



**Southern Union
Gas Services**

Remediation Plan

Below Grade Tank

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Drip Tank Battery #111

Project # BGT-014

Unit ltr."E" Section 27 Twns. 22S Range 36E

Lea County, New Mexico

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HOBBS OCD

Site Remediation Plan

Southern Union Gas Services
Tank Battery Site #111
BGT-014

Unit ltr. E Section 27, Twns. 22S, Range 36E

Waste Management and Remediation Specialist

Signature Tony Savoie

Date: 3/13/08

Tony Savoie
P.O. Box 1226
Jal, New Mexico 88252
575-631-9376
E-mail: tony.savoie@sug.com

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

State of New Mexico
Energy Minerals and Natural Resources

Form C-144
June 1, 2004

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

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

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes No

Type of action: Registration of a pit or below-grade tank Closure of a pit or below-grade tank

Operator: Southern Union Gas Services Telephone: 575-395-2116 e-mail address: tony.savoie@sug.com
Address: P.O. Box 1226 Jal, New Mexico 88252
Facility or well name: Drip Tank #111 API #: _____ U/L or Qtr/Qtr E Sec 27 T 22 S R 36E
County: Lea Latitude 32 deg 21.904N Longitude 103 deg 15.517W NAD: 1927 1983
Surface Owner: Federal State Private Indian

<u>Pit</u>	<u>Below-grade tank</u>	
Type: Drilling <input type="checkbox"/> Production <input type="checkbox"/> Disposal <input type="checkbox"/> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Lined <input type="checkbox"/> Unlined <input type="checkbox"/> Liner type: Synthetic <input type="checkbox"/> Thickness _____ mil Clay <input type="checkbox"/> Pit Volume _____ bbl	Volume: <u>100</u> bbl Type of fluid: <u>Produced water and crude oil</u> Construction material: <u>Steel</u> Double-walled, with leak detection? Yes <input type="checkbox"/> If not, explain why not. <u>Tank was installed by EPNG before the BGT regulations were written</u>	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.) Average 108 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.) No, 4377 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.) 2.01 Horizontal miles to a playa and 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

WTR 200

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

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

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

Date: 3/13/08

Printed Name/ Tony Savoie

Title Waste Management and Remediation Specialist

Signature Tony Savoie

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

Approval:

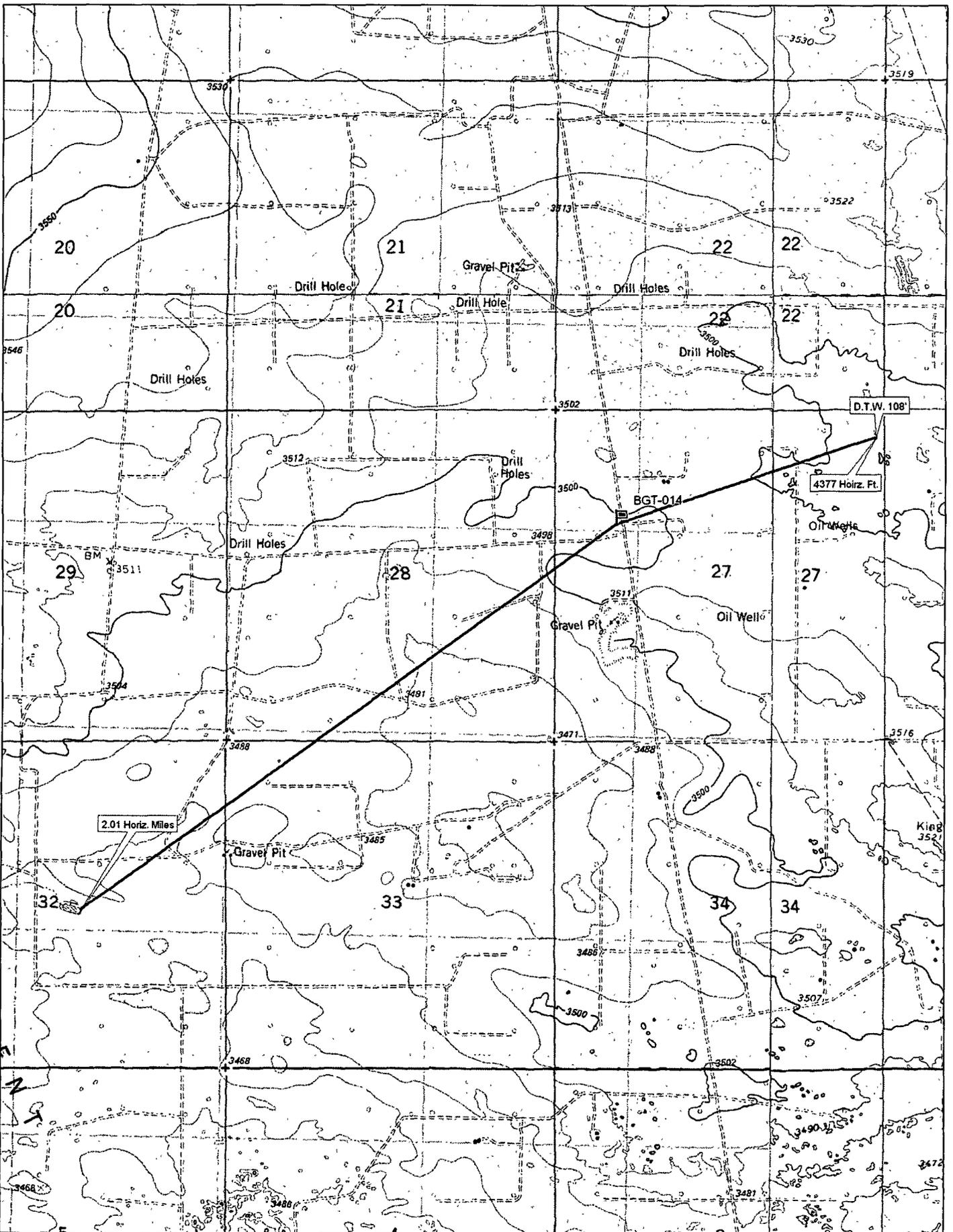
Printed Name/Title

Signature ENVIRONMENTAL ENGINEER

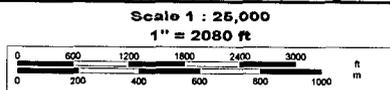
Date: 3.19.08

LRP-1820

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MN
8.7°E

Southern Union Gas Services

Drip Tank #111

Job #BGT-014

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."	108 ft. Average	0
Well Head Protection	4377 Horiz. Ft.	0
Surface Water Body	2.01 Horiz. Miles	0
Total Ranking Score		0

Site Closure Objective	
Benzene (mg/kg)	10
BTEX (mg/kg)	50
TPH (mg/kg) "Surface"	5000
Chloride mg/kg	1000
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) and Chloride EPA method 300.1

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.

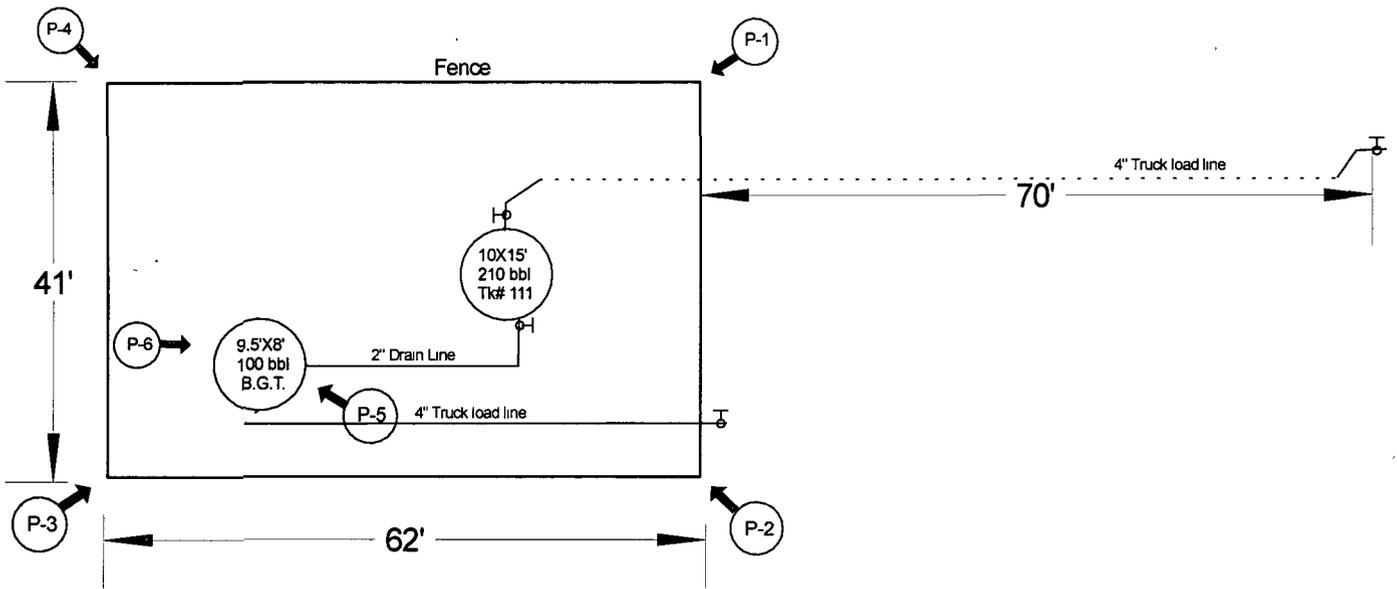
Soil with TPH values greater than 5000 mg/kg or chloride 1000 mg/kg will be transported to the S.U.G.S. Landfarm or remediated on site following the NMOCD recommended guidelines.

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.



Unit ltr."E"
 Section 27
 Twns.-22S
 Range 36E
 County-Lea, N.M.
 GPS
 Lat- 32-21.904N
 Long-103-15.517W

Approximate
 Scale 1"= 20' 

	Site Plan: Drip Tank Battery #111	B.G.T. 014
	Lea County Area Jal, N.M.	Figure 1

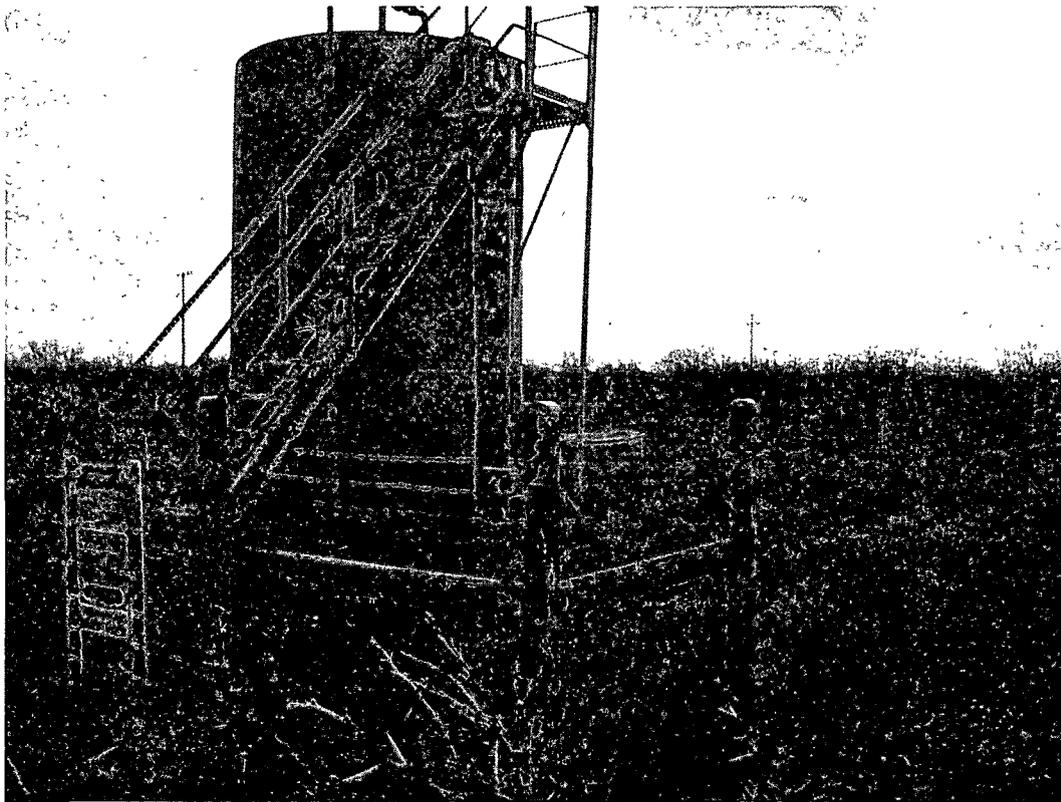


Photo 1



Photo 2

Southern Union Gas Services Site: Drip Tank #111
Job # BGT-014
Site Assessment 3/5/08

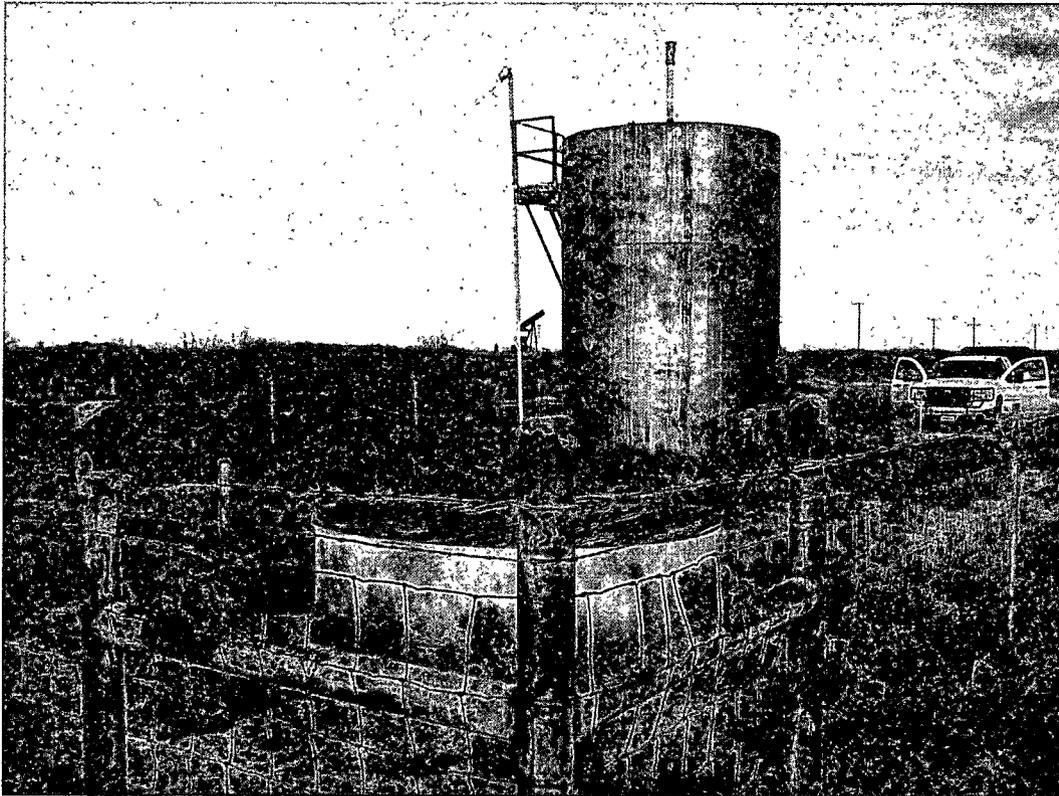


Photo 3



Photo 4

Southern Union Gas Services Site: Drip Tank #111
Job # BGT-014
Site Assessment 3/5/08



Photo 5



Photo 6

Southern Union Gas Services Site: Drip Tank #111
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Site Assessment 3/5/08