AE Order Number Banner

Report Description

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App Number: pKJ1605036047

1RP - 2808

CROSS TIMBERS ENERGY, LLC

2/19/2016

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

HOBBS OCD
DEC 04 2013
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Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: Regency Field Service, LLC Formerly Southern Union Gas Services	Contact: Crystal Callaway
Address: 801 South Loop 464 Monahans, Texas 79756	Telephone No.: 817-302-9407 (Office) 817-807-6514 (Cell)
Facility Name: Trunk "O" Bennett Road 5/7/12	Facility Type: Natural Gas Gathering Pipeline

Surface Owner: Greg Fulfer	Mineral Owner	API No – 30-025-28822

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	31	25	37					Lea

Latitude_N32° 05.432' Longitude:103° 12.532'

NATURE OF RELEASE

Type of Release: Crude oil, Poduced Water, and Natural Gas	Volume of Release: 175 barrels	Volume Recovered: 130 barrels
Source of Release: Steel 30" Pipeline	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 5/7/2012 at approximately 11:00 AM
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Geoffrey Leking	
By Whom? Rose Slade	Date and Hour: 5/7/2012 at 4:00 PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
The 30" natural gas gathering line experienced a release. Repair crews arrived at the release site and began a suface clean up. Impacted soil was placed on plastic until further remediation was completed at the site. The pipeline release point was excavated during initial response activities and the 30 inch pipe line was fitted with a temporary pipeline clamp to mitigate the release. Following initial response activities the pipeline was placed back in service. The landowner was immediately notified and an environmental consultant was retained to remediate the release.

Describe Area Affected and Cleanup Action Taken.*
The area was excavated and soil samples were collected from the excavation and remediated stockpiled soil and submitted to the laboratory for benzene, BTEX, TPH and chloride analysis. Laboratory results indicated benzene, BTEX, TPH, and chloride concentrations were less than the NMOCD approved cleanup standards. The excavation was backfilled with the remediated soil and non-impacted soil purchased from the landowner. Please reference the NOVA Safety and Environmental Soil Remediation Summary and Site Closure Request dated November 2013 for further details.

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

Signature: Crystal Callaway	OIL CONSERVATION DIVISION
Printed Name: Crystal Callaway	Approved by Environmental Specialist: Environmental Specialist
Title: Senior Remediation Specialist	Approval Date: 12/04/13 — Expiration Date: —
E-mail Address: crystal.callaway@regencygas.com	Conditions of Approval: — — Attached ☐ 1RP-2808
Date: 12/4/13 Phone: 817-302-9407	

* Attach Additional Sheets If Necessary

1RP-5-12-2808

REMEDIATION SUMMARY

AND RISK BASED CLOSURE REQUEST

Regency Field Services, LLC,
Formerly Southern Union Gas Services
Trunk "O" Bennett Road 5-7-12 Release
Lea County, New Mexico
UNIT LTR "D" (NW ¼ /NW ¼), Section 31, Township 25 South, Range 37 East
Latitude 32° 05.432' North, Longitude 103° 12.532' West
NMOCD Reference # 1RP-2808

NOVA safety and environmental

Prepared For:

Regency Field Services, LLC,
Formerly South Union Gas Services
801 South Loop 464
Monahans, Texas 79756

approved
Environmental Specialist
NMOCD-DIST 1
12/04/13

HOBBS OCD

DEC 04 2013

RECEIVED

Prepared By:

NOVA Safety & Environmental
2057 Commerce
Midland, Texas 79703

November 2013

Curt D. Stanley
Project Manager

Rebecca Haskell for
Brittan K. Byerly, P.G.
President

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Address: 801 South Loop 464 Monahans, Texas 79756	Telephone No.: 817-302-9407 (Office) 817-807-6514 (Cell)
Facility Name: Trunk "O" Bennett Road 5/7/12	Facility Type: Natural Gas Gathering Pipeline

Surface Owner: Greg Fulfer	Mineral Owner	API No – 30-025-28822

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

Signature: Crystal Callaway	OIL CONSERVATION DIVISION
Printed Name: Crystal Callaway	Approved by Environmental Specialist: Environmental Specialist
Title: Senior Remediation Specialist	Approval Date: 12/04/13 — Expiration Date: —
E-mail Address: crystal.callaway@regencygas.com	Conditions of Approval: — — Attached ☐ 1RP-2808
Date: 12/4/13 Phone: 817-302-9407	

* Attach Additional Sheets If Necessary

1RP-5-12-2808

REMEDIATION SUMMARY

AND RISK BASED CLOSURE REQUEST

Regency Field Services, LLC,
Formerly Southern Union Gas Services
Trunk "O" Bennett Road 5-7-12 Release
Lea County, New Mexico
UNIT LTR "D" (NW ¼ /NW ¼), Section 31, Township 25 South, Range 37 East
Latitude 32° 05.432' North, Longitude 103° 12.532' West
NMOCD Reference # 1RP-2808

NOVA
safety and environmental

Prepared For:

Regency Field Services, LLC,
Formerly South Union Gas Services
801 South Loop 464
Monahans, Texas 79756

Prepared By:

NOVA Safety & Environmental
2057 Commerce
Midland, Texas 79703

November 2013

Curt D. Stanley
Project Manager

Rebecca Haskell for
Brittan K. Byerly, P.G.
President

TABLE OF CONTENTS

1.0 INTRODUCTION

NOVA Safety & Environmental (NOVA), on behalf of Regency Field Services, LLC, formerly Southern Union Gas Services (SUGS), has prepared this Remediation Summary and Risk Based Site Closure Request for the release site known as Trunk "O" Bennett Road 5-7-12 (Bennett Road). The legal description of the release site is Unit Letter "D" (NW ¼ NW ¼), Section 31, Township 25 South, Range 37 East, in Lea County, New Mexico. The property affected by the release is owned by Mr. Greg Fulfer. The release site GPS coordinates are 32° 05.432' North and 103° 12.532' West. Please reference Figure 1 for the Site Location Map and Figure 2 for the Site and Sample Location Map. The Release Notification and Corrective Action (Form C-141) is provided as Appendix E.

On May 7, 2012, a release of crude oil, produced water, and natural gas from a thirty (30)-inch steel pipeline was discovered by Regency Field Services LLC, formerly SUGS. The release fluid flowed from the release point to the south for approximately eight hundred (800) feet. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on May 7, 2012. During initial response activities, Regency Field Services LLC, formerly SUGS, installed a temporary pipeline clamp on the pipeline to mitigate the release. Approximately one hundred seventy-five (175) barrels of fluid was released from the pipeline, with one hundred thirty (130) barrels recovered. General photographs of the site are provided as Appendix B.

2.0 NMOCD SITE CLASSIFICATION

According to data obtained from the New Mexico Office of the State Engineer (NMOSE), no water wells are registered in Section 31, Township 25S, Range 37E. A depth to groundwater reference map utilized by the NMOCD indicates groundwater should be encountered at approximately two hundred (200) feet below ground surface (bgs). The depth to groundwater at the Trunk "O" Bennett Road 5-7-12 Release Site results in zero (0) points being assigned to the site based on the NMOCD depth to groundwater criteria.

The water well database, maintained by the NMOSE, indicated there are no water wells less than 1,000 feet from the release, resulting in zero (0) points being assigned to this site as a result of this criteria.

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

The NMOCD guidelines indicate the Trunk "O" Bennett Road 5-7-12 Release Site has a ranking score of zero (0). Based on this score, the soil remediation levels for a site with a ranking score of zero (0) points are as follows:

- Benzene – 10 mg/Kg (ppm)
- BTEX – 50 mg/Kg (ppm)
- TPH – 5,000 mg/Kg (ppm)

The NMOCD chloride cleanup level concentrations are site specific and will be determined by the NMOCD Hobbs District Office. The NMOCD Hobbs District Office granted approval to

leave soil in-situ exhibiting chloride concentrations less than 1,000 mg/Kg. Areas exhibiting chloride concentrations above 250 mg/Kg would be delineated to less than 250 mg/Kg.

3.0 SUMMARY OF SOIL REMEDIATION ACTIVITIES

On May 14, 2012, following initial response activities, excavation of the impacted soil began at the site. Approximately 16,000 cubic yards (cy) of impacted soil was excavated and stockpiled on-site, pending final disposition. Approximately 1,944 cy of heavily saturated soil was stockpiled separately, pending final disposition. Final dimensions of the Flow Path Excavation were approximately eight hundred twenty-five (825) feet in length, ranged from approximately sixteen (16) to one hundred fifteen (115) feet in width, and varied in depth from four and a half (4.5) feet to twenty (20) feet in depth. The Release Point Excavation on the east side of the Regency Field Services, LLC, formerly SUGS Trunk "O" pipeline measured approximately fifty (50) feet in length, approximately twenty-five (25) feet width and approximately ten (10) feet in depth. The Release Point Excavation on the north and south sides of the caliche road measured approximately fifty-five (55) feet in length, approximately forty-two (42) feet in width and approximately twenty-one (21) feet in depth. Please reference Figure 2 for site details.

On May 23, 2012, eleven (11) soil samples (South S/W-1 @ 3', West S/W-1 @ 2.5', East S/W-1 @ 2.5', Floor-1 @ 5', West S/W-2 @ 2', Floor-2 @ 4.5', East S/W-2 @ 2.5', Floor-3 @ 4.5', East S/W-3 @ 1', West S/W-3 @ 2', and East S/W-4 @ 2') were collected from the flow path excavation. The soil samples were submitted to the laboratory and analyzed for concentrations of benzene, toluene, ethyl-benzene and xylenes (BTEX), total petroleum hydrocarbons (TPH), and chlorides using EPA SW 846-8021b, EPA SW 846-8015M, and E 300, respectively. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory method detection limit (MDL) for all the submitted soil samples with the exception of soil sample West S/W-1 @ 2.5', which exhibited a BTEX concentration of 0.00641 mg/Kg. Laboratory analytical results indicated TPH concentrations ranged from less than the appropriate laboratory MDL for soil samples South S/W-1 @ 3', West S/W-1 @ 2.5', East S/W-1 @ 2.5', Floor-1 @ 5', West S/W-2 @ 2', East S/W-2 @ 2.5', East S/W-3 @ 1', and East S/W-4 @ 2' to 41.8 mg/Kg for soil sample Floor-3 @ 4.5'. Chloride concentrations ranged from 5.02 mg/Kg for soil sample Floor-2 @ 4.5' to 448 mg/Kg for soil sample South S/W-1 @ 3'. Based on laboratory analytical results, the areas represented by soil samples South S/W-1 @ 3', West S/W-2 @ 2' and West S/W-3 @ 2' would require additional horizontal delineation. Table 1 summarizes the Concentrations of Benzene, BTEX, TPH, and Chlorides in Soil. Analytical reports are provided as Appendix A.

On May 23, 2012, a trench was installed in the floor of the Flow Path Excavation in the vicinity of soil sample Floor-1 @ 5' to vertically delineate the extent of impacted soil. The trench was completed to a total depth of approximately eleven (11) feet bgs. A soil sample (Trench-1 @ 11') was collected from the floor of the trench and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. Analytical results indicated a chloride concentration of 448 mg/Kg for soil sample Trench-1 @ 11'. Please reference Figure 2 for soil sample locations and site details.

In addition, a soil sample (Baseline) was collected from the heavily saturated stockpiled soil to determine TPH and chloride concentrations in the soil. Laboratory analytical results indicated a

TPH concentration of 13,000 mg/Kg and a chloride concentration of 522 mg/Kg. Based on the laboratory analytical results it was determined the stockpiled soil represented by soil sample Baseline, would be transported to Sundance Services for disposal.

On May, 30, 2012, two (2) soil samples (West S/W-6 @ 3' and Floor-4 @ 10') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL for both soil samples. TPH concentrations ranged from less than the laboratory MDL for soil sample West S/W-6 @ 3' to 15.6 mg/Kg for soil sample Floor-4 @ 10'. Analytical results indicated chloride concentrations ranged from 15.6 mg/Kg for soil sample West S/W-6 @ 3' to 84.8 mg/Kg for soil sample Floor-4 @ 10'.

Based on chloride field test data, on June 4, 2012, a trench was installed in the floor of the Flow Path Excavation to investigate the vertical extent of impacted soil at the site. The trench was located in the floor of the excavation at approximately ten (10) feet bgs. The trench was complete to a total depth of twenty (20) feet bgs. One (1) soil sample (Floor-5 @ 20') was collected from the trench and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 2,100 mg/Kg. Based on laboratory analytical results of the soil sample Floor-5 @ 20', further investigation of the vertical extent of impacted soil was warranted.

In addition, one (1) soil sample (East S/W-5 @ 8') was collected from the sidewall of the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 5,700 mg/Kg. Based on the analytical results of the soil sample East S/W-5 @ 8', additional excavation would be necessary.

On June 4, 2012, a trench was installed outside the Flow Path Excavation, approximately fourteen (14) feet east of soil sample East S/W-5 @ 8' to horizontally delineate the extent of impacted soil. The trench was installed to a total depth of approximately eight (8) feet bgs. A soil sample (East Trench @ 8') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of sampling activities, the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 15.8 mg/Kg.

On June 5, 2012, two (2) soil samples (Floor-6 @ 10' and East S/W-6 @ 5') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for both soil samples. Chloride concentrations ranged from 365 mg/Kg for soil sample East S/W-6 @ 5' to 771 mg/Kg for soil sample Floor-6 @ 10' (Table 1). Based on the laboratory analytical results, the area represented by soil sample East S/W-6 @ 5' would require additional horizontal delineation.

On June 5, 2012, a trench was installed outside the Flow Path Excavation, approximately fourteen (14) feet east of soil sample East S/W-6 @ 5' to horizontally delineate the extent of impacted soil. The trench was installed to a total depth of approximately five (5) feet bgs. A soil

sample (East Trench-1 @ 5') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of sampling activities, the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 12.5 mg/Kg.

On June 6, 2012, three (3) soil samples (West S\W-4 @ 4.5', Floor-5A @ 10', and West S\W-5 @ 5') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. The laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all the submitted soil samples. Chloride concentrations ranged from 34.9 mg\Kg for soil sample West S\W-4 @ 4.5' to 590 mg\Kg for soil sample West S\W-5 @ 5'. Based on the laboratory analytical results, the area represented by soil sample West S/W-5 @ 5' would require additional horizontal delineation. Please reference Figure 2 for soil sample locations.

On June 6, 2012, a trench was installed outside the Flow Path Excavation, approximately twelve (12) feet west of soil sample West S/W-5 @ 5' to horizontally delineate the extent of impacted soil. The trench was installed to a total depth of approximately five (5) feet bgs. A soil sample (West Trench @ 5') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of sampling activities, the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 25.7 mg/Kg (Table1).

On June 7, 2012, five (5) soil samples (Floor-6A @ 10', West S\W-6 @ 5', South S\W-2 @ 2', North S\W-1 @ 2', and East S\W-7 @ 5') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples with the exception of soil samples South S\W-2 @ 2' and North S\W-1 @ 2', which exhibited TPH concentrations of 68.6 mg\Kg and 26.5 mg\Kg, respectively. Chloride concentrations ranged from 3.97 mg\Kg for soil sample North S\W-1 @ 2' to 1,950 mg\Kg for soil sample East S\W-7 @ 5'. Based on the laboratory analytical results, the area represented by soil sample East S/W-7 @ 5' would require additional excavation. Please reference Figure 2 for soil sample locations.

On June 7, 2012, a trench was installed outside the Flow Path Excavation, approximately fifteen (15) feet east of soil sample East S/W-7 @ 5' to horizontally delineate the extent of impacted soil. The trench was installed to a total depth of approximately five (5) feet bgs. A soil sample (East Trench-2 @ 5') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of sampling activities, the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 7.85 mg/Kg.

On June 11, 2012, two (2) soil samples (Floor-7 @ 10' and West S\W-7 @ 5') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for both soil samples. Chloride concentrations ranged from 10.1 mg/Kg for soil sample West S/W-7 @ 5' to 94.7 mg/Kg for soil sample Floor-7 @ 10'.

On June 13, 2012, one (1) soil sample (East S\W-8 @ 5') was collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 118 mg\Kg.

On June 14, 2012, two (2) soil samples (West S\W-8 @ 5' and Floor-8 @ 10') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for both soil samples. Chloride concentrations ranged from 43.1 mg\Kg for soil sample West S\W-8 @ 5' to 217 mg\Kg for soil sample Floor-8 @ 10'.

On June 15, 2012, NMOCD Hobbs District Office representative met with Regency Field Services, LLC, formerly South Union Gas Services and NOVA representatives at the site to discuss remediation activities to be conducted. During the meeting the NMOCD representative granted verbal approval to leave soil in-situ exhibiting chloride concentrations less than 1,000 mg\Kg. The area along the sidewalls of the excavation exhibiting chloride concentrations above 250 mg\Kg would be delineated to 250 mg\Kg. In addition, a soil boring would be installed in the area of soil sample Floor-5 @ 20' to delineate the vertical extent of chloride impacted soil at the site. The area represented by soil sample Floor-5@ 20' would be excavated to a total depth of approximately fifteen (15) feet bgs. The area would be excavated horizontally until laboratory analytical results indicated chloride concentrations were less than 1,000 mg\Kg. On confirmation of chloride concentrations less than 1,000 mg\Kg, a twenty (20) millimeter (mil) liner would be installed in the fifteen (15) foot excavated area. The area would be backfilled with the stockpiled soil exhibiting benzene, BTEX, TPH, and chloride concentrations of less than 10 mg\Kg, 50 mg\Kg, 5,000 mg\Kg, and 1,000 mg\Kg, respectively.

On June 15, 2012, three (3) soil samples (East S\W-9 @ 5', West S\W-9 @ 9' and Floor-9 @ 10') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples with the exception of soil sample West S\W-9 @ 5', which exhibited a TPH concentration of 95.1 mg\Kg. Chloride concentrations ranged from 7.65 mg\Kg for soil sample East S/W-9 @ 5' to 102 mg\Kg for soil sample West S\W-9 @ 5'.

On June 15, 2012, a trench was installed outside the Flow Path Excavation, approximately five (5) feet west of soil sample West S/W-9 @ 5' to horizontally delineate the extent of impacted soil. The trench was installed to a total depth of approximately five (5) feet bgs. A soil sample (West Trench-1 @ 5') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of sampling activities, the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 10.3 mg/Kg.

On June 20, 2012, three (3) soil samples (Floor-10 @ 4.5', West S\W-10 @ 2', and East S\W-10 @ 1.5') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples with the exception of soil sample West S\W-10 @ 2', which exhibited a TPH concentration of 53.6 mg\Kg. Chloride

concentrations ranged from 8.06 mg\Kg for soil sample Floor-10 @ 4.5' to 9.5 mg\Kg for soil sample West S\W-10 @ 2'.

On June 21, 2012, three (3) soil samples (Floor-11 @ 4.5', East S\W-11 @ 2', and West S\W-11 @ 2') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples with the exception of soil sample Floor-11 @ 4.5', which exhibited a TPH concentration of 18.9 mg/Kg. Chloride concentrations ranged from 5.16 mg\Kg for soil sample West S\W-11 @ 2' to 18.7 mg\Kg for soil sample East S\W-11 @ 2'.

On June 27, 2012, three (3) delineation trenches (South Trench, West Trench-2, and West Trench-3) were installed at the site to delineate the horizontal extent of impacted soil at the site. Selected soil samples were submitted to the laboratory for benzene, BTEX, TPH, and chloride analysis.

South Trench was installed outside of the Flow Path Excavation approximately five (5) feet south of soil sample South S/W-1 @ 3'. The trench was installed to a total depth of approximately three (3) feet bgs. On June 27, 2012, a soil sample (South Trench @ 3') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of soil sampling activities the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 50.9 mg/Kg.

West Trench-2 was installed outside the Flow Path Excavation approximately five (5) feet west of soil sample West S/W-2 @ 2'. The trench was installed to a total depth of approximately two (2) feet bgs. On June 27, 2012, a soil sample (West Trench-2 @ 2') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of soil sampling activities the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 12.6 mg/Kg.

West Trench-3 was installed outside the Flow Path Excavation approximately five (5) feet west of soil sample West S/W-3 @ 2'. The trench was installed to a total depth of approximately two (2) feet bgs. On June 27, 2012, a soil sample (West Trench-3 @ 2') was collected from the floor of the trench and submitted to the laboratory for analysis. On completion of soil sampling activities the trench was backfilled. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 10.2 mg/Kg.

On June 28, 2012, NOVA began excavation activities at the release point. As the release point is located in a highly utilized caliche road, excavation activities were conducted in stages. The impacted area was excavated, soil samples were collected and the excavation was backfilled with locally obtained non-impacted soil and water compacted.

Excavation activities commenced at the eastern most extent of impacted soil and progressed to the west. On June 28, 2012, four (4) soil samples (RP East S/W @ 2.5', RP Floor @ 10', RP South S/W @ 5', and RP North S/W @ 5') were collected from the excavation and submitted to

the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples. Chloride concentrations ranged from 5.18 mg/Kg for soil sample RP East S/W @ 2.5' to 50.2 mg/Kg for soil sample RP Floor @ 10'. Please reference Figure 3 Release Point Excavation and Sample Location Map for soil sample locations.

On June 29, 2012, a soil sample (Floor-7A @ 10') was collected from a previously sampled area and submitted to the laboratory for analysis. The soil sample Floor-7A @ 10' was submitted to the laboratory to confirm previous laboratory analytical data. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 962 mg/Kg.

In addition, a soil sample (South S/W-3 @ 8') was collected from the sidewall of the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 11 mg/Kg.

Excavated soil was stockpiled west of the excavation in a cleared area and remediated by mixing and blending methods. On June 29, 2012, a portion of the stockpiled soil was subdivided into six (6) discreet stockpiles. One (1) composite soil sample was collected from each stockpile, resulting in six (6) composite soil samples, identified as SP-1 through SP-6. Each soil sample represented approximately five hundred (500) cubic yards of remediated soil. The composite soil samples were submitted to the laboratory and analyzed for concentrations of benzene, BTEX, TPH, and chlorides. Laboratory analytical results indicated benzene concentrations were less than the appropriate laboratory MDL for all submitted soil samples. BTEX concentrations ranged from 0.0140 mg/Kg for soil sample SP-6 to 0.151 mg/Kg for soil sample SP-2. Analytical results indicated TPH concentrations ranged from 1,650 mg/Kg for soil sample SP-6 to 2,690 mg/Kg for soil sample SP-3. Chloride concentrations ranged from 229 mg/Kg for soil sample SP-2 to 296 mg/Kg for soil sample SP-4 (Table 1). Based on the laboratory analytical results of the stockpiled soil represented by soil samples SP-1 through SP-6 was deemed suitable for use as backfill material.

Based on laboratory analytical results, additional excavation activities were conducted in the areas represented by soil samples East S/W-7 @ 5'and East S/W-5 @ 8'. On July 2, 2012, a soil sample (East S/W-7A @ 5') was collected from the Flow Path Excavated area and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 82.8 mg/Kg. Please reference Figure 2 for soil sample locations.

On July 3, 2012, a soil sample (East S/W-5A @ 8') was collected from the excavated area and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a TPH concentration of 455 mg/Kg and a chloride concentration of 433 mg/Kg.

On July 5, 2012, NOVA resumed excavation activities at the release point. Excavation activities began on the east side of the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline. Based on chloride field test results and visual and olfactory observations, two (2) trenches were installed to delineate the vertical and horizontal extent of impacted soil at the release point. The

first trench was installed on the east side of the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline and progressed to the north and south. The second trench was installed on the west side of the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline and progressed to the west. The trenches were excavated to a total depth of approximately eighteen (18) feet bgs. As the release point is located in a highly traveled caliche road, the area was excavated, soil samples were collected and the trenches were backfilled with locally obtained non-impacted soil. Please reference Figure 3 for Release Point Excavation details.

On July 5, 2012, five (5) soil samples (RP Floor-2 @ 18', RP S Trench Floor @ 18', RP S Trench South S/W @ 9', RP N Trench Floor @ 18'and RP N Trench North S/W @ 9') were collected from the trench located on the east side of the Regency Field Services, LLC, formerly SUGS Trunk "O" Pipeline and submitted to the laboratory for analysis. Laboratory analytical results of soil sample RP Floor-2 @ 18', indicated a benzene concentration of 7.97 mg/Kg, a BTEX concentration of 619 mg/Kg, a TPH concentration of 48,600 mg/Kg and a chloride concentration of 2,270 mg/Kg. Based on the laboratory analytical results of soil sample RP-2 Floor @ 18', further investigation of the vertical extent of impacted soil was warranted. Laboratory analytical results of the remaining soil samples (RP S Trench Floor @ 18', RP S Trench South S/W @ 9', RP N Trench Floor @ 18'and RP N Trench North S/W @ 9') indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all the submitted soil samples with the exception of soil sample RP S Trench Floor @ 18', which exhibited a BTEX concentration of 0.0239 mg/Kg. Chloride concentrations ranged from 12.9 mg/Kg for soil sample RP S Trench Floor @ 18' to 28.7 mg/Kg for soil sample RP S Trench South S/W @ 9'. Please reference Figure 3 for soil sample locations.

In addition, two (2) soil samples (RP W Trench Floor @ 18' and RP W Trench West S/W @ 9') were collected from the trench located on the west side of the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline. The soil samples were submitted to the laboratory for analysis. Laboratory analytical results indicted benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for both soil samples. Chloride concentrations ranged from 42.1 mg/Kg for soil sample RP W Trench Floor @ 18' to 158 mg/Kg for soil sample RP W Trench West S/W @ 9' (Table 1).

NOVA resumed excavation activities of the Flow Path Excavation. On July 6, 2012, a soil sample (South S/W-4 @ 5') was collected from the sidewall of the excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL. The soil sample exhibited a chloride concentration of 25.6 mg/Kg.

From July 10 through July 19, 2012, approximately 1,944 cy of heavily impacted soil was transported to Sundance Services, Inc. (NMOCD Permit # 01-0003) for disposal. Manifests are provided as Appendix D.

On July 12, 2012, three (3) soil samples (Floor-12 @ 10', Floor-13 @ 10' and North S/W-2 @ 5') were collected from the Flow Path Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples. Chloride concentrations ranged from 126 mg/Kg for soil sample North S/W-2 @ 5' to 636 mg/Kg for soil sample Floor-13 @ 10'.

On July 13, 2012, as per NMOCD request, additional excavation activities were conducted in the area represented by soil sample Floor-5 @ 20'. The area surrounding Floor-5 @ 20' and defined horizontally by soil samples East S/W-5A @ 8', North S/W-2 @ 5', Floor-13 @ 10', Floor 5A @ 10' Floor-12 @ 10', and South S/W-3 @ 8' was excavated to approximately fifteen (15) feet bgs. The resulting excavation measured approximately one hundred ten (110) feet in length, approximately eighty (80) feet in width, and was approximately fifteen (15) feet in depth. Please reference Figure 4 for site details.

On July 20, 2012, a portion of the stockpiled soil was subdivided into five (5) discreet stockpiles. One (1) composite soil sample was collected from each stockpile, resulting in five (5) composite soil samples, identified as SP-7 through SP-11. Each soil sample represented approximately five hundred (500) cubic yards of remediated soil. The composite soil samples were submitted to the laboratory and analyzed for concentrations of benzene, BTEX, TPH, and chlorides. Laboratory analytical results indicated benzene concentrations were less than the appropriate laboratory MDL for all submitted soil samples. BTEX concentrations ranged from 0.0101 mg/Kg for soil sample SP-8 to 0.0268 mg/Kg for soil sample SP-10. Analytical results indicated TPH concentrations ranged from 920 mg/Kg for soil sample SP-10 to 2,050 mg/Kg for soil sample SP-8. Chloride concentrations ranged from 22.2 mg/Kg for soil sample SP-11 to 414 mg/Kg for soil sample SP-8. Based on the laboratory analytical results the soil represented by soil samples SP-7 through SP-11 was deemed suitable for use as backfill material.

On July 27, 2012, the remaining stockpiled soil was subdivided into seventeen (17) discreet stockpiles. One (1) composite soil sample was collected from each stockpile, resulting in seventeen (17) composite soil samples, identified as SP-12 through SP-28. Each soil sample represented approximately five hundred (500) cubic yards of remediated soil. The composite soil samples were submitted to the laboratory and analyzed for concentrations of benzene, BTEX, TPH, and chlorides. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL for all submitted soil samples. Analytical results indicated TPH concentrations ranged from 39.3 mg/Kg for soil sample SP-14 to 217 mg/Kg for soil sample SP-18. Chloride concentrations ranged from 613 mg/Kg for soil sample SP-18 to 1,250 mg/Kg for soil sample SP-23 (Table 1). Based on the laboratory analytical results the soil represented by soil samples SP-13, SP-15 through SP-19, SP-21, SP-22 and SP-27 was deemed suitable for use as backfill material. Based on the laboratory analytical results it was determined the stockpiled soil represented by soil samples SP-12, SP-14, SP-20, SP-23 through SP-26 and SP-28 would require additional mixing and blending.

The stockpiled soil represented by soil samples SP-12, SP-14, SP-20, SP-23 through SP-26 and SP-28 was mixed and blended with stockpiled soil previously deemed suitable for use as backfill material.

On September 7, 2012, three (3) composite soil samples (SP-23A, SP-12A, and SP-12B) were collected from the remediated stockpiled soil and submitted to the laboratory for chloride analysis. Each soil sample represented approximately five hundred (500) cubic yards of soil. Laboratory analytical results indicated chloride concentrations ranged from 378 mg/Kg for soil sample SP-12B to 551 mg/Kg for soil sample SP-23A. Based on laboratory analytical results the soil represented by soil samples SP-23A, SP-12A, and SP-12B was deemed suitable for use as backfill material.

On September 11, 2012, three (3) composite soil samples (SP-23B, SP-20A, and SP-20B) were collected from the remediated stockpiled soil and submitted to the laboratory for chloride analysis. Each soil sample represented approximately five hundred (500) cubic yards of soil. Laboratory analytical results indicated chloride concentrations ranged from 473 mg/Kg for soil sample SP-20A to 595 mg/Kg for soil sample SP-23B. Based on laboratory analytical results the soil represented by soil samples SP-23B, SP-20A, and SP-20B was deemed suitable for use as backfill material.

On September 14, 2012, two (2) composite soil samples (SP-24A and SP-24B) were collected from the remediated stockpiled soil and submitted to the laboratory for chloride analysis. Each soil sample represented approximately five hundred (500) cubic yards of soil. Laboratory analytical results indicated chloride concentrations ranged from 563 mg/Kg for soil sample SP-24A to 600 mg/Kg for soil sample SP-24B. Based on laboratory analytical results the soil represented by soil samples SP-24A and SP-24B was deemed suitable for use as backfill material.

On September 17, 2012, two (2) composite soil samples (SP-25A and SP-25B) were collected from the remediated stockpiled soil and submitted to the laboratory for chloride analysis. Each soil sample represented approximately five hundred (500) cubic yards of soil. Laboratory analytical results indicated chloride concentrations ranged from 367 mg/Kg for soil sample SP-25B to 396 mg/Kg for soil sample SP-25A. Based on laboratory analytical results the soil represented by soil samples SP-25A and SP-25B was deemed suitable for use as backfill material.

On September 19, 2012, six (6) composite soil samples (SP-14A, SP-14B, SP-26A, SP-26B, SP-28A, and SP-28B) were collected from the remediated stockpiled soil and submitted to the laboratory for chloride analysis. Each soil sample represented approximately five hundred (500) cubic yards of soil. Laboratory analytical results indicated chloride concentrations ranged from 367 mg/Kg for soil sample SP-14B to 729 mg/Kg for soil sample SP-26B. Based on laboratory analytical results the soil represented by soil samples SP-14A, SP-14B, SP-26A, SP-26B, SP-28A, and SP-28B was deemed suitable for use as backfill material.

On September 20, 2012, Regency Field Services, LLC, formerly SUGS submitted the Remediation Summary and Proposed Site Closure Strategy to the NMOCD Hobbs District Office. The NMOCD Hobbs District Office granted verbal approval of the Remediation Summary and Proposed Site Closure Strategy.

On December 14, 2012, as proposed in the Remediation Summary and Proposed Site Closure Strategy, an eight (8) inch PVC riser was installed in the floor of the trench (Floor-5 @ 20') at approximately twenty (20) feet bgs. The PVC riser was cemented to the floor of the trench and extended vertically to approximately fifteen (15) feet bgs. The trench was backfilled to approximately fifteen (15) feet bgs with the remediated stockpiled soil.

On December 18, 2012, two (2) soil borings (SB-1 and SB-2) were advanced at the site to further delineate the vertical extent of impacted soil at the site. Soil boring logs are provided as Appendix C. Soil samples were collected at five (5) foot drilling intervals and field screened using a Photo-Ionization Detector (PID) and a chloride field test kit. Selected soil samples were

submitted to the laboratory for determination of concentrations of benzene, BTEX, TPH and chlorides. Please reference Figures 3 and 4 for soil boring locations.

Soil boring SB-1 was advanced through the PVC riser to a total depth of approximately forty (40) feet bgs. Soil samples collected at twenty-five (25) feet bgs, thirty (30) feet bgs, thirty-five (35) feet bgs, and forty (40) feet bgs were submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL for all submitted soil samples. Chloride concentrations ranged from 51.6 mg/Kg for soil sample SB-1 @ 40' to 959 mg/Kg for soil sample SB-1 @ 30' (Table 1).

Soil boring SB-2 was located at the release point and installed to a total depth of approximately forty (40) feet bgs. Soil samples collected at five (5) feet bgs, ten (10) feet bgs, fifteen (15) feet bgs, twenty (20) feet bgs, twenty-five (25) feet bgs, thirty (30) feet bgs, thirty-five (35) feet bgs, and forty (40) feet bgs were submitted to the laboratory for analysis. Laboratory analytical results indicated benzene concentrations ranged from less than the appropriate laboratory MDL for soil samples SB-2 @ 5', SB-2 @ 10', SB-2 @ 25', SB-2 @ 30', SB-2 @ 35', and SB-2 @ 40' to 0.430 mg/Kg for soil sample SB-2 @ 15'. BTEX concentrations ranged from less than the appropriate laboratory MDL for soil samples SB-2 @ 35' and SB-2 @ 40' to 89.4 mg/Kg for soil sample SB-2 @ 20'. TPH concentrations ranged from less than the laboratory MDL for soil sample SB-2 @ 40' to 9,490 mg/Kg for soil sample SB-2 @ 15'. Chloride concentrations ranged from 44.4 mg/Kg for soil sample SB-2 @ 40' to 5,530 mg/Kg for soil sample SB-2 @ 15' (Table 1).

On January 17, 2013, NOVA representatives met with a NMOCD Hobbs District Office representative to present the laboratory analytical results collected during the advancement of the soil borings and request approval to proceed with remediation activities described in the NMOCD approved Remediation Summary and Proposed Site Closure Strategy. The NMOCD granted verbal approval to proceed with the activities described in the Remediation Summary and Proposed Site Closure Strategy.

On April 8, 2013, NOVA resumed excavation activities at the site. Excavation activities commenced at the release point on the north side of the caliche road along the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline. As excavation activities progressed safety issues arose with the depth and stability of the excavation. Regency Field Services, LLC, formerly SUGS requested a variance to the approved plan. Due to the safety concerns which precluded personnel and equipment being in the excavation, no liner would be installed in the excavation. The area would be excavated to approximately twenty-one (21) feet bgs. Soil samples would be collected from the floor and sidewalls of the excavation and the area would be backfilled with locally obtained non-impacted soil. The NMOCD Hobbs District Office granted verbal approval of the variance.

On April 9, 2013, excavation activities resumed at the release point on the north side of the caliche road. Excavation activities commenced at the northern most extent of impacted soil and progressed to the south along the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline. Due to the area being located next to a highly travelled caliche road, the area was excavated, soil samples were collected and the excavation was backfilled with locally obtained non-impacted soil and water compacted. The excavated soil was stockpiled to the east of the excavated area pending final disposition.

On April 10, 2013, four (4) soil samples (RP Excavation East-1 S/W @ 20', RP Excavation Floor @ 21', RP Excavation North S/W @ 20', and RP Excavation West-1 S/W @ 20') were collected from the Release Point Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL for all submitted soil samples. TPH concentrations ranged from less than the laboratory MDL for soil sample RP Excavation West-1 S/W @ 20' to 19.3 mg/Kg for soil sample RP Excavation Floor @ 21'. Chloride concentrations ranged from 39.3 mg/Kg for soil sample RP Excavation North S/W @ 20' to 668 mg/Kg for soil sample RP Excavation Floor @ 21'. Please reference Figure 3 for soil sample locations.

On April 15, 2013, excavation activities continued at the release point. Excavation activities commenced at the caliche road along the Regency Field Services, LLC, formerly SUGS, Trunk "O" Pipeline and progressed to the south. Due to the area being located on a highly travelled caliche road, the area was excavated, soil samples were collected and the excavation was backfilled with locally obtained non-impacted soil and water compacted. Excavated soil was stockpiled to the east of the excavation pending final disposition.

On April 16, 2013, three (3) soil samples (RP Excavation South S/W-2 @ 20', RP Excavation West S/W-2 @ 20', and RP Excavation East S/W-2 @ 20') were collected from the Release Point Excavation and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene, BTEX, and TPH concentrations were less than the appropriate laboratory MDL in all the submitted soil samples with the exception of soil sample RP Excavation East S/W-2 @ 20', which exhibited a TPH concentration of 27.9 mg/Kg. Chloride concentrations ranged from 24.3 mg/Kg for soil sample RP Excavation East S/W-2 @ 20' to 170 mg/Kg for soil sample RP Excavation West S/W-2 @ 20' (Table 1).

On April 17, 2013, one (1) composite soil sample (Baseline-2) was collected from the soil excavated from the release point to determine benzene, BTEX, TPH and chloride concentrations in the soil. The soil sample exhibited a benzene concentration of <0.00103 mg/Kg, a BTEX concentration of 0.0228 mg/Kg, a TPH concentration of 606 mg/Kg and a chloride concentration of 599 mg/Kg. Based on the analytical results the soil was deemed suitable for remediation. The soil was remediated by mixing and blending activities.

On April 22, 2013, a twenty (20) mil polyurethane liner was installed in the floor of the excavation in the area of soil boring SB-1 at approximately fifteen (15) feet bgs. The liner was cushioned with a six (6) inch layer of sand above and below the liner. The excavated area was backfilled and water compacted in twelve (12) inch lifts with the remediated stockpiled soil represented by soil samples SP-1 through SP-28. Please reference Figure 4 for liner location details.

On May 2, 2013, the soil excavated from the Release Point Excavation, was subdivided was into four (4) discreet stockpiles. One (1) composite soil sample was collected from each stockpile, resulting in four (4) composite soil samples, identified as SP-29 through SP-32. Each soil sample represented approximately five hundred (500) cubic yards of remediated soil. The soil samples were submitted to the laboratory for analysis. Laboratory analytical results indicated benzene concentrations were less than the appropriate laboratory MDL for all submitted soil samples. BTEX concentrations ranged from less than the laboratory MDL for soil sample SP-32 to 0.0592

mg/Kg for soil sample SP-30. TPH concentrations ranged from 138 mg/Kg for soil sample SP-32 to 2,540 mg/Kg for soil sample SP-31. Chloride concentrations ranged from 457 mg/Kg for soil sample SP-32 to 785 mg/Kg for soil sample SP-30. Based on the laboratory analytical results the soil was deemed suitable for use as backfill material.

The excavated area was backfilled and water compacted with the remediated stockpiled soil. On completion of backfilling activities the disturbed area was contoured to fit the surrounding topography and the caliche road was repaired and dressed with locally obtained non-impacted caliche.

4.0 QA/QC PROCEDURES

4.1 Soil Sampling

Soil Samples were delivered to Xenco Laboratories, Inc., of Odessa, Texas for BTEX and/or TPH and/or chloride analyses using the methods described below. Soil samples were analyzed for BTEX and/or TPH and/or chloride concentrations within fourteen (14) days following the sampling event.

The soil samples were analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8021B, 5030
- TPH concentrations in accordance with modified EPA Method 8015M GRO/DRO
- Chloride concentration in accordance with Method E 300.

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 (COC) form. These procedures were either transmitted with the laboratory reports or are on file at the laboratory.

5.0 REPORTING

Based on the analytical results of confirmation soil samples, NOVA recommends Regency Field Services, LLC, formerly SUGS provide the NMOCD a copy of this Remediation Summary and Risk Based Closure Request and request the NMOCD grant final closure to the Trunk "O" Bennett Road Release Site.

6.0 LIMITATIONS

NOVA Safety and Environmental has prepared this Report on behalf of, and for the sole and exclusive use of Regency Field Services, LLC, formerly SUGS. This report was prepared by NOVA Safety and Environmental for the benefit of Regency Field Services, LLC, formerly SUGS. The information contained in this Report may be released to third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than specifically named above shall create no rights, obligations, or liabilities on the part of NOVA Safety and Environmental with respect to any such party. The information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

In preparing this Report, NOVA Safety and Environmental may have obtained and relied upon information from multiple sources including the Regency Field Services, LLC, formerly SUGS and other consultants working for the Regency Field Services, LLC, formerly SUGS or other parties. Unless specifically stated, NOVA Safety and Environmental has made no attempt to verify the accuracy or completeness of such information.

7.0 DISTRIBUTION

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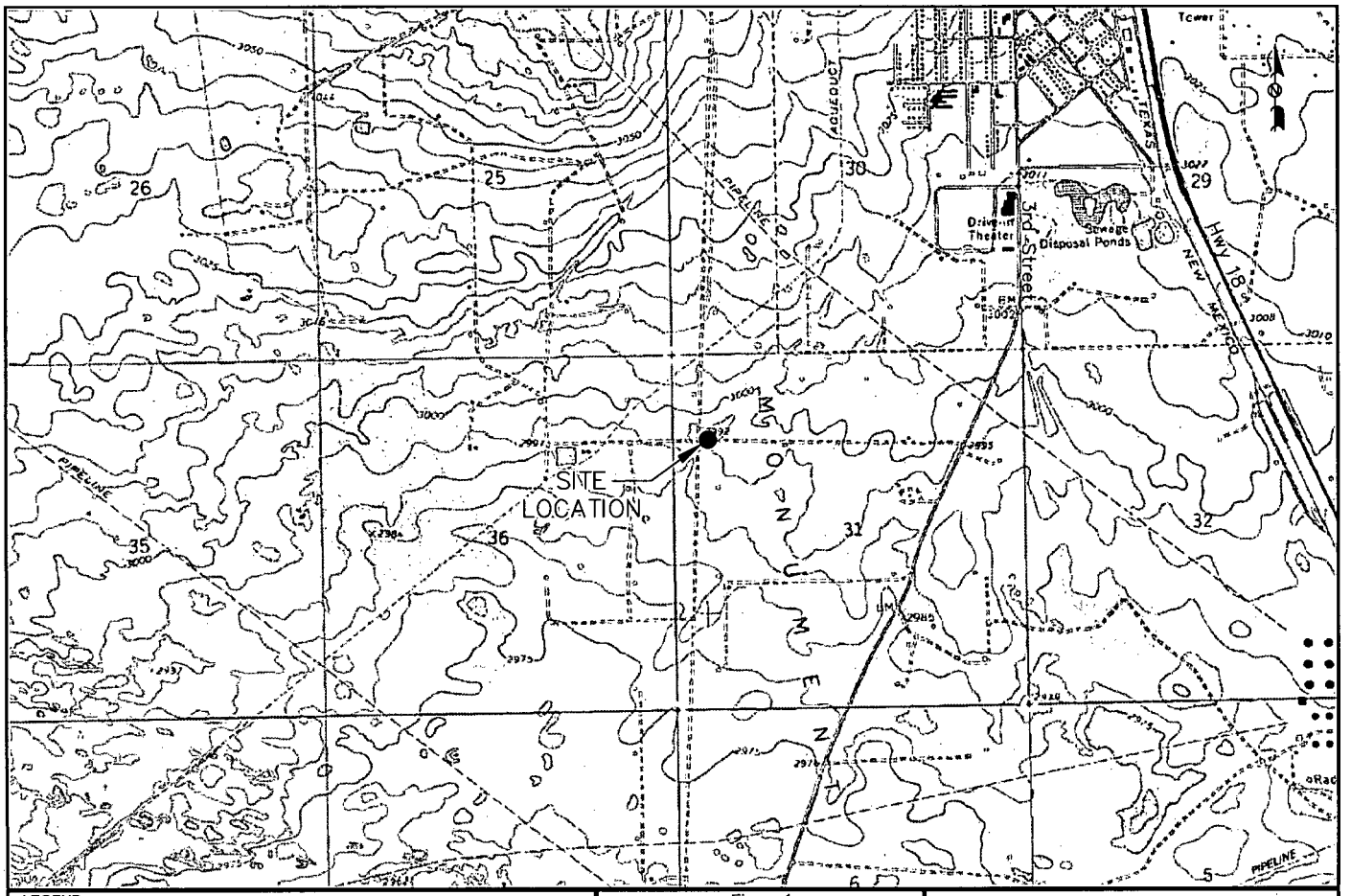
Figures



LEGEND:

2000 1000 0 1000 2000

Distance in Feet

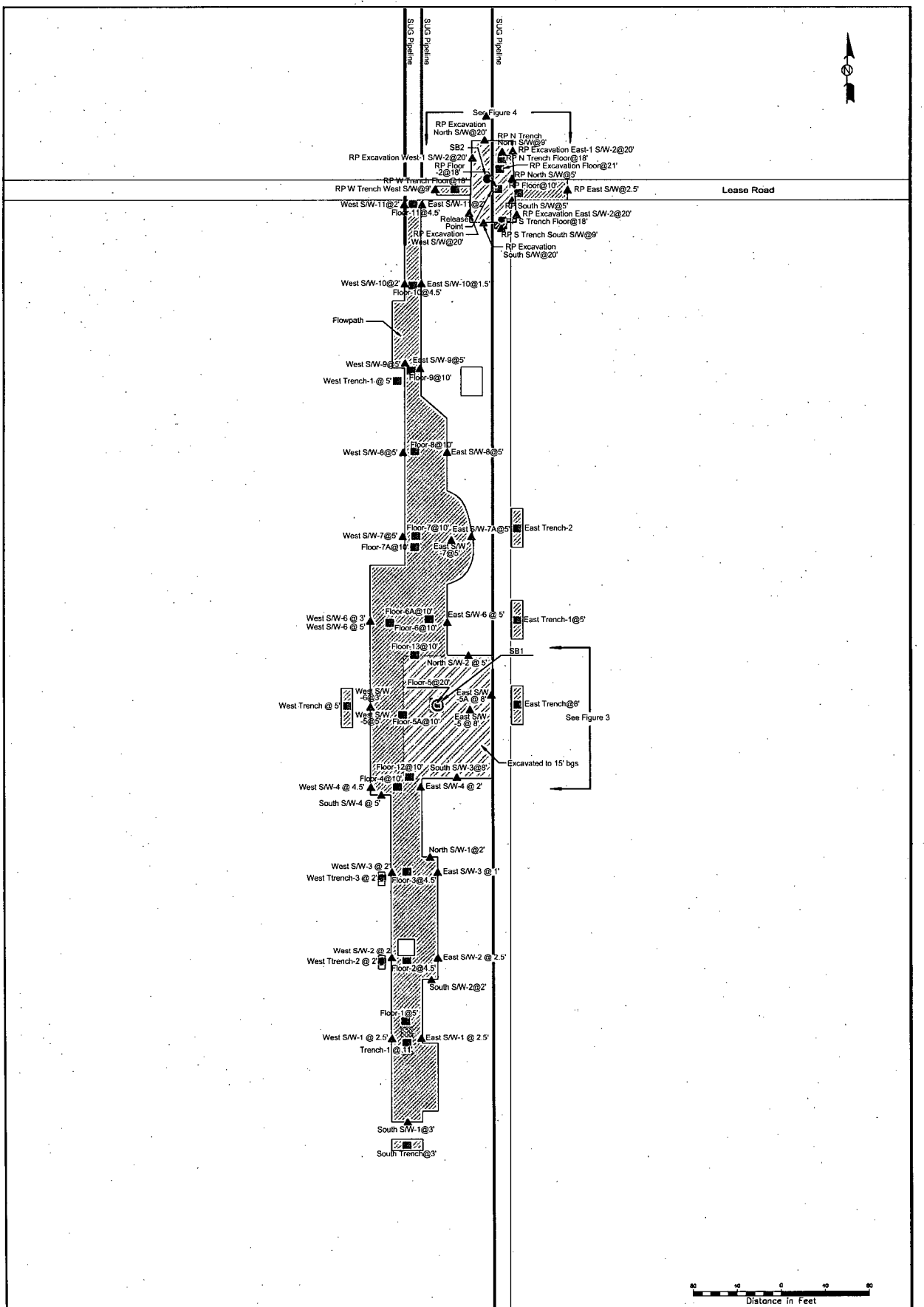
Figure 1

Site Location Map
Regency Field Services, LLC.,
Formerly Southern Union Gas Services
Trunk O Bennett Road
Lea County, NM

NOVA safety and environmental

2057 Commerce Drive
Midland, Texas 79703
432.520.7720
www.novasafetyandenvironmental.com

June 5, 2012	Scale: 1" = 2000'	CAD By: TA	Checked By: CJB
Lat. N 32° 5.432' Long. W 103° 12.532'			



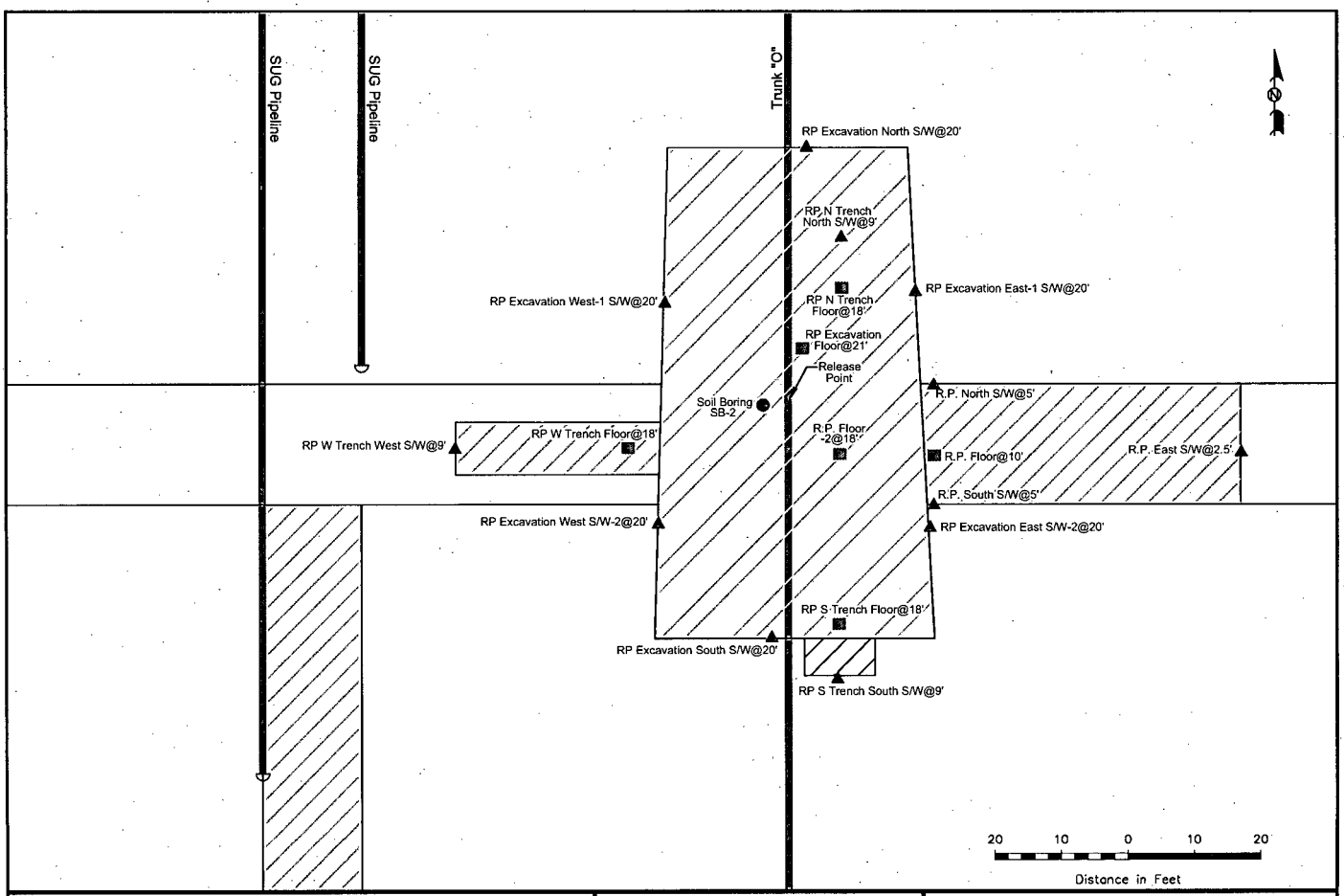
LEGEND:

- Floor Soil Sample Location
- Wall Soil Sample Location
- Pipeline

Figure 2
Site & Sample Locations
Regency Field Services, LLC.,
Formerly Southern Union Gas Services
Trunk O Bennett Road
Lea County, NM

NOVA safety and environmental
2057 Commerce Drive
Midland, Texas 79703
432.520.7720
www.novasafetyandenvironmental.com

June 26, 2012	Scale: 1" = 80'	CAD By: TA	Checked By: CJB
Lat. N 32° 05.432' Long. W 103° 12.532'			



LEGEND:

- Floor Soil Sample Location
- Wall Soil Sample Location
- Pipeline

Figure 3
Release Point Excavation & Sample Location Map
Regency Field Services, LLC.,
Formerly Southern Union Gas Services
Trunk O Bennett Road
Lea County, NM

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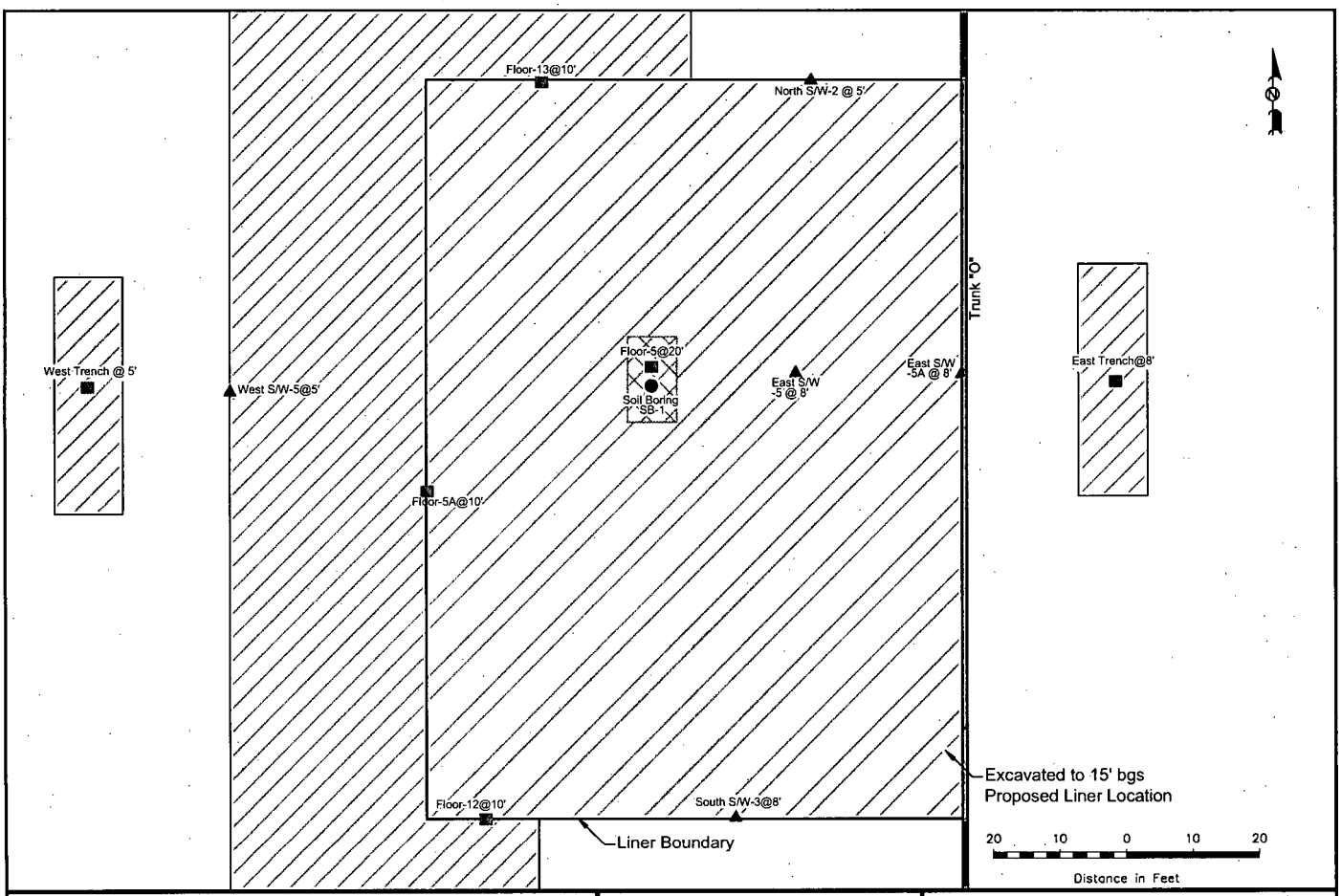
July 20, 2012	Scale: 1" = 20'	CAD By: TA	Checked By: CJB
Lat. N 32° 05.432' Long. W 103° 12.532'			



LEGEND:

- Floor Soil Sample Location
- Wall Soil Sample Location
- Pipeline
- Liner Boundary

Figure 4
Soil Boring (SB-1)
and Liner Location
Regency Field Services, LLC.,
Formerly Southern Union Gas Services
Trunk O Bennett Road
Lea County, NM

NOVA safety and environmental
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July 26, 2012	Scale: 1" = 20'	CAD By: TA	Checked By: CJB
Lat. N 32° 05.432' Long. W 103° 12.532'			

Tables

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN SOIL

REGENCY FIELD SERVICES, LLC
FORMERLY SOUTHERN UNION GAS SERVICES
TRUNK "O" BENNETT ROAD 5-7-12 RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE # 1RP-2808

All concentrations are reported in mg/Kg

SAMPLE LOCATION	SAMPLE DATE	METHODS: SW 846-8021b						METHOD: SW 8015M				E 300.1
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	TOTAL BTEX	TPH GRO C_6-C_{12}	TPH DRO C_{12}-C_{28}	TPH ORO C_{28}-C_{35}	TOTAL TPH C_6-C_{35}	CHLORIDE
NMOCD Regulatory Limit		10	-	-	-	-	50	-	-	-	5,000	-
South S/W-1 @ 3'	05/23/12	<0.00110	<0.00220	<0.00110	<0.00220	<0.00110	<0.00220	<16.5	<16.5	<16.5	<16.5	448
West S/W-1 @ 2.5'	05/23/12	<0.00101	<0.00201	0.00438	<0.00201	0.00203	0.00641	<15.1	<15.1	<15.1	<15.1	65.9
East S/W-1 @ 2.5'	05/23/12	<0.00110	<0.00220	<0.00110	<0.00220	<0.00110	<0.00220	<16.6	<16.6	<16.6	<16.6	12.7
Floor-1 @ 5'	05/23/12	<0.00107	<0.00214	<0.00107	<0.00214	<0.00107	<0.00214	<16.1	<16.1	<16.1	<16.1	364
Trench-1 @ 11'	05/23/12	<0.00105	<0.00210	<0.00105	<0.00210	<0.00105	<0.00210	<15.9	<15.9	<15.9	<15.9	448
West S/W-2 @ 2'	05/23/12	<0.00101	<0.00203	<0.00101	<0.00203	<0.00101	<0.00203	<15.3	<15.3	<15.3	<15.3	328
Floor-2 @ 4.5'	05/23/12	<0.00104	<0.00209	<0.00104	<0.00209	<0.00104	<0.00209	<15.5	31.2	<15.5	31.2	5.02
East S/W-2 @ 2.5'	05/23/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.7	<15.7	<15.7	<15.7	5.32
Floor-3 @ 4.5'	05/23/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.6	41.8	<15.6	41.8	18.9
East S/W-3 @ 1'	05/23/12	<0.00503	<0.0101	<0.00503	<0.0101	<0.00503	<0.0101	<15.0	<15.0	<15.0	<15.0	8.0
West S/W-3 @ 2'	05/23/12	<0.00106	<0.00213	<0.00106	<0.00213	<0.00106	<0.00213	<15.9	25.2	<15.9	25.2	358
East S/W-4 @ 2'	05/23/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.6	<15.6	<15.6	<15.6	92.2
Baseline	05/23/12	-	-	-	-	-	-	922	10,800	1,320	13,000	522
West S/W-6 @ 3'	05/30/12	<0.00123	<0.00247	<0.00123	<0.00247	<0.00123	<0.00247	<14.9	<14.9	<14.9	<14.9	15.6
Floor-4 @ 10'	05/30/12	<0.00605	<0.0121	<0.00605	<0.0121	<0.00605	<0.0121	<15.0	15.6	<15.0	15.6	84.8
Floor-5 @ 20'	06/04/12	<0.00107	<0.00215	<0.00107	<0.00215	<0.00107	<0.00215	<16.1	<16.1	<16.1	<16.1	2,100
East S/W-5 @ 8'	06/04/12	<0.00104	<0.00207	<0.00104	<0.00207	<0.00104	<0.00207	<15.5	<15.5	<15.5	<15.5	5,700
East Trench @ 8'	06/04/12	<0.00104	<0.00209	<0.00104	<0.00209	<0.00104	<0.00209	<15.6	<15.6	<15.6	<15.6	15.8
Floor-6 @ 10'	06/05/12	<0.00106	<0.00213	<0.00106	<0.00213	<0.00106	<0.00213	<16.1	<16.1	<16.1	<16.1	771
East S/W-6 @ 5'	06/05/12	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<15.6	<15.6	<15.6	<15.6	365
East Trench -1 @ 5'	06/05/12	<0.00588	<0.0118	<0.00588	<0.0118	<0.00588	<0.0118	<17.8	<17.8	<17.8	<17.8	12.5
West S/W-4 @ 4.5'	06/06/12	<0.00099	<0.00198	<0.00099	<0.00198	<0.00099	<0.00198	<15.0	<15.0	<15.0	<15.0	34.9
Floor-5A @ 10'	06/06/12	<0.00105	<0.00209	<0.00105	<0.00209	<0.00105	<0.00209	<15.7	<15.7	<15.7	<15.7	510
West S/W-5 @ 5'	06/06/12	<0.00106	<0.00212	<0.00106	<0.00212	<0.00106	<0.00212	<15.9	<15.9	<15.9	<15.9	590
West Trench @ 5'	06/06/12	<0.00104	<0.00207	<0.00104	<0.00207	<0.00104	<0.00207	<15.5	<15.5	<15.5	<15.5	25.7

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN SOIL

REGENCY FIELD SERVICES, LLC
FORMERLY SOUTHERN UNION GAS SERVICES
TRUNK "O" BENNETT ROAD 5-7-12 RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE # 1RP-2808

All concentrations are reported in mg/Kg

SAMPLE LOCATION	SAMPLE DATE	METHODS: SW 846-8021b						METHOD: SW 8015M				E 300.1
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	TOTAL BTEX	TPH GRO C_6-C_{12}	TPH DRO C_{12}-C_{28}	TPH ORO C_{25}-C_{35}	TOTAL TPH C_6-C_{35}	CHLORIDE
NMOCD Regulatory Limit		10	-	-	-	-	50	-	-	-	5,000	-
Floor-6A @ 10'	06/07/12	<0.00105	<0.00209	<0.00105	<0.00209	<0.00105	<0.00209	<15.7	<15.7	<15.7	<15.7	210
West S/W-6 @ 5'	06/07/12	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<15.2	<15.2	<15.2	<15.2	17.3
South S/W-2 @ 2'	06/07/12	<0.00101	<0.00202	<0.00101	<0.00202	<0.00101	<0.00202	<15.2	68.6	15.2	68.6	25.9
North S/W-1 @ 2'	06/07/12	<0.00102	<0.00205	<0.00102	<0.00205	<0.00102	<0.00205	<15.3	26.5	<15.3	26.5	3.97
East S/W-7 @ 5'	06/07/12	<0.00107	<0.00214	<0.00107	<0.00214	<0.00107	<0.00214	<16.1	<16.1	<16.1	<16.1	1,950
East Trench-2 @ 5'	06/07/12	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<15.5	<15.5	<15.5	<15.5	7.85
Floor-7 @ 10'	06/11/12	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<15.6	<15.6	<15.6	<15.6	94.7
West S/W-7 @ 5'	06/11/12	<0.00100	<0.00200	<0.00100	<0.00200	<0.00100	<0.00200	<15.1	<15.1	<15.1	<15.1	10.1
East S/W-8 @ 5'	06/13/12	<0.00109	<0.00109	<0.00109	<0.00219	<0.00109	<0.00219	<16.6	<16.6	<16.6	<16.6	118
West S/W-8 @ 5'	06/14/12	<0.00102	<0.00102	<0.00102	<0.00203	<0.00102	<0.00203	<15.6	<15.6	<15.6	<15.6	43.1
Floor-8 @ 10'	06/14/12	<0.00110	<0.00110	<0.00110	<0.00220	<0.00110	<0.00220	<16.5	<16.5	<16.5	<16.5	217
East S/W -9 @ 5'	06/15/12	<0.00100	<0.00100	<0.00100	<0.00200	<0.00100	<0.00200	<15.3	<15.3	<15.3	<15.3	7.65
West S/W-9 @ 5'	06/15/12	<0.00111	<0.00111	<0.00111	<0.00223	<0.00111	<0.00223	<16.7	95.1	<16.7	95.1	102
Floor-9 @ 10'	06/15/12	<0.00102	<0.00102	<0.00102	<0.00203	<0.00102	<0.00203	<15.2	<15.2	<15.2	<15.2	20.4
West Trench-1 @ 5'	06/15/12	<0.000997	<0.000997	<0.000997	<0.00199	<0.000997	<0.00199	<15.3	<15.3	<15.3	<15.3	10.3
Floor-10 @ 4.5'	06/20/12	<0.00104	<0.00104	<0.00104	<0.00209	<0.00104	<0.00209	<16.0	<16.0	<16.0	<16.0	8.06
West S/W-10 @ 2'	06/20/12	<0.00100	<0.00100	<0.00100	<0.00201	<0.00100	<0.00201	<15.2	53.6	<15.2	53.6	9.5
East S/W-10 @ 1.5'	06/20/12	<0.000997	<0.000997	<0.000997	<0.00199	<0.000997	<0.00199	<15.1	<15.1	<15.1	<15.1	8.4
Floor-11 @ 4.5'	06/21/12	<0.00108	<0.00108	<0.00108	<0.00216	<0.00108	<0.00216	<16.2	18.9	<16.2	18.9	5.33
East S/W-11 @ 2'	06/21/12	<0.00103	<0.00103	<0.00103	<0.00206	<0.00103	<0.00206	<16.2	<16.2	<16.2	<16.2	18.7
West S/W-11 @ 2'	06/21/12	<0.000941	<0.000941	<0.000941	<0.00188	<0.000941	<0.00188	<15.4	<15.4	<15.4	<15.4	5.16

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN SOIL

REGENCY FIELD SERVICES, LLC
FORMERLY SOUTHERN UNION GAS SERVICES
TRUNK "O" BENNETT ROAD 5-7-12 RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE # 1RP-2808

All concentrations are reported in mg/Kg

SAMPLE LOCATION	SAMPLE DATE	METHODS: SW 846-8021b						METHOD: SW 8015M				E 300.1
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	TOTAL BTEX	TPH GRO C_6-C_{12}	TPH DRO C_{12}-C_{28}	TPH ORO C_{28}-C_{35}	TOTAL TPH C_6-C_{35}	CHLORIDE
NMOCD Regulatory Limit		10	-	-	-	-	50	-	-	-	5,000	-
South Trench @ 3'	06/27/12	<0.00106	<0.00213	<0.00106	<0.00213	<0.00106	<0.00213	<16.0	<16.0	<16.0	<16.0	50.9
West Trench-2 @ 2'	06/27/12	<0.00102	<0.00203	<0.00102	<0.00203	<0.00102	<0.00203	<15.3	<15.3	<15.3	<15.3	12.6
West Trench-3 @ 2'	06/27/12	<0.00101	<0.00203	<0.00101	<0.00203	<0.00101	<0.00203	<15.3	<15.3	<15.3	<15.3	10.2
RP East S/W @ 2.5'	06/28/12	<0.00105	<0.00209	<0.00105	<0.00209	<0.00105	<0.00209	<15.9	<15.9	<15.9	<15.9	5.18
RP Floor @ 10'	06/28/12	<0.00108	<0.00216	<0.00108	<0.00216	<0.00108	<0.00216	<16.3	<16.3	<16.3	<16.3	50.2
RP South S/W @ 5'	06/28/12	<0.00111	<0.00221	<0.00111	<0.00221	<0.00111	<0.00221	<16.7	<16.7	<16.7	<16.7	11.6
RP North S/W @ 5'	06/28/12	<0.00112	<0.00223	<0.00112	<0.00223	<0.00112	<0.00223	<16.8	<16.8	<16.8	<16.8	23.8
Floor-7A @ 10'	06/29/12	<0.00109	<0.00218	<0.00109	<0.00218	<0.00109	<0.00218	<16.4	<16.4	<16.4	<16.4	962
South S/W-3 @ 8'	06/29/12	<0.00102	<0.00204	<0.00102	<0.00204	<0.00102	<0.00204	<15.5	<15.5	<15.5	<15.5	11
SP-1	06/29/12	<0.00101	<0.00202	0.00302	0.0253	0.0314	0.0597	93.4	1,430	205	1,730	233
SP-2	06/29/12	<0.00102	0.00290	0.00795	0.0708	0.0690	0.151	172	2,070	273	2,520	229
SP-3	06/29/12	<0.00102	0.00848	0.00567	0.0408	0.0454	0.100	200	2,240	247	2,690	269
SP-4	06/29/12	<0.00102	0.00636	0.00451	0.0289	0.0264	0.0662	165	1,960	223	2,350	296
SP-5	06/29/12	<0.00101	<0.00202	0.00127	0.00799	0.00552	0.0148	108	1,690	194	1,990	243
SP-6	06/29/12	<0.00101	<0.00203	0.00123	0.00772	0.00505	0.0140	94.9	1,410	148	1,650	281
East S/W-7A @ 5'	7/2/2012	<0.00102	<0.00102	<0.00102	<0.00205	<0.00102	<0.00205	<16.0	<16.0	<16.0	<16.0	82.8
East S/W-5A @ 8'	7/3/2012	<0.000988	<0.000988	<0.000998	<0.00198	<0.000988	<0.00198	<15.0	171	284	455	433
RP Floor-2 @ 18'	7/5/2012	7.97	167	65.7	284	94.2	619	18,100	28,600	1,880	48,600	2,270
RP S Trench Floor @ 18'	7/5/2012	<0.00121	0.00557	0.00282	0.0112	0.00426	0.0239	<18.1	<18.1	<18.1	<18.1	12.9
RP S Trench South S/W @ 9'	7/5/2012	<0.00105	<0.00105	<0.00105	<0.00210	<0.00105	<0.00210	<16.3	<16.3	<16.3	<16.3	28.7
RP N Trench Floor @ 18'	7/5/2012	<0.00102	<0.00102	<0.00102	<0.00204	<0.00102	<0.00204	<15.4	<15.4	<15.4	<15.4	24.5
RP N Trench North S/W @ 9'	7/5/2012	<0.00101	<0.00101	<0.00101	<0.00202	<0.00101	<0.00202	<15.2	<15.2	<15.2	<15.2	23.4
RP W Trench Floor @ 18'	7/5/2012	<0.00106	<0.00106	<0.00106	<0.00212	<0.00106	<0.00212	<16.6	<16.6	<16.6	<16.6	42.1
RP W Trench West S/W @ 9'	7/5/2012	<0.000990	<0.000990	<0.000990	<0.00198	<0.000990	<0.00198	<15.4	<15.4	<15.4	<15.4	158

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN SOIL

REGENCY FIELD SERVICES, LLC
FORMERLY SOUTHERN UNION GAS SERVICES
TRUNK "O" BENNETT ROAD 5-7-12 RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE # 1RP-2808

All concentrations are reported in mg/Kg

SAMPLE LOCATION	SAMPLE DATE	METHODS: SW 846-8021b						METHOD: SW 8015M				E 300.1
		BENZENE	TOLUENE	ETHYL-BENZENE	*m, p* - XYLENES	*o* - XYLENE	TOTAL BTEX	TPH GRO C_6-C_{12}	TPH DRO C_{12}-C_{28}	TPH ORO C_{28}-C_{35}	TOTAL TPH C_6-C_{35}	CHLORIDE
NMOCD Regulatory Limit		**10**	**-**	**-**	**-**	**-**	**50**	**-**	**-**	**-**	**5,000**	**-**
South S/W-4 @ 5'	07/06/12	<0.00476	<0.00476	<0.00476	<0.00952	<0.00476	<0.00952	<15.9	<15.9	<15.9	<15.9	25.6
Floor-12 @ 10'	07/12/12	<0.00104	<0.00207	<0.00104	<0.00207	<0.00104	<0.00207	<15.6	<15.6	<15.6	<15.6	255
Floor-13 @ 10'	07/12/12	<0.00109	<0.00218	<0.00109	<0.00218	<0.00109	<0.00218	<16.3	<16.3	<16.3	<16.3	636
North S/W-2 @ 5'	07/12/12	<0.00110	<0.00221	<0.00110	<0.00221	<0.00110	<0.00221	<16.5	<16.5	<16.5	<16.5	126
SP-7	07/20/12	<0.00100	<0.00200	0.00135	0.00963	0.00576	0.0167	101	1,750	166	2,020	32
SP-8	07/20/12	<0.000990	<0.00198	<0.000990	0.00688	0.00320	0.0101	110	1,770	166	2,050	414
SP-9	07/20/12	<0.000992	<0.00198	0.00100	0.00778	0.00373	0.0125	62.5	1,040	91	1,190	113
SP-10	07/20/12	<0.000998	<0.00200	0.00200	0.0117	0.0131	0.0268	94.9	756	69	920	95.8
SP-11	07/20/12	<0.000998	<0.00200	0.00145	0.00916	0.00284	0.0135	54.5	1,220	120	1,390	22.2
SP-12	07/27/12	<0.00104	<0.00209	<0.00104	<0.00209	<0.00104	<0.00209	<15.7	57.1	<15.7	57.1	1,160
SP-13	07/27/12	<0.00103	<0.00205	<0.00103	<0.00205	<0.00103	<0.00205	18.6	84.0	<15.3	103	682
SP-14	07/27/12	<0.00104	<0.00209	<0.00104	<0.00209	<0.00104	<0.00209	<15.6	39.3	<15.6	39.3	1,030
SP-15	07/27/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	19.5	66.6	<15.6	86.1	724
SP-16	07/27/12	<0.00103	<0.00207	<0.00103	<0.00207	<0.00103	<0.00207	<15.5	91.7	<15.5	91.7	663
SP-17	07/27/12	<0.00104	<0.00207	<0.00104	<0.00207	<0.00104	<0.00207	<15.6	71.7	<15.6	71.7	796
SP-18	07/27/12	<0.00103	<0.00205	<0.00103	<0.00205	<0.00103	<0.00205	<15.5	197	20.4	217	613
SP-19	07/27/12	<0.00105	<0.00209	<0.00105	<0.00209	<0.00105	<0.00209	20.1	82.5	<15.7	103	848
SP-20	07/27/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.7	79.5	<15.7	79.5	1,060
SP-21	07/27/12	<0.00103	<0.00207	<0.00103	<0.00207	<0.00103	<0.00207	<15.5	80.0	<15.5	80.0	666
SP-22	07/27/12	<0.00102	<0.00205	<0.00102	<0.00205	<0.00102	<0.00205	15.8	90.5	<15.5	106	787
SP-23	07/27/12	<0.00104	<0.00209	<0.00104	<0.00209	<0.00104	<0.00209	20.0	109	<15.7	129	1,250
SP-24	07/27/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.7	60.5	<15.7	60.5	1,160
SP-25	07/27/12	<0.00105	<0.00210	<0.00105	<0.00210	<0.00105	<0.00210	<15.7	47.5	<15.7	47.5	1,140
SP-26	07/27/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.8	44.4	<15.8	44.4	1,120
SP-27	07/27/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.5	56.5	<15.5	56.5	966

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REGENCY FIELD SERVICES, LLC
FORMERLY SOUTHERN UNION GAS SERVICES
TRUNK "O" BENNETT ROAD 5-7-12 RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE # 1RP-2808

All concentrations are reported in mg/Kg

SAMPLE LOCATION	SAMPLE DATE	METHODS: SW 846-8021b						METHOD: SW 8015M				E 300.1
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	TOTAL BTEX	TPH GRO C_6-C_{12}	TPH DRO C_{12}-C_{28}	TPH ORO C_{28}-C_{35}	TOTAL TPH C_6-C_{35}	CHLORIDE
NMOCD Regulatory Limit		**10**	-	-	-	-	**50**	-	-	-	**5,000**	-
SP-28	07/27/12	<0.00104	<0.00208	<0.00104	<0.00208	<0.00104	<0.00208	<15.6	50.1	<15.6	50.1	1,140
SP-23A	09/07/12	-	-	-	-	-	-	-	-	-	-	551
SP-12A	09/07/12	-	-	-	-	-	-	-	-	-	-	391
SP-12B	09/07/12	-	-	-	-	-	-	-	-	-	-	378
SP-23B	09/11/12	-	-	-	-	-	-	-	-	-	-	595
SP-20A	09/12/12	-	-	-	-	-	-	-	-	-	-	473
SP-20B	09/12/12	-	-	-	-	-	-	-	-	-	-	550
SP-24A	09/14/12	-	-	-	-	-	-	-	-	-	-	563
SP-24B	09/14/12	-	-	-	-	-	-	-	-	-	-	600
SP-25A	09/17/12	-	-	-	-	-	-	-	-	-	-	396
SP-25B	09/17/12	-	-	-	-	-	-	-	-	-	-	367
SP-14A	09/19/12	-	-	-	-	-	-	-	-	-	-	384
SP-14B	09/19/12	-	-	-	-	-	-	-	-	-	-	367
SP-26A	09/19/12	-	-	-	-	-	-	-	-	-	-	625
SP-26B	09/19/12	-	-	-	-	-	-	-	-	-	-	729
SP-28A	09/19/12	-	-	-	-	-	-	-	-	-	-	605
SP-28B	09/19/12	-	-	-	-	-	-	-	-	-	-	672
SB-1 @ 25'	12/18/12	<0.00113	<0.00227	<0.00113	<0.00227	<0.00113	<0.00227	<17.0	<17.0	<17.0	<17.0	687
SB-1 @ 30'	12/18/12	<0.00106	<0.00212	<0.00106	<0.00212	<0.00106	<0.00212	<15.9	<15.9	<15.9	<15.9	959
SB-1 @ 35'	12/18/12	<0.00106	<0.00212	<0.00106	<0.00212	<0.00106	<0.00212	<15.9	<15.9	<15.9	<15.9	106
SB-1 @ 40'	12/18/12	<0.00104	<0.00207	<0.00104	<0.00207	<0.00104	<0.00207	<15.5	<15.5	<15.5	<15.5	51.6
SB-2 @ 5'	12/18/12	<0.00107	<0.00213	<0.00107	0.00446	0.00160	0.00606	<16.0	138.0	<16.0	138	4,990
SB-2 @ 10'	12/18/12	<0.00105	0.00390	0.01700	0.06990	0.00159	0.0924	102	635	<15.7	737	3,910

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN SOIL

REGENCY FIELD SERVICES, LLC
FORMERLY SOUTHERN UNION GAS SERVICES
TRUNK "O" BENNETT ROAD 5-7-12 RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REFERENCE # 1RP-2808

All concentrations are reported in mg/Kg

SAMPLE LOCATION	SAMPLE DATE	METHODS: SW 846-8021b						METHOD: SW 8015M				E 300.1
		BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENE	TOTAL BTEX	TPH GRO C_6-C_{12}	TPH DRO C_{12}-C_{28}	TPH ORO C_{28}-C_{35}	TOTAL TPH C_6-C_{35}	CHLORIDE
NMOCD Regulatory Limit		10	-	-	-	-	50	-	-	-	5,000	-
SB-2 @ 15'	12/18/12	0.430	19.2	7.83	35.2	12.8	75.5	2,390	7,020	84.6	9,490	5,530
SB-2 @ 20'	12/18/12	0.420	26.3	9.36	39.1	14.2	89.4	2,270	5,810	<83.4	8,080	4,280
SB-2 @ 25'	12/18/12	<0.00106	0.0404	0.0385	0.195	0.0594	0.333	94.4	546	<15.8	640	790
SB-2 @ 30'	12/18/12	<0.00103	0.00506	0.00682	0.0309	0.0115	0.0543	18.5	138	<15.6	157	177
SB-2 @ 35'	12/18/12	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<15.6	16.0	<15.6	16.0	48
SB-2 @ 40'	12/18/12	<0.00102	<0.00205	<0.00102	<0.00205	<0.00102	<0.00205	<15.5	<15.5	<15.5	<15.5	44.4
RP Excavation East-1 S/W @ 20'	04/10/13	<0.00101	<0.00203	<0.00101	<0.00203	<0.00101	<0.00203	<15.3	18.1	<15.3	18.1	180
RP Excavation Floor @ 21'	04/10/13	<0.00109	<0.00218	<0.00109	<0.00218	<0.00109	<0.00218	<16.4	19.3	<16.4	19.3	668
RP Excavation North S/W @ 20'	04/10/13	<0.00111	<0.00221	<0.00111	<0.00221	<0.00111	<0.00221	<16.6	16.8	<16.6	16.8	39.3
RP Excavation West-1 S/W @ 20'	04/10/13	<0.00114	<0.00228	<0.00114	<0.00228	<0.00114	<0.00228	<17.0	<17.0	<17.0	<17.0	43.4
RP Excavation South S/W-2 @ 20'	04/16/13	<0.00108	<0.00216	<0.00108	<0.00216	<0.00108	<0.00216	<16.3	<16.3	<16.3	<16.3	28.9
RP Excavation West S/W-2 @ 20'	04/16/13	<0.00111	<0.00221	<0.00111	<0.00221	<0.00111	<0.00221	<16.7	<16.7	<16.7	<16.7	170
RP Excavation East S/W-2 @ 20'	04/16/13	<0.00112	<0.00223	<0.00112	<0.00223	<0.00112	<0.00223	<16.7	27.9	<16.7	27.9	24.3
Baseline-2	04/17/13	<0.00103	<0.00206	0.00247	0.0104	0.00995	0.0228	55.5	512	38.5	606	599
SP-29	05/02/13	<0.00104	<0.00207	0.00253	0.00979	0.00616	0.0185	16.0	355	27.1	398	574
SP-30	05/02/13	<0.00104	0.00939	0.00807	0.0272	0.0145	0.0592	42.9	488	39.4	570	785
SP-31	05/02/13	<0.00104	<0.00209	<0.00104	0.00545	0.00369	0.00914	991	1,520	31.8	2,540	671
SP-32	05/02/13	<0.00103	<0.00206	<0.00103	<0.00206	<0.00103	<0.00206	<15.7	138	<15.7	138	457

Appendix A
Analytical Reports

NOVA
safety and environmental

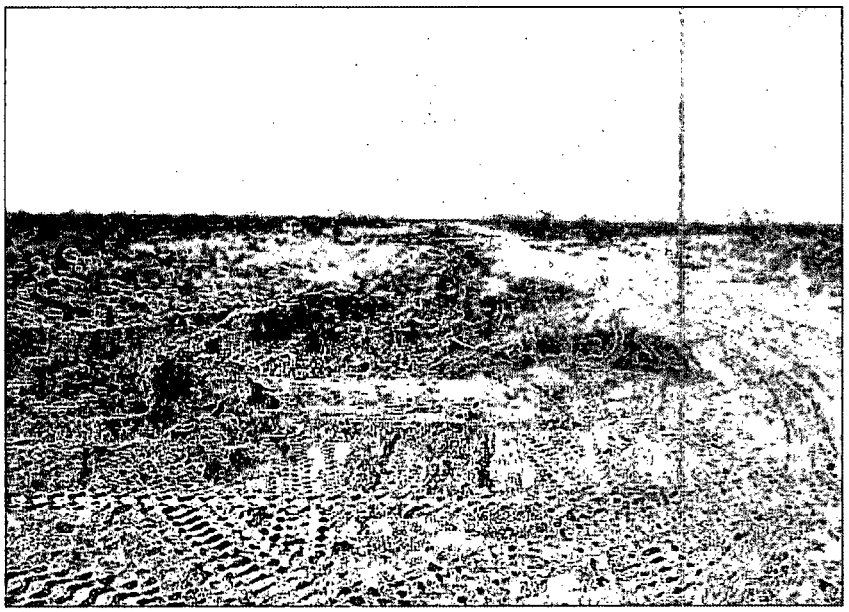
Photographic Documentation

Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 1

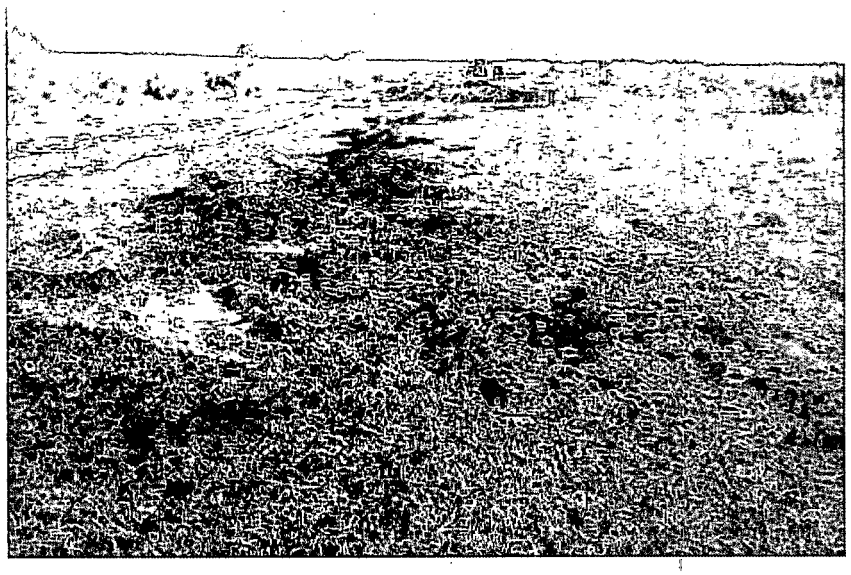
Direction:
Facing South



Description:
View of the initial release.

Photograph No. 2

Direction:
Facing North



Description:
View of the initial release.

NOVA safety and environmental

Photographic Documentation

Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 3

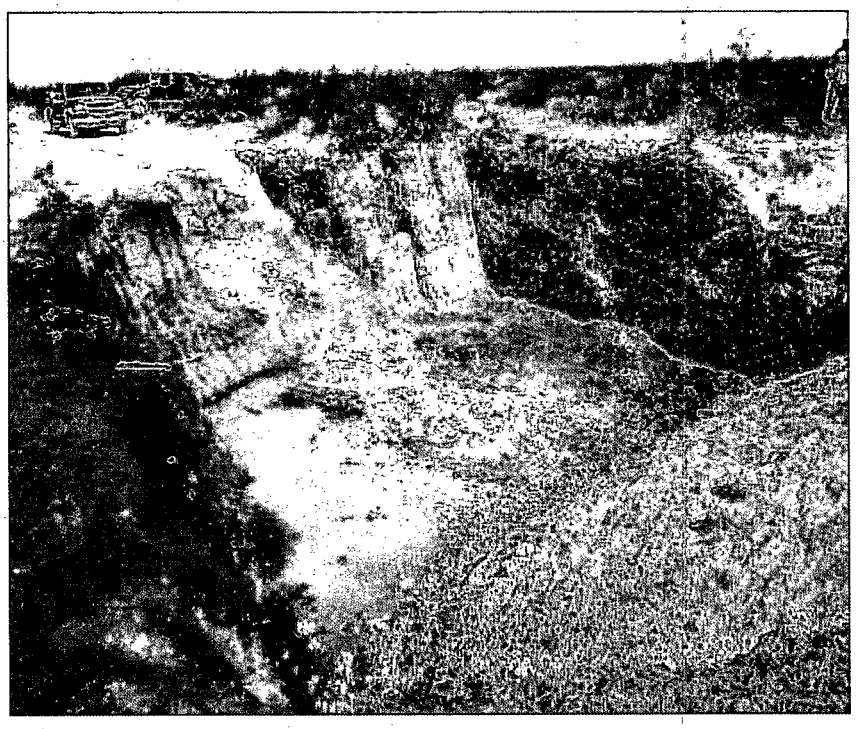
Direction:
Facing South

Description:
View of excavation activities along the Flow Path area.

Photograph No. 4

Direction:
Facing Southeast

Description:
View of excavation and backfilling activities at the Release Point on the east side of the Trunk "O" Pipeline.



NOVA
safety and environmental

Photographic Documentation

Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 5

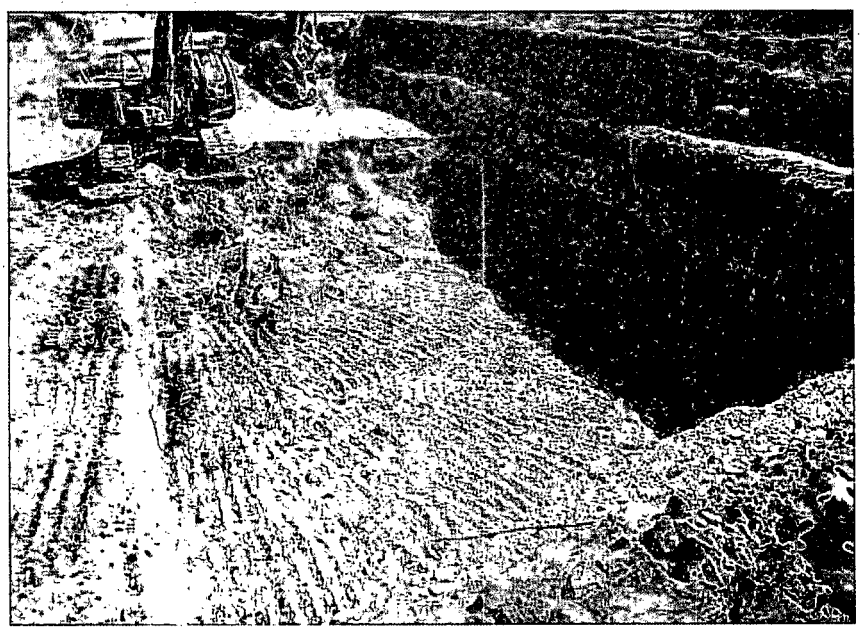
Direction:
Facing Southwest

Description:
View of backfilling activities at the Release Point east of the Trunk "O" Pipeline.

Photograph No. 6

Direction:
Facing North

Description:
View of excavation activities in the area of soil boring SB-1.



NOVA
safety and environmental

Photographic Documentation

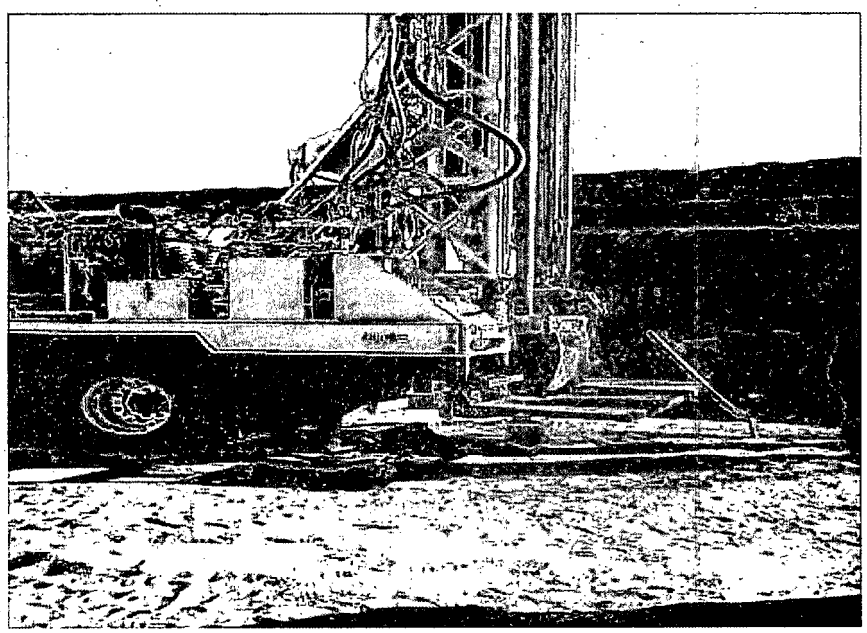
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 7

Direction:
Facing Northeast

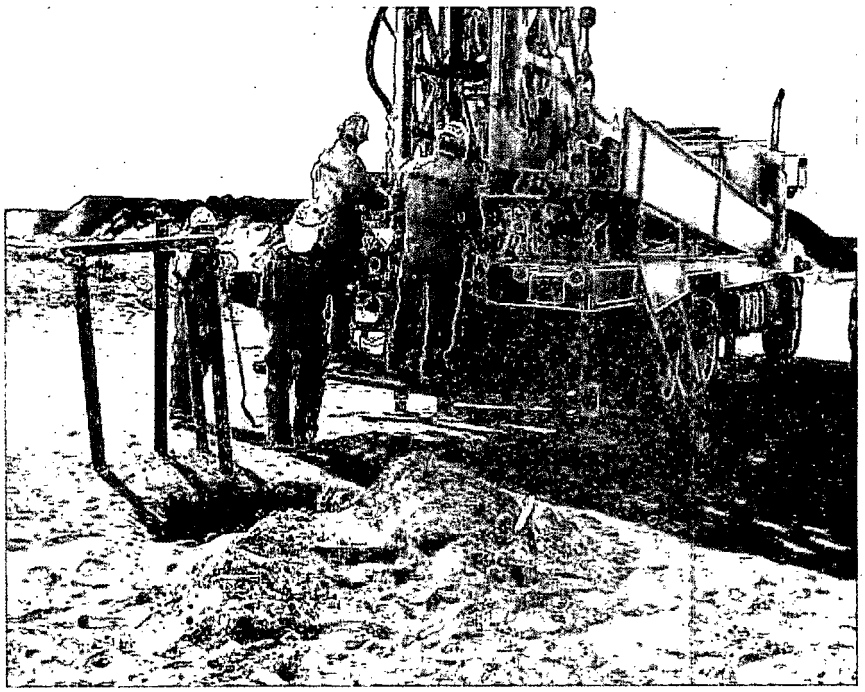
Description:
View of advancement of soil boring SB-1.



Photograph No. 8

Direction:
Facing Southwest

Description:
View of the advancement of soil boring SB-2.



NOVA
safety and environmental

Photographic Documentation

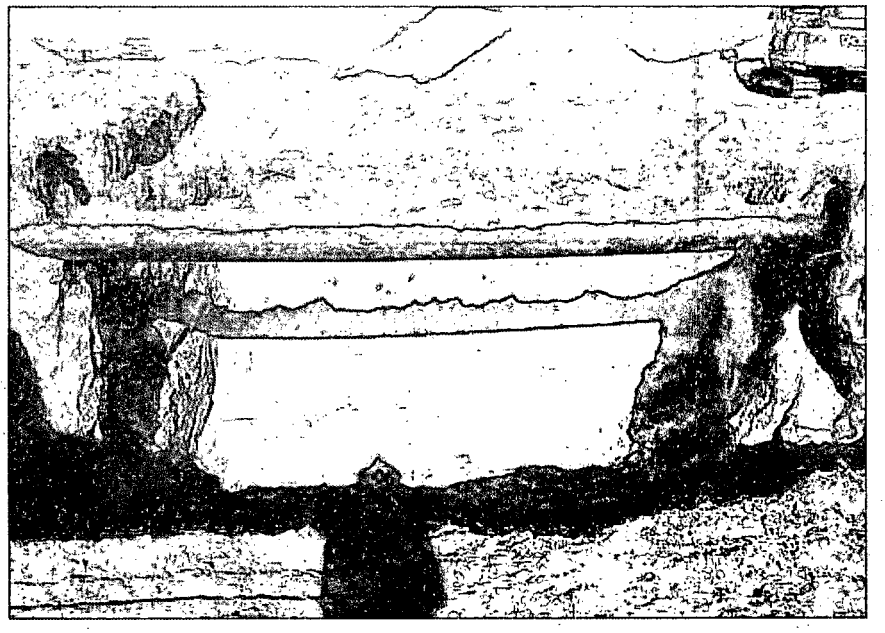
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 9

Direction:
Facing West

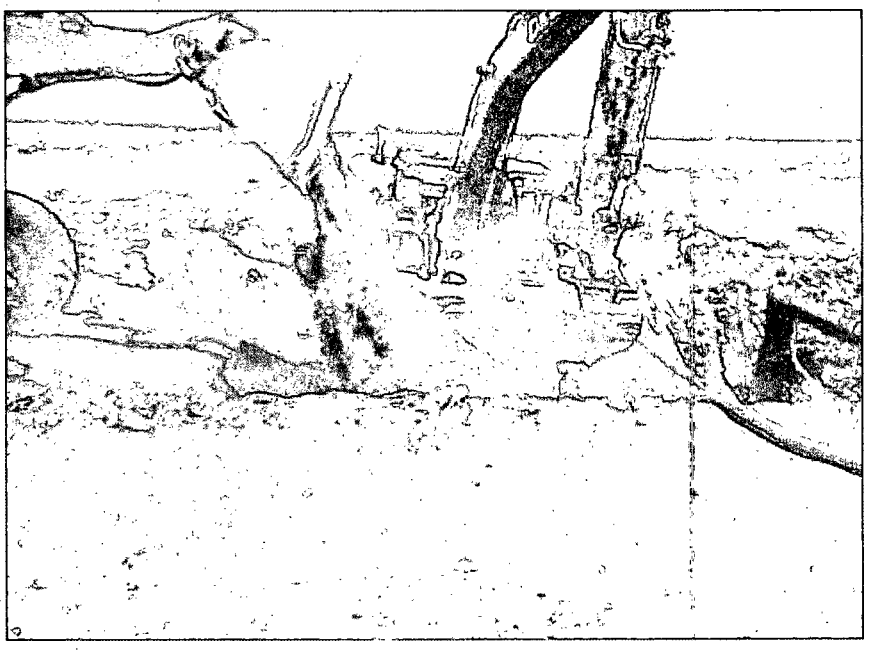
Description:
View of excavation activities at the Release Point on the north side of the caliche road.



Photograph No. 10

Direction:
Facing North

Description:
View of backfilling activities at the Release Point on the north side of the caliche road.



NOVA
safety and environmental

Photographic Documentation

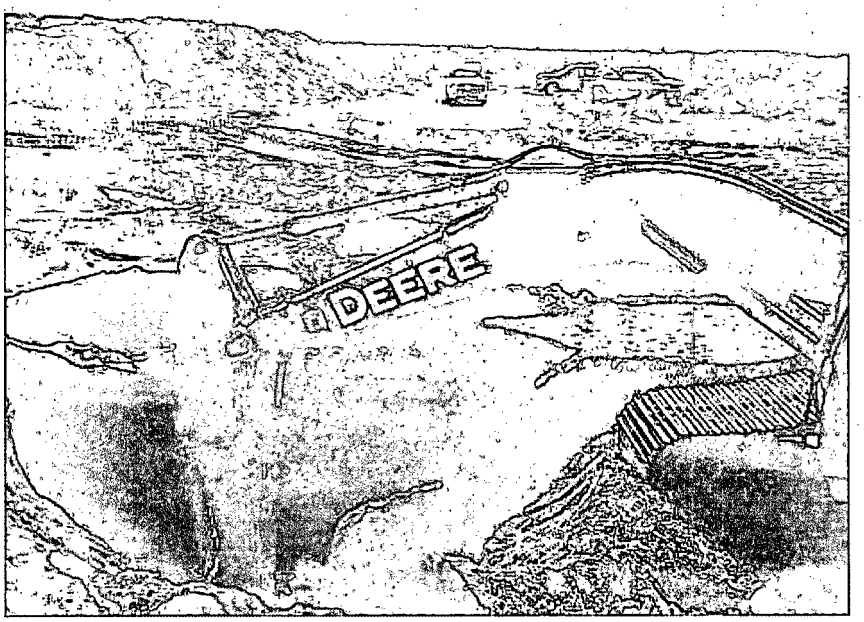
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 11

Direction:
Facing West

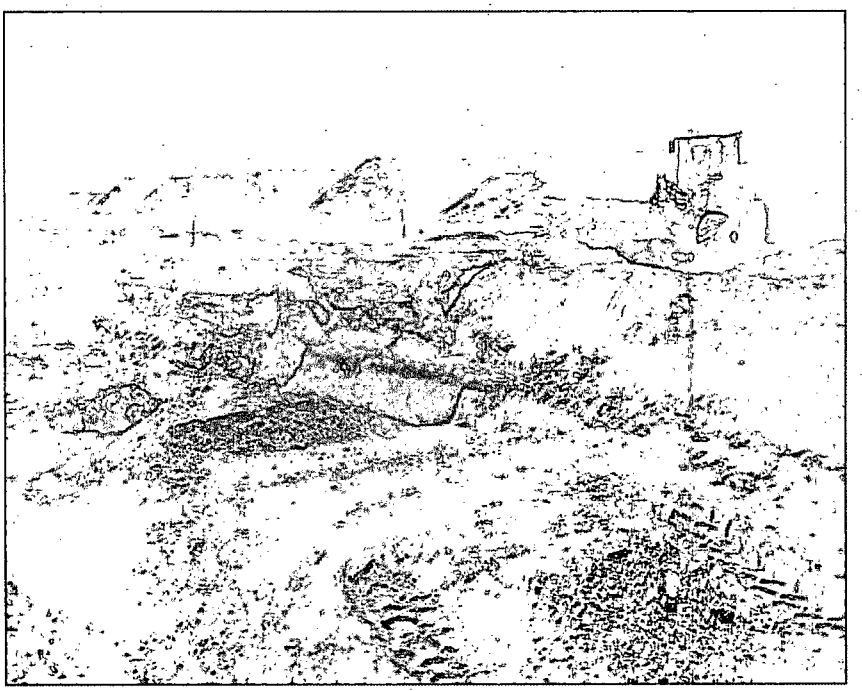
Description:
View of excavation activities at the Release Point along the caliche road and to the south.



Photograph No. 12

Direction:
Facing Southwest

Description:
View of backfilling activities at the Release Point along the caliche road and to the south.



NOVA
safety and environmental

Photographic Documentation

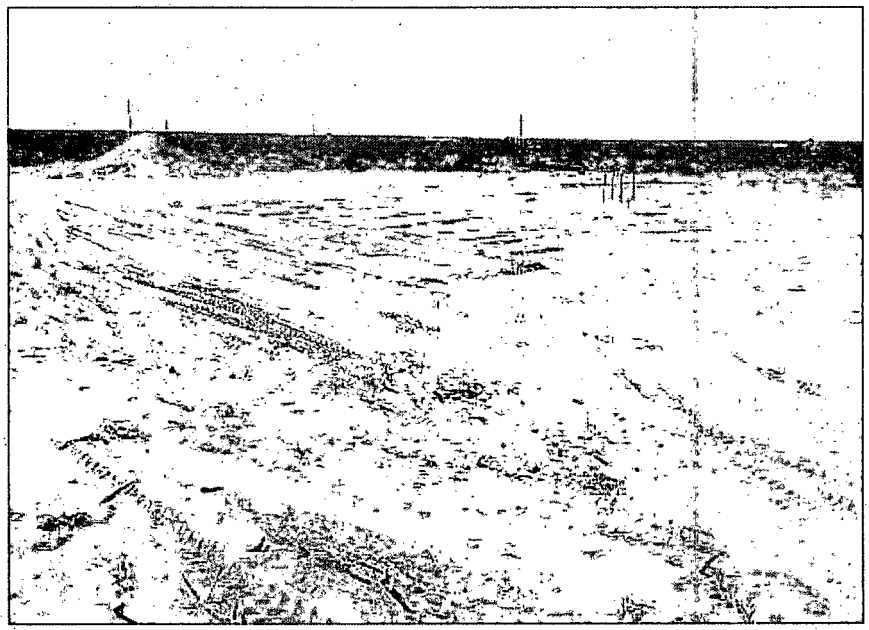
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 13

Direction:
Facing Northwest

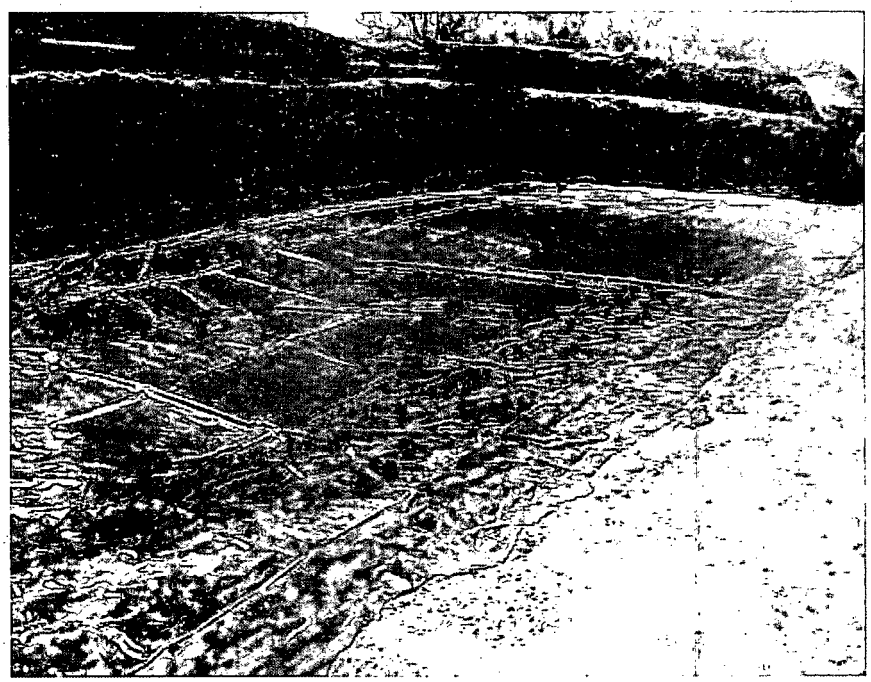
Description:
View of backfilled area at the Release Point.



Photograph No. 14

Direction:
Facing Southeast

Description:
View of the installation of the liner in the area of soil boring SB-1.



NOVA safety and environmental

Photographic Documentation

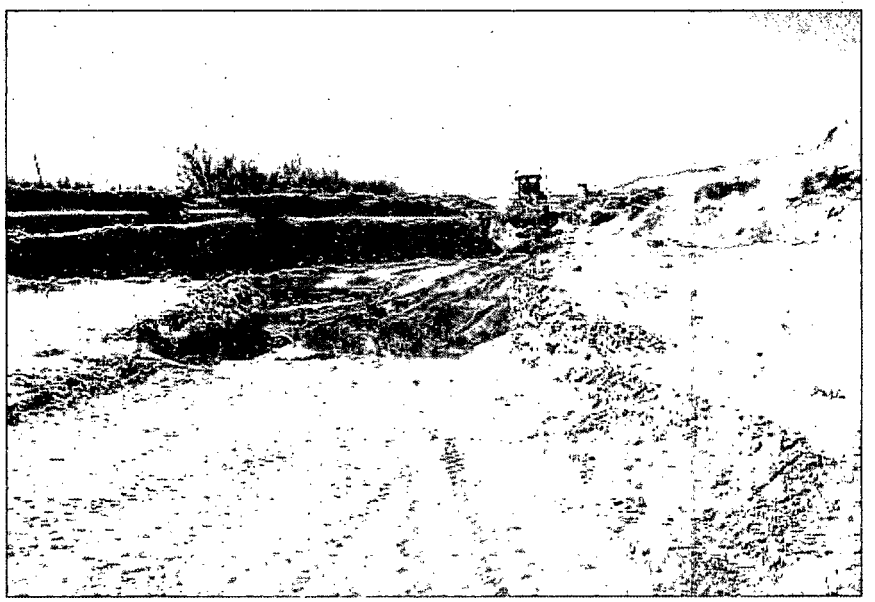
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 15

Direction:
Facing South

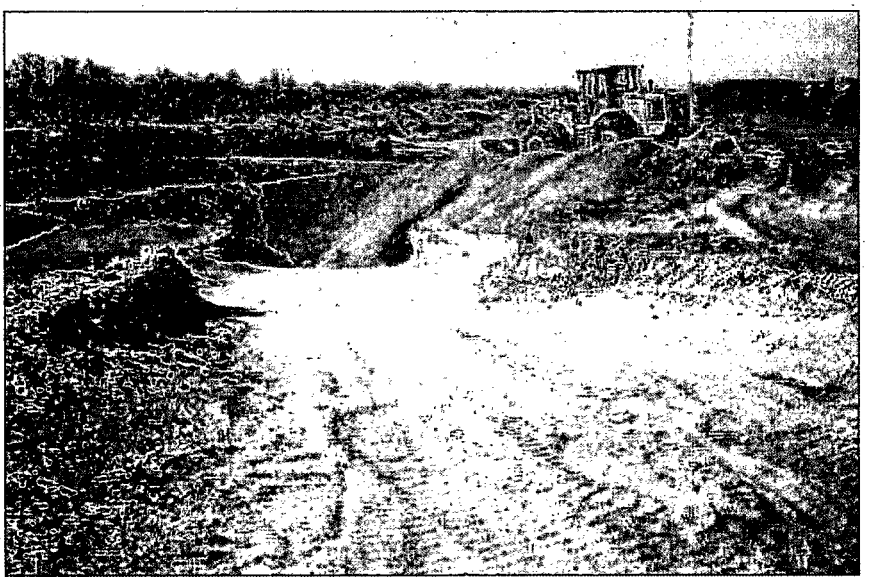
Description:
View of the installation of sand above the liner.



Photograph No. 16

Direction:
Facing South

Description:
View of backfilling activities along the Flow Path area.



NOVA
safety and environmental

Photographic Documentation

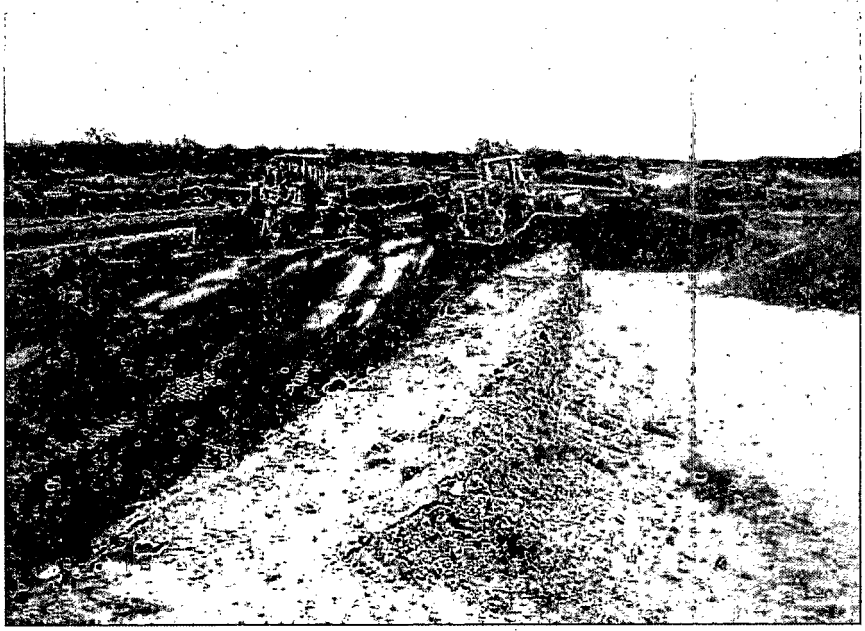
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 17

Direction:
Facing Southeast

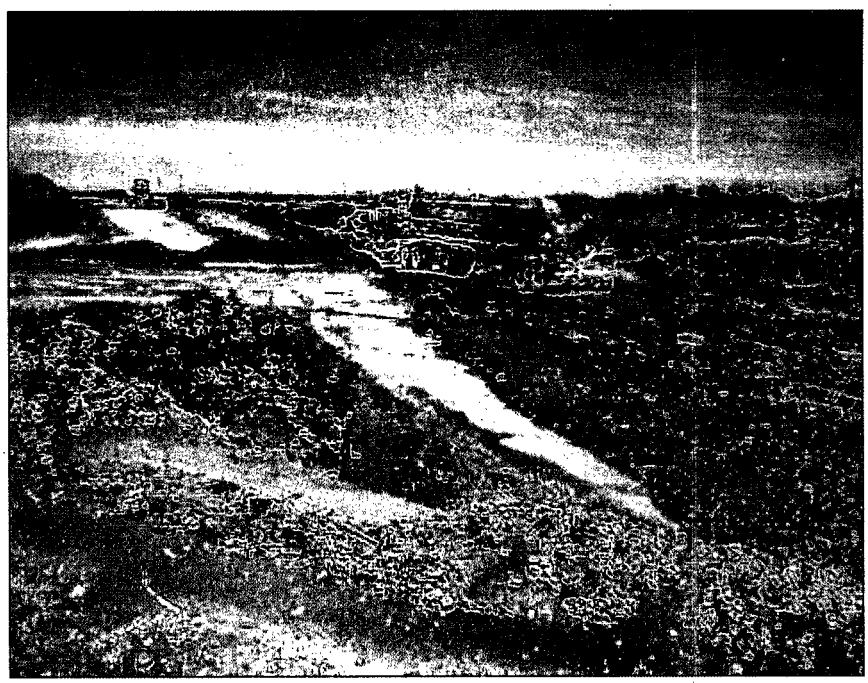
Description:
View of backfilling activities along the Flowpath area.



Photograph No. 18

Direction:
Facing Northeast

Description:
View of backfilling activities along the Flowpath area.



NOVA
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Photographic Documentation

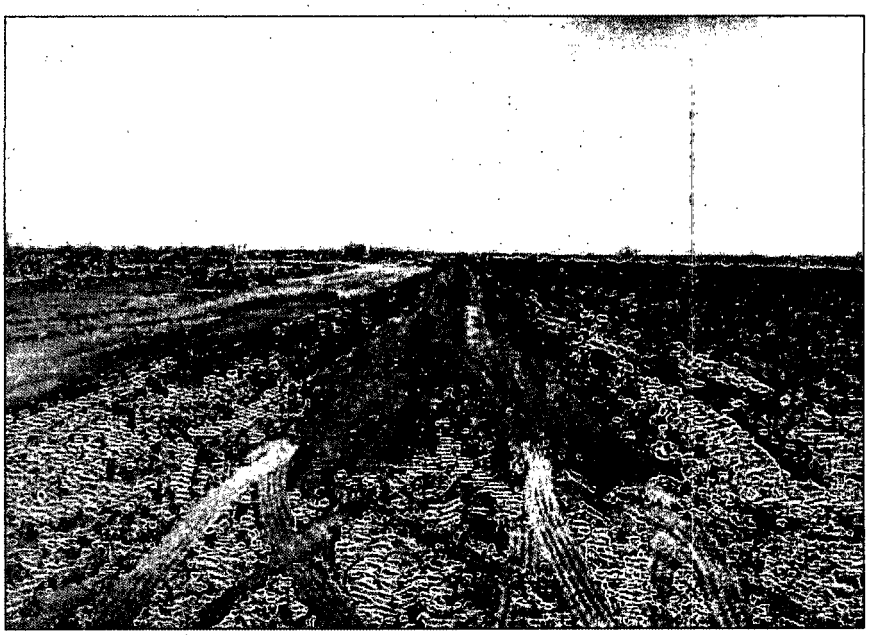
Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

Photograph No. 19

Direction:
Facing South

Description:
View of restored site.



Photograph No. 20

Direction:
Facing Northeast

Description:
View of restored site.

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Photographic Documentation

Client: Regency Field Services, LLC,
Formerly Southern Union Gas Services
Project Name: Trunk "O" Bennett Road

Prepared by: NOVA
Location: Lea County, New Mexico

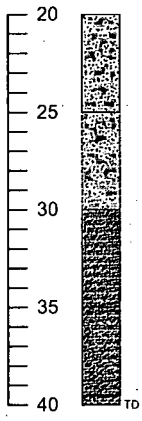
Photograph No. 21

Direction:
Facing East

Description:
View of restored site and caliche road.

Appendix C
Soil Boring Logs

Soil Boring Log SB-1



Depth (feet)	PID Reading	Odor	Chlorides	Soil Description
25	0.0	None	625	25' - Brown, Medium Grained Sandstone.
30	0.0	None	776	30' - Red to Brown, Fine to Medium Grained Sandstone.
35	0.0	None	<112	35' - Red to Brown, Fine to Medium Grained Sandstone.
40	0.0	None	<112	40' - Pink to Brown, Silty to Medium Grained Sandstone.

Soil Boring Details

Date Drilled 12-18-12
Depth of Exploratory Well 40 ft
Depth to Water N/A

Completion Notes

1. Soil boring was plugged same day. Using Air Rotary drilling Technique.
2. 8 bags of Bentonite and 1 bag of Cement.
3. 2' Concrete seal at top.
4. (0.0) Indicates Samples submitted to Laboratory for analysis.

Soil Boring Log Details
SB - 1
Regency Field Services, LLC.,
Formerly Southern Union Gas Services
Trunk O Bennet Road Lea County, NM

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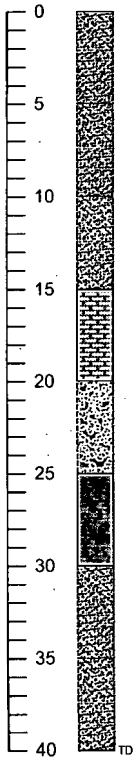
Scale: NTS	Prep By: TA	Checked By: CJB
September 25,2013		

Soil Boring Log SB-2



Depth (feet)	PID Reading	Odor	Chlorides	Soil Description
5	0.0	Produced Water	>2480	5' - Dark Brown, Silty to Medium Grained Sandstone.
10	123	TPH	>2480	10' - Brown, Fine to Medium Grained Sandstone.
15	394	TPH	>2480	15' - Dark Tan, Fine to Medium Grained Sandstone.
20	467	TPH	>2480	20' - Tan, Siliceous Limestone.
25	138	Slight TPH	332	25' - Pink to Tan, Coarse Grained Sandstone.
30	54	Slight TPH	168	30' - Brown to Pink, Siltstone.
35	9	None	<112	35' - Brown to Pink, Silty to Medium Grained Sandstone.
40 TD	2	None	<112	40' - Pink to Dark Tan, Fine Grained Sandstone.

Soil Boring Details

Date Drilled 12-18-12
Depth of Exploratory Well 40 ft
Depth to Water N/A

Completion Notes

1. Soil boring was plugged same day. Using Air Rotary drilling Technique.
2. 14 bags of Bentonite and 1 bag of Cement.
3. 2' Concrete seal at top.
4. (0.0) Indicates Samples submitted to Laboratory for analysis.

Soil Boring Log Details
SB - 2
Regency Field Services, LLC.,
Formerly Southern Union Gas Services
Trunk O Bennet Road Lea County, NM

NOVA Safety and Environmental

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Scale: NTS	Prep By: TA	Checked By: CJB
September 25,2013		

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-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Southern Union Gas Services	Contact: Rose Slade
Address: 801 South Loop 464 Monahans, Texas 79756	Telephone No.: 817-302-9716 or 432-940-5147 (cell)
Facility Name: Monahans Field Office	Facility Type: Natural Gas Gathering /Trunk "O" Bennett Road 5/7/12

Surface Owner: Greg Fulfer	Mineral Owner	API No – 30-025-28822

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	31	25	37					Lea

Latitude N32'05.432 **Longitude:**103'12.532

NATURE OF RELEASE

Type of Release: Crude oil, Poduced water, and Natural Gas	Volume of Release: 175 barrels	Volume Recovered: 130 barrels
Source of Release: Steel 30" Pipeline	Date and Hour of Occurrence: not known	Date and Hour of Discovery: 5/7/2012 at approximately 11:00 Am
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Geoff Leking	
By Whom? Rose Slade	Date and Hour: 5/7/2012 at 4:00 PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
The 30" natural gas gathering line developed a leak. Repair crews arrived at the leak site and started the suface clean up of the release site and put the impacted soil onto plastic until further remediation is done at this site. The leak area was excavated and the 30" line was clampled and put back in service. The landowner was immediately notified and an environmental consultant was hired to clean and remediate the contaminated site.

Describe Area Affected and Cleanup Action Taken.*

The dimensions for the Trunk "O" Bennett Road 5-7-12 are as follows:

- 700' x 25' (Run off Area) down the road and at the release point
- The remediation of this release site is scheduled to begin on Thursday 5/10/2012

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

Signature:	OIL CONSERVATION DIVISION	
Printed Name: Rose L. Slade	Approved by District Supervisor:	
Title: EHS Compliance Specialist	Approval Date:	Expiration Date:
E-mail Address: rose.slade@sug.com	Conditions of Approval:	Attached ☐
Date: 5/8/12 Phone: 432-940-5147		

* Attach Additional Sheets If Necessary