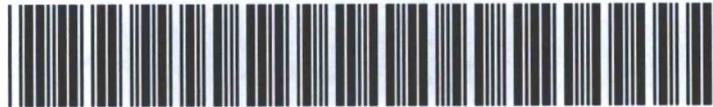




# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number: pCOH0806354599**

**1RP - 1802**

**SOUTHERN UNION GAS COMPANY**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., 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  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised August 1, 2011

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.  
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action:  Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Modification to an existing permit  
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Southern Union Gas Services OGRID #: N/A  
Address: 801 S. Loop 464 Monahans, Texas 79756  
Facility or well name: Drip Tank #55  
API Number: N/A OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr M Section 21 Township 21S Range 36E County: Lea County, NM  
Center of Proposed Design: Latitude 32 27.637 Longitude -103 16.563 NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  
 **Pit:** Subsection F or G of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
 **Closed-loop System:** Subsection H of 19.15.17.11 NMAC  
Type of Operation:  P&A  Drilling a new well  Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
 Drying Pad  Above Ground Steel Tanks  Haul-off Bins  Other \_\_\_\_\_  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_

4.  
 **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 100 bbl \_\_\_\_\_ bbl Type of fluid: Produced Water and Crude Oil  
Tank Construction material: Steel  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other Tank was installed by EPNG before BGT regulations  
Liner type: Thickness N/A mil  HDPE  PVC  Other \_\_\_\_\_

5.  
 **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)  
 Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)  
 Four foot height, four strands of barbed wire evenly spaced between one and four feet  
 Alternate. Please specify \_\_\_\_\_

7.  
**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)  
 Screen  Netting  Other \_\_\_\_\_  
 Monthly inspections (If netting or screening is not physically feasible)

8.  
**Signs:** Subsection C of 19.15.17.11 NMAC  
 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  
 Signed in compliance with 19.15.16.8 NMAC

9.  
**Administrative Approvals and Exceptions:**  
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  
**Please check a box if one or more of the following is requested, if not leave blank:**  
 Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.  
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.  
**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC  
*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i> ) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to permanent pits</i> ) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

11.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_
- Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type:  Drilling  Workover  Emergency  Cavitation  P&A  Permanent Pit  Below-grade Tank  Closed-loop System  
 Alternative
- Proposed Closure Method:  Waste Excavation and Removal  
 Waste Removal (Closed-loop systems only)  
 On-site Closure Method (Only for temporary pits and closed-loop systems)  
 In-place Burial  On-site Trench Burial  
 Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)

*Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

Yes (If yes, please provide the information below)  No

*Required for impacted areas which will not be used for future service and operations:*

Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC

Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

*Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.*

- Ground water is less than 50 feet below the bottom of the buried waste.
  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes  No  
 NA
- Ground water is between 50 and 100 feet below the bottom of the buried waste
  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes  No  
 NA
- Ground water is more than 100 feet below the bottom of the buried waste.
  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes  No  
 NA
- Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).
  - Topographic map; Visual inspection (certification) of the proposed site Yes  No
- Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.
  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image Yes  No
- Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.
  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site Yes  No
- Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.
  - Written confirmation or verification from the municipality; Written approval obtained from the municipality Yes  No
- Within 500 feet of a wetland.
  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site Yes  No
- Within the area overlying a subsurface mine.
  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division Yes  No
- Within an unstable area.
  - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map Yes  No
- Within a 100-year floodplain.
  - FEMA map Yes  No

18.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
- Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

20.

**OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment)  **CLOSURE CERTIFICATION**

OCD Representative Signature: Jeffrey Perkins **Environmental Specialist** Approval Date: 6/19/13

Title: \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_

21.

**Closure Report (required within 60 days of closure completion):** Subsection K of 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

Closure Completion Date: 4/25/13

22.

**Closure Method:**

Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)  
 If different from approved plan, please explain.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?

Yes (If yes, please demonstrate compliance to the items below)  No

Required for impacted areas which will not be used for future service and operations:

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

24.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- Proof of Closure Notice (surface owner and division)
- Proof of Deed Notice (required for on-site closure)
- Plot Plan (for on-site closures and temporary pits)
- Confirmation Sampling Analytical Results (if applicable)
- Waste Material Sampling Analytical Results (required for on-site closure)
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD:  1927  1983

HOBBS OCD

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25.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Jacob Krautsch Title: Sr. Director EHS

Signature: Jacob Krautsch Date: 6-17-2013

e-mail address: jacob.krautsch@regencygas.com Telephone: 817-302-9426

# *Basin Environmental Service Technologies, LLC*

3100 Plains Highway  
P. O. Box 301  
Lovington, New Mexico 88260

[jwlowry@basinenv.com](mailto:jwlowry@basinenv.com)

Office: (575) 396-2378 Fax: (575) 396-1429



## **REMEDICATION SUMMARY & SITE CLOSURE REQUEST**

**SOUTHERN UNION GAS SERVICES**

**DRIP TANK #55 (1RP-1802)**

**HISTORICAL RELEASE SITE**

**Lea County, New Mexico**

**Unit Letter "M", Section 21, Township 21 South, Range 36 East**

**Latitude 32° 27.637' North, Longitude 103° 16.563' West**

**NMOCD Reference # 1RP-1802**

Prepared For:

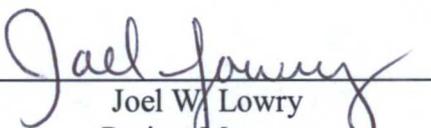
Southern Union Gas Services  
801 S. Loop 464  
Monahans, TX 79756

Prepared By:

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

**June 2013**

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JUN 19 2013  
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Joel W. Lowry  
Project Manager

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### FIGURES

Figure 1 – Site Location Map

Figure 2 – Site & Sample Location Map

### TABLES

Table 1 – Concentrations of Benzene, BTEX, TPH & Chloride in Soil

### APPENDICES

Appendix A – Photographs

Appendix B – Laboratory Analytical Reports

Appendix C – Pit or Below-Grade Tank Registration Form (Form C-144)

## 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 Drip Tank Battery #55 Historical Remediation Site (1RP-1802). The legal description of the release site is Unit Letter "M", Section 21, Township 21 South, Range 36 East, in Lea County, New Mexico. The geographic coordinates of the release site are 32° 27.637' North latitude and 103° 16.563' West longitude. The property affected by the release is owned by the State of New Mexico and administered by the New Mexico State Land Office (NMSLO).

On February 23, 2008, Southern Union filed a "Pit or Below-Grade Tank Registration of Closure Form" (Form C-144) with the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office, registering the Drip Tank #55 and notifying them of their intentions to remove the on-site below-grade tank (BGT) and remediate the area. The Form C-144 described the BGT as a steel, one hundred barrel (100 bbl) tank used to contain produced water and crude oil. The C-144 indicated the tank was installed by El Paso Natural Gas (EPNG) before the BGT regulations were written. General photographs of the release site are provided as Appendix A. The Form C-144 is provided as Appendix C.

## 2.0 NMOCD SITE CLASSIFICATION

An NMOCD representative indicated on the initial C-144 that the depth to groundwater is greater than two hundred feet (>200') 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 New Mexico Water Rights Reporting System (NMWRRS) database indicated there are no registered water wells within 1,000' of the remediation site. 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 1,000' of the remediation site. 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 Drip Tank #55 Historical Remediation 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 March 4, 2008, exhumation of the BGT began. Inactive pipelines and plumbing were disconnected, and the BGT was removed and transported to an approved disposal facility. Upon removing the BGT, six (6) soil samples (Sample 3 Floor, Floor Composite, North Wall Composite, South Wall Composite, West Wall Composite and East Wall Composite) were collected from the excavation floor and sidewalls and submitted to the laboratory for analysis of TPH concentrations. Laboratory analytical results indicated TPH were less than the appropriate laboratory method detection limit (MDL) for each of the submitted soil samples with the exception of Sample 3 Floor which had a concentration of 16.8 mg/kg. Soil sample Sample 3 Floor was also analyzed for concentrations of BTEX and chloride which were determined to be less than the laboratory MDL and 7.92 mg/kg, respectively. Table 1 summarizes the "Concentrations of Benzene, BTEX, TPH & Chloride in Soil". Soil sample locations are depicted in Figure 2, "Site & Sample Location Map". Laboratory analytical reports are provided as Appendix B.

On or around March 13, 2013, the last remaining above ground storage tank (AST) was removed from the location. During the removal of the AST, no holes were discovered and very minimal surface staining was encountered.

On April 25, 2013, a test trench was advanced in the footprint of the former AST in an effort to determine soil had been impacted above NMOCD Regulatory Standards. During the advancement of the test trenches, three (3) soil samples (TT-1 @ Surface, TT-1 @ 4' and TT-1 @ 8') were collected and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX concentrations were less than the laboratory MDL for each of the submitted soil samples. Analytical results indicated TPH concentrations ranged from less than the laboratory MDL for soil sample TT-1 @ 4' to 93.6 mg/kg for soil sample TT-1 @ 8'. Chloride concentrations ranged from 208 mg/kg for soil sample TT-1 @ 8' to 432 mg/kg for soil sample TT-1 @ 4'. Test trenches were backfilled and the site was contoured to match the surrounding topography. The site will be reseeded at a time more conducive to germination. Based on laboratory analytical results it was determined that the soil beneath the former AST had not been impacted above NMOCD Regulatory Standards.

### **4.0 QA/QC PROCEDURES**

#### **4.1 Soil Sampling**

Soil samples were delivered to Permian Basin Environmental Lab LP, of Midland, 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 300.0 and/or 4500 Cl-B

## **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**

Laboratory analytical results from confirmation soil samples collected during the BGT removal indicated benzene, BTEX, TPH and chloride concentrations were less than NMOCD regulatory standards. Soil samples collected from beneath the former AST indicated soil had not been impacted above NMOCD Regulatory Standards. 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 Drip Tank #55 Historical Remediation Site.

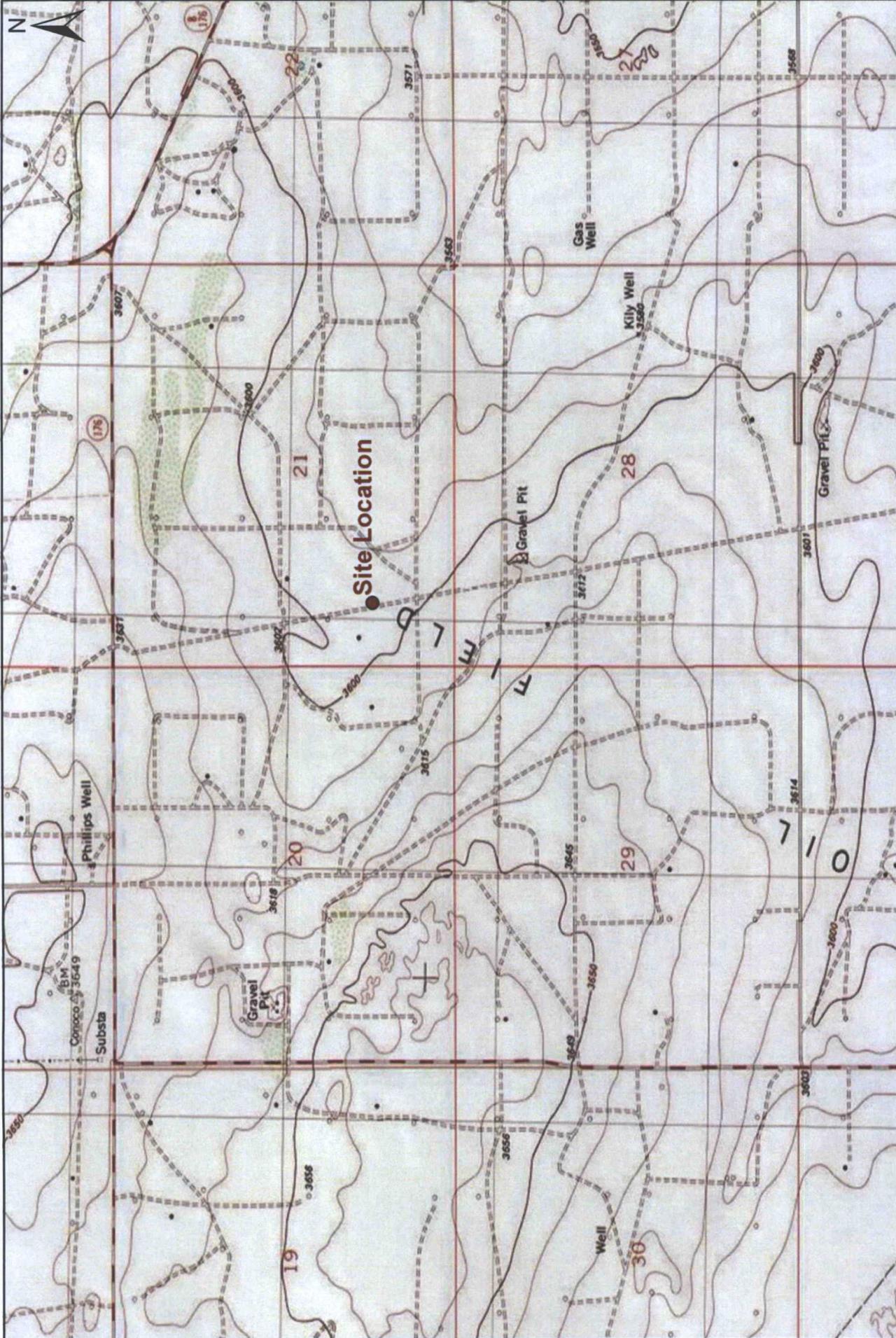
## 6.0 LIMITATIONS

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: Jacob Krautsch  
Southern Union Gas Services  
801 S. Loop 464  
Monahans, Texas 79756  
Jacob.krautsch@SUG.com
- Copy 3: Basin Environmental Service Technologies, LLC  
P.O. Box 301  
Lovington, New Mexico 88260  
jwlowry@basinenv.com

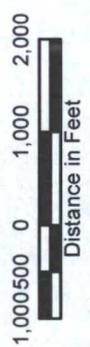


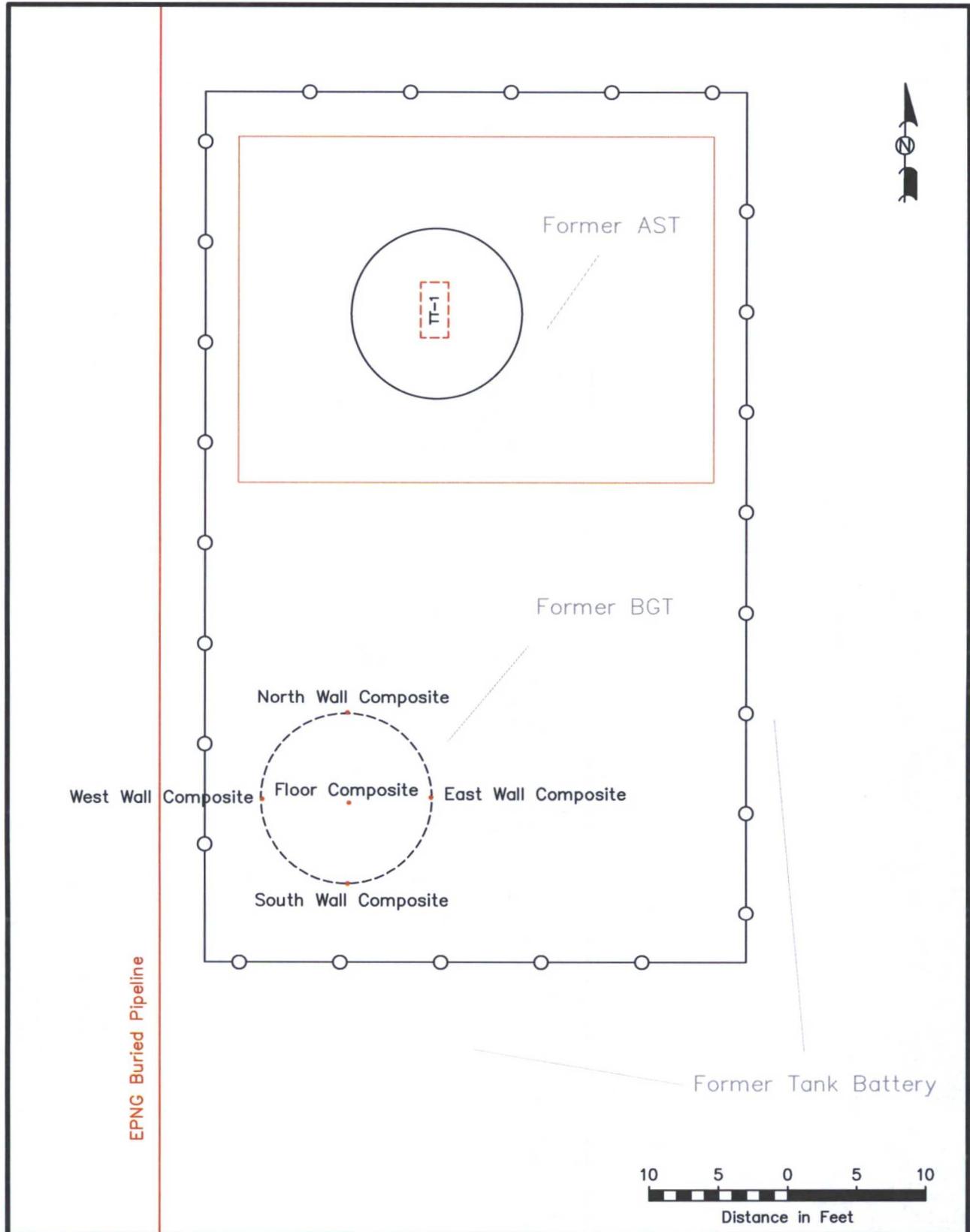
Basin Environmental Service Technologies, LLC  
 3100 Plains Hwy.  
 Lovington, NM 88260

Drawn By: BJA	Checked By: JWL
June 13, 2013	Scale: 1" = 2000'



**Figure 1**  
**Site Location Map**  
 Southern Union Gas Services  
 Drip Tank #55  
 Lea County, New Mexico  
 NMOCD Reference #: 1RP-1802





**LEGEND:**

	Fence		Test Trench
	Pipeline		Former BGT
	Earthen Containment		Sample Location

Figure 2  
 Site & Sample Location Map  
 Southern Union Gas Services  
 Drip Tank #55  
 Lea County, NM

**Basin Environmental Services**

Scale: 1" = 10'	Drawn By: JWL	Prepared By: BRB
August 23, 2012		

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES  
 DRIP TANK #55  
 HISTORICAL RELEASE SITE  
 LEA COUNTY, NEW MEXICO  
 NMOCD REF# 1RP-1802

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030				METHOD: 8015M				TOTAL TPH C <sub>9</sub> -C <sub>28</sub> (mg/Kg)	CHLORIDE (mg/Kg)	
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO C <sub>9</sub> -C <sub>12</sub> (mg/Kg)	DRO C <sub>12</sub> -C <sub>28</sub> (mg/Kg)	ORO C <sub>28</sub> -C <sub>38</sub> (mg/Kg)			
Sample 3 Floor	N/A	3/4/2008	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<0.0020	<15.3	16.8	<15.2	16.8	7.92
Floor Composite	N/A	3/4/2008	In-Situ	-	-	-	-	-	-	<15.5	<15.5	<15.5	<15.5	-
North Wall Composite	N/A	3/4/2008	In-Situ	-	-	-	-	-	-	<16.0	<16.0	<16.0	<16.0	-
South Wall Composite	N/A	3/4/2008	In-Situ	-	-	-	-	-	-	<16.3	<16.3	<16.3	<16.3	-
West Wall Composite	N/A	3/4/2008	In-Situ	-	-	-	-	-	-	<15.9	<15.9	<15.9	<15.9	-
East Wall Composite	N/A	3/4/2008	In-Situ	-	-	-	-	-	-	<16.2	<16.2	<16.2	<16.2	-
TT-1 @ Surface	Surface	4/25/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<0.300	<10.0	35.8	45.5	81.3	368
TT-1 @ 4'	4'	4/25/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	432.0
TT-1 @ 8'	8'	4/25/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<0.300	<10.0	71.7	21.9	93.6	208
<b>NMOCD Standard</b>				<b>10</b>				<b>50</b>					<b>5,000</b>	<b>1,000</b>

- = Not analyzed.



Photograph of the former BGT at Drip Tank #55.



Photograph of the BGT removal and sample locations at Drip Tank #55.



Photograph of the BGT removal and sample locations at Drip Tank #55.



Photograph of the former BGT location after being backfilled.



Photograph of the former above ground storage tank location.



Photograph of the former above ground storage tank location.

# **Analytical Report 298902**

**for**

## **Southern Union Gas Services-Jal**

**Project Manager: Tony Savoie**

**Drip Tank 55**

**BGT 016**

**11-MAR-08**



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

Texas certification numbers:

Houston, TX T104704215

Florida certification numbers:

Houston, TX E871002 - Miami, FL E86678 - Tampa, FL E86675

Norcross(Atlanta), GA E87429

South Carolina certification numbers:

Norcross(Atlanta), GA 98015

North Carolina certification numbers:

Norcross(Atlanta), GA 483

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

Midland - Corpus Christi - Atlanta



11-MAR-08

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

Reference: XENCO Report No: **298902**  
**Drip Tank 55**  
Project Address: Lea County, NM

**Tony Savoie:**

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 298902. 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. 298902 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

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**Sample Cross Reference 298902**



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

Drip Tank 55

<b>Sample Id</b>	<b>Matrix</b>	<b>Date Collected</b>	<b>Sample Depth</b>	<b>Lab Sample Id</b>
Sample 3 Floor	S	Mar-04-08 15:30		298902-001
Floor Composite	S	Mar-04-08 15:35		298902-002
North Wall Composite	S	Mar-04-08 15:40		298902-003
South Wall Composite	S	Mar-04-08 15:45		298902-004
West Wall Composite	S	Mar-04-08 15:50		298902-005
East Wall Composite	S	Mar-04-08 15:55		298902-006



# Certificate of Analysis Summary 298902

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

**Project Id:** BGT 016      **Date Received in Lab:** Wed Mar-05-08 12:20 pm  
**Contact:** Tony Savoie      **Report Date:** 11-MAR-08  
**Project Location:** Lea County, NM      **Project Manager:** Brent Barron, II

Analysis Requested	Lab Id:	Field Id:	Depth:	Matrix:	Sampled:	298902-001	298902-002	298902-003	298902-004	298902-005	298902-006
						Sample 3 Floor	Floor Composite	North Wall Composite	South Wall Composite	West Wall Composite	East Wall Composite
						SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
						Mar-04-08 15:30	Mar-04-08 15:35	Mar-04-08 15:40	Mar-04-08 15:45	Mar-04-08 15:50	Mar-04-08 15:55
<b>Anions by EPA 300/300.1</b>	<b>Extracted:</b>										
	<b>Analyzed:</b>										
	<b>Units/RL:</b>					mg/kg RL					
Chloride						7.92 5.00					
<b>BTEX by EPA 8021B</b>	<b>Extracted:</b>										
	<b>Analyzed:</b>										
	<b>Units/RL:</b>					mg/kg RL					
Benzene						ND 0.0010					
Toluene						ND 0.0020					
Ethylbenzene						ND 0.0010					
m,p-Xylenes						ND 0.0020					
o-Xylene						ND 0.0010					
Xylenes, Total						ND					
Total BTEX						ND					
<b>Percent Moisture</b>	<b>Extracted:</b>										
	<b>Analyzed:</b>										
	<b>Units/RL:</b>					% RL					
Percent Moisture						2.15 1.00	3.39 1.00	6.43 1.00	8.05 1.00	5.63 1.00	7.32 1.00
						Mar-05-08 16:00	Mar-05-08 16:00	Mar-05-08 16:00	Mar-05-08 16:00	Mar-05-08 16:00	Mar-05-08 16:00
						Mar-05-08 14:48	Mar-05-08 14:48	Mar-05-08 14:48	Mar-05-08 14:48	Mar-05-08 14:48	Mar-05-08 14:48
						mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
<b>TPH By SW8015 Mod</b>	<b>Extracted:</b>										
	<b>Analyzed:</b>										
	<b>Units/RL:</b>					mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
C6-C12 Gasoline Range Hydrocarbons						ND 15.3	ND 15.5	ND 16.0	ND 16.3	ND 15.9	ND 16.2
C12-C28 Diesel Range Hydrocarbons						16.8 15.3	ND 15.5	ND 16.0	ND 16.3	ND 15.9	ND 16.2
C28-C35 Oil Range Hydrocarbons						ND 15.3	ND 15.5	ND 16.0	ND 16.3	ND 15.9	ND 16.2
Total TPH						16.8	ND	ND	ND	ND	ND

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 user of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

  
**Brent Barron**  
 Odessa Laboratory Director

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## 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(PQL) and above the SQL(MDL).
  - 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.
- \* Outside XENCO'S scope of NELAC Accreditation

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(214) 902 0300	(214) 351-9139
(210) 509-3334	(210) 509-3335
(813) 620-2000	(813) 620-2033
(305) 823-8500	(305) 823-8555
(770) 449-8800	(770) 449-5477



# Form 2 - Surrogate Recoveries

Project Name: Drip Tank 55



Work Order #: 298902

Project ID: BGT 016

Lab Batch #: 716752

Sample: 298902-001 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0337	0.0300	112	80-120	
4-Bromofluorobenzene	0.0340	0.0300	113	80-120	

Lab Batch #: 716752

Sample: 505700-1-BKS / BKS

Batch: 1 Matrix: Solid

Units: mg/kg

### SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0308	0.0300	103	80-120	
4-Bromofluorobenzene	0.0328	0.0300	109	80-120	

Lab Batch #: 716752

Sample: 505700-1-BLK / BLK

Batch: 1 Matrix: Solid

Units: mg/kg

### SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0330	0.0300	110	80-120	
4-Bromofluorobenzene	0.0335	0.0300	112	80-120	

Lab Batch #: 716752

Sample: 505700-1-BSD / BSD

Batch: 1 Matrix: Solid

Units: mg/kg

### SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0306	0.0300	102	80-120	
4-Bromofluorobenzene	0.0329	0.0300	110	80-120	

Lab Batch #: 716637

Sample: 298902-001 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	97.8	100	98	70-135	
o-Terphenyl	51.6	50.0	103	70-135	

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

\*\*\* Poor recoveries due to dilution

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

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



# Form 2 - Surrogate Recoveries



Project Name: Drip Tank 55

Work Order #: 298902

Project ID: BGT 016

Lab Batch #: 716637

Sample: 298902-001 S / MS

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	109	100	109	70-135	
o-Terphenyl	55.9	50.0	112	70-135	

Lab Batch #: 716637

Sample: 298902-001 SD / MSD

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	100	100	100	70-135	
o-Terphenyl	52.4	50.0	105	70-135	

Lab Batch #: 716637

Sample: 298902-002 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	95.9	100	96	70-135	
o-Terphenyl	50.7	50.0	101	70-135	

Lab Batch #: 716637

Sample: 298902-003 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	97.5	100	98	70-135	
o-Terphenyl	52.2	50.0	104	70-135	

Lab Batch #: 716637

Sample: 298902-004 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	95.6	100	96	70-135	
o-Terphenyl	51.7	50.0	103	70-135	

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

\*\*\* Poor recoveries due to dilution

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

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



# Form 2 - Surrogate Recoveries

Project Name: Drip Tank 55



Work Order #: 298902

Project ID: BGT 016

Lab Batch #: 716637

Sample: 298902-005 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	97.2	100	97	70-135	
o-Terphenyl	52.3	50.0	105	70-135	

Lab Batch #: 716637

Sample: 298902-006 / SMP

Batch: 1 Matrix: Soil

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	94.8	100	95	70-135	
o-Terphenyl	51.1	50.0	102	70-135	

Lab Batch #: 716637

Sample: 505640-1-BKS / BKS

Batch: 1 Matrix: Solid

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	108	100	108	70-135	
o-Terphenyl	57.0	50.0	114	70-135	

Lab Batch #: 716637

Sample: 505640-1-BLK / BLK

Batch: 1 Matrix: Solid

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	101	100	101	70-135	
o-Terphenyl	54.5	50.0	109	70-135	

Lab Batch #: 716637

Sample: 505640-1-BSD / BSD

Batch: 1 Matrix: Solid

Units: mg/kg

### SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	105	100	105	70-135	
o-Terphenyl	57.7	50.0	115	70-135	

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

\*\*\* Poor recoveries due to dilution

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

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



# Blank Spike Recovery



Project Name: Drip Tank 55

Work Order #: 298902

Project ID:

BGT 016

Lab Batch #: 716323

Sample: 716323-1-BKS

Matrix: Solid

Date Analyzed: 03/05/2008

Date Prepared: 03/05/2008

Analyst: LATCOR

Reporting Units: mg/kg

Batch #: 1

## BLANK /BLANK SPIKE RECOVERY STUDY

Anions by EPA 300/300.1 Analytes	Blank Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
Chloride	ND	100	98.6	99	75-125	

Blank Spike Recovery [D] = 100\*[C]/[B]

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

**Project Name: Drip Tank 55**

Work Order #: 298902

Analyst: SHE

Lab Batch ID: 716752

Sample: 505700-1-BKS

Units: mg/kg

Project ID: BGT 016

Date Analyzed: 03/10/2008

Matrix: Solid

Date Prepared: 03/10/2008

Batch #: 1

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY											
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
BTEX by EPA 8021B	ND	0.1000	0.0887	89	0.1	0.0901	90	2	70-130	35	
Benzene	ND	0.1000	0.0884	88	0.1	0.0902	90	2	70-130	35	
Toluene	ND	0.1000	0.0897	90	0.1	0.0921	92	3	71-129	35	
Ethylbenzene	ND	0.2000	0.1805	90	0.2	0.1841	92	2	70-135	35	
m,p-Xylenes	ND	0.1000	0.0956	96	0.1	0.0973	97	2	71-133	35	
o-Xylene	ND										

Analyst: BRB

Lab Batch ID: 716637

Sample: 505640-1-BKS

Units: mg/kg

Date Prepared: 03/05/2008

Batch #: 1

Date Analyzed: 03/07/2008

Matrix: Solid

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY											
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
TPH By SW8015 Mod	ND	1000	907	91	1000	874	87	4	70-135	35	
C6-C12 Gasoline Range Hydrocarbons	ND	1000	913	91	1000	871	87	5	70-135	35	
C12-C28 Diesel Range Hydrocarbons	ND										

Relative Percent Difference RPD =  $200 * [(D-F)/(D+F)]$   
 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: Drip Tank 55

Work Order #: 298902

Project ID: BGT 016

Lab Batch #: 716323

Date Prepared: 03/05/2008

Analyst: LATCOR

Date Analyzed: 03/05/2008

Batch #: 1

Matrix: Soil

QC- Sample ID: 298877-001 S

Reporting Units: mg/kg

### MATRIX / MATRIX SPIKE RECOVERY STUDY

Inorganic Anions by EPA 300  Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
	Chloride	903	200	1160	129	75-125

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



# Form 3 - MS / MSD Recoveries



Project Name: Drip Tank 55

Work Order #: 298902

Project ID: BGT 016

Lab Batch ID: 716637

QC-Sample ID: 298902-001 S

Batch #: 1 Matrix: Soil

Date Analyzed: 03/07/2008

Date Prepared: 03/05/2008

Analyst: BRB

Reporting Units: mg/kg

TPH By SW8015 Mod Analytes	MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY										
	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	Spiked Sample %R [D]	Spike Added [E]	Duplicate Spiked Sample Result [F]	Spiked Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
C6-C12 Gasoline Range Hydrocarbons	ND	1020	932	91	1020	890	87	4	70-135	35	
C12-C28 Diesel Range Hydrocarbons	16.8	1020	965	93	1020	926	89	4	70-135	35	

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

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

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



# Sample Duplicate Recovery



**Project Name: Drip Tank 55**

**Work Order #: 298902**

**Lab Batch #: 716323**

**Date Analyzed: 03/05/2008**

**QC- Sample ID: 298877-001 D**

**Reporting Units: mg/kg**

**Date Prepared: 03/05/2008**

**Batch #: 1**

**Project ID: BGT 016**

**Analyst: LATCOR**

**Matrix: Soil**

SAMPLE / SAMPLE DUPLICATE RECOVERY					
Anions by EPA 300/300.1	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Analyte					
Chloride	903	890	1	20	

**Lab Batch #: 716512**

**Date Analyzed: 03/05/2008**

**QC- Sample ID: 298858-001 D**

**Reporting Units: %**

**Date Prepared: 03/05/2008**

**Batch #: 1**

**Analyst: RBA**

**Matrix: Soil**

SAMPLE / SAMPLE DUPLICATE RECOVERY					
Percent Moisture	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Analyte					
Percent Moisture	3.50	3.29	6	20	

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



**Environmental Lab of Texas**  
Variance/ Corrective Action Report- Sample Log-In

Client: S.U.G.S  
 Date/ Time: 3 5 08 12 20  
 Lab ID #: 278702  
 Initials: CL

**Sample Receipt Checklist**

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

**Variance Documentation**

Contact: \_\_\_\_\_ Contacted by: \_\_\_\_\_ Date/ Time: \_\_\_\_\_

Regarding: \_\_\_\_\_

Corrective Action Taken: \_\_\_\_\_

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

April 30, 2013

JOEL LOWRY

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: DRIP TANK BATTERY #55

Enclosed are the results of analyses for samples received by the laboratory on 04/26/13 12:19.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/ga/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/ga/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 Basin Environmental Service  
 JOEL LOWRY  
 P.O. Box 301  
 Lovington NM, 88260  
 Fax To: (575) 396-1429

Received:	04/26/2013	Sampling Date:	04/25/2013
Reported:	04/30/2013	Sampling Type:	Soil
Project Name:	DRIP TANK BATTERY #55	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Celey D. Keene
Project Location:	LEA COUNTY, NM		

**Sample ID: TT - 1 @ SURFACE (H300991-01)**

BTEX 8021B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/29/2013	ND	2.18	109	2.00	0.709		
Toluene*	<0.050	0.050	04/29/2013	ND	1.96	98.2	2.00	0.399		
Ethylbenzene*	<0.050	0.050	04/29/2013	ND	2.14	107	2.00	0.0330		
Total Xylenes*	<0.150	0.150	04/29/2013	ND	6.18	103	6.00	1.28		
Total BTEX	<0.300	0.300	04/29/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 101 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	368	16.0	04/29/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	04/29/2013	ND	190	95.1	200	1.11		
DRO >C10-C28	35.8	10.0	04/29/2013	ND	192	95.9	200	0.524		
EXT DRO >C28-C35	45.5	10.0	04/29/2013	ND						

Surrogate: 1-Chlorooctane 82.2 % 65.2-140

Surrogate: 1-Chlorooctadecane 97.0 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

 Basin Environmental Service  
 JOEL LOWRY  
 P.O. Box 301  
 Lovington NM, 88260  
 Fax To: (575) 396-1429

Received:	04/26/2013	Sampling Date:	04/25/2013
Reported:	04/30/2013	Sampling Type:	Soil
Project Name:	DRIP TANK BATTERY #55	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Celey D. Keene
Project Location:	LEA COUNTY, NM		

**Sample ID: TT - 1 @ 4' (H300991-02)**

BTEX 8021B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/29/2013	ND	2.18	109	2.00	0.709		
Toluene*	<0.050	0.050	04/29/2013	ND	1.96	98.2	2.00	0.399		
Ethylbenzene*	<0.050	0.050	04/29/2013	ND	2.14	107	2.00	0.0330		
Total Xylenes*	<0.150	0.150	04/29/2013	ND	6.18	103	6.00	1.28		
Total BTEX	<0.300	0.300	04/29/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	432	16.0	04/29/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	04/29/2013	ND	190	95.1	200	1.11		
DRO >C10-C28	<10.0	10.0	04/29/2013	ND	192	95.9	200	0.524		
EXT DRO >C28-C35	<10.0	10.0	04/29/2013	ND						

Surrogate: 1-Chlorooctane 92.9 % 65.2-140

Surrogate: 1-Chlorooctadecane 103 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

 Basin Environmental Service  
 JOEL LOWRY  
 P.O. Box 301  
 Lovington NM, 88260  
 Fax To: (575) 396-1429

Received:	04/26/2013	Sampling Date:	04/25/2013
Reported:	04/30/2013	Sampling Type:	Soil
Project Name:	DRIP TANK BATTERY #55	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Celey D. Keene
Project Location:	LEA COUNTY, NM		

**Sample ID: TT - 1 @ 8' (H300991-03)**

BTEX 8021B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/29/2013	ND	2.18	109	2.00	0.709		
Toluene*	<0.050	0.050	04/29/2013	ND	1.96	98.2	2.00	0.399		
Ethylbenzene*	<0.050	0.050	04/29/2013	ND	2.14	107	2.00	0.0330		
Total Xylenes*	<0.150	0.150	04/29/2013	ND	6.18	103	6.00	1.28		
Total BTEX	<0.300	0.300	04/29/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>208</b>	16.0	04/29/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	04/29/2013	ND	190	95.1	200	1.11		
<b>DRO &gt;C10-C28</b>	<b>71.7</b>	10.0	04/29/2013	ND	192	95.9	200	0.524		
<b>EXT DRO &gt;C28-C35</b>	<b>21.9</b>	10.0	04/29/2013	ND						

Surrogate: 1-Chlorooctane 89.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 99.2 % 63.6-154

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

LAB Order ID # H300991

Page 1 of 1

# Cardinal Laboratories

101 East Merland  
Hobbs, NM 88240  
Tel (575) 393-2326  
Fax (575) 393-2476

Company Name: Basin Environmental Service Technologies, LLC

Phone #: (575)396-2378

Address: P.O. Box 301  
Lovington, NM 88260

Fax #: (575)396-1429

Contact Person:

E-mail: pm@basenv.com,  
rose.slade@sung.com, cynthia.linskeep@sung.com

Invoice to: Southern Union Gas

Project #:

Project Name: Drip Tank Battery H55

Project Location: Lea Co., NM

Sampler Signature: Juel Jowers

LAB ID (LAB USE ONLY)	SAMPLE ID	(G)RAB or (C)OMP	# CONTAINERS	MATRIX				PRESERVATIVE METHOD						SAMPLING	
				WATER	SOIL	AIR	SLUDGE	HCL	HNO <sub>3</sub>	H <sub>2</sub> SO <sub>4</sub>	NaOH	ICE	NONE	DATE	TIME
	01 TT-1 Surface		1	X										4/25	11:00
	02 TT-1 4'		1	X										4/25	11:15
	03 TT-1 8'		1	X										4/25	11:30

ANALYSIS REQUEST  
(Circle or Specify Method No.)

Chloride	<input checked="" type="checkbox"/>
TPH 8015M	<input checked="" type="checkbox"/>
BTEX 8021B	<input checked="" type="checkbox"/>

Turn Around Time if different from standard

Hold

Relinquished by: Quilston Besi Company: 4/26/13 Date: 12:19

Received by: W. Jowers Company: 4/26/13 Date: 12:19

Relinquished by: Quilston Besi Company: 4/26/13 Date: 12:19

Received by: W. Jowers Company: 4/26/13 Date: 12:19

Relinquished by: Quilston Besi Company: 4/26/13 Date: 12:19

Received by: W. Jowers Company: 4/26/13 Date: 12:19

LAB USE ONLY

Intact Y / N

Headspace Y / N / NA

Log-In Review

REMARKS:

Dry Weight Basis Required

TRRP Report Required

Check if Special Reporting Limits Are Needed

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

Form C-144  
June 1, 2004

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

For drilling and production facilities, submit to appropriate NMOCD District Office.  
For downstream facilities, submit to Santa Fe office

**Pit or Below-Grade Tank Registration or Closure**

Is pit or below-grade tank covered by a "general plan"? Yes  No   
Type of action: Registration of a pit or below-grade tank  Closure of a pit or below-grade tank

Operator: Southern Union Gas Services Telephone: 575-395-2116 e-mail address: tony.savoie@sug.com  
Address: P.O. Box 1226 Jal. New Mexico 88252  
Facility or well name: Drip Tank #55 API #: \_\_\_\_\_ U/L or Qtr/Qtr M Sec 21 T 21 S R 36E  
County: Lea Latitude 32 deg. 27.637N Longitude 103 deg. 16.563W NAD: 1927  1983   
Surface Owner: Federal  State  Private  Indian

<u>Pit</u>	<u>Below-grade tank</u>	
Type: Drilling <input type="checkbox"/> Production <input type="checkbox"/> Disposal <input type="checkbox"/> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Lined <input type="checkbox"/> Unlined <input type="checkbox"/> Liner type: Synthetic <input type="checkbox"/> Thickness _____ mil Clay <input type="checkbox"/> Pit Volume _____ bbl	Volume: <u>100</u> bbl Type of fluid: <u>Produced water and crude oil</u> Construction material: <u>Steel</u> Double-walled, with leak detection? Yes <input type="checkbox"/> If not, explain why not. <u>Tank was installed by EPNG before the BGT regulations were written</u>	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.) Average 206 ft.	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more <u>WTR &gt; 205</u>	(20 points) (10 points) ( 0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.) No, 4746 Horiz. Ft. to a private water well	Yes No	(20 points) ( 0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.) 2.18 Horizontal miles to an intermittent water course.	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more	(20 points) (10 points) ( 0 points)
	<b>Ranking Score (Total Points)</b>	0 Points

If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks (2) Indicate disposal location (check the onsite box if you are burying in place) onsite  offsite  If offsite, name of facility \_\_\_\_\_ (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No  Yes  If yes, show depth below ground surface \_\_\_\_\_ ft. and attach sample results (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments: The Below Grade Tank will be removed in accordance with the NMOCD proposed Pit and Below Grade Tank Rules.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines , a general permit , or an (attached) alternative OCD-approved plan .

Date: 2/23/08  
Printed Name/ Tony Savoie  
Title Waste Management and Remediation Specialist Signature Tony Savoie  
Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or

Approval: Chris Williams Signature Chris Williams Date: 03/03/2008  
Printed Name/Title \_\_\_\_\_ Signature \_\_\_\_\_ Date: \_\_\_\_\_  
RP # 1802

FCOAO806 354083