NM2 - ____19_____

GENERAL CORRESPONDENCE YEAR(S):

___2011 - 2012____

New Mexico Energy, Minerals and Natural Resources Department

June 30, 2011

Rosa L. Slade
Southern Union Gas Services, LTD
1507 W. 15th
Monahans, Texas 79756

RE: Compliance with the Transitional Provisions of the Surface Waste Management Facilities rule (Rule 36) and Treatment and Vadose Monitoring Requirements at Existing Landfarms
Southern Union Gas Services, LTD
Sid Richardson Landfarm: Permit NM-2-019
Location: Unit F of Section 36, Township 23 South, Range 36 East, NMPM
Lea County, New Mexico

Dear Owner/Operator:

The Oil Conservation Division (OCD) has received several landfarm monitoring reports which indicate Owner/Operators are not conducting the required sampling and assessment of the monitoring data required by existing permit conditions and the applicable requirements of the Surface Waste Management Facilities rule 19.15.36 NMAC (Rule 36). OCD wishes to remind such Owner/Operators that the requirements of Rule 36 have been in effect since February 14, 2007 and compliance is required. This letter is provided to help Owner/Operators understand the most common deficiencies regarding compliance in general operations, sampling of landfarms at existing surface waste management facilities, and the reporting of such results.

I. Transitional Provisions, Existing Surface Waste Management Facilities:
The transitional provision of Rule 36.20.A states that existing surface waste management facilities *shall comply with the operational, waste acceptance, and closure requirements* provided in the new rule, unless specifically addressed in the current permit, order, waiver, exception, or agreement granted in writing from OCD. Where the language in the existing permit is silent (i.e., where a specified requirement of Rule 36 is not addressed within the existing permit or in writing from OCD), the operational, waste acceptance, and closure provisions of Rule 36 apply and

supplement the conditions of the existing permit. Examples of how this transitional provision would be applied to Owner/Operators of existing landfarms are as follows:

A. Treatment Zone Monitoring (contaminated soils being remediated):
Most Owner/Operators of existing landfarms have common language or conditions specified within their permits. For this example, two of the following common permit conditions demonstrate how an Owner/Operator would request the necessary modification of their existing permit.

In an existing landfarm permit:

1. Soils will be spread on the surface in six-inch lifts or less.

2. Successive lifts of contaminated soils may not be spread until a laboratory measurement of:
   a. total petroleum hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm);
   b. the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm; and
   c. benzene is less than 10 ppm.
   d. Comprehensive records of the laboratory analyses and the sampling locations must be maintained at the facility. Authorization from the OCD must be obtained prior to application of successive lifts and/or removal of the remediated soils.

In addition to the above permit conditions, an Owner/Operator also has to implement the following additional requirements of Rule 36:

- Chloride testing and limits (See 19.15.36.15.D NMAC)

If ground water is between 50' and 100' below the bottom of the oil field waste:	**If ground water is more than 100' below the bottom of the oil field waste:**
Chloride concentration cannot exceed **500** mg/kg	Chloride concentration cannot exceed **1000** mg/kg

- The following test methods would have to be utilized: TPH concentration of each lift determined by EPA SW-846 method 8015M or EPA method 418.1 or other EPA method approved by the division, and chloride concentration, determined by EPA method 300.1. (See 19.15.36.15.D NMAC)

- The sampling protocol and frequency: "*The operator shall collect and analyze at least one composite soil sample, consisting of four discrete samples, from the treatment zone at least semi-annually using the methods specified below for TPH and chlorides.*" (See 19.15.36.15.D NMAC)

- The maximum thickness of remediated soils for closure: "*The maximum thickness of treated soils in a landfarm cell shall not exceed two feet or approximately 3000 cubic yards per acre. When that thickness is reached, the operator shall not place additional oil field waste in the*

landfarm cell until it has demonstrated by monitoring the treatment zone at least semi-annually that the contaminated soil has been treated to the standards specified in Subsection F of 19.15.36.15 NMAC or the contaminated soils have been removed to a division-approved surface waste management facility." (See 19.15.36.15.D NMAC)

Therefore, in order to remain in compliance with existing permit conditions and Rule 36 the Owner/Operator shall ensure that:

1. Soils will be spread on the surface in **six**-inch lifts or less, and the addition of any remediated soils is not allowed until:
   a. TPH concentration of each lift, as determined by EPA SW-846 method 8015M or EPA method 418.1 or other EPA method approved by the division, does not exceed **100** mg/kg (ppm),
   b. the sum of all aromatic hydrocarbons (BTEX) is less than **50** ppm,
   c. benzene is less than **10** ppm, and
   d. the chloride concentration, as determined by EPA method 300.1, does not exceed **500** mg/kg or 1000 mg/kg. (See depth to ground water restrictions above.)
2. The Owner/Operator shall collect and analyze at least **one** composite soil sample, consisting of **four** discrete samples, from the treatment zone at least **semi-annually** using the methods specified above for TPH and chlorides.
3. The maximum thickness of treated soils in a landfarm cell shall not exceed **two feet** or approximately **3000 cubic yards per acre**. When that thickness is reached, the Owner/Operator shall not place additional oil field waste in the landfarm cell until it has demonstrated by monitoring the treatment zone at least semi-annually that the contaminated soil has been treated to the standards specified in Rule 36.15.F or the contaminated soils have been removed to a division-approved surface waste management facility. Owner/Operators **must** obtain authorization from the OCD prior to application of successive lifts and/or removal of the remediated soils.

The requirements of Rule 36 that would require an Owner/Operator to submit a modification request regarding treatment zone monitoring to an existing landfarm are as follows:

- "*The operator shall spread contaminated soils on the surface in **eight**-inch or less lifts or approximately 1000 cubic yards per acre per eight-inch lift.*" (See 19.15.36.15.D NMAC)

- "*TPH concentration of each lift, as determined by EPA SW-846 method 8015M or EPA method 418.1 or other EPA method approved by the division, does not exceed **2500** mg/kg.*" (See 19.15.36.15.D NMAC)

B. Vadose Zone Monitoring (native soils beneath the contaminated soils being remediated):

In regards to vadose zone monitoring (commonly referred to by the misnomer of "Treatment Zone Monitoring" within existing landfarm permits), most Owner/Operators of existing surface waste management facilities that operate landfarms have common language or conditions specified within their permits. For this example two of the most common permit conditions regarding the

vadose zone will be used to demonstrate how an Owner/Operator would comply with the transitional provision of Rule 36.20.A, and what requirements of the rule would require an Owner/Operator to submit a request to modify an existing permit.

Two of the most common conditions in an existing landfarm permit are as follows:

1. A treatment zone not to exceed **three (3) feet** beneath the landfarm native ground surface must be monitored. A minimum of one random soil sample must be taken from each individual cell, with no cell being larger than five (5) acres, **six (6) months** after the first contaminated soils are received in the cell and then **quarterly** thereafter. The sample must be taken at two (2) to three (3) feet below the native ground surface.

2. The soil samples must be analyzed using EPA-approved methods for total petroleum hydrocarbons (TPH) and volatile aromatic organics (BTEX) **quarterly** and for major cations/anions and Water Quality Control Commission (WQCC) metals **annually**.

Based upon the transitional provision of Rule 36.20.A, an Owner/Operator would have to implement and integrate the following **additional requirements** while complying with the conditions specified above.

- The testing for chlorides and the comparison of the results to background: "*The operator shall collect and analyze a minimum... using the methods specified below for TPH, BTEX and* ***chlorides*** *and shall compare each result to the higher of the PQL or the background soil concentrations to determine whether a release has occurred.*" (See 19.15.36.15.E(2) NMAC).

    i. *Note*: The "methods specified below for TPH, BTEX and chlorides" are those identified in Subsection F of 19.15.36.15 NMAC: "Total BTEX, as determined by *EPA SW-846 method 8021B or 8260B...*" (See 19.15.36.15.F(2) NMAC); "TPH, as determined by *EPA method 418.1* or other EPA method approved by the division..." (See 19.15.36.15.F(3) NMAC); and "Chlorides, as determined by *EPA method 300.1...*" (See 19.15.36.15.F(3) NMAC).

- The five year monitoring program: "*The operator shall collect and analyze a minimum of* ***four*** *randomly selected, independent samples from the vadose zone, using the methods specified below for the constituents listed in Subsections A and B of 20.6.2.****3103*** *NMAC at least* ***every five years*** *and shall compare each result to the higher of the PQL or the background soil concentrations to determine whether a release has occurred.*" (See 19.15.36.15.E(3) NMAC).

    ii. *Note:* The "*methods specified below for the constituents listed in Subsections A and B of 20.6.2.3103 NMAC*" are those identified in Subsection F of 19.15.36.15 NMAC: "The concentration of constituents listed in Subsections A and B of 20.6.2.3103

NMAC shall be determined by *EPA SW-846 methods 6010B or 6020* or other methods approved by the division." (See 19.15.36.15.F(5) NMAC)

- The release response: *"If vadose zone sampling results show that the concentrations of TPH, BTEX or chlorides exceed the higher of the PQL or the background soil concentrations, then the operator shall notify the division's environmental bureau of the exceedance, and shall* ***immediately collect and analyze*** *a minimum of* ***four*** *randomly selected, independent samples for TPH, BTEX, chlorides and the constituents listed in Subsections A and B of 20.6.2.3103 NMAC. The operator shall submit the results of the re-sampling event and a response action plan for the division's approval within 45 days of the initial notification. The response action plan shall address changes in the landfarm's operation to prevent further contamination and, if necessary, a plan for remediating existing contamination."* (See 19.15.36.15.E(5) NMAC

The requirements of Rule 36 that would require an Owner/Operator to submit a modification request regarding vadose zone monitoring to an existing landfarm are as follows:

- *"The operator shall take the vadose zone samples from soils between three and four feet below the cell's original ground surface."* (See 19.15.36.15.E(1) NMAC)

- *"The operator shall collect and analyze a minimum of four randomly selected, independent samples from the vadose zone at least* ***semi-annually****..."* (See 19.15.36.15.E(2) NMAC)

C. Transitional Provisions, New Landfarm Cells Constructed at an Existing Surface Waste Management Facility:

The transitional provision, Rule 36.20.B, states "Major modification of an existing surface waste management facility and new landfarm cells constructed at an existing surface waste management facility shall comply with the requirements provided in 19.15.36 NMAC." In this case, an Owner/Operator is required to consider the siting criteria and operational requirements regarding landfarms specified in Rule 36.13; the specific requirements applicable to landfarms specified in Rule 36.15; and the closure and post closure requirements regarding landfarms of Rule 36.18. The existing permit conditions would not be applicable to new landfarm cells at the existing facility, but would continue to apply to landfarm cells that were constructed prior to the February 14, 2007 effective date of Rule 36.

II. Compliance with Additional Operational Requirements:

Other regulatory requirements that Owner/Operators of existing surface waste management facilities that operate landfarms should be aware of and consider when operating its facility are as follows:

A. Reuse of remediated soils:

Most existing surface waste management facility permits regarding landfarming do not specify the constituents and concentrations that must be achieved for reuse of treated or remediated soils. Rule 36 has a provision that specifically addresses the conditions of approval for reuse of treated

soils. Rule 36.15.G(1), disposition of treated soils, states "*If the operator achieves the closure performance standards specified in Subsection F of 19.15.36 NMAC, then the operator may either leave the treated soils in place, or, with prior division approval, dispose or reuse of the treated soils in an alternative manner.*"

In accordance with the treatment zone closure performance standards of Rule 36.15.F, "*the operator shall continue treatment until the contaminated soil has been remediated to the higher of the background concentrations or the following closure performance standards. The operator shall demonstrate compliance with the closure performance standards by collecting and analyzing a minimum of one composite soil sample, consisting of four discrete samples.*

(1) Benzene, as determined by EPA SW-846 method 8021B or 8260B, shall not exceed ***0.2 mg/kg****.*

(2) Total BTEX, as determined by EPA SW-846 method 8021B or 8260B, shall not exceed ***50 mg/kg****.*

(3) The gasoline range organics (GRO) and diesel range organics (DRO) combined fractions, as determined by EPA SW-846 method 8015M, shall not exceed ***500 mg/kg****. TPH, as determined by EPA method 418.1 or other EPA method approved by the division, shall not exceed* ***2500 mg/kg****.*

(4) Chlorides, as determined by EPA method 300.1, shall not exceed ***500 mg/kg if*** *the landfarm is located where ground water is less than* ***100*** *feet but at least* ***50*** *feet below the lowest elevation at which the operator will place oil field waste or* ***1000 mg/kg if*** *the landfarm is located where ground water is* ***100*** *feet or more below the lowest elevation at which the operator will place oil field waste.*

(5) The concentration of constituents listed in Subsections A and B of 20.6.2.3103 NMAC shall be determined by EPA SW-846 methods 6010B or 6020 or other methods approved by the division. If the concentration of those constituents exceed the PQL or background concentration, the operator shall ***either*** *perform a site specific risk assessment using EPA approved methods and shall propose closure standards based upon individual site conditions that protect fresh water, public health, safety and the environment, which shall be subject to division approval* ***or*** *remove pursuant to Paragraph (2) of Subsection G of 19.15.36.15 NMAC.*"

B. Waste Acceptance:

Based upon conversations with several landfarm Owner/Operators, it has come to OCD's attention that the proper waste acceptance protocol is not being implemented at all applicable facilities. In accordance with Rule 36.15.A, "*Only soils and drill cuttings predominantly contaminated by petroleum hydrocarbons shall be placed in a landfarm. The division may approve placement of tank bottoms in a landfarm if the operator demonstrates that the tank bottoms do not contain economically recoverable petroleum hydrocarbons. Soils and drill cuttings placed in a landfarm shall be sufficiently free of liquid content to pass the paint filter test, and shall not have a chloride concentration exceeding* ***500 mg/kg if*** *the landfarm is located where ground water is less than* ***100 feet but at least 50 feet*** *below the lowest elevation at which the operator will place oil field waste or exceeding* ***1000 mg/kg if*** *the landfarm is located where ground water is* ***100*** *feet or more below the lowest elevation at which the operator will place oil field waste. The person tendering oil field waste for treatment at a landfarm shall* ***certify,*** *on form C-138, that representative samples of the*

oil field waste have been subjected to the paint filter test and tested for chloride content, and that the samples have been found to conform to these requirements. The landfarm's operator shall not accept oil field waste for landfarm treatment unless accompanied by this certification."

All landfarm Owner/Operators should be implementing the above referenced requirements in order to ensure compliance to the transitional and waste acceptance provisions of Rule 36. Please note that pursuant to Rule 36.7.A(3), a landfarm "*means a discrete area of land designated and used for the remediation of petroleum hydrocarbon-contaminated soils and drill cuttings.*" Landfarm Owner/Operators should ensure that the waste material accepted for remediation at their facilities contains petroleum hydrocarbons. Acceptance of any other waste material could be considered disposal.

Please note that if you are currently implementing the protocols identified above, OCD appreciates your efforts to continually remain in compliance with the regulations. As for Owner/Operators that are not currently in compliance, the goal of OCD is to get you back on track and in compliance. OCD anticipates observing the changes identified above in the submittal of the results of the next sampling event. If there are any questions regarding this matter, please do not hesitate to contact Mr. Brad A. Jones of my staff at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Jami Bailey
Division Director
Oil Conservation Division

JB/baj

cc: OCD District I Office, Hobbs
Basin Environmental, Lovington, NM 88260

Southern Union Gas Services

1507 W. 15th
Monahans, Texas 79756
432.943.1100 Fax: 432.943.1101

January 12, 2011

Mr. Brad Jones
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Remediation Summary - Removal of 1,500 cubic yards of Chloride Impacted Soil
Southern Union Gas Services
Southern Union Landfarm – Permit #NM-02-0019
SE ¼ of the NW ¼ of Section 36, Township 23 South, Range 36 East
Lea County, New Mexico

Mr. Jones,

Enclosed is the Southern Union Landfarm facility *Remediation Summary - Removal of 1,500 cubic yards of Chloride Impacted Soil* dated January 12, 2011. The Southern Union Landfarm is located in Unit Letter "F", Section 36, Township 23 South, Range 36 East, in rural Lea County, New Mexico.

I have personally reviewed this document, prepared by Basin Environmental Service Technologies on behalf of Southern Union Gas Services, and believe the facts are true and accurate to the best of my knowledge and ability. If you have any questions or comments, please contact me at 432-940-5147 or by email at rose.slade@sug.com.

Respectfully submitted,

Rose L. Slade
EHS Compliance Specialist
Southern Union Gas Services, Ltd
1507 W. 15th Street
Monahans, Texas 79756
rose.slade@sug.com

Cc:
SUG Environmental Files

Basin Environmental Service Technologies, LLC

3100 Plains Highway
P. O. Box 301
Lovington, New Mexico 88260
bjarguijo@basinenv.com
Office: (575) 396-2378 Fax: (575) 396-1429

Effective Solutions

January 12, 2011

Mr. Brad Jones
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Remediation Summary - Removal of 1,500 cubic yards of Chloride Impacted Soil
Southern Union Gas Services
Southern Union Landfarm – Permit #NM-02-0019
SE ¼ of the NW ¼ of Section 36, Township 23 South, Range 36 East
Lea County, New Mexico

Dear Mr. Jones:

Basin Environmental Service Technologies, LLC ("Basin"), at the request of Southern Union Gas Services ("Southern Union"), assumed maintenance and reporting responsibilities for the Southern Union Landfarm in December 2009. Basin, on behalf of Southern Union, is submitting this *Remediation Summary* to document the removal of 1,500 cubic yards ("cy") of chloride-impacted soil from Cell 8 – Grid 1 of the Southern Union Landfarm. The Southern Union Landfarm is operated and maintained in accordance with New Mexico Oil Conservation Division ("NMOCD"), Natural Resources and Wildlife, Oil and Gas Surface Waste Management Facilities (Title 19 Chapter 15 Part 36). The Landfarm is operated by Southern Union as a "centralized" facility for Southern Union use only. Please reference the 2009 *Annual Report* for additional information.

On December 15, 2009, during the routine bi-annual sampling event, Basin collected one (1) to five (5) four-point composite treatment zone soil samples from each of the fifteen (15) treatment cells being utilized. Laboratory analytical results indicated chloride concentrations were less than the NMOCD regulatory standard for Surface Waste Management Facilities for each of the soil samples submitted, with the exception of the soil sample from Cell 8 – Grid 1 ("TZ Cell 8 G1"), which exhibited a chloride concentration of 2,050 mg/Kg. Please reference Attachment #1, "2009 Concentrations of Chloride in the Treatment Zone", for additional information.

On June 14, 2010, based on laboratory analytical results from soil sample "TZ Cell 8 G1", Southern Union requested NMOCD approval to remove and dispose of approximately 1,500 cy of chloride-impacted soil from the treatment zone of Cell 8 – Grid 1 at an NMOCD-approved land disposal facility. On June 30, 2010, Southern Union received NMOCD approval to conduct the proposed remediation activities.

SUMMARY OF SOIL REMEDIATION ACTIVITIES

On November 25, 2010, removal of chloride-impacted soil commenced at the Southern Union Landfarm. Approximately 600 cy of impacted soil was excavated from Cell 8 - Grid 1 and transported to Sundance Services, Inc. (NMOCD Permit # NM-01003), for disposal. Following the removal of the soil, two (2) soil samples (#1 and #2) were collected in the vadose zone at a depth of approximately six (6) inches below ground surface ("bgs") to determine the extent (if any) of chloride impact to the vadose zone. Field test results indicated that chloride concentrations were less than that measurable by the Hach Quantab Chloride Low Range (30-600 mg/Kg) Titrators ("Hach Quantab Titrators") utilized to perform the field analyses. Please reference Attachment #2, "Chloride Field Test Results", for additional information.

On November 26, 2010, approximately 900 cy of chloride-impacted soil was excavated from Cell 8 - Grid 1 and transported to Sundance Services, Inc., for disposal. Following the removal of the soil, six (6) soil samples (#1, #2, #3, #4, #5, and #6) were collected from the vadose zone at a depth of approximately six (6) inches bgs. Field test results indicated that chloride concentrations were less than that measurable by the Hach Quantab Titrators utilized to perform the field analyses.

On November 30, 2010, six (6) five-point composite confirmation samples were collected from the vadose zone at a depth of approximately six (6) inches bgs. The soil samples were submitted to Xenco Laboratories in Odessa, Texas, and analyzed for chloride concentrations using EPA Method 300. Chloride concentrations ranged from 32 mg/Kg for soil sample VZ Cell 8 G-1 Confirmation 3 to 87.2 mg/Kg for soil sample VZ Cell 8 G-1 Confirmation 5. Please reference Attachment #3, "Concentrations of Chloride in the Vadose Zone", for additional information.

The locations of soil samples collected during the November 25 through 30, 2010, sampling events at Cell 8 – Grid 1 are depicted in the attached "Site & Sample Location Map" (Attachment #4). Photographs documenting the remediation activities are attached.

CONCLUSIONS

Analytical results of vadose zone soil sampling indicate soil underlying Cell 8 - Grid 1 of the Southern Union Landfarm has not been significantly affected above chloride background levels established prior to the construction of the landfarm treatment cells. Please reference Attachment #5, "Historic Concentrations of Hydrocarbons, Chlorides, Sulfates and Alkalinity in the Vadose Zone", for additional information. An executed C-138 documenting the disposal of the chloride-impacted soil is attached. Further remediation activities do not appear to be warranted at this time.

An *Annual Report* will be submitted by April 1, 2011, documenting the results of the 2010 treatment cell and vadose zone bi-annual sampling events.

LIMITATIONS

Basin Environmental Service Technologies, LLC ("Basin"), has prepared this *Remediation Summary* 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 the documents and the information provided in documents or statements 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 also notes 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.

Should you have any questions or concerns, please contact Rose Slade at (432)940-5147, or me at (575)396-2378.

Respectfully,

Ben J. Arguijo
Basin Environmental Service Technologies, LLC

Cc:
Rose Slade, Southern Union Gas Services, Monahans, Texas (rose.slade@sug.com)

Attachments:

Attachment #1: 2009 Concentrations of Chloride in the Treatment Zone
Attachment #2: Chloride Field Test Results
Attachment #3: Concentrations of Chloride in the Vadose Zone
Attachment #4: Site & Sample Location Map
Attachment #5: Historic Concentrations of Hydrocarbons, Chlorides, Sulfates & Alkalinity in the Vadose Zone

Laboratory Analytical Reports
Photographs
NMOCD Form C-138

Attachments

ATTACHMENT #1

2009 CONCENTRATIONS OF CHLORIDE IN THE TREATMENT ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD Permit #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	EPA 300 Chloride (mg/Kg)
Cell #7 - Comp	-	4/20/2009	-
Cell #11 - Comp	-	4/20/2009	-
Cell #12 - Comp	-	4/20/2009	-
Cell #13 - Comp	-	4/20/2009	-
Cell #14 - Comp	-	4/20/2009	-
Cell #2 North Comp	-	4/21/2009	-
Cell #2 South Comp	-	4/21/2009	-
Cell #15 Comp	-	4/21/2009	-
TZ Cell 14 C1	-	12/15/2009	<4.92
TZ Cell 1 G1	-	12/15/2009	61.5
TZ Cell 1 G2	-	12/15/2009	98
TZ Cell 1 G3	-	12/15/2009	231
TZ Cell 1 G4	-	12/15/2009	300
TZ Cell 1 G5	-	12/15/2009	44.8
TZ Cell 2 G1	-	12/15/2009	7.83
TZ Cell 2 G2	-	12/15/2009	161
TZ Cell 2 G3	-	12/15/2009	144
TZ Cell 2 G4	-	12/15/2009	45.6
TZ Cell 3 G1	-	12/15/2009	16.2
TZ Cell 3 G2	-	12/15/2009	26.3
TZ Cell 3 G3	-	12/15/2009	26.6
TZ Cell 3 G4	-	12/15/2009	15.8
TZ Cell 3 G5	-	12/15/2009	17.8
TZ Cell 4 G1	-	12/15/2009	18
TZ Cell 4 G2	-	12/15/2009	39.7
TZ Cell 4 G3	-	12/15/2009	9.49
TZ Cell 4 G4	-	12/15/2009	16.1
TZ Cell 4 G5	-	12/15/2009	31

ATTACHMENT #1

2009 CONCENTRATIONS OF CHLORIDE IN THE TREATMENT ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD Permit #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	EPA 300 Chloride (mg/Kg)
TZ Cell 8 G1	-	12/15/2009	2,050
TZ Cell 8 G2	-	12/15/2009	<10.4
TZ Cell 7 G1	-	12/15/2009	17.1
TZ Cell 5 G1	-	12/15/2009	<4.28
TZ Cell 6 G1	-	12/15/2009	<20.6
TZ Cell 6 G2	-	12/15/2009	36.5
TZ Cell 9 G1	-	12/15/2009	156
TZ Cell 9 G2	-	12/15/2009	152
TZ Cell 9 G3	-	12/15/2009	58.6
TZ Cell 9 G4	-	12/15/2009	43.5
TZ Cell 9 G5	-	12/15/2009	81.6
TZ Cell 10 G1	-	12/15/2009	9.63
TZ Cell 10 G2	-	12/15/2009	11.9
TZ Cell 10 G3	-	12/15/2009	9.06
TZ Cell 10 G4	-	12/15/2009	10
TZ Cell 15 G1	-	12/15/2009	<46.9
TZ Cell 11 G1	-	12/15/2009	128
TZ Cell 11 G2	-	12/15/2009	161
TZ Cell 12 G1	-	12/15/2009	<22.6
TZ Cell 13 G1	-	12/15/2009	291

ATTACHMENT #2

CHLORIDE FIELD TEST RESULTS

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD PERMIT #NM-02-19

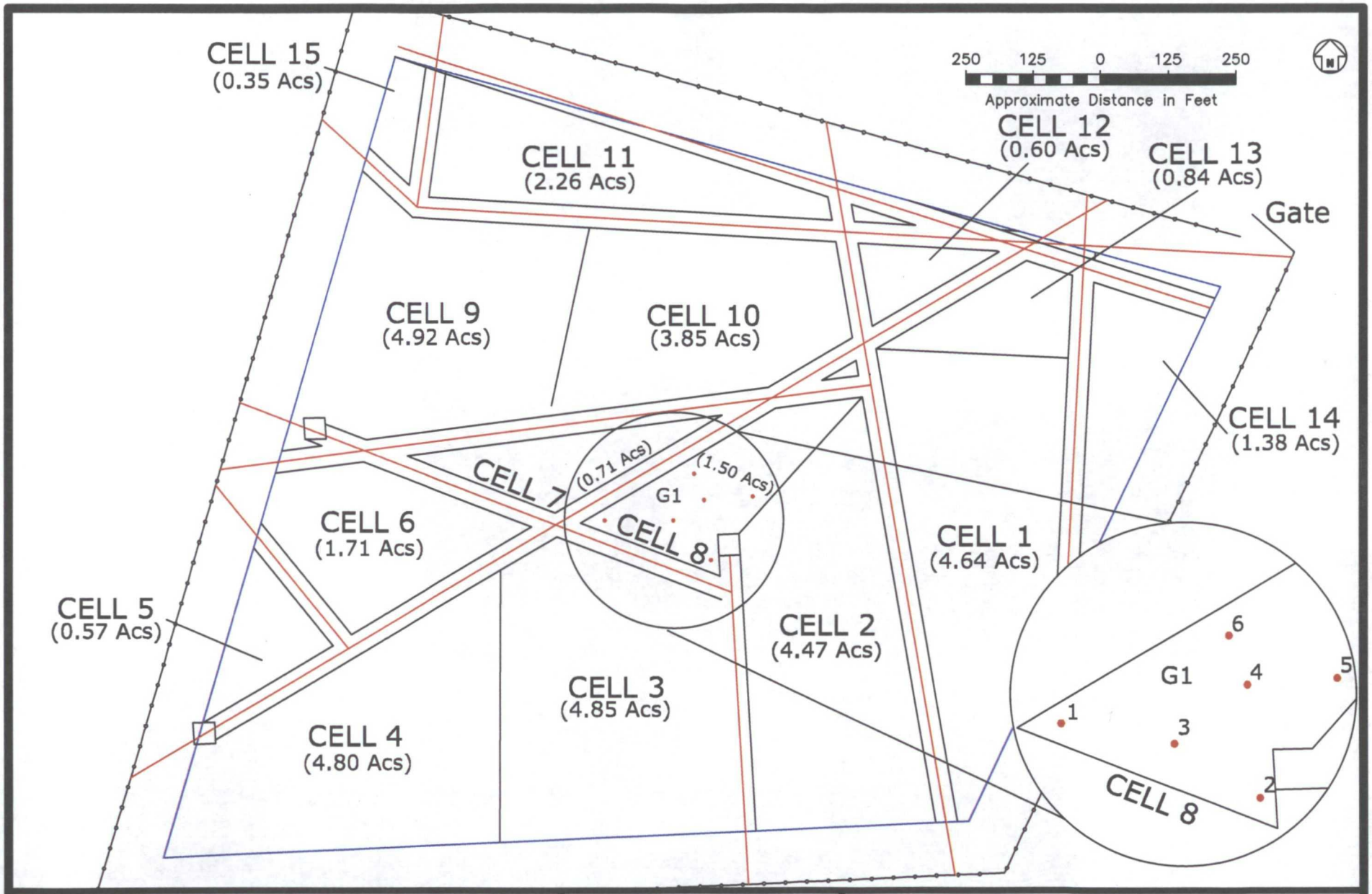
SAMPLE LOCATION	SAMPLE DEPTH (Below Ground Surface)	SAMPLE DATE	SOIL STATUS	Hach Quantab CHLORIDE (mg/Kg)
#1	6"	11/25/2010	In-Situ	ND
#2	6"	11/25/2010	In-Situ	ND
#1	6"	11/26/2010	In-Situ	ND
#2	6"	11/26/2010	In-Situ	ND
#3	6"	11/26/2010	In-Situ	ND
#4	6"	11/26/2010	In-Situ	ND
#5	6"	11/26/2010	In-Situ	ND
#6	6"	11/26/2010	In-Situ	ND

ATTACHMENT #3

CONCENTRATIONS OF CHLORIDE IN THE VADOSE ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD PERMIT #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	E 300 CHLORIDE (mg/Kg)
VZ Cell 8 G-1 Confirmation 1	6"	11/30/2010	In-situ	78
VZ Cell 8 G-1 Confirmation 2	6"	11/30/2010	In-situ	66.7
VZ Cell 8 G-1 Confirmation 3	6"	11/30/2010	In-situ	32
VZ Cell 8 G-1 Confirmation 4	6"	11/30/2010	In-situ	32.2
VZ Cell 8 G-1 Confirmation 5	6"	11/30/2010	In-situ	87.2
VZ Cell 8 G-1 Confirmation 6	6"	11/30/2010	In-situ	82.7



Legend:
- Pipeline
- Fenceline
- Landfarm Extent
- Individual Cell Extent
- Vadose Zone Sample Location

Attachment #4
Site & Sample Location Map
Southern Union Gas Services
Landfarm
Lea County, New Mexico
NM2-19-0

Basin Environmental Service Technologies, LLC

Prep By: BJA	Checked By: BRB
January 5, 2010	Scale: Approximately 1"=100'

ATTACHMENT #5

HISTORIC CONCENTRATIONS OF HYDROCARBONS, CHLORIDES, SULFATES & ALKALINITY IN THE VADOSE ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LANDFARM
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030						METHOD: 8015M			TOTAL TPH C_6-C_{35} (mg/Kg)
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M.P. - XYLENES (mg/Kg)	O-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)	
Landfarm Background	2'	4/11/2001	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	-	-	-	134.0

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SODIUM (mg/Kg)	CALCIUM (mg/Kg)	MAGNESIUM (mg/Kg)	POTASSIUM (mg/Kg)	CHLORIDE (mg/Kg)	SULFATE (mg/Kg)	CARBONATE (mg/Kg)	BICARBONATE (mg/Kg)
Landfarm Background	2'	4/11/2001	14.4	73.54	8.54	11.24	<10	35.2	<1.0	140

Laboratory Analytical Reports

Analytical Report 399257

for

Southern Union Gas Services- Monahans

Project Manager: Rose Slade

Southern Union Gas Landfarm

10-DEC-10

Celebrating 20 Years of commitment to excellence in Environmental Testing Services

12600 West I-20 East Odessa, Texas 79765

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

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

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

Xenco Phoenix (EPA Lab Code: AZ00901):
Arizona(AZ0757), California(06244CA), Texas(104704435-10-2), Nevada(NAC-445A), DoD(65816)
Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)
Xenco Tucson (EPA Lab code:AZ000989): Arizona (AZ0758)

10-DEC-10

Project Manager: **Rose Slade**
Southern Union Gas Services- Monahans
1507 W. 15th Street
Monahans, TX 79756

Reference: XENCO Report No: **399257**
Southern Union Gas Landfarm
Project Address: Lea County, NM

Rose Slade:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 399257. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

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

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 399257 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

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

Respectfully,

Brent Barron, II
Odessa Laboratory Manager

Sample Cross Reference 399257

Southern Union Gas Services- Monahans, Monahans, TX

Southern Union Gas Landfarm

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
VZ Cell 8 G-1 Confirmation 1	S	Nov-30-10 10:00		399257-001
VZ Cell 8 G-1 Confirmation 2	S	Nov-30-10 10:30		399257-002
VZ Cell 8 G-1 Confirmation 3	S	Nov-30-10 11:00		399257-003
VZ Cell 8 G-1 Confirmation 4	S	Nov-30-10 11:30		399257-004
VZ Cell 8 G-1 Confirmation 5	S	Nov-30-10 12:00		399257-005
VZ Cell 8 G-1 Confirmation 6	S	Nov-30-10 12:30		399257-006

CASE NARRATIVE

Client Name: Southern Union Gas Services- Monahans
Project Name: Southern Union Gas Landfarm

Project ID:
Work Order Number: 399257

Report Date: 10-DEC-10
Date Received: 12/03/2010

Sample receipt non conformances and Comments:

None

Sample receipt Non Conformances and Comments per Sample:

None

Certificate of Analysis Summary 399257

Southern Union Gas Services- Monahans, Monahans, TX

Project Name: Southern Union Gas Landfarm

Project Id:

Contact: Rose Slade

Project Location: Lea County, NM

Date Received in Lab: Fri Dec-03-10 01:45 pm

Report Date: 10-DEC-10

Project Manager: Brent Barron, II

Analysis Requested	*Lab Id:*	399257-001		399257-002		399257-003		399257-004		399257-005		399257-006	
	Field Id:	VZ Cell 8 G-1 Confirmation		VZ Cell 8 G-1 Confirmation		VZ Cell 8 G-1 Confirmation		VZ Cell 8 G-1 Confirmation		VZ Cell 8 G-1 Confirmation		VZ Cell 8 G-1 Confirmation	
	Depth:												
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	Sampled:	Nov-30-10 10:00		Nov-30-10 10:30		Nov-30-10 11:00		Nov-30-10 11:30		Nov-30-10 12:00		Nov-30-10 12:30	
Anions by E300	*Extracted:*												
	Analyzed:	Dec-06-10 16:02		Dec-06-10 16:02		Dec-06-10 16:02		Dec-06-10 16:02		Dec-06-10 16:02		Dec-06-10 16:02	
	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL
Chloride		78.0	8.70	66.7	8.72	32.0	8.65	32.2	8.78	87.2	8.93	82.7	8.83
Percent Moisture	*Extracted:*												
	Analyzed:	Dec-06-10 12:55		Dec-06-10 12:55		Dec-06-10 12:55		Dec-06-10 12:55		Dec-06-10 12:55		Dec-06-10 12:55	
	Units/RL:	%	RL	%	RL	%	RL	%	RL	%	RL	%	RL
Percent Moisture		3.40	1.00	3.65	1.00	2.93	1.00	4.38	1.00	5.92	1.00	4.86	1.00

Brent Barron, II
Odessa Laboratory 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 effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.

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

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

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

F RPD exceeded lab control limits.

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

U Analyte was not detected.

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

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

K Sample analyzed outside of recommended hold time.

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

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit

PQL Practical Quantitation Limit

* Outside XENCO's scope of NELAC Accreditation.

BS / BSD Recoveries

Project Name: Southern Union Gas Landfarm

Work Order #: 399257 **Project ID:**

Analyst: LATCOR **Date Prepared:** 12/06/2010 **Date Analyzed:** 12/06/2010

Lab Batch ID: 834914 **Sample:** 834914-1-BKS **Batch #:** 1 **Matrix:** Solid

Units: mg/kg

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

Anions by E300 Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Chloride	ND	10.0	10.5	105	10	10.3	103	2	75-125	20	

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

Form 3 - MS Recoveries

Project Name: Southern Union Gas Landfarm

Work Order #: 399257
Lab Batch #: 834914
Project ID:
Date Analyzed: 12/06/2010
Date Prepared: 12/06/2010
Analyst: LATCOR
QC- Sample ID: 399253-003 S
Batch #: 1
Matrix: Soil
Reporting Units: mg/kg

Inorganic Anions by EPA 300	MATRIX / MATRIX SPIKE RECOVERY STUDY					
Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Chloride	ND	221	202	91	75-125	

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

BRL - Below Reporting Limit

Sample Duplicate Recovery

Project Name: Southern Union Gas Landfarm

Work Order #: 399257

Lab Batch #: 834914 **Project ID:**

Date Analyzed: 12/06/2010 16:02 **Date Prepared:** 12/06/2010 **Analyst:** LATCOR

QC- Sample ID: 399253-003 D **Batch #:** 1 **Matrix:** Soil

Reporting Units: mg/kg

	SAMPLE / SAMPLE DUPLICATE RECOVERY				
Anions by E300 **Analyte**	**Parent Sample Result [A]**	**Sample Duplicate Result [B]**	**RPD**	**Control Limits %RPD**	**Flag**
Chloride	ND	ND	NC	20	

Lab Batch #: 834602

Date Analyzed: 12/06/2010 12:55 **Date Prepared:** 12/06/2010 **Analyst:** JLG

QC- Sample ID: 399253-003 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	9.60	10.8	11	20	

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

Environmental Lab of Texas

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: Ben Arguijo

Company Name: Basin Environmental Services Technologies

Company Address: P.O. Box 301

City/State/Zip: Lovington, NM 88260

Telephone No: (575) 396-2378 Fax No: (575) 396-1429

Sampler Signature: Troy Hahn

Project Name: Southern Union Gas Landfarm

Project #:

Project Loc: Lea County, NM

PO #: ESA-SUP-37954

Report Format: [X] Standard [ ] TRRP [ ] NPDES

e-mail: pm@basinenv.com

(lab use only)

ORDER #: 399257

LAB # (lab use only)	FIELD CODE	Beginning Depth	Ending Depth	Date Sampled	Time Sampled	Field Filtered	Total # of Containers	Preservation & # of Containers: Ice	HNO3	HCl	H2SO4	NaOH	Na2S2O3	None	Other (Specify)	Matrix: DW = Drinking Water SL = Sludge; GW = Groundwater S = Soil/Sol; NP = Non-Potable Specify Oth	Analyze For: TCLP: TPH: 418.1 ~~8015M~~ 8015B	TPH: TX 1005 TX 1006	Cations (Ca, Mg, Na, K)	Anions (Cl, SO4, Alkalinity)	SAR / ESP / CEC	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	TOTAL: ~~BTEX 8021B/5030~~ or BTEX 8260 X	RCI	N.O.R.M.	E 300 Chloride			RUSH TAT (Pre-Schedule) 24, 48, 72 hrs	Standard TAT 4 DAY
1	VZ Cell 8 G1 Confirmation 1			11/30/10	1000		1	X								SOIL												X				X
2	VZ Cell 8 G1 Confirmation 2			11/30/10	1030		1	X								SOIL												X				X
3	VZ Cell 8 G1 Confirmation 3			11/30/10	1100		1	X								SOIL												X				X
4	VZ Cell 8 G1 Confirmation 4			11/30/10	1130		1	X								SOIL												X				X
5	VZ Cell 8 G1 Confirmation 5			11/30/10	1200		1	X								SOIL												X				X
6	VZ Cell 8 G1 Confirmation 6			11/30/10	1230		1	X								SOIL												X				X

Special Instructions:

Relinquished by:	Date	Time	Received by:	Date	Time
Troy Hahn	12/3/10	0715		12/3/10	0716
	12/3/10	0900	Mike Dunn	12/3/10	0900
Mike Dunn	12/3/10	1:45	Lisa Murdock	12/3/10	1:45

Laboratory Comments:

Sample Containers Intact? Y (NA)
VOCs Free of Headspace? Y N (NA)
Labels on container(s) Y N
Custody seals on container(s) Y N (NA)
Custody seals on cooler(s) Y N (NA)
Sample Hand Delivered by Sampler/Client Rep. ? Y N
by Courier? UPS DHL FedEx Lone Star

Temperature Upon Receipt: 4oz glass °C

XENCO Laboratories

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

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

Prelogin / Nonconformance Report - Sample Log-In

Client: Basin Environmental
Date/Time: 12/3/10 1:45
Lab ID #: 399257
Initials: AM

Sample Receipt Checklist

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

18. Cooler 1 No.		Cooler 2 No.		Cooler 3 No.		Cooler 4 No.		Cooler 5 No.	
lbs	(0) °C	lbs	°C	lbs	°C	lbs	°C	lbs	°C

Nonconformance Documentation

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

Regarding: _____

Corrective Action Taken: _____

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

Photographs

Southern Union Landfarm: Cell 8 – Grid 1

Removal of chloride-impacted soil from Cell 8 – Grid 1

Loading of chloride-impacted material from Cell 8 – Grid 1

Grid 8 – Cell 1 following removal of chloride-impacted material
(Sample locations marked with green flags)

Request for Approval to Accept Solid Waste (Form C-138)

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-138
Revised March 12, 2007

*Surface Waste Management Facility Operator and Generator shall maintain and make this documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. **Generator Name and Address:**
Southern Union Gas Services, Ltd 1507 W. 15th Street Monahans, Texas 79756

2. **Originating Site:**
Various environmental remediation sites deposited in the western ½ of Landfarm Cell #8

3. **Location of Material (Street Address, City, State or ULSTR):**
Western ½ of Landfarm Cell #8, Located in Unit Letter Unit "F", Section 36, Township 23 South, Range 36 East, NMPM, in rural Lea County, New Mexico.

4. **Source and Description of Waste:**
Waste is hydrocarbon and chloride impacted soil deposited in western ½ of Cell #8 of Southern Union Gas Services, Ltd Landfarm. Analytical results obtained during December 2009 biannual sampling event indicated soil contained within the western ½ of Cell #8 exhibited chloride concentrations in excess of the NMOCD permitted concentration. Subject soil was transported to the landfill with NMOCD approval.

Estimated Volume 1,500 yd^3 / bbls Known Volume (to be entered by the operator at the end of the haul) _____ yd^3 / bbls

5. **GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS**

I, Rose Slade, representative or authorized agent for Southern Union Gas Services, Ltd do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. *Operator Use Only: Waste Acceptance Frequency* ☐ *Monthly* ☐ *Weekly* ☐ *Per Load*

☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description in Box 4)

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

I, _____, representative for _____ do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.

5. **Transporter:**
Basin Environmental Services Technologies, LLC Lovington, New Mexico

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: Sundance Services, Inc. (NM-01-003)

Address of Facility: PO Box 1737, Eunice, New Mexico 88231

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☐ Landfarm ☒ Landfill ☐ Other

Waste Acceptance Status:

☐ **APPROVED** ☐ **DENIED** (Must Be Maintained As Permanent Record)

PRINT NAME: Connie Romero TITLE: _____ DATE: 12-3-10

SIGNATURE: Connie Romero TELEPHONE NO.: 575-394-2511