Southern Union Gas Services
Trunk "O"
Job #BGT-024
Ranking Analysis

NMOCD Standards					Points
Depth to Ground Water		Greater than 100 ft.			0
Depth to Ground Water		Less than 100 ft. but greater than 50 ft			10
Depth to Ground Water		Less than 50 ft.			20
Well Head Protection		Less than 1000 ft. from a water source, or;		Yes	20
		Less than 200 ft. from private domestic water source		No	0
Distance to Surface water body		Less than 200 Horizontal. ft.			20
Distance to Surface water body		200 to 1000 Horizontal ft.			10
Distance to Surface water body		Greater than 1000 Horizontal ft.			0
Action levels	**>19**	**10-19**	**0-9**		
Benzene (mg/kg)	10	10	10		
BTEX (mg/kg)	50	50	50		
TPH (mg/kg)	100	1000	5000		

Site Ranking			Points
Depth to Ground Water "Avg."	36 ft Average		20
Well Head Protection	287 Horiz. Ft.		20
Surface Water Body	227 Horiz. Ft.		10
	Total Ranking Score		**50**

Site Closure Objective	
Benzene (mg/kg)	10
BTEX (mg/kg)	50
TPH (mg/kg) "Surface"	100

Remediation Plan:

The below grade tank will be completely free of any liquids prior to starting the excavation activities.
The soil will be excavated around the sidewalls of the tank to a depth of approximately 8 ft. B.G.S.
The tank will then be lifted out of the ground intact to observe for any damage to the bottom or side-walls of the tank.
Samples will be collected from the undisturbed soils beneath the tank and analyzed for Total Hydrocarbons EPA method (8015M)
All samples will be field screened with a "PID" The soil sample with the highest PID reading will be analyzed separately and tested for BTEX.
All affected soil will be excavated and sampled for the presence of Hydrocarbons EPA method (8015M)
Soil with TPH values greater than 100 mg/kg will be transported to the S.U.G.S. Landfarm
Soil samples will be collected from the excavation and analyzed for Hydrocarbons EPA method (8015M)
All samples will be field screened with a "PID" The soil sample with the highest PID reading will be analyzed separately and tested for BTEX.

Tank Cleaning and Removal

Both of the above ground storage tanks will be emptied, cleaned and removed from the site location.
Any contamination found near or beneath the tankage will be remediated using the same procedures as listed above.
The facility fence will be left intact until the area has been re-vegetated.
The above ground piping that is still in service will be left intact.

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-144
June 1, 2004

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: Trunk "O" Tank Battery API # U/L or Qtr/Qtr H Sec 28 T 20 S R 37E
County Lea Latitude 32 deg 32.326 Longitude 103 deg 17 689 NAD: 1927 ☐ 1983 ☒
Surface Owner Federal ☐ State ☐ Private ☒ Indian ☐

Pit	**Below-grade tank**	
Type Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume 100 bbl Type of fluid: Produced water and crude oil Construction material Steel Double-walled, with leak detection? Yes ☐ If not, explain why not WTR30 Tank was installed by EPNG before the BGT regulations were written	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water) 36 ft	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more	(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) Yes, 287 To 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) 227 Horizontal Feet to Monument Draw	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	50 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 your 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

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 ☐.**

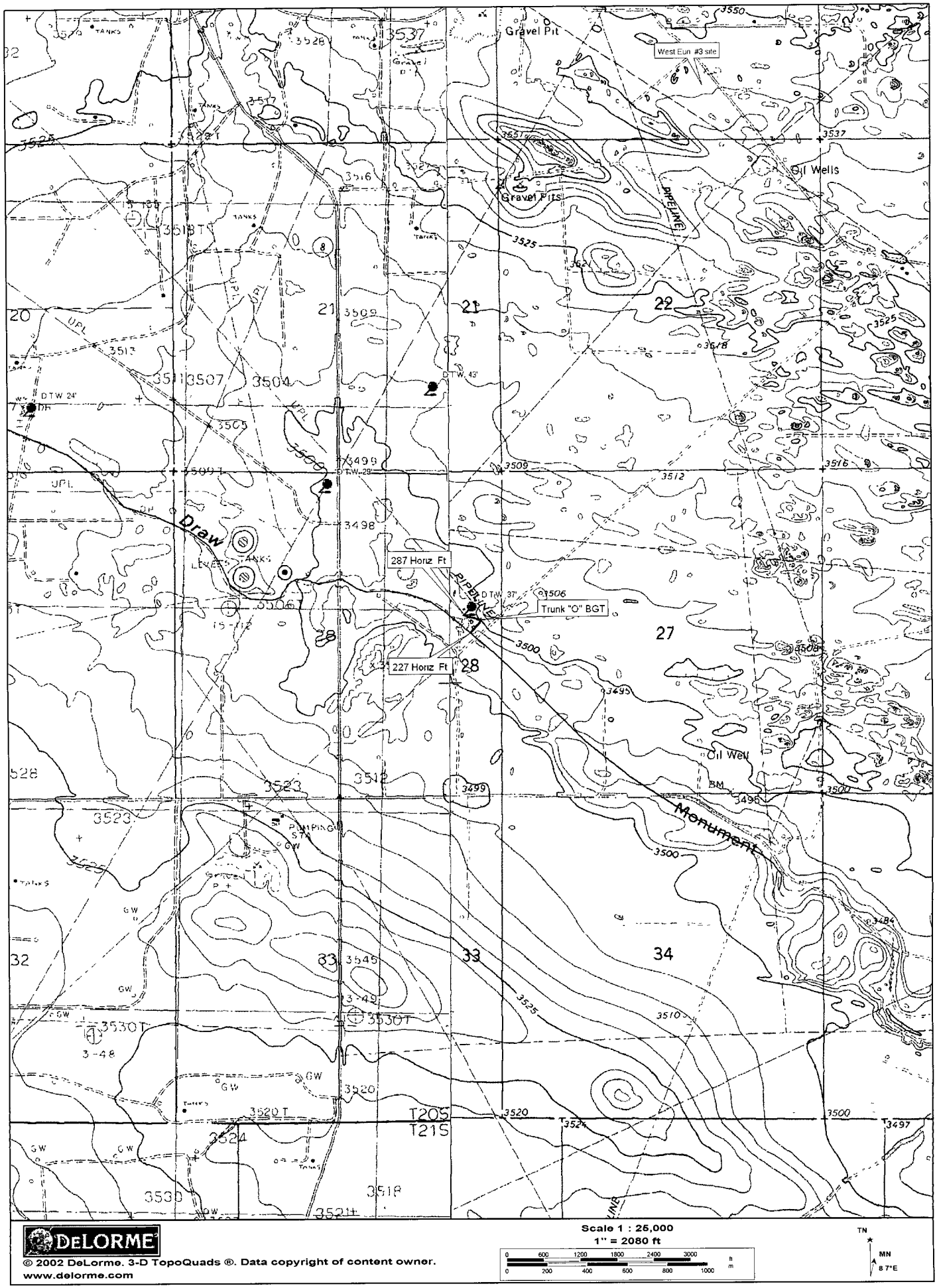
Date 2/14/08 TONY Savoie
Printed Name/Title Waste Management and Remediation Specialist Signature Tony Savoie

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 regulations

Approval
Printed Name/Title ____ Signature Johnson ENVIRONMENTAL ENGINEER Date 2.15.08
RP # 1800

fCOH0806349144

37 E


Gravel Pit
West Eun #3 site
Oil Wells
Gravel Pits
PIPELINE
Draw
287 Horiz Ft
227 Horiz Ft
Trunk "O" BGT
Oil Well
Monument
TANKS
LEVEES
PUMPING STA
DTW 24'
DTW 43'
DTW 28'
DTW 37'
T20S
T21S
DeLORME
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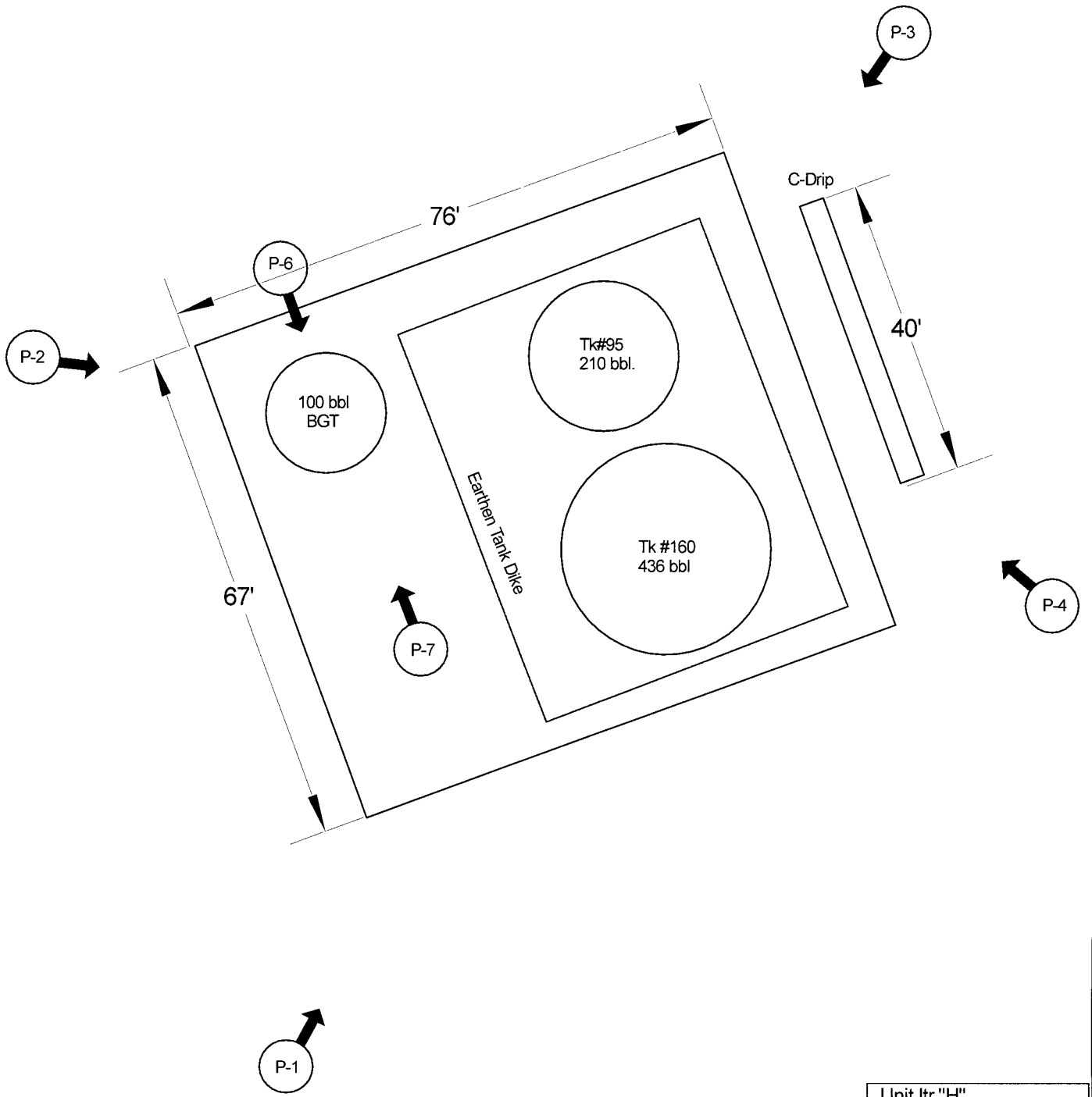
www.delorme.com
Scale 1 : 25,000
1" = 2080 ft
TN
MN
8 7°E

20 S



Approximate
Scale 1"= 20'

N

Unit ltr."H"
Section 28
Twns.-20 S
Range 37E
County-Lea, N.M.
GPS
Lat- 32 deg. 32.326 N
Long-103 deg 17.689 W

Southern Union Gas Services	Site Plan-Trunk "O" Tank Battery	BGT-024
	Lea County Area Jal, N.M.	Figure 1

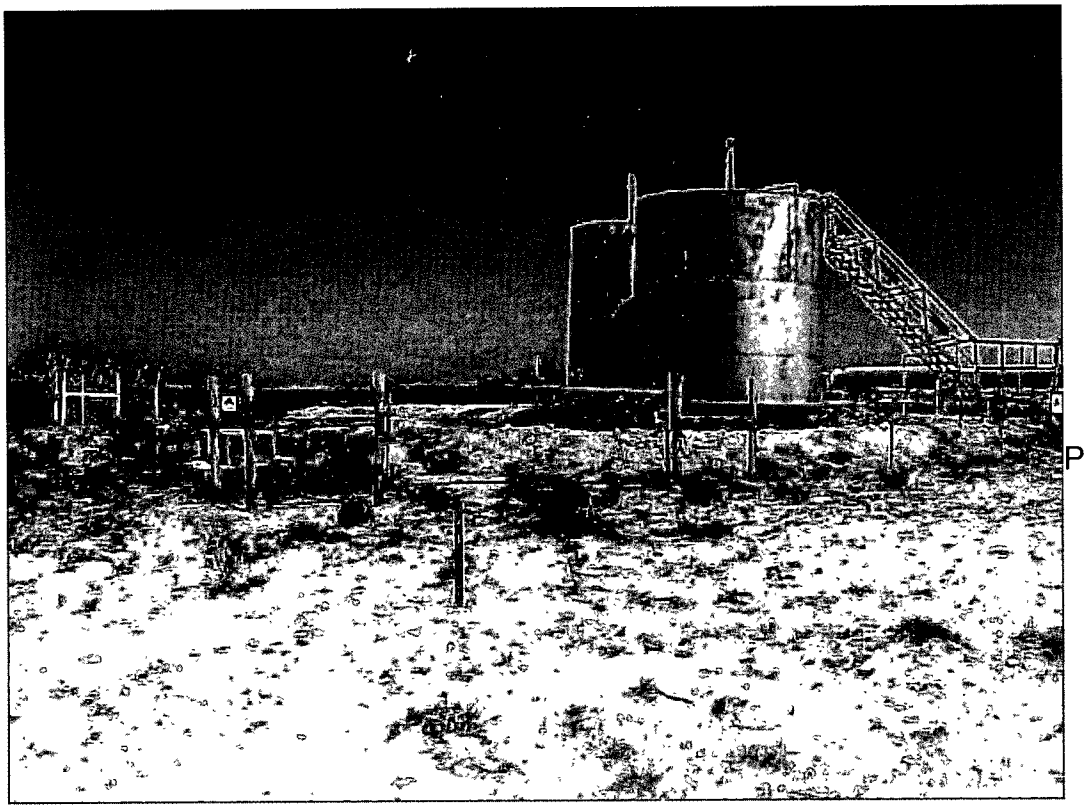


Photo 1

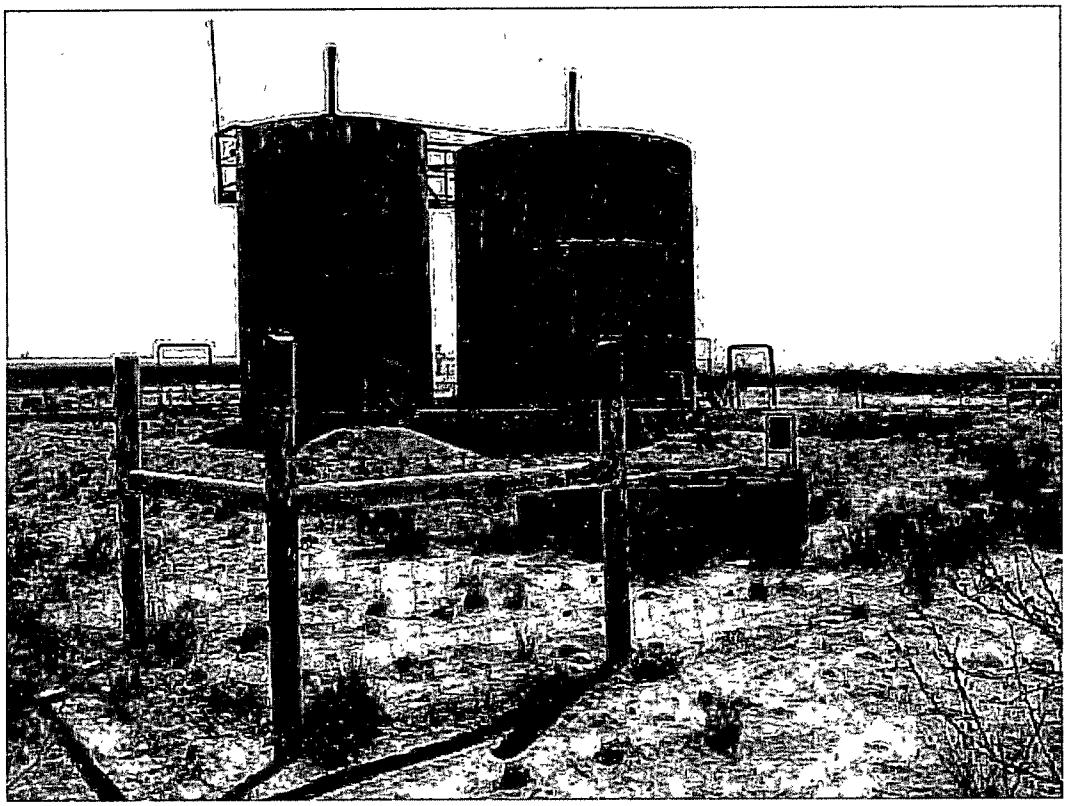
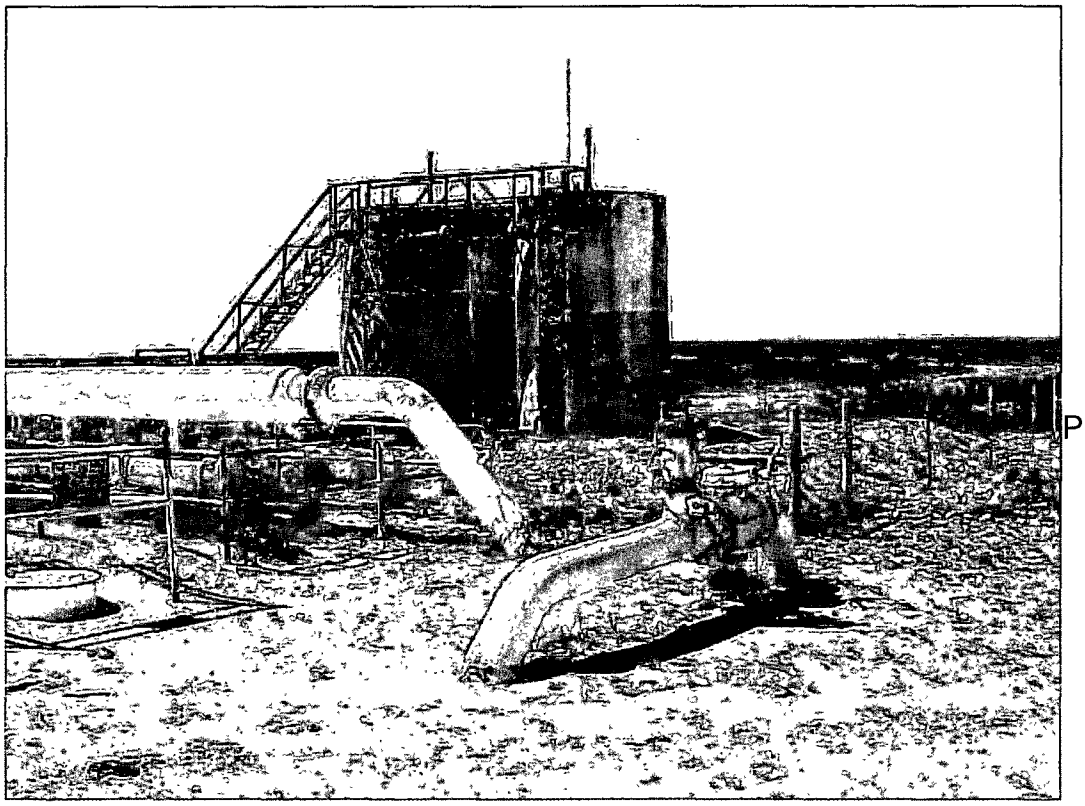


Photo 2

Southern Union Gas Services Site: Trunk "O" Tank Battery
Job # BGT-024
Site Assessment 4/22/04



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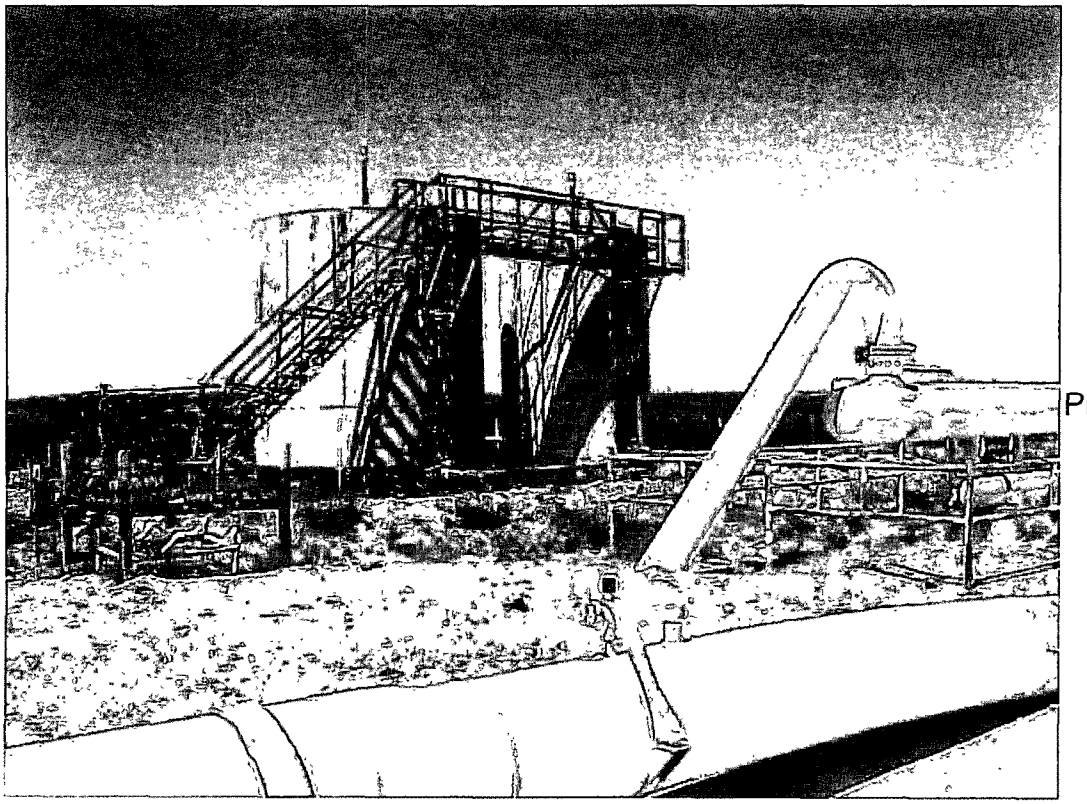

Photo 4

Southern Union Gas Services Site: Trunk "O" Tank Battery
Job # BGT-024
Site Assessment 4/22/04

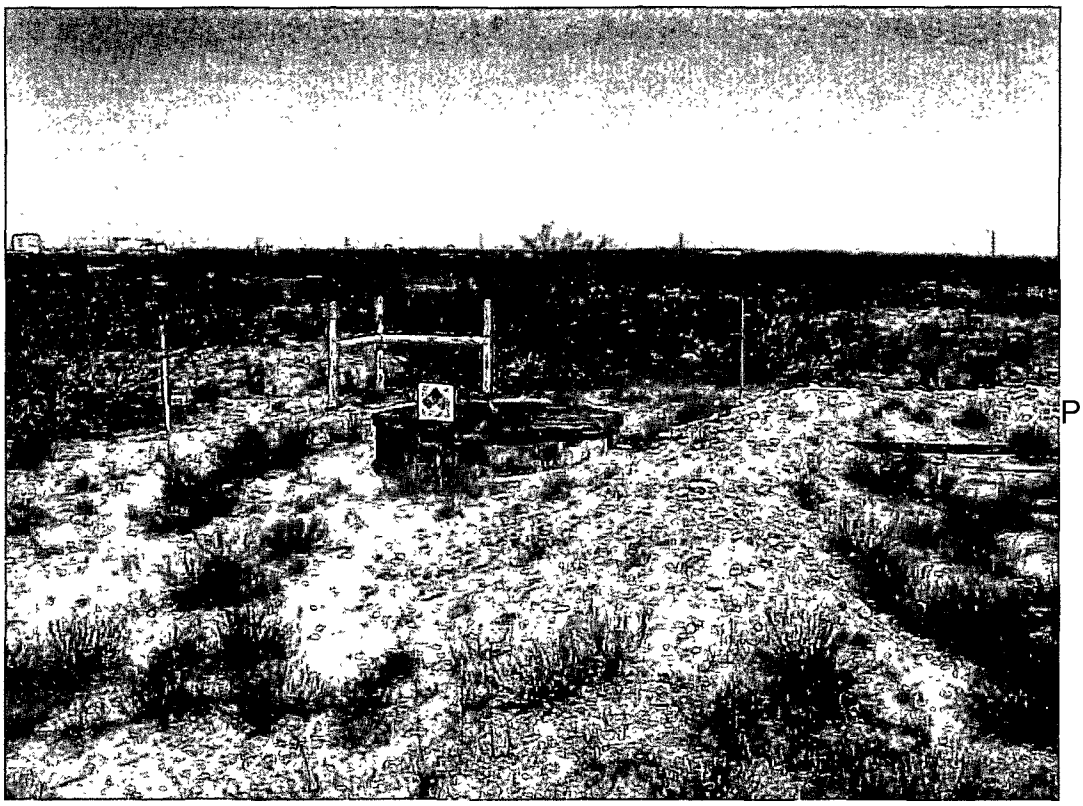

Photo 5

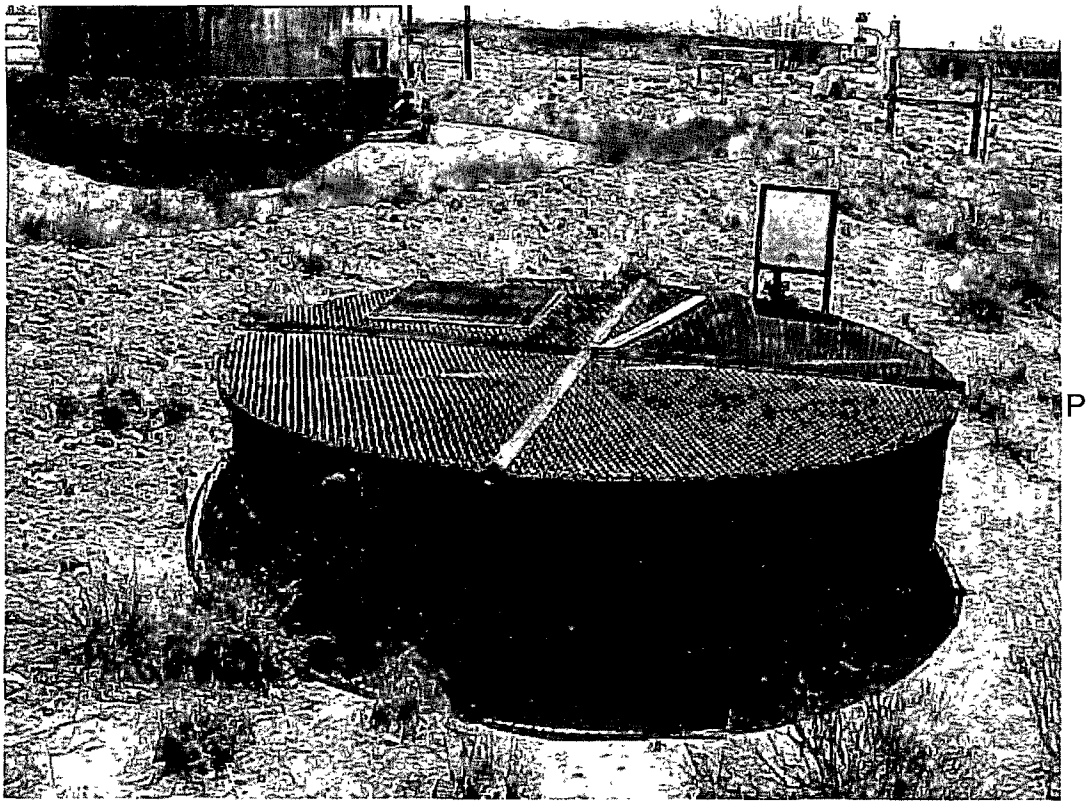

Photo 6

Southern Union Gas Services Site: Trunk "O" Tank Battery
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Site Assessment 4/22/04