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REMEDIATION SUMMARY & SITE CLOSURE REQUEST

SOUTHERN UNION GAS SERVICES

TRUNK "O" LINE (1RP-2612)

HISTORICAL RELEASE SITE

Lea County, New Mexico

Unit Letter "J" (NW/SE), Section 33, Township 21 South, Range 36 East

Latitude 32° 25.808' North, Longitude 103° 16.221' West

NMOCD Reference # 1RP-2612

Prepared For:

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

Prepared By:

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

January 2013

Joel W. Lowry
Project Manager

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1.0 INTRODUCTION & BACKGROUND INFORMATION

Basin Environmental Service Technologies, LLC (Basin), on behalf of Southern Union Gas Services (Southern Union), has prepared this *Remediation Summary & Site Closure Request* for the Trunk “O” Line Historical Release Site (1RP-2612). The legal description of the release site is Unit Letter “J” (NW/SE), Section 33, Township 21 South, Range 36 East, in Lea County, New Mexico. The geographic coordinates of the release site are 32° 25.808' North latitude and 103° 16.221' West longitude. The property affected by the release is owned by the Dasco Land Corporation. Please reference Figure 1 for a "Site Location Map".

On September 17, 2010, Southern Union discovered a release had occurred on the Trunk “O” Line. The “Release Notification and Corrective Action Form” (Form C-141) indicated failure of a section of thirty-inch (30”) low-pressure pipeline resulted in the release of approximately one hundred twenty-six barrels (126 bbls) of a crude oil and produced water mixture. During initial response activities the temporary pipeline clamp was installed and a vacuum truck was utilized to recover approximately one hundred six barrels (106 bbls) of free-standing fluids. The release was reported to the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office on September 17, 2010. The Form C-141 indicated the release affected an area measuring approximately thirty feet (30’) in length, twenty feet (20’) in width, and ten feet (10’) in depth. General photographs of the release site are provided as Appendix A. The Form C-141 is provided as Appendix D.

2.0 NMOCD SITE CLASSIFICATION

A search of the New Mexico Water Rights Reporting System (NMWRRS) database maintained by the New Mexico Office of the State Engineer (NMOSE) indicated information was unavailable for Section 33, Township 21 South, Range 36 East. A depth to groundwater gradient map utilized by the NMOCD indicates groundwater should be encountered at approximately three hundred seventy-five feet (375’) below ground surface (bgs). Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

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

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

NMOCD guidelines indicate the Trunk “O” Line Historical Release Site has an initial ranking score of zero (0) points. The soil remediation levels for a site with a ranking score of zero (0) points are as follows:

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

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

3.0 SUMMARY OF SOIL REMEDIATION ACTIVITIES

On October 26, 2011, excavation of impacted soil commenced at the release site. Excavated material was blended and stockpiled on-site pending final disposition. A photo-ionization detector (PID) and chloride field test kit was used to field screen select soil samples and guide the excavation. The floor and sidewalls of the excavation were advanced to the maximum extent possible given the nature of the machinery and proximity to active natural gas pipelines.

A series delineation trenches were advanced in an effort to determine the horizontal extent of soil impact. During the advancement of the delineation trenches, soil samples were collected and field-screened using a PID and chloride field test kit. Select soil samples were submitted to Xenco Laboratories of Odessa, Texas, for determination of BTEX, TPH and chloride concentrations in accordance with EPA Methods SW 846-8021B, SW 846-8015M and 300/300.1, respectively.

Delineation trench “West Trench” was advanced near the western margin of the pooling area. The delineation trench was advanced to approximately eight feet (8’) bgs and extended approximately five feet (5’) to the west of the open excavation. Following the advancement of the delineation trench, one (1) soil sample (West Trench 8’ Floor) was collected and submitted to the laboratory for analysis. Soil sample “West Trench 8’ Floor” exhibited a BTEX concentration of 0.00419 mg/Kg, a TPH concentration of 108 mg/Kg and a chloride concentration of 607 mg/Kg. Based on laboratory analytical results, further delineation would be required in the area defined by soil sample “West Trench 8’ Floor”. Laboratory analytical reports are provided as Appendix C.

Delineation trench “North Trench” was advanced near the northern margin of the pooling area. The delineation trench was advanced to approximately nine feet (9’) bgs and extended approximately five feet (5’) to the north of the open excavation. Following the advancement of the delineation trench, one (1) soil sample (North Trench 9’ Floor) was collected and submitted to the laboratory for analysis. Laboratory analytical results indicated the concentration of BTEX was less than the laboratory method detection limit (MDL). Soil sample “North Trench 9’ Floor” exhibited a TPH concentration of 20.0 mg/Kg and a chloride concentration of 29.9 mg/Kg. Based on laboratory analytical results, the northern extent of soil impact had been determined.

Delineation trench “South Trench” was advanced near the southern margin of the pooling area. The delineation trench was advanced to approximately nine feet (9’) bgs and extended approximately five feet (5’) to the south of the open excavation. On advancement of the delineation trench, one (1) soil sample (South Trench 9’ Floor) was collected and submitted to the laboratory for analysis. Laboratory analytical results indicated the concentration of BTEX was less than the laboratory MDL. Soil sample “South Trench 9’ Floor” exhibited a TPH concentration of 25.3 mg/Kg and a chloride concentration of 711 mg/Kg. Based on laboratory analytical results, further delineation would be required in the area defined by soil sample “South Trench 9’ Floor”.

One (1) soil sample (14' Floor) was collected from the floor of the excavation at approximately fourteen feet (14') bgs and submitted to the laboratory for analysis. Soil sample "14' Floor" exhibited a benzene concentration of 0.133 mg/Kg, a BTEX concentration of 17.8 mg/Kg, a TPH concentration of 4,090 mg/Kg and a chloride concentration of 867 mg/Kg. Based on laboratory analytical results, further delineation would be required in the area defined by soil sample "14' Floor".

A delineation trench was not advanced to the east due the proximity of an active El Paso Natural Gas Pipeline. It was determined that the advancement of soil borings would be necessary to safely determine the horizontal and vertical extent of soil impact. The excavation and delineation trenches were backfilled with the blended stockpiled material on-site. Prior to backfilling, the final dimensions of the excavation were approximately forty-five feet (45') in length, twenty feet (20') in width and fourteen feet (14') in depth.

On November 16, 2011, two (2) soil borings (SB-1 and SB-2) were advanced at the release site in order to determine the vertical and horizontal extent of soil impact. Soil samples were collected at five foot (5') drilling intervals and field screened using a PID and chloride field test kit. Selected soil samples were submitted to the laboratory for determination of BTEX, TPH and chloride concentrations. Soil boring logs are provided as Appendix B.

Soil boring SB-1 was located approximately fifteen feet (15') west of the release point, adjacent to the previously excavated area. The soil boring was advanced to a total depth of approximately thirty-five feet (35') bgs. Soil samples were collected at five (5), fifteen (15), twenty-five (25), thirty (30) and thirty-five (35) feet bgs and submitted to the laboratory. Laboratory analytical results indicated BTEX concentrations ranged from less than the laboratory MDL for soil samples SB-1 @ 25', SB-1 @ 30' and SB-1 @ 35' to 0.102 mg/Kg for soil sample SB-1 @ 5'. TPH concentrations ranged from less than the appropriate laboratory MDL for soil samples SB-1 @ 15', SB-1 @ 25', SB-1 @ 30' and SB-1 @ 35' to 42.5 mg/Kg for soil sample SB-1 @ 5'. Chloride concentrations ranged from 13.1 mg/Kg for soil sample SB-1 @ 5' to 58.0 mg/Kg for soil sample SB-1 @ 35'.

Soil boring SB-2 was located approximately fifteen feet (15') east of the release point, west of El Paso Natural Gas's active pipeline. The soil boring was advanced to a total depth of approximately thirty-five feet (35') bgs. Soil samples were collected at five (5), fifteen (15), twenty-five (25), thirty (30) and thirty-five (35) feet bgs and submitted to the laboratory for analysis. Laboratory analytical results indicated BTEX concentrations ranged from less than the laboratory MDL for soil samples SB-2 @ 15' and SB-2 @ 35' to 0.0431 mg/Kg for soil sample SB-2 @ 5'. TPH concentrations ranged from less than the appropriate laboratory MDL for soil samples SB-2 @ 5', SB-2 @ 25' and SB-2 @ 35' to 140 mg/Kg for soil sample SB-2 @ 15'. Chloride concentrations ranged from 49.0 for soil sample SB-2 @ 35' to 412 mg/Kg for soil sample SB-2 @ 5'. Based on laboratory analytical results, the eastern extent of soil impact had been determined.

On November 23, 2012, Basin revisited the Trunk "O" Line Historical Release Site. During the initial investigation, a series of delineation trenches were advanced in an effort to achieve horizontal delineation.

Delineation trench “West Trench” was advanced to the west in the area defined by soil sample “West Trench 8’ Floor”. During the advancement of the delineation trench, one (1) soil sample (West Trench #2 @ 11’) was collected and submitted to the laboratory for analysis of TPH and chloride concentrations. Laboratory analytical results indicated the TPH concentration was 111 mg/Kg and the chloride concentration was 35.6 mg/Kg. Based on these laboratory analytical results, the western extent of soil impact had been determined.

Delineation trench “South Trench” was advanced to the south in the area defined by soil sample “South Trench 9’ Floor”. During the advancement of the delineation trench, one (1) soil sample (South Trench #2 @ 11’) was collected and submitted to the laboratory for analysis of TPH and chloride concentrations. Laboratory analytical results indicated the TPH concentration was 195 mg/Kg and the chloride concentration was 18.0 mg/Kg. Based on these laboratory analytical results, the southern extent of soil impact had been determined.

4.0 QA/QC PROCEDURES

4.1 Soil Sampling

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

- BTEX concentrations in accordance with EPA Method SW-846 8021b
- TPH concentrations in accordance with modified EPA Method SW-846 8015M
- Chloride concentrations in accordance with EPA Method 300/300.1

4.2 Decontamination of Equipment

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

4.3 Laboratory Protocol

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

5.0 SITE CLOSURE REQUEST

Soil samples collected during the October 26, 2011, sampling event indicated concentrations of benzene, BTEX, TPH and chloride were below NMOCD regulatory remediation action levels in each of the submitted soil samples. Laboratory analytical results from the soil samples collected on November 19, 2012, indicated horizontal delineation had been achieved. Based on these laboratory analytical results, Basin recommends Southern Union provide the NMOCD Hobbs District Office a copy of this *Remediation Summary & Site Closure Request* and request the NMOCD grant site closure to the Trunk “O” Line Historical Release Site.

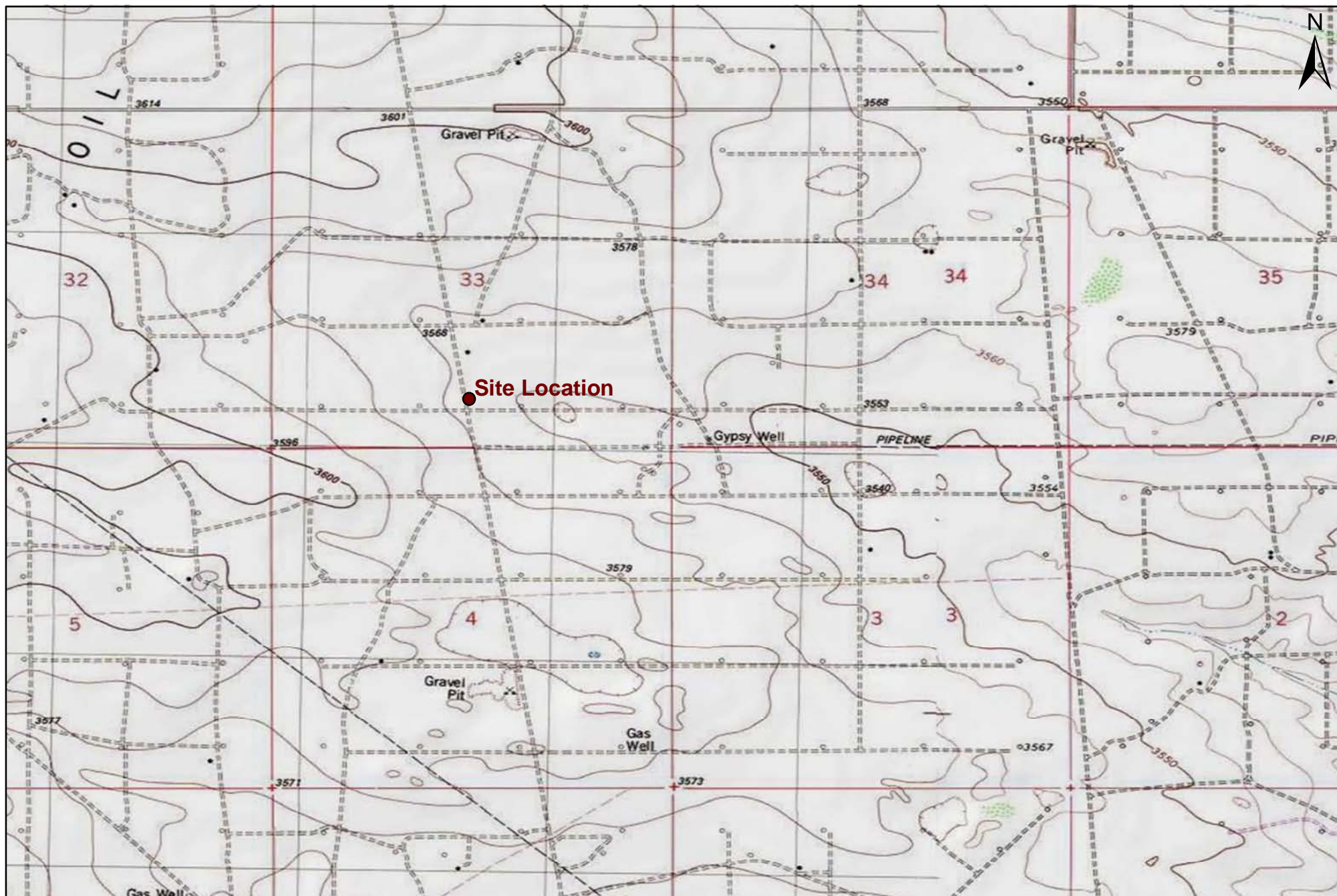
6.0 LIMITATIONS

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

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

7.0 DISTRIBUTION

- Copy 1: Geoffrey Leking
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division (District 1)
1625 French Drive
Hobbs, NM 88240
GeoffreyR.Leking@state.nm.us
- Copy 2: Rose Slade
Southern Union Gas Services
801 S. Loop 464
Monahans, Texas 79756
rose.slade@sug.com
- Copy 3: Basin Environmental Service Technologies, LLC
P.O. Box 301
Lovington, New Mexico 88260



1,000 500 0 1,000 2,000
 Distance in Feet

Figure 1
Site Location Map
Southern Union Gas Services
Trunk "O" Line
Lea County, New Mexico
NMOCD Reference #: 1RP-2612



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

Drawn By: BJA	Checked By: JWL
November 12, 2012	Scale: 1" = 2000'



SUG Trunk "A"

SUG Trunk "O" 30"

EPNG 30" Pipeline

SB-1		
Depth	Chloride	TPH
5'	13.1	42.5
15'	37.7	<15.8
25'	41.5	<15.7
30'	54.7	<15.6
35'	58.0	<15.5

SB-1

West Trench #2 @ 11'

West Trench 8' Floor

14' Floor	
TPH	4090
Chloride	867

14' bgs

14' bgs

North Trench 9' Floor

SB-2

South Trench 9' Floor

South Trench #2 @ 11'

SB-2		
Depth	Chloride	TPH
5'	412	<15.6
15'	114	140
25'	68.9	<16.0
30'	57.4	23.5
35'	49.0	<15.5

10 5 0 5 10

Distance in Feet

LEGEND:

- Excavation Extent
- Pipeline
- Road
- Delineation Trench
- Sample Location
- Soil Boring

Figure 2

Site & Sample Location Map
Southern Union Gas Services
Trunk "O" Line (1RP-2612)
Lea County, NM

Basin Environmental Services

Scale: 1" = 30'	Drawn By: JWL	Prepared By: BRB
October 22, 2012		

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES
TRUNK "O" LINE HISTORICAL (1RP-2612)
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 503C							METHOD: 8015M			TOTAL TPH	E 300
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M.P. - XYLENES (mg/Kg)	O-XYLENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO C ₆ -C ₁₂ (mg/Kg)	DRO C ₁₂ -C ₂₈ (mg/Kg)	ORO C ₂₈ -C ₃₅ (mg/Kg)	C ₆ -C ₃₅ (mg/Kg)	CHLORIDE (mg/Kg)
West Trench 8' Floor	8'	10/26/2011	In-situ	<0.0011	<0.0023	0.00283	<0.0023	0.00136	0.00136	0.00419	35.3	53.7	18.9	108	607
North Trench 9' Floor	9'	10/26/2011	In-situ	<0.0011	<0.0021	<0.0011	<0.0021	<0.0011	<0.0021	<0.0021	<15.9	20.0	<15.9	20.0	29.9
South Trench 9' Floor	9'	10/26/2011	In-situ	<0.0011	<0.0023	<0.0011	<0.0023	<0.0011	<0.0023	<0.0023	<17.1	25.3	<17.1	25.3	711
14' Floor	14'	10/26/2011	In-situ	0.133	0.840	3.51	9.33	3.98	13.3	17.8	1,520	1,870	700	4,090	867
SB-1 @ 5'	5'	11/16/2011	In-situ	0.0116	0.0165	0.0169	0.0376	0.0197	0.0573	0.102	<16.0	42.5	<16.0	42.5	13.1
SB-1 @ 15'	15'	11/16/2011	In-situ	0.00726	<0.0104	<0.0052	<0.0104	<0.0052	<0.0104	0.00726	<15.8	<15.8	<15.8	<15.8	37.7
SB-1 @ 25'	25'	11/16/2011	In-situ	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<0.0021	<15.7	<15.7	<15.7	<15.7	41.5
SB-1 @ 30'	30'	11/16/2011	In-situ	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<0.0021	<15.6	<15.6	<15.6	<15.6	54.7
SB-1 @ 35'	35'	11/16/2011	In-situ	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<0.0021	<15.5	<15.5	<15.5	<15.5	58.0
SB-2 @ 5'	5'	11/16/2011	In-situ	0.0111	<0.0103	<0.0052	0.0229	0.00905	0.0320	0.0431	<15.6	<15.6	<15.6	<15.6	412
SB-2 @ 15'	15'	11/16/2011	In-situ	0.0123	<0.0107	<0.0053	<0.0107	<0.0053	<0.0053	<0.0053	16.5	123	<16.0	140	114
SB-2 @ 25'	25'	11/16/2011	In-situ	<0.0011	<0.0021	0.00147	0.00370	0.00322	0.00692	0.00839	<16.0	<16.0	<16.0	<16.0	68.9
SB-2 @ 30'	30'	11/16/2011	In-situ	0.00776	<0.0104	0.00719	0.0146	<0.0052	0.0146	0.0296	<15.6	23.5	<15.6	23.5	57.4
SB-2 @ 35'	35'	11/16/2011	In-situ	<0.0010	<0.0021	<0.0010	<0.0021	<0.0010	<0.0021	<0.0021	<15.5	<15.5	<15.5	<15.5	49.0
West Trench #2 @ 11'	11'	11/19/2012	In-situ	-	-	-	-	-	-	-	<19.9	111	<19.9	111	35.6
South Trench #2 @ 11'	11'	11/19/2012	In-situ	-	-	-	-	-	-	-	<18.6	195	<18.6	195	18.0
NMOCD Standard				10						50				5,000	1,000



Photograph of the initial release at the Trunk "O" Line Historical Release Site.



Photograph of the initial release at the Trunk "O" Line Historical Release Site.



Photograph of the initial excavation at the Trunk "O" Line Historical Release Site.



Photograph of the initial excavation at the Trunk "O" Line Historical Release Site.



Photograph of the initial excavation at the Trunk "O" Line Historical Release Site.



Photograph of the advancements of soil borings at the Trunk "O" Line Historical Release Site.

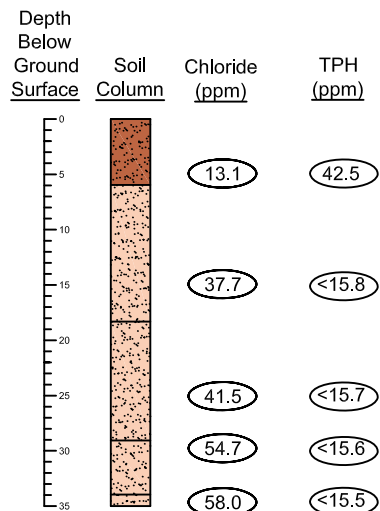


Photograph of the plugging of the soil borings at the Trunk "O" Line Historical Release Site.



Photograph of the Trunk "O" Line Historical Release Site after being backfilled.

Soil Boring SB-1



Soil Description

0' - 6' - Red Sand, F. Grained

6' - 18' - Tan Sand, F. Grained, Consolidated

18' - 29' - Tan Sand, F. Grained

29' - 34' - Tan Sand, F. Grained, Consolidated

34' - 35' - Tan Sand, F. Grained

Boring SB-1

Date Drilled November 16, 2011
 Thickness of Bentonite Seal 33 Ft
 Depth of Exploratory Boring 35 Ft bgs
 Depth to Groundwater _____
 Ground Water Elevation _____

Indicates the PSH level measured on _____
 Indicates the groundwater level measured on _____
 Indicates samples selected for Laboratory Analysis.

Completion Notes

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

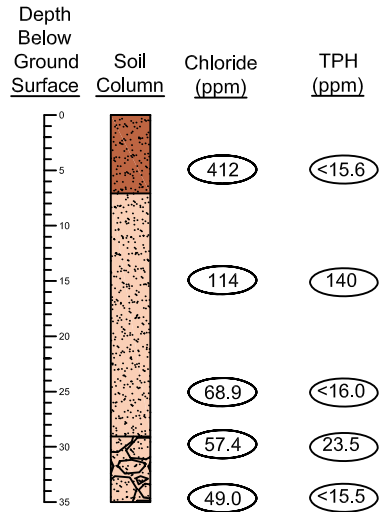
Soil Boring SB-1

Southern Union Gas Services
 Trunk "O" Line Historical (RP-2612)
 Lea County, New Mexico

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

Prep By: JWL	Checked By: BJA
October 22, 2012	

Soil Boring SB-2



Soil Description




0' - 7' - Red Sand, F. Grained

7' - 27' - Tan Sand, F. Grained, Consolidated

27' - 35' - Tan Sand, F. Grained, w/Caliche

Boring SB-2

Date Drilled November 16, 2011
 Thickness of Bentonite Seal 33 Ft
 Depth of Exploratory Boring 35 Ft bgs
 Depth to Groundwater _____
 Ground Water Elevation _____

-  Indicates the PSH level measured on _____
-  Indicates the groundwater level measured on _____
-  Indicates samples selected for Laboratory Analysis.

Completion Notes

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

Soil Boring SB-2

Southern Union Gas Services
 Trunk "O" Line Historical (RP-2612)
 Lea County, New Mexico

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

Prep By: JWL	Checked By: BJA
October 22, 2012	

Analytical Report 452903
for
Southern Union Gas Services- Monahans

Project Manager: Joel Lowry
Trunk "O" 30" Coyote Hill Road
RP-2612

27-NOV-12

Collected By: Client



12600 West I-20 East Odessa, Texas 79765

Xenco-Houston (EPA Lab code: TX00122):

Texas (T104704215-10-6-TX), Arizona (AZ0765), Arkansas (08-039-0), Connecticut (PH-0102), Florida (E871002)
Illinois (002082), Indiana (C-TX-02), Iowa (392), Kansas (E-10380), Kentucky (45), Louisiana (03054)
New Hampshire (297408), New Jersey (TX007), New York (11763), Oklahoma (9218), Pennsylvania (68-03610)
Rhode Island (LAO00312), USDA (S-44102), DoD (L11-54)

Xenco-Atlanta (EPA Lab Code: GA00046):

Florida (E87429), North Carolina (483), South Carolina (98015), Kentucky (85), DoD (L10-135)
Louisiana (04176), USDA (P330-07-00105)

Xenco-Tampa Mobile (EPA Lab code: FL01212): Florida (E84900)

Xenco-Lakeland: Florida (E84098)

Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-TX)

Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295-TX)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757)

Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)

Xenco Tucson (EPA Lab code:AZ000989): Arizona (AZ0758)



27-NOV-12

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

Reference: XENCO Report No: **452903**
Trunk "O" 30" Coyote Hill Road
Project Address: Lea County, NM

Joel Lowry:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 452903. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 452903 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

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

Respectfully,

Nicholas Straccione

Project Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Odessa - San Antonio - Tampa - Lakeland - Atlanta - Phoenix - Oklahoma - Latin America



Sample Cross Reference 452903



Southern Union Gas Services- Monahans, Monahans, TX

Trunk "O" 30" Coyote Hill Road

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
West Trench #2 @ 11	S	11-19-12 12:00		452903-001
South Trench #2 @ 11	S	11-19-12 12:30		452903-002



CASE NARRATIVE

Client Name: Southern Union Gas Services- Monahans

Project Name: Trunk "O" 30" Coyote Hill Road



Project ID: RP-2612

Work Order Number: 452903

Report Date: 27-NOV-12

Date Received: 11/21/2012

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None

Certificate of Analysis Summary 452903

Southern Union Gas Services- Monahans, Monahans, TX



Project Id: RP-2612
Contact: Joel Lowry
Project Location: Lea County, NM

Project Name: Trunk "O" 30" Coyote Hill Road

Date Received in Lab: Wed Nov-21-12 12:53 pm

Report Date: 27-NOV-12

Project Manager: Nicholas Straccione

Analysis Requested	Lab Id:	452903-001	452903-002				
	Field Id:	West Trench #2 @ 11	South Trench #2 @ 11				
	Depth:						
	Matrix:	SOIL	SOIL				
	Sampled:	Nov-19-12 12:00	Nov-19-12 12:30				
Inorganic Anions by EPA 300/300.1 SUB: TX104704215	Extracted:	Nov-23-12 18:55	Nov-23-12 19:12				
	Analyzed:	Nov-23-12 18:55	Nov-23-12 19:12				
	Units/RL:	mg/kg RL	mg/kg RL				
Chloride		35.6 1.28	18.0 1.32				
Percent Moisture	Extracted:	Nov-21-12 13:49	Nov-21-12 13:49				
	Analyzed:						
	Units/RL:	% RL	% RL				
Percent Moisture		24.8 1.00	19.4 1.00				
TPH By SW8015 Mod	Extracted:	Nov-26-12 09:00	Nov-26-12 09:00				
	Analyzed:	Nov-26-12 19:39	Nov-26-12 20:08				
	Units/RL:	mg/kg RL	mg/kg RL				
C6-C12 Gasoline Range Hydrocarbons		ND 19.9	ND 18.6				
C12-C28 Diesel Range Hydrocarbons		111 19.9	195 18.6				
C28-C35 Oil Range Hydrocarbons		ND 19.9	ND 18.6				
Total TPH		111 19.9	195 18.6				

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use.
The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories.
XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented.
Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi



Nicholas Straccione
Project Manager

Flagging Criteria

- X** In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F** RPD exceeded lab control limits.
- J** The target analyte was positively identified below the quantitation limit and above the detection limit.
- U** Analyte was not detected.
- L** The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- K** Sample analyzed outside of recommended hold time.
- JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

* Surrogate recovered outside laboratory control limit.

BRL Below Reporting Limit.

RL Reporting Limit

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

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

DL Method Detection Limit

NC Non-Calculable

+ NELAC certification not offered for this compound.

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

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(432) 563-1800	(432) 563-1713
(770) 449-8800	(770) 449-5477
(602) 437-0330	

Form 2 - Surrogate Recoveries

Project Name: Trunk "O" 30" Coyote Hill Road

Work Orders : 452903,

Project ID: RP-2612

Lab Batch #: 901575

Sample: 452903-001 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg Date Analyzed: 11/26/12 19:39		SURROGATE RECOVERY STUDY			
TPH By SW8015 Mod		Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R
Analytes					
1-Chlorooctane		93.8	99.9	94	70-135
o-Terphenyl		48.6	50.0	97	70-135

Lab Batch #: 901575

Sample: 452903-002 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg Date Analyzed: 11/26/12 20:08		SURROGATE RECOVERY STUDY			
TPH By SW8015 Mod		Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R
Analytes					
1-Chlorooctane		93.7	99.9	94	70-135
o-Terphenyl		48.5	50.0	97	70-135

Lab Batch #: 901575

Sample: 630401-1-BLK / BLK

Batch: 1 Matrix: Solid

Units: mg/kg Date Analyzed: 11/26/12 12:28		SURROGATE RECOVERY STUDY			
TPH By SW8015 Mod		Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R
Analytes					
1-Chlorooctane		92.4	100	92	70-135
o-Terphenyl		46.3	50.0	93	70-135

Lab Batch #: 901575

Sample: 630401-1-BKS / BKS

Batch: 1 Matrix: Solid

Units: mg/kg Date Analyzed: 11/26/12 11:25		SURROGATE RECOVERY STUDY			
TPH By SW8015 Mod		Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R
Analytes					
1-Chlorooctane		88.3	99.9	88	70-135
o-Terphenyl		53.7	50.0	107	70-135

Lab Batch #: 901575

Sample: 630401-1-BSD / BSD

Batch: 1 Matrix: Solid

Units: mg/kg Date Analyzed: 11/26/12 11:59		SURROGATE RECOVERY STUDY			
TPH By SW8015 Mod		Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R
Analytes					
1-Chlorooctane		85.6	99.6	86	70-135
o-Terphenyl		51.3	49.8	103	70-135

* Surrogate outside of Laboratory QC limits

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

*** Poor recoveries due to dilution

Surrogate Recovery [D] = $100 * A / B$

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



Form 2 - Surrogate Recoveries

Project Name: Trunk "O" 30" Coyote Hill Road

Work Orders : 452903,

Project ID: RP-2612

Lab Batch #: 901575

Sample: 452960-002 S / MS

Batch: 1 Matrix: Soil

Units: mg/kg

Date Analyzed: 11/26/12 22:41

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	103	100	103	70-135	
o-Terphenyl	56.5	50.1	113	70-135	

Lab Batch #: 901575

Sample: 452960-002 SD / MSD

Batch: 1 Matrix: Soil

Units: mg/kg

Date Analyzed: 11/26/12 23:11

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	101	99.9	101	70-135	
o-Terphenyl	56.3	50.0	113	70-135	

* Surrogate outside of Laboratory QC limits

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

*** Poor recoveries due to dilution

Surrogate Recovery [D] = $100 * A / B$

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

Project Name: Trunk "O" 30" Coyote Hill Road

Work Order #: 452903

Analyst: JOL

Date Prepared: 11/23/2012

Project ID: RP-2612

Date Analyzed: 11/23/2012

Lab Batch ID: 901508

Sample: 630351-1-BKS

Batch #: 1

Matrix: Solid

Units: mg/kg

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

Inorganic Anions by EPA 300/300.1	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Analytes											
Chloride	<1.00	100	105	105	100	105	105	0	80-120	20	

Analyst: KEB

Date Prepared: 11/26/2012

Date Analyzed: 11/26/2012

Lab Batch ID: 901575

Sample: 630401-1-BKS

Batch #: 1

Matrix: Solid

Units: mg/kg

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

TPH By SW8015 Mod	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Analytes											
C6-C12 Gasoline Range Hydrocarbons	<15.0	999	910	91	996	905	91	1	70-135	35	
C12-C28 Diesel Range Hydrocarbons	<15.0	999	905	91	996	873	88	4	70-135	35	

Relative Percent Difference RPD = $200 * |(C-F)/(C+F)|$

Blank Spike Recovery [D] = $100 * (C)/[B]$

Blank Spike Duplicate Recovery [G] = $100 * (F)/[E]$

All results are based on MDL and Validated for QC Purposes



Form 3 - MS Recoveries



Project Name: Trunk "O" 30" Coyote Hill Road

Work Order #: 452903

Lab Batch #: 901508

Date Analyzed: 11/23/2012

QC- Sample ID: 452891-001 S

Reporting Units: mg/kg

Project ID: RP-2612

Analyst: JOL

Batch #: 1

Matrix: Soil

MATRIX / MATRIX SPIKE RECOVERY STUDY						
Inorganic Anions by EPA 300	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Analytes						
Chloride	8940	12400	21900	105	80-120	

Lab Batch #: 901508

Date Analyzed: 11/23/2012

QC- Sample ID: 452891-002 S

Reporting Units: mg/kg

Date Prepared: 11/23/2012

Analyst: JOL

Batch #: 1

Matrix: Soil

MATRIX / MATRIX SPIKE RECOVERY STUDY						
Inorganic Anions by EPA 300	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Analytes						
Chloride	10800	11300	22500	104	80-120	

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

BRL - Below Reporting Limit



Form 3 - MS / MSD Recoveries



Project Name: Trunk "O" 30" Coyote Hill Road

Work Order # : 452903

Project ID: RP-2612

Lab Batch ID: 901575

QC- Sample ID: 452960-002 S

Batch #: 1 Matrix: Soil

Date Analyzed: 11/26/2012

Date Prepared: 11/26/2012

Analyst: KEB

Reporting Units: mg/kg

MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	Spiked Sample %R [D]	Spike Added [E]	Duplicate Spiked Sample Result [F]	Spiked Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
C6-C12 Gasoline Range Hydrocarbons	<15.4	1020	1070	105	1020	1070	105	0	70-135	35	
C12-C28 Diesel Range Hydrocarbons	<15.4	1020	1080	106	1020	1090	107	1	70-135	35	

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

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

ND = Not Detected, J = Present Below Reporting Limit, B = Present in Blank, NR = Not Requested, I = Interference, NA = Not

ApplicableN = See Narrative, EQL = Estimated Quantitation Limit

Project Name: Trunk "O" 30" Coyote Hill Road

Work Order #: 452903

Lab Batch #: 901385

Project ID: RP-2612

Date Analyzed: 11/21/2012 12:30

Date Prepared: 11/21/2012

Analyst: WRU

QC- Sample ID: 452891-001 D

Batch #: 1

Matrix: Soil

Reporting Units: %

SAMPLE / SAMPLE DUPLICATE RECOVERY

Percent Moisture Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Percent Moisture	19.2	19.3	1	20	

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

Xenco Laboratories

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

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

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

Project Manager: Joel Lowry

Project Name: Trunk "O" 30" Coyote Hill Road

Company Name **Basin Environmental Service Technologies, LLC**

Project #: RP-2612

Company Address: P.O. Box 301

Project Loc: Lea County, NM

City/State/Zip: Lovington, NM 88260

PO #: Bill Southern Union Gas Services

Telephone No: **(575)396-2378**

Fax No: (575) 396-1429

Report Format: ☒ Standard ☐ TRRP ☐ NPDES

Sampler Signature: *Robert R. Leuburner*

e-mail: pm@basinenv.com, rose.slade@sug.com, cydni.inskeep@sug.com

[illegible]

Special Instructions:

Laboratory Comments:

Relinquished by: <i>Robert Blakemore</i>	Date 11-20-12	Time 10:20	Received by: <i>Mr. [Signature]</i>	Date 11/20/12	Time 06:48
Relinquished by: <i>Mr. [Signature]</i>	Date 11/20/12	Time 13:30	Received by: <i>Amber Williams</i>	Date 11/20/12	Time 130
Relinquished by:	Date	Time	Received by ELOT: <i>Shaunel Smith</i>	Date 11/21/12	Time 12:5

Sample Containers Intact?	Y	N
VOCs Free of Headspace?	Y	N
Labels on container(s)	Y	N
Custody seals on container(s)	Y	N
Custody seals on cooler(s)	Y	N
Sample Hand Delivered	Y	N
by Sampler/Client Rep. ?	Y	N
by Courier?	UPS	DHL
	FedEx	Lone Star
Temperature Upon Receipt:	1.5	7 °C



Prelogin/Nonconformance Report- Sample Log-In

Client: Southern Union Gas Services- Monahan

Date/ Time Received: 11/21/2012 12:53:00 PM

Work Order #: 452903

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used :

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	0
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	Yes
#5 Custody Seals intact on sample bottles?	Yes
#6 *Custody Seals Signed and dated?	Yes
#7 *Chain of Custody present?	Yes
#8 Sample instructions complete on Chain of Custody?	Yes
#9 Any missing/extra samples?	No
#10 Chain of Custody signed when relinquished/ received?	Yes
#11 Chain of Custody agrees with sample label(s)?	Yes
#12 Container label(s) legible and intact?	Yes
#13 Sample matrix/ properties agree with Chain of Custody?	Yes
#14 Samples in proper container/ bottle?	Yes
#15 Samples properly preserved?	Yes
#16 Sample container(s) intact?	Yes
#17 Sufficient sample amount for indicated test(s)?	Yes
#18 All samples received within hold time?	Yes
#19 Subcontract of sample(s)?	Yes
#20 VOC samples have zero headspace (less than 1/4 inch bubble)?	Yes
#21 <2 for all samples preserved with HNO3,HCL, H2SO4?	Yes
#22 >10 for all samples preserved with NaAsO2+NaOH, ZnAc+NaOH?	Yes

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

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

Checklist completed by:

Date: _____

Checklist reviewed by:

Date: _____

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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SEP 21 2010

HOBBSOC

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
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side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Southern Union Gas Services	Contact: Rose Slade
Address: 1507 West 15 th Street	Telephone No. 432-940-5147
Facility Name: Trunk "O" line	Facility Type: Gathering 30" Pipeline

Surface Owner: Dasco Land Corp.	Mineral Owner	Lease No.
---------------------------------	---------------	-----------

LOCATION OF RELEASE API # 30.0253822.00.00

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	33	21	36					Lea

Latitude 32 25.808 Longitude 103 16.221

NATURE OF RELEASE

Type of Release: Mixture of crude oil/produced water	Volume of Release 126 barrels	Volume Recovered 106 barrels
Source of Release: Leak on 30" pipeline	Date and Hour of Occurrence: 9/17/2010 @ approx. 9:30 am	Date and Hour of Discovery: 9/17/2010
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? D.L. Gonzales	
By Whom? Rose Slade	Date and Hour: 9/18/2010 at 5:00 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

N/A


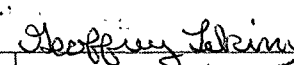
Describe Cause of Problem and Remedial Action Taken.*

The release was caused by internal corrosion of the 30" steel pipeline. A temporary clamp was utilized to mitigate the release during the initial release response. Following initial response activities (recovering liquids with a vacuum truck) the line will be replaced at a later date.

Describe Area Affected and Cleanup Action Taken.*

The area affected was approximately 20x30 feet in width and length and approximately 10 feet in depth. An environmental consultant team will remediate the site per NMOCD regulatory guidelines.

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

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Rose Slade	Approved by ENV ENGINEER: 	
Title: EHS Compliance Specialist	Approval Date: 09/22/10	Expiration Date: 11/22/10
E-mail Address: rose.slade@sug.com	Conditions of Approval: SUBMIT FINAL C-141 BY 11/22/10	Attached <input type="checkbox"/>
Date: 9/21/2010 Phone: 432-940-5147	IRP-10-9-2612	

* Attach Additional Sheets If Necessary

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
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Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

Initial Report ☐ Final Report ☒

Name of Company	Southern Union Gas Services, Ltd.	Contact	Crystal Callaway
Address	801 S. Loop 464, Monahans, TX, 79756	Telephone No.	(817) 302-9407
Facility Name: Trunk "O" Line	(RP-2612)	Facility Type	Gathering Pipeline

Surface Owner	Dasco Land Corp.	Mineral Owner:		Lease No.	API#30.025.38822.00.00
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	33	21S	36E					Lea

Latitude 32 25.808 Longitude 103 16.221

NATURE OF RELEASE

Type of Release: Mixture of crude oil/produced water	Volume of Release 126 barrels	Volume Recovered 106 barrels
Source of Release: Leak on 30" pipeline	Date and Hour of Occurrence 9/17/2010 @ approx. 9:30 am	Date and Hour of Discovery 9/17/2010
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? D.L. Gonzales	
By Whom? Rose Slade	Date and Hour: 9/18/2010 at 5:00 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken:

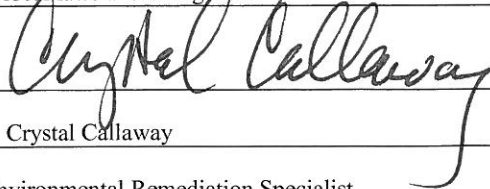
The release was caused by internal corrosion of the 30" steel pipeline. A temporary clamp was utilized to mitigate the release during the initial release response. Following initial response activities (recovering liquids with a vacuum truck) the line will be replaced at a later date.

Describe Area Affected and Cleanup Action Taken.

The area affected was approximately 20x30 feet in width and length and approximately 10 feet in depth. An environmental consultant team will remediate the site per NMOCD regulatory guidelines.

Soil samples collected during the October 26, 2011, sampling event indicated concentrations of benzene, BTEX, TPH and chloride were less than NMOCD regulatory remediation action levels in each of the submitted soil samples. Analytical results from the soil samples collected on November 19, 2012, indicated horizontal delineation had been achieved. While soil represented by sample 14' Floor exhibited concentrations of BTEX, TPH and chloride less than NMOCD regulatory standards; vertical delineation was not able to be achieved due to the proximity of active high-pressure pipelines and the congested nature of the release site. **Please reference the attached Basin Environmental Services Technologies Remediation Summary and Site Closure Request for details of remedial activities and the site investigation.**

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

Signature: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Crystal Callaway		Approved by District Supervisor:	
Title: Senior Environmental Remediation Specialist		Approval Date:	Expiration Date:
E-mail Address: Crystal.Callaway@Regencygas.com		Conditions of Approval:	
Date: 11/17/2014		Phone: (817) 302-9407	