# GW - 269

# GENERAL CORRESPONDENCE

YEAR(S): 2008 - 2013

2009 JUL 6 PM 1 31

#### LAW OFFICES

# HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON MICHAEL T. NEWELL LEWIS C. COX, III PATRICK B. McMAHON 311 NORTH FIRST STREET POST OFFICE DRAWER 1599 LOVINGTON, NM 88260 TELEPHONE (575) 396-5303 FAX (575) 396-5305

F.L. HEIDEL (1913-1985)

July 2, 2009

NMOCD
Attn: Leonard Lowe
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Southern Union Gas Services/Boyd Compressor Site GW-269

Dear Mr. Lowe,

As per our conversation, I am writing this letter on behalf this firm's client, Mr. Bill Sims, regarding Southern Union's remediation activities at the Boyd Compressor Site GW-269. Attached for your review is Mr. Tony Savoie's December 15, 2008 email to Mr. Wayne Price, your December 17, 2008 letter response to Mr. Savoie and Southern Union's analytical results for soil samples of MW #1 taken on or about January 14, 2009.

Despite Mr. Savoie's statement in the attached email that ".....the chloride impacted soil was excavated and removed from location to a depth of 20ft. Below Ground Surface...", Mr. Sims is concerned that the horizontal and vertical extent of chloride contamination was not properly delineated at this site. As proof of such, Mr. Sims would direct you to Southern Union's soil analyticals for monitor well #1. Those soil analyticals show chloride levels at the monitor well #1 location to be 6180 ppm at 15 ft. BGS and 8740 ppm at 20 ft BGS. These results indicate that not all of the chloride contaminated soils have been excavated from the site.

Mr. Sims would like to schedule a meeting with you and Southern Union to discuss his concerns as to whether contamination at the Boyd Compressor Site has been properly delineated and what other remediation activities, if any, need to be undertaken.

I look forward to hearing from you.

10/19

Letter to Leonard Lowe, NMOCD

Re: Southern Union Gas Services/Boyd Compressor Site GW-269

July 2, 2009 Page two.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

Patrick B. McMahon

PBM:jo Enclosure

cc: Bill Sims

Aaron Shields, Southern Union Gas Services

Report Date: January 28, 2009 1005-3863

Work Order: 9011638 Boyd

Page Number: 6 of 46 Eunice, NM

Sample: 185178 - MW-1-15

Laboratory:

Midland

Analysis: Chloride (Titration)

QC Batch: 56283 Prep Batch: 48075

Analytical Method: Date Analyzed:

Sample Preparation:

SM 4500-Cl B

2009-01-23 2009-01-23

Prep Method: N/A

Analyzed By: AR AR

RL

Parameter Chloride

Result Flag 6180

Units

mg/Kg

Prepared By:

RL

4.00

Sample: 185178 - MW-1-15

Laboratory:

Midland

Analysis: TPH DRO

QC Batch: 56106 Prep Batch: 47935 Analytical Method:

Mod. 8015B

Analyzed By:

Dilution

 $\overline{50}$ 

Prep Method: N/A LD

Date Analyzed: Sample Preparation:

2009-01-16 2009-01-19

Prepared By: LD

Parameter

RLUnits

Dilution

RL50.0

DRO

Flag

Result < 50.0

mg/Kg

Recovery

Spike Percent Dilution Limits Surrogate Flag Result Units Amount Recovery n-Triacontane 80.9 mg/Kg  $\overline{100}$ 81 10 - 250.4

Sample: 185178 - MW-1-15

Laboratory:

GRO

Midland

Analysis: TPH GRO QC Batch: 56157

Analytical Method:

S 8015B

Prep Method: S 5035 Analyzed By: ME

Prep Batch: 47995

Date Analyzed: Sample Preparation:

2009-01-20 2009-01-20

Prepared By: ME

RLResult

Parameter Flag

Units

Dilution

RL1.00

Surrogate Trifluorotoluene (TFT) < 1.00

mg/Kg

Recovery

Spike Percent Flag Result Units Dilution Amount Recovery Limits 0.887 mg/Kg 1 1.00 89 67.5 - 135.2 89 4-Bromofluorobenzene (4-BFB) 0.887 mg/Kg 1 1.00 63.8 - 141

Report Date: January 28, 2009

1005-3863

Work Order: 9011638

Boyd

Page Number: 7 of 46

Eunice, NM

Sample: 185179 - MW-1-20

Laboratory:

Midland

Analysis: Chloride (Titration)

56283

Analytical Method: Date Analyzed:

SM 4500-Cl B

2009-01-23

Analyzed By:

Prep Method: N/A AR

QC Batch: Prep Batch:

48075

Sample Preparation:

2009-01-23

Prepared By:

AR

RL

4.00

RL

Parameter Chloride

Flag Result 8740

Units mg/Kg Dilution

50

Sample: 185179 - MW-1-20

Laboratory:

Midland

Analysis:

TPH DRO

56106 47935 Analytical Method:

Mod. 8015B 2009-01-16

Prep Method:

N/A

QC Batch: Prep Batch: Date Analyzed: Sample Preparation:

2009-01-19

Analyzed By: Prepared By:

LD LD

RL

Parameter DRO

Result < 50.0

Result

87.0

Units mg/Kg Dilution

Recovery

87

RL

50.0

Surrogate

n-Triacontane

Flag

Flag

Units

mg/Kg

Dilution

1

Spike Percent

Amount

100

Recovery Limits

10 - 250.4

ME

Sample: 185179 - MW-1-20

Laboratory:

Prep Batch:

Analysis: QC Batch: Midland TPH GRO

56157

47995

Analytical Method: Date Analyzed:

S 8015B

2009-01-20 Sample Preparation: 2009-01-20 Prep Method: S 5035

Prepared By:

Analyzed By: ME

RL

Flag Parameter Result Units Dilution RL $\overline{GRO}$ <1.00 mg/Kg 1.00

Spike Percent Recovery Units Dilution Surrogate Flag Result Amount Recovery Limits Trifluorotoluene (TFT) 0.920 mg/Kg 1 1.00 92 67.5 - 135.2 4-Bromofluorobenzene (4-BFB) 0.913 mg/Kg 1 1.00 91 63.8 - 141

Report Date: January 28, 2009 Work Order: 9011638 Page Number: 8 of 46 1005-3863 Boyd Eunice, NM

Sample: 185180 - MW-1-25

Laboratory: Midland

Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR

QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

RL

Sample: 185180 - MW-1-25

Laboratory: Midland

Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD

Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By:

Spike Percent Recovery Surrogate Flag Result Units Dilution Amount Recovery Limits n-Triacontane 81.2 100 81 10 - 250.4 mg/Kg 1

Sample: 185180 - MW-1-25

Laboratory: Midland

Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035 QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME

Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Spike Percent Recovery Flag Surrogate Result Units Dilution Amount Recovery Limits Trifluorotoluene (TFT) 0.939 mg/Kg 1 1.00 94 67.5 - 135.2 63.8 - 141 4-Bromofluorobenzene (4-BFB) 0.930 1 1.00 93 mg/Kg

sol 19

LD

Report Date: January 28, 2009 Work Order: 9011638 Page Number: 9 of 46 1005-3863 Boyd Eunice, NM

Sample: 185181 - MW-1-30

Laboratory: Midland

Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR

QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By:

RL

Sample: 185181 - MW-1-30

Laboratory: Midland

Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD

Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By:

Spike Percent Recovery Surrogate Flag Result Units Dilution Amount Recovery Limits n-Triacontane 81.4 100 81 10 - 250.4 mg/Kg 1

Sample: 185181 - MW-1-30

Laboratory: Midland

Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035 QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME

Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Percent Spike Recovery Flag Surrogate Result Units Dilution Amount Recovery Limits Trifluorotoluene (TFT) 0.921mg/Kg 1 1.00 92 67.5 - 135.2 0.903 1 1.00 4-Bromofluorobenzene (4-BFB) mg/Kg 90 63.8 - 141



AR

LD

Report Date: January 28, 2009 Work Order: 9011638 Page Number: 10 of 46 1005-3863 Boyd Eunice, NM

Sample: 185182 - MW-1-35

Laboratory: Midland

Analysis: Chloride (Titration)

QC Batch: 56283 Prep Batch: 48075

Analytical Method: SM 4500-Cl B Date Analyzed: 2009-01-23

Sample Preparation: 2009-01-23 Prep Method: N/A Analyzed By: AR Prepared By: AR

RL

Units Dilution RLParameter Flag Result Chloride 10900 50 4.00mg/Kg

Sample: 185182 - MW-1-35

Laboratory: Midland

Analysis: TPH DRO QC Batch: 56106 Prep Batch: 47935

Analytical Method: Mod. 8015B Date Analyzed: 2009-01-16 Sample Preparation: 2009-01-19

Prep Method: N/A Analyzed By: LDPrepared By: LD

RLParameter Flag Result Units Dilution RL $\overline{\text{DRO}}$ < 50.0 mg/Kg  $\overline{1}$ 50.0

|               |      |        |       |          | $\operatorname{Spike}$ | $\operatorname{Percent}$ | Recovery   |
|---------------|------|--------|-------|----------|------------------------|--------------------------|------------|
| Surrogate     | Flag | Result | Units | Dilution | Amount                 | Recovery                 | Limits     |
| n-Triacontane |      | 57.5   | mg/Kg | 1        | 100                    | 58                       | 10 - 250.4 |

Sample: 185182 - MW-1-35

Laboratory: Midland

Analysis: TPH GRO QC Batch: 56157 Prep Batch: 47995

Analytical Method: S 8015B Date Analyzed: 2009-01-20 Sample Preparation: 2009-01-20

Prep Method: S 5035 Analyzed By: MEPrepared By: ME

RLResult Parameter Flag Units Dilution RL $\overline{GRO}$ < 1.00mg/Kg 1.00

| Surrogate                    | Flag | Result | Units | Dilution | Spike<br>Amount | Percent<br>Recovery | Recovery<br>Limits |
|------------------------------|------|--------|-------|----------|-----------------|---------------------|--------------------|
| Trifluorotoluene (TFT)       | 1105 | 0.926  | mg/Kg | 1        | 1.00            | 93                  | 67.5 - 135.2       |
| 4-Bromofluorobenzene (4-BFB) |      | 0.917  | mg/Kg | 1        | 1.00            | 92                  | 63.8 - 141         |

Report Date: January 28, 2009

1005-3863

Work Order: 9011638 Boyd

Page Number: 11 of 46 Eunice, NM

Sample: 185183 - MW-1-40

Laboratory:

Midland

Analysis: Chloride (Titration)

QC Batch: 56283 Prep Batch: 48075 Analytical Method:

SM 4500-Cl B

Date Analyzed: Sample Preparation: 2009-01-23

2009-01-23

Prep Method: N/A Analyzed By:  $\mathbf{AR}$ 

Prepared By: AR

RL

Result Units Dilution RLParameter Flag 6830 50 4.00 Chloride mg/Kg

Sample: 185183 - MW-1-40

Laboratory:

Midland

Analysis: QC Batch:

TPH DRO 56106 Prep Batch: 47935

Analytical Method:

Date Analyzed: Sample Preparation: 2009-01-19

Mod. 8015B 2009-01-16

Prep Method: N/A Analyzed By:

LDPrepared By: LD

RL

Flag Result Units Dilution RLParameter  $\overline{\text{DRO}}$ < 50.0 50.0 mg/Kg

|               |      |        |       |          | $\operatorname{Spike}$ | Percent  | Recovery   |
|---------------|------|--------|-------|----------|------------------------|----------|------------|
| Surrogate     | Flag | Result | Units | Dilution | Amount                 | Recovery | Limits     |
| n-Triacontane |      | 77.0   | mg/Kg | 1        | 100                    | 77       | 10 - 250.4 |

Sample: 185183 - MW-1-40

Laboratory:

Midland

Analysis: TPH GRO QC Batch: 56157 Prep Batch: 47995

Analytical Method: Date Analyzed:

S 8015B 2009-01-20 Sample Preparation: 2009-01-20 Prep Method: S 5035 Analyzed By: ME

Prepared By: ME

RLResult Dilution Parameter Flag Units RLGRO < 1.00 mg/Kg 1.00

|                              |      |        |                  |          | Spike  | Percent  | Recovery     |
|------------------------------|------|--------|------------------|----------|--------|----------|--------------|
| Surrogate                    | Flag | Result | $\mathbf{Units}$ | Dilution | Amount | Recovery | Limits       |
| Trifluorotoluene (TFT)       |      | 0.925  | mg/Kg            | 1        | 1.00   | 92       | 67.5 - 135.2 |
| 4-Bromofluorobenzene (4-BFB) |      | 0.912  | mg/Kg            | 1        | 1.00   | 91       | 63.8 - 141   |

Work Order: 9011638 Page Number: 12 of 46 Report Date: January 28, 2009 Eunice, NM 1005-3863 Boyd

Sample: 185184 - MW-1-45

Laboratory: Midland

Analysis: Chloride (Titration)

QC Batch: 56283 Prep Batch: 48075

Analytical Method: Date Analyzed:

2009-01-23 Sample Preparation: 2009-01-23

SM 4500-Cl B Prep Method: N/A Analyzed By: Prepared By:

RL

Parameter Flag Result Units Dilution RL5900 mg/Kg 50 4.00Chloride

Sample: 185184 - MW-1-45

Laboratory: Midland

Analysis: TPH DRO QC Batch: 56106 Prep Batch: 47935

Analytical Method: Date Analyzed:

Mod. 8015B 2009-01-16 Sample Preparation: 2009-01-19

Prep Method: N/A Analyzed By: LD

AR

AR

Prepared By: LD

RLResult Units Dilution Parameter Flag RL $\overline{\text{DRO}}$ < 50.0 mg/Kg 50.0

|               |                       |        |                  |          | $\mathbf{Spike}$ | Percent  | Recovery   |
|---------------|-----------------------|--------|------------------|----------|------------------|----------|------------|
| Surrogate     | $\operatorname{Flag}$ | Result | $\mathbf{Units}$ | Dilution | Amount           | Recovery | Limits     |
| n-Triacontane |                       | 82.5   | mg/Kg            | 1        | 100              | 82       | 10 - 250.4 |

Sample: 185184 - MW-1-45

Laboratory: Midland

Analysis: TPH GRO QC Batch: 56157 Prep Batch: 47995

Analytical Method: Date Analyzed: Sample Preparation:

RL

S 8015B 2009-01-20 2009-01-20

Prep Method: S 5035 Analyzed By: ME Prepared By: ME

Parameter Flag Result Units Dilution RL $\overline{GRO}$ < 1.00 1.00 mg/Kg

|                              |                       |        |       |          | $\operatorname{Spike}$ | Percent  | $\operatorname{Recovery}$ |
|------------------------------|-----------------------|--------|-------|----------|------------------------|----------|---------------------------|
| Surrogate                    | $\operatorname{Flag}$ | Result | Units | Dilution | Amount                 | Recovery | Limits                    |
| Trifluorotoluene (TFT)       |                       | 0.909  | mg/Kg | 1        | 1.00                   | 91       | 67.5 - 135.2              |
| 4-Bromofluorobenzene (4-BFB) |                       | 0.907  | mg/Kg | 1        | 1.00                   | 91       | 63.8 - 141                |

Report Date: January 28, 2009 1005-3863

Work Order: 9011638 Boyd

Page Number: 13 of 46 Eunice, NM

Sample: 185185 - MW-1-50

Laboratory:

Analysis:

Midland

Chloride (Titration)

QC Batch: 56283 Prep Batch: 48075 Analytical Method:

Date Analyzed: Sample Preparation: SM 4500-Cl B

2009-01-23 2009-01-23 Prep Method: N/A

Analyzed By: ARPrepared By: AR

RL

Parameter Flag Chloride

Result 5760 Units Dilution

RL4.00

Sample: 185185 - MW-1-50

Laboratory:

Midland

Analysis: QC Batch:

TPH DRO 56106 Prep Batch: 47935

Analytical Method: Date Analyzed:

Mod. 8015B 2009-01-16 Sample Preparation: 2009-01-19

mg/Kg

Prep Method: N/A Analyzed By:

LD

Prepared By:

50

LD

RL

Parameter Flag Result Units Dilution RL< 50.0 DRO mg/Kg 50.0 1

|               |      |        |       |          | $\mathbf{Spike}$ | Percent  | Recovery   |
|---------------|------|--------|-------|----------|------------------|----------|------------|
| Surrogate     | Flag | Result | Units | Dilution | Amount           | Recovery | Limits     |
| n-Triacontane |      | 80.8   | mg/Kg | 1        | 100              | 81       | 10 - 250.4 |

Sample: 185185 - MW-1-50

Laboratory:

Midland

Analysis: TPH GRO QC Batch: 56157 Prep Batch: 47995

Analytical Method: Date Analyzed:

S 8015B 2009-01-20 Sample Preparation: 2009-01-20

Prep Method: S 5035 Analyzed By:

MEPrepared By: ME

RL

Parameter Flag Result Units Dilution RL< 1.00  $\overline{GRO}$ mg/Kg 1.00

|                              |                 |        |                  |          | Spike  | Percent  | Recovery     |
|------------------------------|-----------------|--------|------------------|----------|--------|----------|--------------|
| Surrogate                    | $\mathbf{Flag}$ | Result | $\mathbf{Units}$ | Dilution | Amount | Recovery | Limits       |
| Trifluorotoluene (TFT)       |                 | 0.890  | mg/Kg            | 1        | 1.00   | 89       | 67.5 - 135.2 |
| 4-Bromofluorobenzene (4-BFB) |                 | 0.841  | ${ m mg/Kg}$     | 1        | 1.00   | 84       | 63.8 - 141   |

Report Date: January 28, 2009 1005-3863

Work Order: 9011638 Boyd

Page Number: 14 of 46 Eunice, NM

Sample: 185186 - MW-1-55

Laboratory:

Midland

Analysis: Chloride (Titration)

QC Batch: 56283 Prep Batch: 48075

Analytical Method: Date Analyzed:

Sample Preparation:

SM 4500-Cl B

2009-01-23 2009-01-23 Prep Method: N/A

Analyzed By: AR

RL

Parameter Flag Chloride

Result 1300

Units

mg/Kg

Prepared By:

Dilution

50

AR

RL

4.00

Sample: 185186 - MW-1-55

Laboratory:

Midland

Analysis: QC Batch:

TPH DRO 56106 Prep Batch: 47935

Analytical Method: Date Analyzed:

Mod. 8015B 2009-01-16 Sample Preparation: 2009-01-19

Prep Method: N/A

Analyzed By: LDPrepared By: LD

RL

Result Units Dilution RLParameter Flag < 50.0 50.0 DRO mg/Kg

|               |                 |        |       |          | $\mathbf{Spike}$ | Percent  | Recovery   |
|---------------|-----------------|--------|-------|----------|------------------|----------|------------|
| Surrogate     | $\mathbf{Flag}$ | Result | Units | Dilution | Amount           | Recovery | Limits     |
| n-Triacontane |                 | 78.1   | mg/Kg | 1        | 100              | 78       | 10 - 250.4 |

Sample: 185186 - MW-1-55

Laboratory:

Midland

Analysis: TPH GRO QC Batch: 56157 Prep Batch: 47995

Analytical Method: Date Analyzed:

RL

Sample Preparation:

S 8015B 2009-01-20 2009-01-20 Prep Method: Analyzed By:

S 5035 ME

Prepared By: ME

Flag Result Units Dilution RLParameter  $\overline{GRO}$ < 1.00 mg/Kg 1.00

|                              |                       |        |                  |          | $\mathbf{Spike}$ | Percent  | Recovery     |
|------------------------------|-----------------------|--------|------------------|----------|------------------|----------|--------------|
| Surrogate                    | $\operatorname{Flag}$ | Result | $\mathbf{Units}$ | Dilution | Amount           | Recovery | Limits       |
| Trifluorotoluene (TFT)       |                       | 0.958  | mg/Kg            | 1        | 1.00             | 96       | 67.5 - 135.2 |
| 4-Bromofluorobenzene (4-BFB) |                       | 0.967  | ${ m mg/Kg}$     | 1        | 1.00             | 97       | 63.8 - 141   |

From:

Savoie, Tony [tony.savoie@sug.com]

Sent: To:

Monday, December 15, 2008 7:00 AM

Subject:

Price, Wayne, EMNRD; Lowe, Leonard, EMNRD

Attachments:

Boyd Compressor GW-269 Analytical Summary.xlsm

Follow Up Flag: Flag Status:

Follow up Flagged

<<Analytical Summary.xlsm>> Dear Wayne, Southern Union Gas Services is requesting your consideration for closure of the excavation associated with the removal of a leaking fiberglass tank located at our Boyd Compressor Site GW-269.

The leaking tank was removed and the chloride impacted soil was excavated and removed from location to a depth of 20 ft. Below Ground Surface "BGS"

The excavation was backfilled with clean soil to a depth of 10ft. BGS and a ramp was constructed to allow an air rotary rig access to the center of the below grade tank location. Soil Samples were collected at 5 ft. intervals starting at a depth of 30 ft. BGS the soil samples were analyzed on-site by a field technician employed by Straub Drilling. Also 2 samples were selected and sent to a lab for comparison.

The Highest chloride reading was at 30 ft. BGS at 7197 mg/kg The Lowest chloride reading was at 60 ft. BGS at 80 mg/kg The driller estimated the depth to water to be between 52 to 54 ft. BGS.

A table with all of the site analytical is attached.

The samples associated with the leaking tank start at line 64 through 70 We would like for you to consider the placement of a 30 mil liner in the bottom of the excavation which is 10 ft. BGS and backfilling with clean soil.

Once the area has been backfilled and stabilized we plan on putting in 3 monitor wells, one up-gradient and 2 down-gradient. We hope to place one of the down-gradient wells directly in line with the Tank location.

However if 4th. well is required after determining gradient flow it will be placed as close to the source point as possible.

I have not submitted a written plan for closure to the landowner. I will forward this information along with your response to him. Thanks,

Tony

The message is ready to be sent with the following file or link attachments:

Analytical Summary.xlsm

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Private and confidential as detailed here: <a href="http://www.sug.com/disclaimers/default.htm#Mail">http://www.sug.com/disclaimers/default.htm#Mail</a> . If you cannot access the link, please e-mail sender.

This inbound email has been scanned by the MessageLabs Email Security System.

#### **Bill Richardson**

Governor Joanna Prukop Cabinet Secretary Reese Fullerton **Deputy Cabinet Secretary** 

**Division Director** Oil Conservation Division

Mark Fesmire

December 17, 2008

Mr. Tony Savoie Southern Union Gas P.O. Box 1226 Jal, New Mexico 88252

Re: GW-269, Boyd Compressor Station, Below Grade Tank Work Assessment

Dear Mr. Savoie

The Environmental Bureau of the New Mexico Oil Conservation Division (NMOCD) has received the site follow up report for the release at the Boyd compressor station dated December 15, 2008, and has conducted a review of the report. The OCD hereby approves the anticipated actions at the site as specified in the report. However, the OCD recommends locating the groundwater monitor wells as specified below (see attached schematic for details):

MW-1, down gradient and adjacent to the localize area of the release, but not close enough to penetrate through the 30 Mil liner.

MW-2, down gradient of the release.

MW-3, down gradient of the release.

Southern Union Gas may place a monitor well up-gradient of the incident but are not required to. The initial sampling should include the parameters specified in the attached list.

Please be advised that the NMOCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions pertaining to this process please call me at (505) 476-3492 or e-mail me at leonard.lowe@state.nm.us.

Sincerely,

Leonard Lowe

**Environmental Engineer** 

Oil Conservation Division \* 1220 South St. Francis Drive \* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* http://www.emnrd.state.nm.us



From:

Lowe, Leonard, EMNRD

Sent:

Wednesday, December 17, 2008 10:24 AM

To:

Tony Savoie

Cc:

Price, Wayne, EMNRD; Hansen, Edward J., EMNRD

Subject:

GW-269, Boyd Compressor Station

Attachments:

GW-269, work plan assessment.pdf; Analytical Parameters for water.pdf

Mr. Savoie,

If you have any questions please feel free to contact me.

llowe

### **Leonard Lowe**

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505

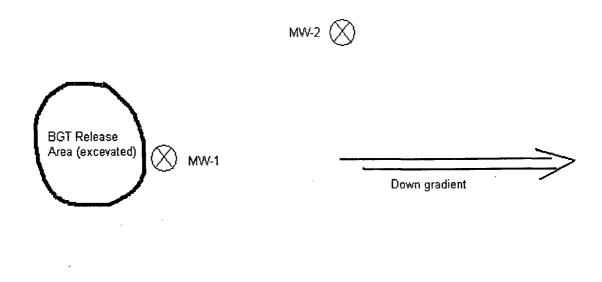
Office: 505-476-3492 Fax: 505-476-3462

E-mail: leonard.lowe@state.nm.us

Website: http://www.emnrd.state.nm.us/ocd/

Mayin

# Schematic for location of monitor wells



From:

Lowe, Leonard, EMNRD

Sent:

Wednesday, December 17, 2008 10:24 AM

To:

Tony Savoie

Cc:

Price, Wayne, EMNRD; Hansen, Edward J., EMNRD

Subject:

GW-269, Boyd Compressor Station

Attachments:

GW-269, work plan assessment.pdf; Analytical Parameters for water.pdf

Mr. Savoie,

If you have any questions please feel free to contact me.

llowe

# **Leonard Lowe**

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492

Fax: 505-476-3462

E-mail: leonard.lowe@state.nm.us

Website: http://www.emnrd.state.nm.us/ocd/



#### **Bill Richardson**

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



December 17, 2008

Mr. Tony Savoie Southern Union Gas P.O. Box 1226 Jal, New Mexico 88252

Re: GW-269, Boyd Compressor Station, Below Grade Tank Work Assessment

Dear Mr. Savoie

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MW-3, down gradient of the release.

Southern Union Gas may place a monitor well up-gradient of the incident but are not required to. The initial sampling should include the parameters specified in the attached list.

Please be advised that the NMOCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

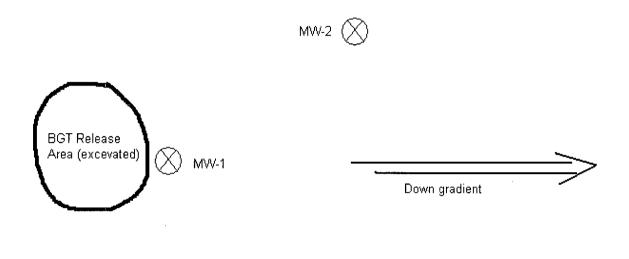
If you have any questions pertaining to this process please call me at (505) 476-3492 or e-mail me at leonard.lowe@state.nm.us.

Sincerely,

Leonard Lowe

Environmental Engineer

# Schematic for location of monitor wells





# NMOCD - Analytical Parameters for Initial Groundwater Sampling (5-29-08)

# Field Parameters

specific conductance

рΗ

temperature

depth to water

# **General Chemistry**

Calcium

Magnesium

Potassium

Sodium

Chloride

Sulfate

Bicarbonate Alkalinity

Carbonate Alkalinity

Nitrate

Phosphate

Fluoride

Total Dissolved Solids (TDS)

# **RCRA** Metals

Arsenic

Barium

Cadmium

Chromium

Lead

Mercury

Selenium

Silver

# Additional WQCC Metals

Copper

Iron

Manganese

Zinc

Aluminum

Boron

Cobalt

Molybdenum

Nickel

All compounds listed in U.S. EPA SW-846 Methods: 8260 (VOCs) & 8270 (SVOCs)

From:

Savoie, Tony [tony.savoie@sug.com]

Sent:

Monday, December 15, 2008 7:00 AM

To:

Price, Wavne, EMNRD: Lowe, Leonard, EMNRD

Subject: Attachments: Boyd Compressor GW-269 Analytical Summary.xlsm

Follow Up Flag:

Follow up

Flag Status:

Flagged

<<Analytical Summary.xlsm>> Dear Wayne, Southern Union Gas Services is requesting your consideration for closure of the excavation associated with the removal of a leaking fiberglass tank located at our Boyd Compressor Site GW-269.

#### Facts:

The leaking tank was removed and the chloride impacted soil was excavated and removed from location to a depth of 20 ft. Below Ground Surface "BGS"

The excavation was backfilled with clean soil to a depth of 10ft. BGS and a ramp was constructed to allow an air rotary rig access to the center of the below grade tank location. Soil Samples were collected at 5 ft. intervals starting at a depth of 30 ft. BGS the soil samples were analyzed on-site by a field technician employed by Straub Drilling. Also 2 samples were selected and sent to a lab for comparison.

The Highest chloride reading was at 30 ft. BGS at 7197 mg/kg The Lowest chloride reading was at 60 ft. BGS at 80 mg/kg The driller estimated the depth to water to be between 52 to 54 ft. BGS.

A table with all of the site analytical is attached.

The samples associated with the leaking tank start at line 64 through 70 We would like for you to consider the placement of a 30 mil liner in the bottom of the excavation which is 10 ft. BGS and backfilling with clean soil.

Once the area has been backfilled and stabilized we plan on putting in 3 monitor wells, one up-gradient and 2 down-gradient. We hope to place one of the down-gradient wells directly in line with the Tank location.

However if 4th. well is required after determining gradient flow it will be placed as close to the source point as possible.

I have not submitted a written plan for closure to the landowner. I will forward this information along with your response to him.

Thanks. Tony

The message is ready to be sent with the following file or link attachments:

Analytical Summary.xlsm

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Private and confidential as detailed here: <a href="http://www.sug.com/disclaimers/default.htm#Mail">http://www.sug.com/disclaimers/default.htm#Mail</a> . If you cannot access the link, please e-mail sender.

This inbound email has been scanned by the MessageLabs Email Security System.

6/18/200 6/18/200 6/18/200 6/18/200 6/18/200 6/18/200 6/18/200

| Date Collected  | # Hoder    |                   |                             | 1000      |               | _                                       |        | -          |            |             | _         |         | _     | 1     |                                  |
|-----------------|------------|-------------------|-----------------------------|-----------|---------------|---|--------|------------|------------|-------------|-----------|---------|-------|-------|----------------------------------|
| +               |            |                   | Compressor Locations        | шдукд     | шд/кд         | D S S S S S S S S S S S S S S S S S S S | mg/kg  | Field Test | - -        | Lab IIIg/Kg | Day Dilli | g vg vg | mg/kg | Dy AG | Removed Blended On Site          |
| 9/18/2007       |            |                   | Surface Composite @3"       |           |               |   |        | 51400      | L          |             |           |         |       |       | Removed Blended On Site          |
| 9/18/2007       | 289820     | 2 ft. B.G.S.      | #1 Core @ 2'                |           |               |   |        | 54800      |            | <br> -      |           | <br> -  |       |       | Removed Blended On Site          |
| 9/18/2007       | 289820     | 4 ft. B.G.S.      | #1 Core @ 4'                |           |               |   |        | 31900      |            |             |           |         |       |       | Removed Blended On Site          |
| 9/18/2007       | 289820     | 2 ft. B.G.S.      | #2 Core @ 2'                |           |               |   |        | 43300      |            |             |           |         |       |       | Removed Blended On Site          |
| 9/18/2007       | 289820     | 4 ft. B.G.S.      | #2 Core @ 4'                |           |               |   |        | 1240       | -          |             |           |         |       |       | Removed Blended On Site          |
| 2007            | 289820     | 6 ft. B.G.S.      | #2 Core @ 6'                |           |               |   |        | 47700      |            | -           |           |         |       |       | Removed Blended On Site          |
| 9/18/2007       | 289820     | 8 ft. B.G.S.      | #2 Core @ 8'                |           |               |   |        | 59200      | -          | -           |           |         |       |       | Removed Blended On Site          |
| 9/18/2007       | 289820     | 10 ft. B.G.S.     | #2 Core @10                 | C F. C 13 | F-012 C12 C28 | C28.C35                                 | 75.035 | 00/10      |            | -           | -         |         |       |       | Hernoved blended On Site         |
|                 |            |                   |                             | mo/kg     | mo/kg         | _                                       | ma/ka  |            |            |             |           |         |       |       |                                  |
| 7/29/2008       | 308900-002 | 20 ft.            | S.B.2                       | GN ON     | 74.1          | +                                       | 121.3  | -          | -          | Z           | -         | 2       | Q     | Q     | Excavated and blended on-site    |
| 7/29/2008       | 308900-002 | 25 ft.            | S.B.2                       | 2         | 29.9          | 26.1                                    | 29     |            | -          | 2           | QN Q      |         | Q     | S     | Left in Place                    |
|                 |            |                   |                             | -         |               |   |        |            | <br>  <br> |             |           |         |       |       |                                  |
| 8/21/2008       | 310769-001 |                   | Comp. Floor 1               | 374       | 3370          | 4940                                    | 8684   |            | i          | -           |           |         |       |       | Removed Blended On Site          |
| 2008            | 310769-002 |                   | Comp Floor S.E. Corner      | 2         | 93.4          | 9.88                                    | 182    |            |            |             | -         |         |       |       | Removed Blended On Site          |
| 8/21/2008       | 310769-003 |                   | Comp. Floor 2               | 504       | 2890          | 497                                     | 3591   |            |            |             | -         |         |       |       | Removed Blended On Site          |
| 8/28/2008       | 311359-001 |                   | Center Deep Floor           | 2         | 62.5          | 44.7                                    | 107.2  |            | 1          | Q           | QN        | 2       | g     | Q     | Left in place/Bottom Hole sample |
| 8/28/2008       | 311359-002 |                   | North Wall Center Deep      | Q         | 23.7          | Q                                       | 23.7   |            |            |             |           |         |       |       | Left in place/Bottom Hole sample |
| 8/28/2008       | 311359-003 |                   | Center Deep Wall Composite  | 2         | 21.3          | 2                                       | 27.3   | -          |            |             | -         |         |       |       | Left in place/Bottom Hole sample |
| 8/28/2008       | 311359-004 |                   | East Wall Intermediate      | 2         | 2             | Q                                       | Q.     | -          |            |             | 1         |         |       |       | Left in place/Bottom Hole sample |
| 8/28/2008       | 311359-005 |                   | Wall Composite Intermediate | 2         | 24.1          | 2                                       | 24.1   |            |            |             |           | -       |       |       | Left in place/Bottom Hole sample |
| 9/5/2008        | H15879-1   |                   | N.E. Bottom                 | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in place/Bottom Hole sample |
| 9/5/2008        | H15879-2   |                   | Walls                       | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         | -     |       | Left in place/Bottom Hole sample |
| 9/5/2008        | H15879-3   |                   | E.S. Bottom Wall            | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             | +         |         |       |       | Left in place/Bottom Hole sample |
| 9/5/2008        | H15879-4   |                   | S.W. Bottom Wall            | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in place/Bottom Hole sample |
| 9/5/2008        | H15879-5   |                   | W.N. Top Wall               | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in place/Bottom Hole sample |
| 9/5/2008        | H15879-6   |                   | Floor                       | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in place/Bottom Hole sample |
| 9/2/5008        | H15879-7   |                   | N.W. Floor                  | <25.0     | <25.0         | <25.0                                   | <25.0  |            | +          | +           |           |         |       |       | Left in place/Bottom Hole sample |
| 9/11/2008       | H15910-1   |                   | L.L. R.P.                   | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in place/Bottom Hote sample |
| 9/11/2008       | H15910-2   |                   | L.L. Floor composite        | <25.0     | <25.0         | <25.0                                   | <25.0  |            | V          | <16         |           |         |       |       | Left in place/Bottom Hole sample |
| 9/11/2008       | H15910-3   |                   | L.L. N.W. Bottom            | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            | 48          |           |         |       |       | Left in place/Bottom Hole sample |
| 9/11/2008       | H15910-4   |                   | L.L. Walls                  | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in place/Bottom Hole sample |
| 9/11/2008       | H15910-7   | Soil Pile         | Stockpile E                 | 49.8      | 2770          | 159                                     | 2979   |            | -          |             |           |         |       |       | StockPile E Blended on-site      |
| 9/15/2008       | H15932-2   | Soil Pile         | Stockpile E "Blending Test" | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       |       | Left in Place                    |
| 9/16/2008       | H15932-2   | Soil Pile         | Stockpile E                 |           |               |   |        |            |            | 96          |           |         |       |       | StockPile E Blended on-site      |
| 9/22/2008       | H15959-1   | Soil Pile         | Stockpile FA                | <25.0     | <25.0         | <25.0                                   | <25.0  | ļ          |            |             |           |         |       | -     | Stockpile used for Blending      |
| 9/22/2008       | H15959-2   | Soil Pile         | Stockpile FB                | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             |           |         |       | 1     | Stockpile used for Blending      |
| 9/26/2008       | H15991-1   | Blended Soil Pile | Stockpile EA                | <25.0     | 130           | <25.0                                   | 130    |            |            |             |           |         |       |       | Reworked and Sampled again       |
| 10/1/2008       | H16019-1   | Blended Soil Pile | Stockpile EA                | <25.0     | 126           | <25.0                                   | 126    |            |            |             |           |         |       |       | Reworked and Sampled again       |
| 10/6/2008       | H16051-1   | Blended Soil Pile | Stockpile EA                | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            | _           |           |         |       |       | Ready For Backfill               |
| 10/6/2008       | H16051-2   | Blended Soil Pile | Stockpile EB                | <25.0     | <25.0         | <25.0                                   | <25.0  |            |            |             | _         |         |       |       | Ready For Backfill               |
| 10/8/2008       | H16074-1   | Blended Soil Pile | Stockpile EC                | <25.0     | 78.3          | <25.0                                   | 78.3   |            |            |             |           |         |       | İ     | Ready For Backfill               |
| 10/10/2008      | H16098-1   | Blended Soil Pile | Stockpile ED                | <25.0     | 30.8          | <25.0                                   | 30.8   |            |            |             |           |         |       |       | Ready For Backfill               |
| 10/16/2008      | H16130-1   | Blended Soil Pile | Stockpile EF                | <25.0     | 89.4          | <10.0                                   | 89.4   |            |            |             |           |         |       |       | Ready For Backfill               |
| 10/20/2008      | H16146-1   | Blended Soil Pile | Stockpile EG                | <10.0     | <10.0         | <10.0                                   | <10.0  |            |            |             |           |         |       |       | Ready For Backfill               |
| 10/22/2008      | H16174-1   | Blended Soil Pile | Stockpile EH                | <10.0     | 18.0          | <10.0                                   | 18.0   |            |            | <u> </u>    |           |         |       |       | Ready For Backfill               |
| 10/24/2008      | H16196-1   | Blended Soil Pile | Stockpile El                | <10.0     | 60.2          | <10.0                                   | 60.2   |            | -          |             |           |         |       |       | Ready For Backfill               |
| 10/27/2008      | H16202-1   | Blended Soil Pile | Stockpile E.J               | <10.0     | 52.0          | <10.0                                   | 52.0   |            | L          |             |           |         |       |       | Ready For Backfill               |
| 10/29/2008      | H16215-1   | Blended Soil Pile | Stocknile FK                | <10.0     | 30.8          | <10.0                                   | 30.8   |            | _          | <br> -      |           |         |       |       | Beady For Backfill               |
| 10/31/2008      | H16249-1   | Blended Soil Pile | Stockpile EL                | <10.0     | 35.5          | <10.0                                   | 35.5   |            | -          |             | <u> </u>  |         |       |       | Ready For Backfill               |
| 11/3/2008       | H16261-1   | Blended Soil Pile | Stockpile EM                | <10.0     | 50.6          | <10.0                                   | 50.6   |            |            | _           |           |         |       |       | Ready For Backfill               |
| 11/4/2008       | H16268-1   | Blended Soil Pile | Stockpile EN                | <10.0     | 36.2          | <10.0                                   | 36.2   |            |            |             |           |         |       |       | Ready For Backfill               |
| 11/6/2008       | H16279-1   | Blended Soil Pile | Stockpile EO                | <10.0     | 48.2          |   | ٠.     |            |            |             |           | _       | -     |       | 13-1-0-1-1-C                     |
| 1 1 1 1 1 1 1 1 |            |                   |                             |           | 40.7          | <10.01>                                 | 48.2   |            |            |             |           |         | -     |       | Heady For Backfill               |

7/17/200

|  | Date Collected | Report #  | Depth Of Sample     | Location                     | C-6-CI | C10-C28   | C-6-C10 C10-C28 C28-C35 C6-C35 | C6-C35 TPH 418.1 | 18.1 Chloride |            | Benzene | Loluene | Chloride Benzene Toluene Ethylbenzene | p/m-Xylene o-Xlyene | o-Xiyene | Status of Soil                       |
|--|----------------|-----------|---------------------|------------------------------|--------|-----------|--------------------------------|------------------|---------------|------------|---------|---------|---------------------------------------|---------------------|----------|--------------------------------------|
| H16309-1         Blanned Soll Pile         Stockholie EO A (100)         66.2         A (100)         GEA         A (100)  |                |           |                     |                              | mg/kg  | mg/kg     | _                              | _                | _             |            | mg/kg   | mg/kg   | mg/kg                                 | mg/kg               | mg/kg    |                                      |
| H163D5-2         Bennade Soil Pile         Stockbelie ER         < 100         117         < 100         117         < 100         117         < 100         H163D5-2         Bennade Soil Pile         Stockbelie ER         < 100         117         < 100         H163D5-1         Character Soil Pile         February Soil Soil Browney         Total stylenes         Total   | 11/11/2008     | H16305-1  | Blended Soil Pile   | Stockpile EQ                 | <10.0  | 50.4      | _                              |                  |               |            |         |         |                                       |                     |          | Ready For Backfill                   |
| H1539-1   Blandeed Boli Pile   Stockpile PO & Eff   Chiori   Blandeed Boli Pile   Stockpile PO & Eff   Chiori   Blandeed Boli Pile   Stockpile Po & Eff   Chiori   Blandeed Boli Pile   Stockpile Po & Chiori   Blandeed Boli Pile Policy   Chiori   C   | /2008          | H16305-2  | Blended Soil Pile   | Stockpile ER                 | <10.0  | 117       | <10.0                          | 117              |               |            |         |         |                                       |                     |          | Reworked and Sampled again           |
| H15011-1   Surface to 8 ft.   North Wall N.C.T.   <10.0 < 10.0 < 10.0   1.6 < 20.0   20.0   1.   | 11/17/2008     | H16349-1  | Blended Soil Pile   | Stockpile EQ & ER            | <10.0  | 66.2      | <10.0                          | 66.2             |               |            |         |         |                                       |                     |          | Ready For Backfill                   |
| Highlite   Surface to 8 th   |                |           |                     |                              |        |           |                                |                  |               |            |         |         |                                       |                     |          |                                      |
| H15011-1 Surface to 6 ft. Worth Wall N.C.T. < <10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0 < 10.0   |                |           |                     | Below Grade Tank Location (  |        |           |                                |                  |               | Chloride   |         | Toluene | Ethylbenzene                          |                     |          |                                      |
| H15011-12         Surface to Bit.         North Wall NET.         < <ul> <li>10.0              <li>10.0             <li>10.0             <li>10.0</li> <li>10.0             <li>10.0<td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>4500 CL`E</td><td></td><td>mg/kg</td><td>mg/kg</td><td>mg/kg</td><td></td><td></td></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></li></ul> |                |           |                     |                              |        |           |                                |                  |               | 4500 CL`E  |         | mg/kg   | mg/kg                                 | mg/kg               |          |                                      |
| H150112         Surface to 6th         Week Wall         < 100         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000         < 1000   | 2008           | H15011-1  | Surface to 8 ft.    | North Wall N.E.T.            | <10.0  | <10.0     |                                |                  |               | 272        | <0.001  | <0.001  | <0.001                                | <0.003              |          | Left in place                        |
| H15011-3         Surface 10 8 ft.         Free Month Well         < 10.00         < 10.00         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.001         < 0.0  | 6/18/2008      | H15011-2  | Surface to 8 ft.    | West Wall W.C.T.             | <10.0  | <10.0     |                                |                  |               | 16         | <0.001  | <0.001  | <0.001                                | <0.003              |          | Left in place                        |
| Hi   | 6/18/2008      | H15011-3  | 8 ft.               | Floor                        | <10.0  | <10.0     |                                |                  |               | 7440       | <0.001  | <0.001  | <0.001                                | <0.003              |          | Removed Hauled to Texas for Backfill |
| H15011-5         Surface to 8th         East Wall         <10.0         <10.0           H15011-7         Surface to 8th         West Wall         <10.0  | 6/18/2008      | H15011-4  | Surface to 8 ft.    | North Wall                   | <10.0  | <10.0     |                                |                  |               |            |         |         |                                       |                     |          | Left in place                        |
| H15011-6         Surface to 6 ft.         South Wall         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10.0         <10   | 6/18/2008      | H15011-5  | Surface to 8 ft.    | East Wall                    | <10.0  | <10.0     |                                |                  |               |            |         |         |                                       |                     |          | Left in place                        |
| H15175-1         Soil Pite Composite         Stockpile 'G'         C10.0         <   | 2008           | H15011-6  | Surface to 8 ft.    | South Wall                   | <10.0  | <10.0     |                                |                  |               |            |         |         |                                       |                     |          | Left in place                        |
| H-15175-1 Soll Pile Composite Stockpile '19'   | 2008           | H15011-7  | Surface to 8 ft.    | West Wall                    | <10.0  | <10.0     |                                |                  |               |            |         |         |                                       |                     |          | Left in place                        |
| H-15175-1         Soil Pile Composite         Stockpile 'B'         R80           H-15186-2         8 ft.         NW Corner         16           H-15186-3         Surface to 8 ft.         NW Starface to 8 ft.         16           H-15186-3         Surface to 8 ft.         West Ramp Wall         16           H-15186-3         12 ft.         4 ft.B. Floor         16           H-15186-3         12 ft.         17 ft.         17 ft.           H-15186-3         12 ft.         14 ft.         17 ft.           H-15186-3         12 ft.         14 ft.         17 ft.           H-15186-4         12 ft.         14 ft.         17 ft.           H-15186-5         12 ft.         14 ft.         17 ft.           H-15186-6         16 ft.         16 ft.         17 ft.           H-15186-7         16 ft.         17 ft.         17 ft.           H-15186-8         16 ft.         17 ft.         17 ft.           H-15186-9         16 ft.         17 ft.         17 ft. </td <td></td>  |                |           |                     |                              |        |           |                                |                  |               |            |         |         |                                       |                     |          |                                      |
| H.15186-2         Soil Pile Composite         Nuv Corner         788           H.15186-2         8 ft.         Nuv Corner         16           H.15186-3         Surface to 8 ft.         Nuv Corner         16           H.15186-3         Surface to 8 ft.         Nuv Corner         16           H.15186-3         Surface to 8 ft.         Very RT-B. Floor         13200           H.15186-3         12 ft.         4 ft.B. Floor         13200           H.15186-3         12 ft.         6 ft.B. Floor         13200           H.15186-3         18 ft.         1 ft.         1 ft.           H.15186-3         18 ft.         1 ft.         1 ft.           H.15186-4         10 ft.         6 ft.B. Floor         1 ft.           H.15186-7         16 ft.         8 ft.B. Floor         1 ft.           H.15186-7         16 ft.         8 ft.B. Floor         1 ft.           H.15186-7         16 ft.         8 ft.B. Floor         1 ft.           H.15186-8         8 ft.         8 ft. ft.M. floor         1 ft.           S08384         8 ft.         8 ft. ft.M. floor         1 ft.           H.15300-1         Sull Floor         1 ft.           H.15300-1         Sull Floor         1  | 2008           | H-15175-1 | Soil Pile Composite | Stockpile "B"                |        |           |                                |                  |               | 880        |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H-15186-2         8ft.         NW Corner         B0           H-15186-3         Surface to 8ft.         West Prompt Wall         156           H-15186-5         12ft.         2 FT.B. Floor         13200           H-15186-6         12ft.         4 FT.B. Floor         13200           H-15186-6         12ft.         6 FT.B. Floor         11600           H-15186-7         14ft.         6 FT.B. Floor         16ft.           H-15186-8         18ft.         16 FT.B. Floor         16ft.           H-15186-9         18ft.         15 FT.B. Floor         16ft.           H-15186-9         20ft.         15 FT.B. Floor         16ft.           H-15186-9         20ft.         15 FT.B. Floor         16ft.           H-15186-9         20ft.         20ft.         26000           H-15186-9         20ft.         26ft.         26600           H-15186-9         Sulface under StockPile 'C'         410.0         410.0           H15310-5         Sulface under StockPile 'C'         410.0         410.0           H15310-6         Soil Pile Composite         AB Floor         704           H15321-1         Soil Pile Test         C-6C12         C12-C28         C5-C35           C-6C   | 5008           | H-15175-2 | Soil Pile Composite | Stockpile "A"                |        |           |                                |                  |               | 768        |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H-15186-2         Sufface to 8 ft.         NW Comer         80   |                |           |                     |                              | +      |           |                                |                  |               |            |         |         |                                       |                     |          |                                      |
| H-15186-3         Surface to 8ft.         West Ramp Wall         16         16         16         17200 <td>8008</td> <td>H-15186-2</td> <td>8 ft.</td> <td>NW Corner</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>80</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Left in Place</td>  | 8008           | H-15186-2 | 8 ft.               | NW Corner                    |        |           |                                |                  |               | 80         |         |         |                                       |                     |          | Left in Place                        |
| H-15186-4         10 ft.         2 FTB Floor         13200         13200           H-15186-5         12 ft.         6 FTB Floor         1400         1500         1500           H-15186-7         16 ft.         8 FTB Floor  | 8008           | H-15186-3 | Surface to 8 ft.    | West Ramp Wall               |        |           |                                |                  |               | 16         |         |         |                                       |                     |          | Left in Place                        |
| H-15186-5         12 ft.         4 FT.B. Floor         13200         13200           H-15186-6         14 ft.         6 FT.B. Floor         11600         11600         11600           H-15186-7         16 ft.         17 FT.B. Floor         16 ft.         12400         1600           H-15186-8         18 ft.         10 FT.B. Floor         1600         26000         26000           H-15186-9         20 ft.         12 FT.B. Floor         10 FT.B. Floor         1600         1600           H-15186-9         20 ft.         12 FT.B. Floor         1600         1600         1600           H-15186-9         20 ft.         20 ft.         26000         26000         2600           H-15186-9         20 ft.         26000         2600         2600         2600           H-15186-9         8 ft.         8 ft. fm floor         4100         410         4100         4100         4  | 8008           | H-15186-4 | 10 ft.              | 2 FT.B. Floor                |        |           |                                |                  |               | 13200      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H-15186-6         14ft         6 FTB. Floor         116000         11600         116000         116000 <td>8008</td> <td>H-15186-5</td> <td>12 ft.</td> <td>4 FT.B. Floor</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>13200</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Removed Hauled to Texas for Backfill</td>  | 8008           | H-15186-5 | 12 ft.              | 4 FT.B. Floor                |        |           |                                |                  |               | 13200      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H-15186-7         16 ft.         8 FT.B. Floor         RT.B. Floor         PT.B. Floor <t< td=""><td>2008</td><td>H-15186-6</td><td>14 ft.</td><td>6 FT.B. Floor</td><td></td><td></td><td></td><td></td><td></td><td>11600</td><td></td><td></td><td></td><td></td><td></td><td>Removed Hauled to Texas for Backfill</td></t<>  | 2008           | H-15186-6 | 14 ft.              | 6 FT.B. Floor                |        |           |                                |                  |               | 11600      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H-15186-8         18 ft.         10 FT.B. Floor         16000 <td>2008</td> <td>H-15186-7</td> <td>16 ft.</td> <td>8 FT.B. Floor</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>12400</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Removed Hauled to Texas for Backfill</td>   | 2008           | H-15186-7 | 16 ft.              | 8 FT.B. Floor                |        |           |                                |                  |               | 12400      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H-15186-9         20 ft.         12 FT.B. Floor         Proposed   | 2008           | H-15186-8 | 18 ft.              | 10 FT.B. Floor               |        |           |                                |                  |               | 16000      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| 308364         8 ft.         8 ft. frm floor         15300   | 2008           | H-15186-9 | 20 ft.              | 12 FT.B. Floor               |        |           |                                |                  |               | 26000      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| 308364         8 ft. rm floor         8 ft. rm floor         15300         15300         15300         9 <td></td> <td>Removed Hauled to Texas for Backfill</td>   |                |           |                     |                              |        |           |                                |                  |               |            |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H15238-1         Soil Pile Composte         StockPile *C*         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0         < 10.0 <td>2008</td> <td>308364</td> <td>8 ft.</td> <td>8 ft. frm floor</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>15300</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Removed Hauled to Texas for Backfill</td>  | 2008           | 308364    | 8 ft.               | 8 ft. frm floor              |        |           |                                |                  |               | 15300      |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| H1553B-1   Soil Pile Composile   Soil Pile Test   Stock Pile "C"   C-6-C12   C12-C28   C28-C35   C28-C35   C28-C35   C28-C35   C28-C35   C28-C35   C28-C35   C38-C35   C   | 000            |           |                     |                              |        |           |                                |                  |               |            |         |         |                                       |                     |          |                                      |
| H15910-5 Surface   Soil Surface Under Stockpile   Soil Pile Test   Soil  | 5008           | H15238-1  | Soil Pile Composte  | StockPile 'C'                | <10.0  | <10.0     |                                |                  |               | 526        |         |         |                                       |                     |          | Hemoved Hauled to Texas for Backfull |
| H15910-5         Surface         AB Floor         AB Composite   |                |           |                     | Soil Surface under Stockpile |        |           |                                |                  |               |            |         |         |                                       |                     |          |                                      |
| H15910-6         Soil Pile Composite         AB Composi   | 2008           | H15910-5  | Surface             | AB Floor                     |        |           |                                |                  |               | <16        |         |         |                                       |                     |          | Left in Place                        |
| H15932-1 Soil Pile Test Stock Pile "C" 480 480 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6   | 2008           | H15910-6  | Soil Pile Composite | AB Composite                 |        |           |                                |                  |               | 704        |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| C6-C35   | 2008           | H15932-1  | Soil Pile Test      | Stock Pile "C"               |        |           |                                |                  |               | 480        |         |         |                                       |                     |          | Removed Hauled to Texas for Backfill |
| CG-C33   |                |           |                     |                              | 7      | 24.0      |                                | 26.735           |               | EDA 200    |         |         |                                       |                     |          |                                      |
|  |                |           |                     |                              | 2      | 2 212-220 | - 1                            | 557-02           |               | - FT # 300 |         |         |                                       |                     |          |                                      |

# **Boyd Compressor**

|                                |       |               |                   |                   |                   |                   | _                 |               | . , | <br> |                                |       |                            |               |                     |             | <br>, | <br>, | , | <br>_ | <br> |  |   | , |
|--------------------------------|-------|---------------|-------------------|-------------------|-------------------|-------------------|-------------------|---------------|-----|------|--------------------------------|-------|----------------------------|---------------|---------------------|-------------|-------|-------|---|-------|------|--|---|---|
| Status of Soil                 |       | Left in Place | Left in Place     | Left in Place     | Left in Place     | Left in Place     | Left in Place     | Left in Place |     |      |                                |       |                            | Left in Place |                     |             |       |       |   |       |      |  |   |   |
| o-Xlyene                       | mg/kg |               | Fe                | <br> <br>         | Te                | Fe                | Le                | Le            |     |      |                                |       |                            | Le            |                     | ,           |       |       |   |       |      |  |   |   |
| p/m-Xylene                     | mg/kg |               |                   |                   |                   |                   |                   |               |     |      |                                |       |                            |               | <0.150              |             |       |       |   |       |      |  |   |   |
| Ethylbenzene                   | mg/kg |               |                   |                   |                   |                   |                   |               |     |      |                                |       |                            |               | <0.050              |             |       |       |   |       |      |  |   |   |
| Toluene                        | mg/kg |               |                   |                   |                   |                   |                   |               |     |      |                                |       |                            |               | <0.050              |             |       |       |   |       |      |  | _ |   |
| Benzene                        | mg/kg |               |                   |                   |                   |                   |                   |               |     |      |                                |       |                            |               | <0.050              |             |       |       |   |       |      |  |   |   |
| Chloride                       | mg/kg | 23100         |                   |                   |                   |                   |                   | 182           |     |      | EPA 300                        | mg/kg |                            | 96            | <16                 | 32          |       |       |   |       |      |  |   |   |
| Chloride                       | mg/kg | 7197          | 5198              | 5398              | 5198              | 1239              | 580               | 80            |     |      |                                |       |                            |               |                     |             |       |       |   |       |      |  |   |   |
| TPH 418.1                      | mg/kg |               |                   | _                 |                   |                   |                   |               |     |      |                                | _     |                            |               |                     |             |       |       |   |       |      |  |   |   |
|                                | mg/kg |               |                   |                   |                   |                   |                   | Q             |     |      | C6-C35                         | mg/kg |                            |               | <25.0               |             |       |       |   |       |      |  |   |   |
| C-6-C10 C10-C28 C28-C35 C6-C35 | mg/kg |               |                   |                   |                   |                   |                   | QN            |     |      | C-6-C10 C10-C28 C28-C35 C6-C35 | mg/kg |                            |               | <25.0               |             |       |       |   |       |      |  |   |   |
| C10-C28                        | mg/kg | $\vdash$      |                   |                   |                   |                   |                   | QN            |     |      | C10-C28                        | mg/kg |                            |               | <25.0               | 9.69        |       |       |   |       |      |  |   |   |
| C-6-C10                        | mg/kg |               |                   |                   |                   |                   |                   | QN            |     |      | C-6-C10                        | mg/kg |                            |               | <25.0               | <25.0       |       |       |   |       |      |  |   |   |
| Location                       |       | S.B.1         | S.B.1             | S.B.1             | S.B.1             | S.B.1             | S.B.1             | S.B.1         |     |      |                                |       | Above Ground Tank Location | 2" CK V/V     | Stock Pile #5       | Stockpile F |       |       |   |       |      |  |   |   |
| Depth Of Sample                |       | 30 ft.        | 35 ft.            | 40 ft.            | 45 ft.            | 50 ft.            | 55 ft.            | 60 ft.        |     |      |                                |       |                            | 2 ft.         | Soil Pile Composite | Soil Pile   |       |       |   |       |      |  |   |   |
| Report #                       |       | 308900-001    | Straub Field test | 308900-002    |     |      |                                |       |                            | H-15186-1     | H15857-1            | H15991-2    |       |       |   |       |      |  |   |   |
| Date Collected                 |       | 7/29/2008     | 7/29/2008         | 7/29/2008         | 7/29/2008         | 7/29/2008         | 7/29/2008         | 7/29/2008     |     |      |                                |       |                            | 7/17/2008     | 9/3/2008            | 9/26/2008   |       |       |   |       |      |  |   |   |

From: Savoie, Tony [tony.savoie@sug.com] Sent: Thursday, October 02, 2008 11:26 AM

Lowe, Leonard, EMNRD

Subject: Re: Boyd Compressor GW-269

I talked with Wayne a couple of weeks ago regarding the chloride closure and ladowner concerns. I will call you later to discuss.

Tony

To:

Sent using BlackBerry

---- Original Message ----

From: Lowe, Leonard, EMNRD < Leonard.Lowe@state.nm.us>

To: Savoie, Tony

Cc: Price, Wayne, EMNRD < wayne.price@state.nm.us>

Sent: Thu Oct 02 12:24:55 2008

Subject: RE: Boyd Compressor GW-269

Tony,

Good morning.

What is the status of the clean up for closure of GW-269? The last I recall you were going to get me some sample results.

"From: Savoie, Tony [mailto:tony.savoie@sug.com]

Sent: Monday, June 30, 2008 9:34 AM

To: Lowe, Leonard, EMNRD

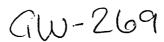
Subject: RE: Boyd Compressor Station BGT closure

The BGT was used to store water and or sediment that was drained from the Above ground storage tank. SUGS never used the BGT for this purpose, so it is hard to say when it was last used. It was empty the first time I looked at it in 2002. We removed the BGT and discovered that the bolts used to secure the two sections of the fiberglass tank had corroded and probably allowed some of the fluid to leak from the tank into the ground, we are in the process of determining the extent of the contamination found under the tank. We are sampling for TPH, BTEX, and Chlorides. I will pass the results of the analytical on to you as soon as this is accomplished. We will not backfill any of the excavations until you have had a chance to review the data.

Our Landfarm was first permitted for Sid Richardson Energy Services, we submitted and received the name change information from Sid Richardson to Southern Union Gas Services from Brad Jones on 10/19/06.

Our permit number is NM-02-0019

Let me know.



From: Savoie, Tony [tony.savoie@sug.com]

**Sent:** Monday, June 30, 2008 10:48 AM

To: Lowe, Leonard, EMNRD

Subject: RE: Boyd Compressor Station BGT closure

It was a single walled fiberglass tank.

Tony

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]

**Sent:** Monday, June 30, 2008 11:48 AM

To: Savoie, Tony

Subject: RE: Boyd Compressor Station BGT closure

Is the BGT single or double walled?

From: Savoie, Tony [mailto:tony.savoie@sug.com]

**Sent:** Monday, June 30, 2008 9:34 AM

To: Lowe, Leonard, EMNRD

Subject: RE: Boyd Compressor Station BGT closure

The BGT was used to store water and or sediment that was drained from the Above ground storage tank. SUGS never used the BGT for this purpose, so it is hard to say when it was last used. It was empty the first time I looked at it in 2002. We removed the BGT and discovered that the bolts used to secure the two sections of the fiberglass tank had corroded and probably allowed some of the fluid to leak from the tank into the ground, we are in the process of determining the extent of the contamination found under the tank. We are sampling for TPH, BTEX, and Chlorides. I will pass the results of the analytical on to you as soon as this is accomplished. We will not backfill any of the excavations until you have had a chance to review the data.

Our Landfarm was first permitted for Sid Richardson Energy Services, we submitted and received the name change information from Sid Richardson to Southern Union Gas Services from Brad Jones on 10/19/06.

Our permit number is NM-02-0019

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]

**Sent:** Monday, June 30, 2008 10:20 AM

To: Savoie, Tony

Subject: RE: Boyd Compressor Station BGT closure

Tony,

Clarification: the BGT on this facility was used to store water from the scrubber? When was the last time this BGT contained liquid?

Do your land farms have an NM-XXX OCD number?

llowe

**From:** Savoie, Tony [mailto:tony.savoie@sug.com]

**Sent:** Monday, June 30, 2008 6:19 AM

Subject: RE: Boyd Compressor Station BGT closure

Sorry about the delay in response, I have been on vacation.

I used the new BGT closure guidelines for my remediation plan.

Yes, we do operate a centralized landfarm. We do not accept any wastes generated outside of SUGS facilities. We do not deal with drilling pit wastes, however we have started sampling all of our remediation projects for chlorides. And have sampled the landfarm for chlorides the last two sampling events.

Thanks, Tony

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]

**Sent:** Thursday, June 26, 2008 5:56 PM

To: Savoie, Tony

Subject: Boyd Compressor Station BGT closure

Importance: High

Tony,

I have reviewed your submitted closure plan for the Boyd Compressor Station.

I have made some points.

Being that the new pit rule is in effect, which includes Below Grade Tanks, I can not make a sufficient determination to conclude your submitted closure plan for this facility.

Wayne is out providing guidance on the new pit rule this week.

He will be in the office next week and as his schedule will allow I will present my conclusions to him. We are in the stages of the fine line between old rule and new rule.

One question for now: Does SUG have their own land farms? You are aware of chloride limits for land farms, right?

llowe

#### **Leonard Lowe**

Environmental Engineer
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