Southern Union Gas Services

Remediation Plan

Below Grade Tank

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Drip Tank Battery #55

Project # BGT-016

Unit ltr."M" Section 21 Twns. 21S Range 36E

Lea County, New Mexico

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FEB 2 6 2008

HOBBS OCD

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: Drip Tank #55 API #: _____ U/L or Qtr/Qtr M Sec 21 T 21 S R 36E
County: Lea Latitude 32 deg. 27.637N Longitude 103 deg. 16.563W NAD: 1927 ☐ 1983 ☒
Surface Owner: Federal ☐ State ☒ Private ☐ Indian ☐

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. __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.) Average 206 ft.	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more WTR > 205	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.) No, 4746 Horiz. Ft. to a private water well	Yes No	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.) 2.18 Horizontal miles to an intermittent water course.	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0 Points

If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks (2) Indicate disposal location: (check the onsite box if 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: The Below Grade Tank will be removed in accordance with the NMOCD proposed Pit and Below Grade Tank Rules.

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

Date: _2/23/08_____
Printed Name/ Tony Savoie
Title ___Waste Management and Remediation Specialist Signature Tony Savoie

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

fCOH0806354083

Southern Union Gas Services
Drip Tank #55
Job #BGT-016
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."	206 ft.Average		0
Well Head Protection	4746 Horiz. Ft.		0
Surface Water Body	2.18 Horiz. Miles		0
		Total Ranking Score	**0**

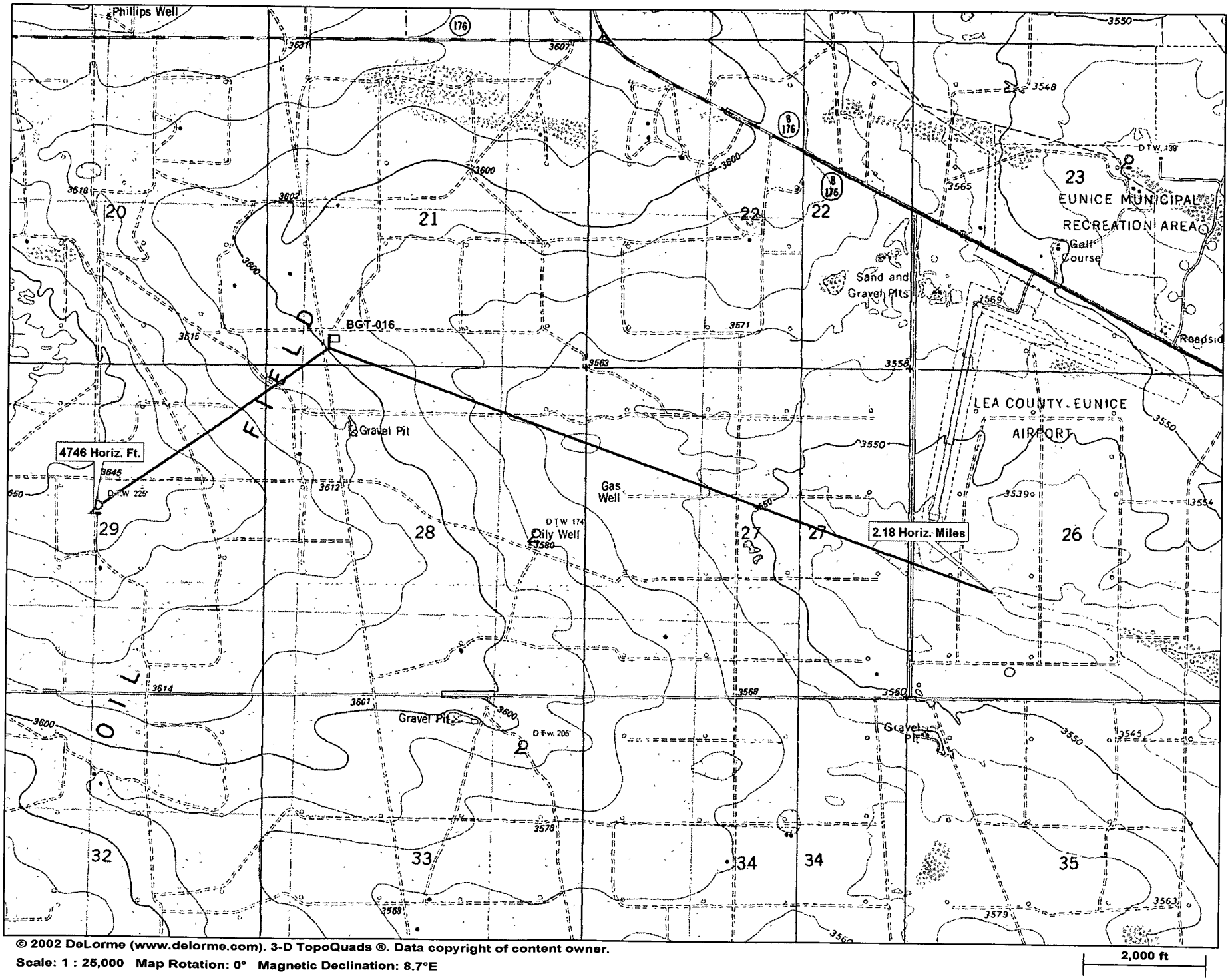
Site Closure Objective	
Benzene (mg/kg)	10
BTEX (mg/kg)	50
TPH (mg/kg) "Surface"	5000

Remediation Plan:

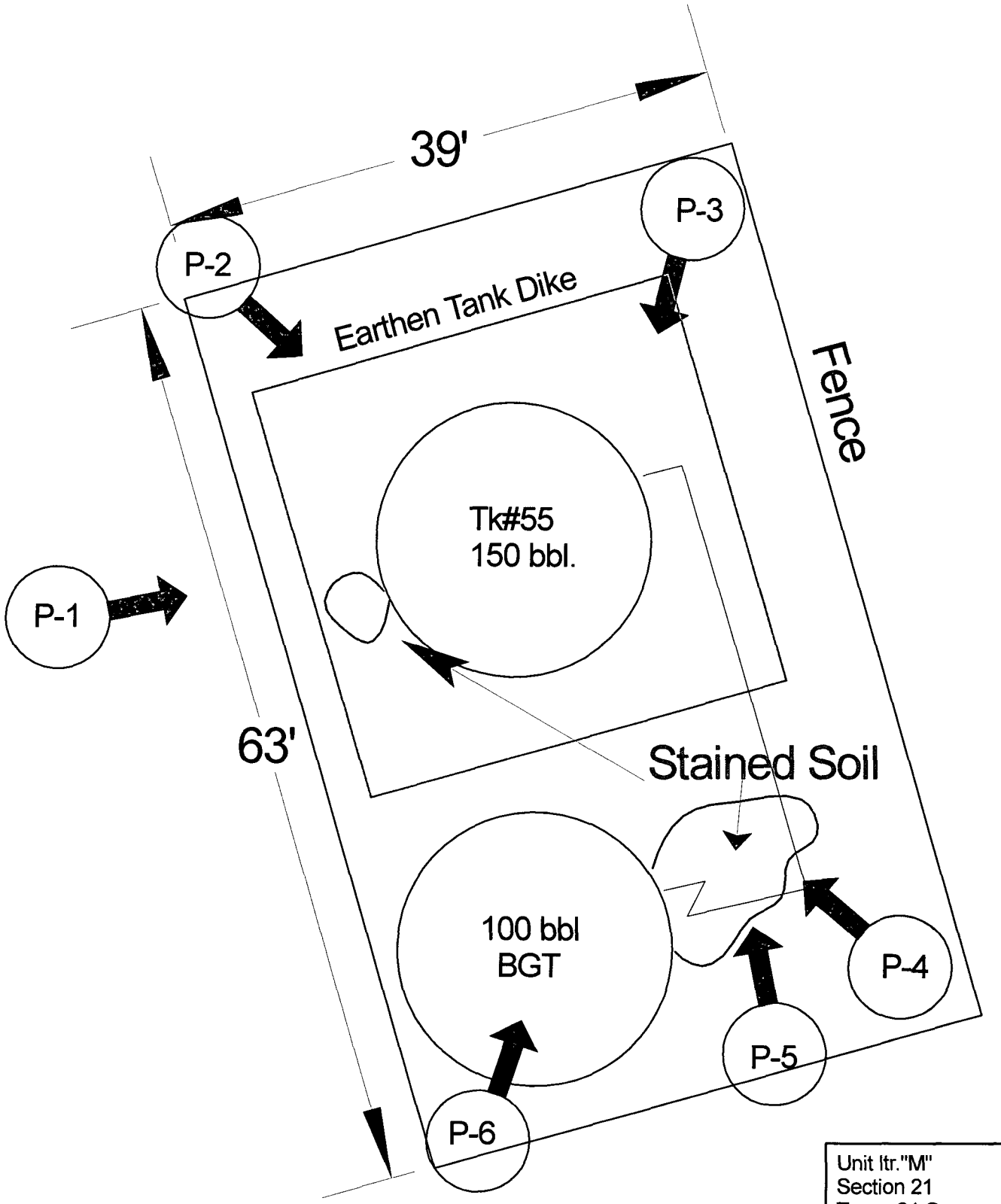
The below grade tank will be completely free of any liquids prior to starting the excavation activities.
The soil will be excavated around the sidewalls of the tank to a depth of approximately 8 ft. B.G.S.
The tank will then be lifted out of the ground intact to observe for any damage to the bottom or 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 5000 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

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.



Scale: 1 : 25,000 Map Rotation: 0° Magnetic Declination: 8.7°E



Unit ltr."M"
Section 21
Twns.-21 S
Range 36E
County-Lea, N.M.
GPS
Lat- 32-27.637N
Long-103-16.563W

Approximate
Scale 1"= 10'

N

Southern Union Gas Services

Site Plan-Drip Tank #55

Job # BGT-016

Lea County Area Jal, N.M.

Figure 1

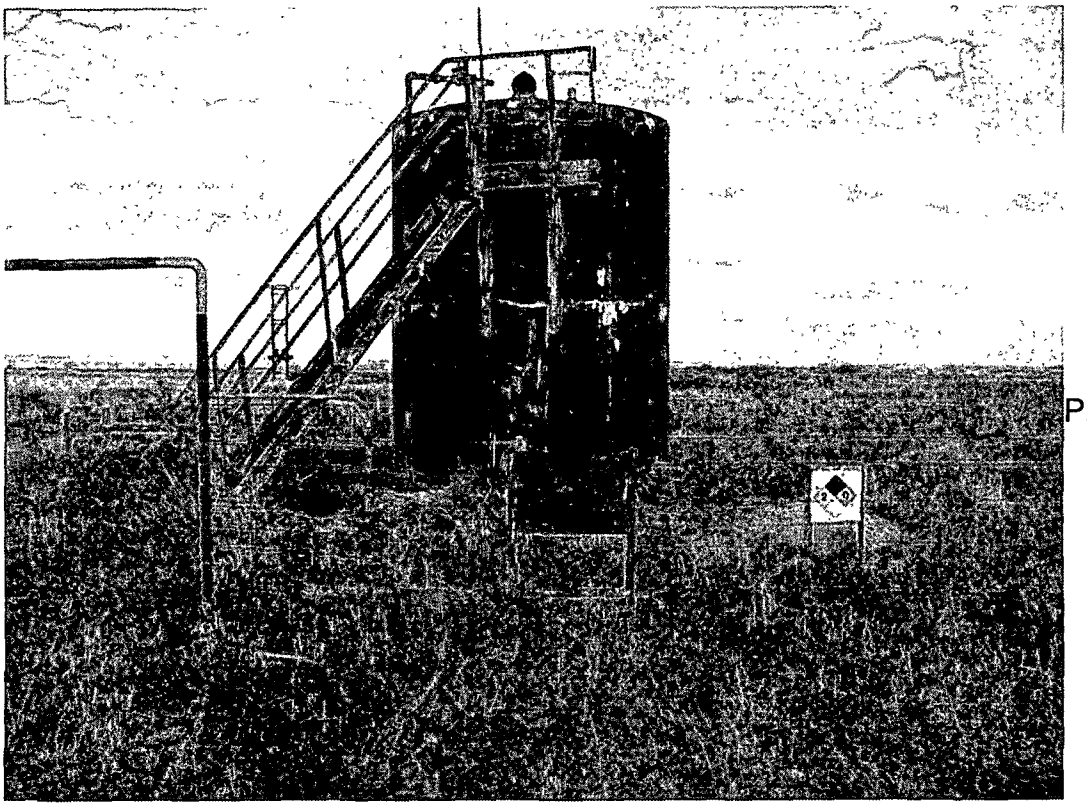


Photo 1

Photo 2

Southern Union Gas Services Site: Drip Tank #55
Job # BGT-016
Site Assessment 2/21/08

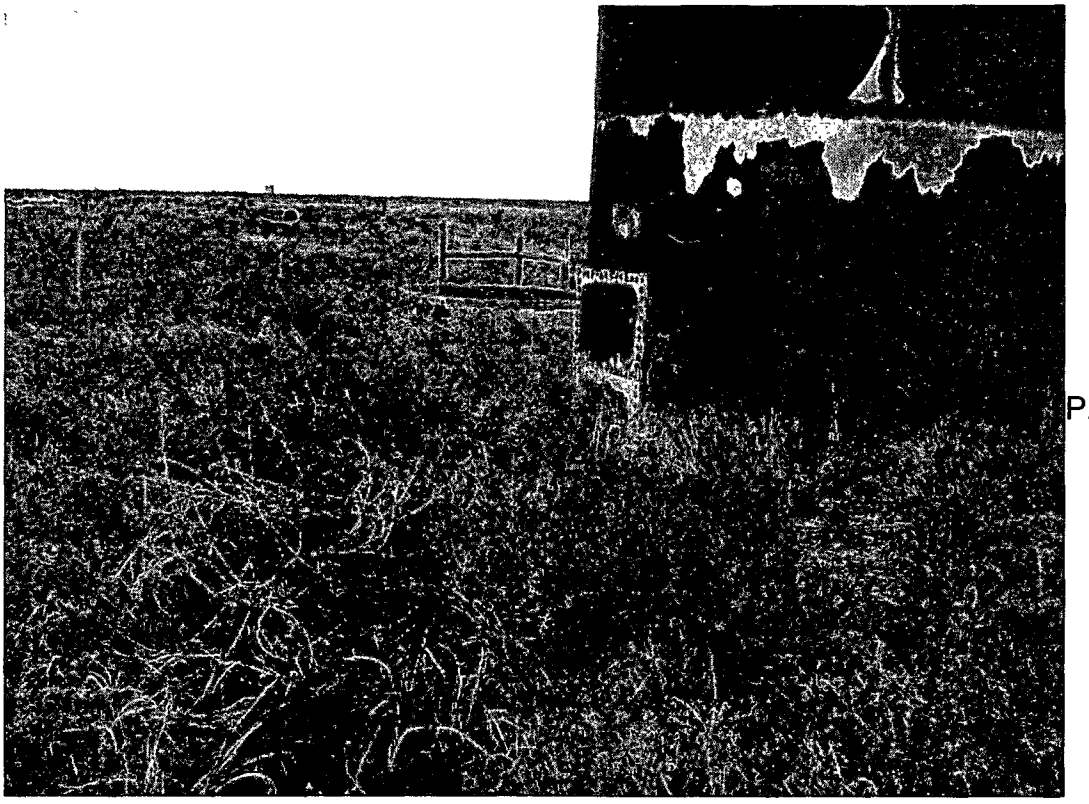


Photo 3

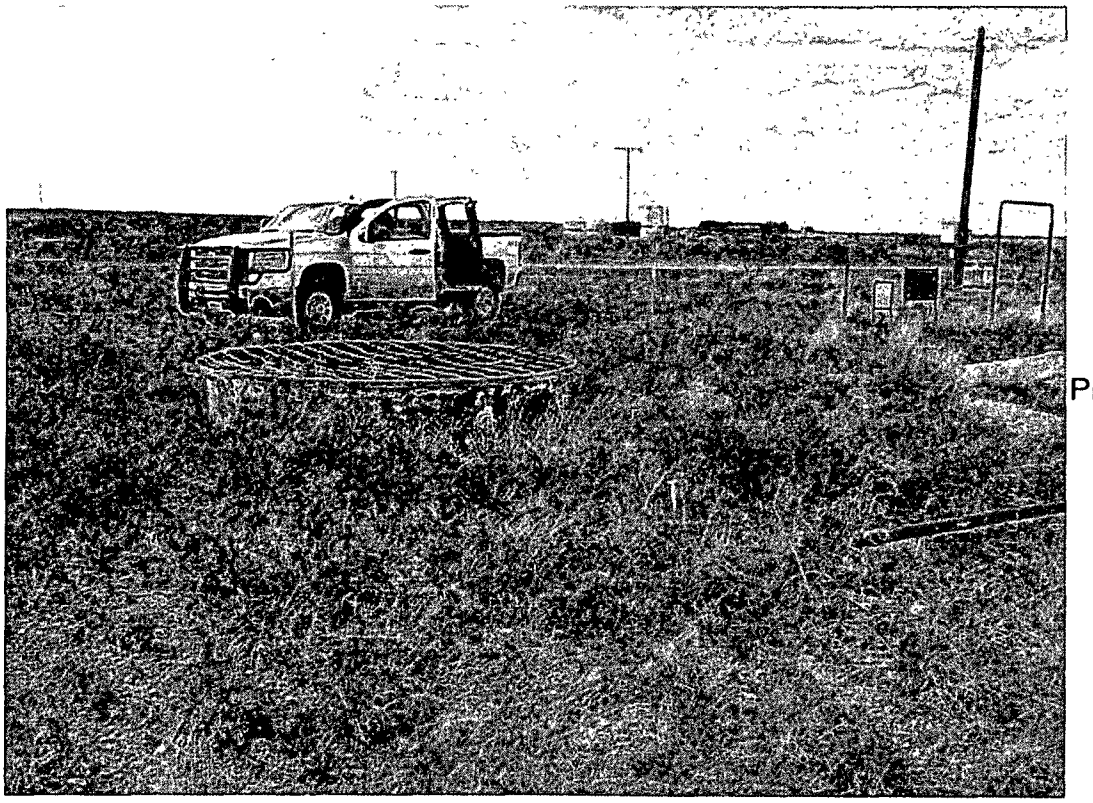


Photo 4

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Photo 5

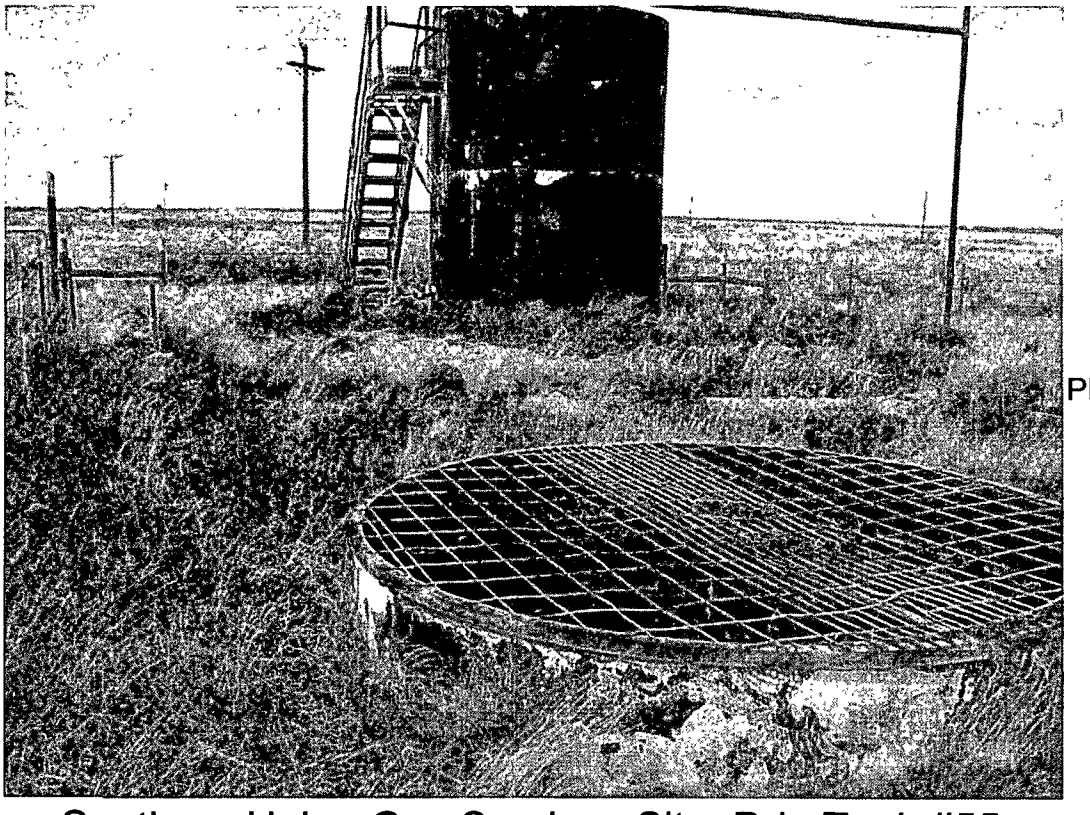

Photo 6

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