Services, LLC, formerly Southern Union Gas Services' Line 290 (East of Jal South) (1RP-11-11-2752) Historical Remediation Site. The legal description of the release site is Unit Letter "D", Section 34, Township 25 South, Range 37 East, in Lea County, New Mexico. The property affected by the release is owned by George Willis. The release site GPS coordinates are 32°05.467' North and 103°09.406' West. The inferred depth to groundwater was 80-85' bgs prior to the installation of the monitor well. Please reference the attached Site Location Map.

On October 26, 2011, Southern Union discovered a release had occurred on the Line #290 pipeline. Failure of a section of the twelve inch (12") steel, high-pressure natural gas pipeline resulted in the release of approximately twenty barrels (20 bbls) of a mixture of natural gas, crude oil, and produced water. During initial response activities, the pipeline was fitted with a temporary clamp to mitigate the release. Following initial response activities, the affected pipeline segment was replaced with twelve inch (12") steel pipe. The release was reported to the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office on November 3, 2011. The "Release Notification and Corrective Action" (Form C-141) indicated the release affected an area measuring approximately 350' in length and approximately 5' to 10' in width. Please reference the attached Site & Sample Location Map.

On November 15, 2011, one (1) soil boring (SB-1) was advanced at the site in an effort to determine the vertical extent of impacted soil. Soil boring "SB-1" was located at the terminus of the release flowpath. The soil boring was advanced to a total depth of approximately eighty-five feet (85') bgs. Soil samples were collected at five-foot (5') drilling intervals and field-screened using a Photo-Ionization Detector (PID) and/or chloride test kit. Please reference the attached Soil Boring/Monitor Well Logs.

During the advancement of the soil bore, soil samples collected at drilling depths of 5', 15', 25', 35', 45', 55', 65', 75', 80', and 85' bgs were submitted to the laboratory for analysis of BTEX, TPH and/or chloride concentrations. Laboratory analytical results indicated benzene concentrations ranged from less than the laboratory MDL of 0.0207 mg/Kg in soil sample SB-1 @ 55' to 1.70 mg/Kg in soil sample SB-1 @ 15'. Total BTEX concentrations ranged from 0.0440 mg/Kg in soil sample SB-1 @ 45' to 177 mg/Kg in soil sample SB-1 @ 15'. TPH concentrations ranged from 119 mg/Kg in soil sample SB-1 @ 45' to 8,240 mg/Kg in soil sample SB-1 @ 15'. Chloride concentrations ranged from less than the laboratory MDL in soil sample SB-1 @ 15' and SB-1 @ 25' to 490 mg/Kg in soil sample SB-1 @ 55'. Please reference the attached Soil Chemistry Tables.

On May 2, 2012, following NMOCD approval of the *Risk-Based Site Closure Proposal*, Basin began remediation activities at the release site. The excavation floor was advanced and leveled at approximately ten feet (10') bgs, pending the installation of an NMOCD approved twenty (20) mil polyurethane liner. The excavation sidewalls were advanced until laboratory analytical results from confirmation soil samples indicated benzene, BTEX, TPH and chloride concentrations were below NMOCD regulatory standards. Excavated material was stockpiled on-site pending final disposition. Please reference the *Remediation Summary*, *Risk-Based Soil Closure Request & Groundwater Investigation Proposal* dated June 2012 for details of remediation activities.

Between May 2 and May 18, 2012, approximately 2,700 yd³ of impacted material was transported to Sundance Services, Inc. (NMOCD Permit #NM-01-0003), for disposal.

On May 21, 2012, a twenty (20) mil polyurethane liner was installed on the floor of the excavation at approximately ten feet (10') bgs. Approximately one foot (1') of non-impacted pad sand was installed both above and below the liner to protect the liner from damage during installation and backfilling activities. The liner was fitted with 8" PVC conduit in three (3) locations to allow for the installation of groundwater monitor wells without compromising the integrity of the liner.

From May 21 through May 25, 2012, the excavation was backfilled with non-impacted material purchased from the landowner. Backfill was compacted in 18" lifts and contoured to fit the surrounding topography. The final dimensions of the excavation were approximately three hundred feet (300') in length, ranging in width from approximately 12' to approximately 45', and approximately 10' in depth.

Remediation activities conducted at the Line #290 (East of Jal South) release site met the objectives set forth in the *Remediation Summary & Risk-Based Site Closure Proposal* dated April 2012. *A Remediation Summary, Risk Based Soil Closure Request & Groundwater Investigation Proposal* was submitted to the NMOCD and subsequently approved.

On September 4, 2012, in accordance with the Groundwater Investigation portion of the approved proposal, a monitor well (MW-1) was installed in the western portion of the release site in the area defined by soil sample Sample #3. The monitor well was advanced to a depth of 110' bgs. During the installation of the monitor well, soil samples collected at drilling depths of 15', 25', 35', 45', 50', 55', and 60' bgs were submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated benzene concentrations were less than the appropriate laboratory MDL in soil samples MW-1 @ 35' and MW-1 @ 60' to 0.774 mg/Kg in soil sample MW-1 @ 15'. TPH concentrations ranged from 16.9 mg/Kg in soil sample MW-1 @ 45' to 1,470 mg/Kg in soil sample MW-1 @ 15'. Chloride concentrations ranged from 1.13 mg/Kg in MW-1 @ 15' and to 44.1 mg/Kg in soil sample MW-1 @ 55'. Considerable time was given to allow for the monitor well

to make water. It was allowed to remain undisturbed overnight to determine whether groundwater had been reached. Subsequent gauging determined that the monitor well was dry.

Between September 5, 2012, and July 23, 2013, as per the NMOCD, monitor well MW-1 was gauged monthly to check for the presence of groundwater. Monthly gauging of the onsite monitor well indicated there was no groundwater within the red, silty clay zone that characterized the subsurface at the Line 290 East of Jal South release site. Please reference the attached groundwater gauging data sheet.

With NMOCD permission, Regency Field Services would like to Plug and Abandon the onsite monitor well during the week of August 12, 2013. A plugging plan has been submitted to the New Mexico Office of the State Engineer and subsequently approved. Plugging activities will be conducted by a licensed driller, a summary of which will be submitted upon request.

If you have any questions or would like any additional information, please feel free to contact me by phone or email. Thanks.

Respectfully,

Joel founy

Joel W. Lowry Basin Environmental Service Technologies, LLC

Attachments:

Attachment #1: Site Location Map Attachment #2: Site & Sample Location Map Attachment #3: Soil Bore/Monitor Well Logs Attachment #4: Soil Chemistry Table Attachment #5: Groundwater Gauging Data





Soil Boring SB-1

Depth Below Ground Surface	Soil <u>Column</u>	Chloride Field <u>Test</u>	PID Reading	Petroleum Pe <u>Odor</u>	etroleum <u>Stain</u>	Soil Description		Boring SB-1
	8305	632	267	Heavy	None	0' - 1' - Tan fine sand 1' - 7' - Red fine sand 7' - 9' - Tan fine sand	Date Thick Depth Depth Groun	Drilled <u>November 15, 2011</u> ness of Bentonite Seat <u>85 Ft</u> of Exploratory Boring <u>85 Ft bgs</u> to Groundwater <u></u> d Water Elevation
E 10		(168)		Heavy	None		Citra	
15		<120	1,518	Slight	None	9' - 25' - Red fine sand	T	Indicates the PSH level measured on
20		<120		Moderate	None		OPID	measured on Indicates samples selected for Laboratory Analysis. Head-space reading in pom obtained
-25	11255		1,415	Slight	None		110	with a photo-ionization detector.
-30			1,921	Slight	None	25 - 33' - Tan fine sand, calcified sandstone		
-36			835	Slight	None	33' - 35' - Gypsum		
40	56515 11285		456	Slight	None	35' - 44' - Tan fine sand, sandstone		
45	51382			Slight	None			
50			373	Slight	None			
55			2,352	Moderate	None			
E 60				Moderate	None			
65			1,605	Moderate	None	44' - 81' - Red very fine to fine sand		
-70				Moderate	None			
75			864	Moderate	None			
80				Slight	None			
E _{es}	1		1,109	Moderate	None	81' - 85' - Red silty clay		

Completion Notes

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

Prep By: JWL

June 19, 2012

The soil boring was advanced on date using air rotary drilling techniques.
 The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Checked By: BJA

Soil Boring SB-1

Southern Union Gas Services Line #290 (East of Jal South) Lea County, New Mexico

Soil Boring/Monitor Well Log MW-1

			N	MOCD Re	eference #:	1RP-11-	11-2752		September 5, 2012	
Soil B	Boring/	W-1		Southe Line 2 Lea	ern Union G 290 (East of County, Ne	as Servic Jal Sout	ces ch)		3100 Lovingto Prep By: JWL	Plains Hwy. on, NM 88260 Checked By: BRB
J. B.	1. A Mark					-			60' bgs. Free the integrity of Basin Environmental	th water was injected to maintain of the borehole. Service Technologies. LLC
									6.) Depths indica ground surfac 7.) Borehole bec	ited are referenced from ce. an to collapse at approximately
									5.) Lines betwee on the profile boundaries.	n material types shown log represent approximate Actual transitions may be
									Schedule 40 4.) Well is protect steel cover a	HVC pipe. ted with a locked stick-up nd compression cap.
									 Monitor Well an establishe the integrity of within the exc 2.) Monitor well v air rotary drill 3.) Monitor well v 	MW-1 was advanced through d 8° PVC conduit to maintain fa 20-mil poly liner installed avation at 10° bgs. was advanced on date using ing techniques. was constructed with 2° ID.
	L ₁₁₅								Comp	eletion Notes
	110									
	105							A COLOR		
	190 195 195						85' - 110' Red silty clay	9978978978978978		
	-85	教						NAME OF A		
	80						80' - 85' Red silty sand w/ day	252252V		
	75							IN LOCAL		
	- 65 						54' - 80' Tan silty sand (sugar sand)			
	60			170	Moderate	None				
	55		<112	160	Moderate	None			Screen	
	45			102 1,110	Slight	None			Sand Par	sk
	40			852	Moderate	None			Bentonita	Pellet Seal
	35			550	Moderate	None	26' - 54' - Tan eilty sand w/ candetone		Grout Su	rface Seal
	30			760	Strong	None				
	25		<112	504	Strong	None	18' - 26' - Tan silty sand		PID Head-spa with a pho	samples selected for y Analysis. Ice reading in ppm obtained oto-ionization detector.
	20		<112	1,700	Strong	None	12' - 18' - Red fine slity sand		Indicates	the groundwater level
	- 10 L	***		1 700	Change		10' - 12' - Tan fine sand		- Indicates	the DSH level measured
							0' - 10' - Backfill		Depth of Explora Depth to Ground Ground Water El	tory Boring <u>110 Ft bgs</u> water <u>85 Ft bgs</u> evation
	Surface C		Test	Reading	Odor	Stain	Soil Description		Date Drilled	September 4, 2012
	Depth Below Ground Surface	Soil Column	Chloride Field Test	PID Reading	Petroleum F	Petroleum <u>Stain</u>	Soil Description			

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES LINE #290 (EAST OF JAL SOUTH) LEA COUNTY, NEW MEXICO NMOCD REFERENCE NO: 11P-11-11-2762

	-			N. A. P. S. S.	N	IETHOD: EPA	SW 846-8021	B, 5030			MET	HOD: 8015	M	TOTAL	E 300
SAMPLE LOCATION	DEPTH	SAMPLE	SOIL	BENZENE	TOLUENE	ETHYL-	M.P	ò	TOTAL	TOTAL	GRO	DRO	ORO	HAT	CHLORIDE
	(BGS)	DATE	STATUS	(mg/Kg)	(mg/Kg)	BENZENE (mg/Kg)	XYLENES (mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	Cs-C12 (mg/Kg)	C ₁₂ -C ₂₈ (mg/Kg)	C28-C36 (mg/Kg)	Cg-C36 (mg/Kg)	(mg/Kg)
Sample #1	7	11/10/2011	Excavated								13,800	4,550	418	18,800	676
Sample #2	1.5'	11/10/2011	Excavated							-	10,700	3,770	280	14,800	1,150
Sample #3	14'	11/10/2011	Excavated								30,500	8,840	519	39,900	5.62
Sample #4	6	11/10/2011	Excavated								14,800	5,110	466.0	20,400	<4.42
		and a contraction of	A SALE ANALY		and the second se	the strange		A THE REAL PROPERTY	and the second second	のなどのないという	でのないの	Contraction of the second s	「「「「「「」」」		and the second
SB-1@5'	5	11/15/2011	Excavated	0.273	3.56	7.00	21.5	9.33	30.8	41.7	1,440	2,010	75.6	3,530	490
SB-1 @ 15'	15'	11/15/2011	In-Situ	1.70	16.0	28.3	95.2	35.3	131	177	4,640	3,410	186	8,240	<4.38
SB-1 @ 25'	25'	11/15/2011	In-Situ	0.719	4.38	9.03	28.5	11.1	39.6	53.7	1,550	1,460	65.5	3,080	<4.37
SB-1 @ 35'	35'	11/15/2011	In-Situ	0.0118	0.0459	0.216	0.0260	0.0414	0.0674	0.341	30.9	182	<15.8	213	
SB-1 @ 45'	45'	11/15/2011	In-Situ	0.00720	<0.0102	0.00643	0.0213	0.00904	0.0303	0.0440	<15.3	119	<15.3	119	9.70
SB-1 @ 55'	55'	11/15/2011	In-Situ	<0.0207	0.219	0.619	2.03	0.816	2.85	3.68	360	885	52.1	1,300	
SB-1 @ 65'	65'	11/15/2011	In-Situ	0.00907	0.0235	0.0636	0.246	0.0903	0.336	0.432	109	412	43.4	564	55.3
SB-1 @ 75'	75'	11/15/2011	In-Situ	0.00954	<0.0105	0.00755	0.0449	0.0159	0.0608	0.0779	41.5	246	22.0	310	19.2
SB-1 @ 80'	80'	11/15/2011	In-Situ	0.00785	0.0254	0.0839	0.264	0.108	0.372	0.489	94.7	444	24.9	564	15.6
SB-1 @ 85'	85'	11/15/2011	In-Situ	0.00955	<0.0106	0.00591	0.0269	0.00976	0.0367	0.0521	25.7	178	<15.9	204	12.8
							and North	No. of the second	Personal and and		and a straight of the	and a second			Salasa ana ang ang ang ang ang ang ang ang an
Vorth Wall #1	9,	5/3/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	4.32
Vorthwest Wall	9,	5/3/2012	In-Situ	-		-			-			-	1 ··· ·	-	9.89
East Wall #1	9,	5/3/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	14.9
South Wall #1	9'	5/3/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	<4.24
			A statement of the												
South Wall #2	9,	5/4/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	7.16
		and the second							State State			No. of the office of the other			
Nest Wall	6	5/7/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	6.40
Vorth Wall #2	6	5/7/2012	In-Situ	<0.0010	<0.0020	<0.0010	0.00215	0.00116	0.00331	0.00331	<15.0	<15.0	<15.0	<15.0	7.13
	and the second second	N. S.	ないないとうという	and the second second		and the second states of the	and the second	She wanted and	STATE OF STATES	Statistical and the state of th	Contraction of the	STRANSPORT OF STRANSPORT		and a second second	
V. Wall #3	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.2	<15.2	<15.2	<15.2	<1.02
V. Wall #4	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.3	<15.3	<15.3	<15.3	<1.02
V. Wall #5	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.3	<15.3	<15.3	<15.3	<1.02
S. Wall #3	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.1	<15.1	<15.1	<15.1	<1.01
S. Wall #4	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.5	<15.5	<15.5	<15.5	<1.03
5. Wall #5	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.9	<15.9	<15.9	<15.9	<1.06
	State State State				ALL		No. of Concession, Name				States - States			States and	PERSONAL PROPERTY.
V. Wall #6	6	5/17/2012	In-Situ	<0.0010	0.00264	<0.0010	0.00279	0.00135	0.00414	0.00678	<15.3	<15.3	<15.3	<15.3	5.38
S. Wall #6	6	5/17/2012	In-Situ	<0.0010	0.00465	<0.0010	0.00263	<0.0010	0.00263	0.00728	<15.3	<15.3	<15.3	<15.3	16.8
N. Wall #2	2	ZLOZIJLIC	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0010	<0.0020	1.01>	1.01>	1.61>	1.01>	4.88
V. Wall #7	6	5/17/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0010	<0.0020	<15.3	<15.3	<15.3	<15.3	9.57
5. Wall #7	6	5/17/2012	In-Situ	<0.0010	0.00453	0.00103	0.00381	0.00121	0.00502	0.0106	<15.3	<15.3	<15.3	<15.3	12.9
MALE AFTLES	11	0140040	- Ch.	0110	10000	0440	0.100	0.444	0 561	1110	001	740	110	011	C 7 7
SBG C1 @ 1-AAM	120	2102/4/8	In-Situ	20.0011Z	0.0406	0.110	0.0200	0.141	100.0	4//0	1001	104	44.0	1/4/1	1.13
204 32 WW	35	CLUCIAIO	In-Situ	<0.00104	BUCUD UN	-000104	0,0070	0.00113	COEUCO	COEUCO	187	OK R	157	OK F	110
12 12 12 12 12 12 12 12 12 12 12 12 12 1	45'	CIUCIDIO	In-Situ	<0.00100			SUDON ON	0,000	SUCOO UN	Socon on	215.A	16.0	10.1 45.4	160	37.8
200 1-00 1-000	2	CENCENC	In Cit.	-0.00104		-0.00104		10000101			410.4	0.01	10.4	10.2	0.10
MM-1 @ 55' hrs	55	9/4/2012	In-Situ	<0.00102	<0.000 0>	<0.00102	0,00063	0.00118	0.002010	0.00200	<15.5	30.2	<15.5	30.2	44.1
and the Boy has	en'	CLOCINO	in Situ	-00000-		<0.00100		001000			170	24.2	170	24.2	7 50
SPG 00 1-144	8	71071416		00100-04	0.0200	00100-0-	-0.200	00100-02	-0.00200	00200-02	0.11	0.10	0.11~	0.10	BC.1
MOCD Criteria				10			Contraction of the second second			60	Contraction of the local division of the loc			100	
= Not analyzed.															

TABLE 1

GROUNDWATER ELEVATION DATA

SOUTHERN UNION GAS SERVICES LINE 290 EAST OF JAL SOUTH NMOCD REF # 1RP-11-11-2752 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	TOTAL DEPTH	CORRECTED GROUNDWATER ELEVATION
MW-1	9/4/2013	200.00*		dry	-	124.5	
MW-1	9/7/2013	200.00*	-	dry	-	124.5	-
MW-1	10/26/2013	200.00*	-	dry		124.5	-
MW-1	11/28/2013	200.00*		dry	-	124.5	-
MW-1	12/20/2013	200.00*	-	dry	-	124.5	
MW-1	1/21/2013	200.00*		dry	-	124.5	
MW-1	2/27/2013	200.00*	-	dry	-	124.5	
MW-1	3/28/2013	200.00*	4	dry	-	124.5	
MW-1	4/8/2013	200.00*	-	dry	120 - I	124.5	
MW-1	5/9/2013	200.00*	-	dry	-	124.5	and the state of t
MW-1	6/26/2013	200.00*		dry		124.5	
MW-1	7/23/2013	200.00*	Sec. 1	dry	-	124.5	- second second
						No. of the second	

*Arbitrary value. Well has not been surveyed.