NM2 - ___19_____

GENERAL CORRESPONDENCE YEAR(S):

___2007-2010___

Jones, Brad A., EMNRD

From: Ben J. Arguijo [bjarguijo@basinenv.com]
Sent: Monday, November 29, 2010 9:59 AM
To: Johnson, Larry, EMNRD
Cc: 'Slade, Rose'; Jones, Brad A., EMNRD
Subject: Biannual sampling of Southern Union Landfarm

Mr. Johnson,

I am writing to inform you that Basin Environmental, on behalf of Southern Union Gas Services, will conduct biannual soil sampling of the Southern Union Landfarm (Permit # NM-02-0019) at the end of this week. The sampling event will commence after the removal of approximately 1,500 cubic yards of chloride-impacted soil from Cell 8 (addressed under separate cover to Mr. Brad Jones), which I anticipate will be completed Wednesday.

If you have any questions, comments; or concerns, please do not hesitate to contact me by telephone or e-mail.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
Project Manager
Basin Environmental
3100 Plains Hwy.
P.O. Box 301
Lovington, NM 88260
p:(575)396-2378 m:(575)408-8852
f:(575)396-1429
bjarguijo@basinenv.com

Jones, Brad A., EMNRD

From: Ben J. Arguijo [bjarguijo@basinenv.com]
Sent: Monday, November 29, 2010 9:36 AM
To: Jones, Brad A., EMNRD
Cc: 'Slade, Rose'
Subject: Removal of chloride-impacted soil from Southern Union Landfarm (Permit # NM-02-0019)

RE: Removal of 1,500 Cubic Yards of Chloride Impacted Soil
Southern Union Gas Services
Southern Union Landfarm: Permit # NM-02-0019
Location: SE ¼ of the NW ¼ of Section 36, Township 23 South, Range 36 East
Lea County, New Mexico

Mr. Jones,

I am writing to inform you that today, 11/29/2010, Basin Environmental, on behalf of Southern Union Gas Services, commenced removal of approximately 1,500 cubic yards of chloride impacted soil from Cell 8 of the Southern Union Landfarm. The impacted material will be disposed of at Sundance Services, Inc. (NMOCD Permit # NM-01003), as detailed in a May 2010 letter sent to you from my associate, Joel Lowry.

Per your letter dated June 30, 2010, a report will be submitted within 45 days of removal of the impacted soil, which will include results of chloride testing (both field and laboratory), a detailed site map with sample locations, photo documentation of soil removal, and a copy of the C-138 form provided to Sundance Services.

If you have any questions or problems, please do not hesitate to contact me by telephone or e-mail.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
Project Manager
Basin Environmental
3100 Plains Hwy.
P.O. Box 301
Lovington, NM 88260
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bjarguijo@basinenv.com

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Jon Goldstein
Cabinet Secretary

Jim Noel
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

June 30, 2010

Rosa Slade
Southern Union Gas Services
1507 W. 15th
Monahans, Texas 79756

RE: Request of Approval for Removal of 1,500 Cubic Yards of Chloride Impacted Soil
Southern Union Gas Services
Southern Union Landfarm: Permit NM-2-019
Location: SE/4, NW/4 Section 36, Township 23 South, Range 36 East, NMPM
Lea County, New Mexico

Dear Ms. Slade:

The Oil Conservation Division (OCD) has reviewed Southern Union Gas Services' (Southern Union) request, dated June 14, 2010, to grant approval to remove approximately 1,500 cubic yards of chloride impacted soil from Cell 8 of the Southern Union Landfarm for disposal at Sundance Services, Inc.'s landfill (Permit NM-2-003).

Based upon the information provided in the request, OCD hereby grants Southern Union approval to remove approximately 1,500 cubic yards of chloride impacted soil from the Southern Union Landfarm for disposal at OCD permitted surface waste management facility commercial landfill with the following understandings and conditions:

1. Southern Union shall remove approximately 1,500 cubic yards of chloride impacted soil from Cell 8 of the Southern Union landfarm (permit NM-2-019) for disposal at Sundance Services, Inc.'s landfill (Permit NM-1-003).

2. Southern Union shall utilize a transporter that has a form C-133, authorization to move liquid waste, approved by the division to transport the chloride impacted soil from the Southern Union landfarm to Sundance Services, Inc.'s landfill, pursuant to Subsection D of 19.15.16.13 NMAC.

3. Southern Union shall provide the operator of Sundance Services Inc. a signed and completed form C-138 upon delivery of the chloride impacted soil, pursuant to Subsection F of 19:15.16.13 NMAC.

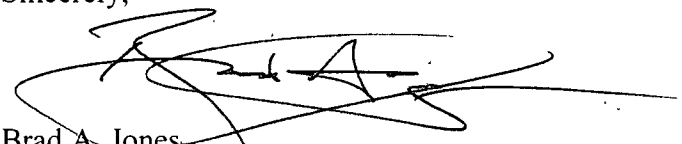
4. Upon removal of the chloride impacted soils from Cell 8 of the Southern Union landfarm, Southern Union shall conduct chloride field tests to determine if the soil beneath Cell 8's treatment zone has been impacted, as a preliminary assessment. Southern Union shall collect a series of soil samples six (6) inches to one (1) foot below the ground surface from Cell 8 and analyze for chlorides. Southern Union shall analyze a confirmation (composite) sample for chlorides, as determined by EPA method 300.0 or Standard Method 4500B.

5. Southern Union shall submit a report to the OCD within 45 days of the removal of the chloride impacted soil. The report shall include the results of the chloride field tests, the confirmation laboratory analysis, a site map that illustrates the associated sampling points, a copy of the form C-138, and photo documentation of the removal of the soil.

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

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District I Office, Hobbs
Joel Lowry, Basin Environmental Consulting, LLC, Lovington, NM

Southern Union Gas Services

RECEIVED OCD

2010 JUN 16 P 1:21

Date: 6/14/2010

To: Mr. Brad Jones

Cc: Camille Bryant

From: Rose L. Slade

Subject: Request for disposal of 1,500 cubic yards of impacted soil

Dear Mr. Jones:

Southern Union Gas Services is pleased to submit the attached request for disposal of 1,500 cubic yards of impacted soil dated May 2010, for Southern Union Gas Land farm. The land farm is located in Section 36 of Township 23 South, and Range 36 East. This report details activities conducted to date and future activities to be conducted to continue soil remediation at the land farm.

Should you have any questions or comments, please contact me at (432) 940-5147 or email at rose.slade@sug.com

Sincerely,

Rosa L. Slade

Rosa L. Slade
EHS Compliance Specialist
432-940-5147 (CELL)
432-943-1116 (OFFICE)
1507 W. 15th
Monahans,TX. 79756

Basin Environmental Consulting, LLC

2800 Plains Highway
P. O. Box 381
Lovington, New Mexico 88260
jwlowry@basin-consulting.com
Office: (575) 396-2378 Fax: (575) 396-1429

Effective Solutions

May 2010

Mr. Brad Jones
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Request of Disposal of approximately 1,500 cubic yards of Chloride Impacted Soil
Southern Union Gas Services
Southern Union Landfarm – Permit #NM-02-0019
SE ¼ of the NW ¼ of Section 36, Township 23 South, Range 36 East
Lea County, New Mexico

Dear Mr. Jones:

Basin Environmental Consulting, LLC (Basin), at the request of Southern Union Gas Services (Southern Union), assumed maintenance and reporting responsibilities of the Southern Union Landfarm in December 2009. The Southern Union Landfarm is being operated and maintained in accordance with New Mexico Oil Conservation Division (NMOCD), Natural Resources and Wildlife, Oil and Gas Surface Waste Management Facilities (Title 19 Chapter 15 Part 36). The Landfarm is operated by Southern Union as a "centralized" facility for Southern Union use only. For additional information please reference the 2009 *Annual Report.* A site and sample location map is attached.

On December 15, 2009, during the bi-annual sampling event, Basin collected one (1) to five (5) four-point composite treatment zone soil samples from each of the fifteen (15) treatment cells being utilized. The soil samples were delivered to Xenco Laboratories of Odessa, Texas and analyzed for concentrations of Total Petroleum Hydrocarbons (TPH) and chloride. TPH concentrations ranged from 61.5 mg/Kg for soil sample TZ Cell 14 G1 to 4,398 mg/Kg for soil sample TZ Cell 3 G1. The laboratory analytical results indicate hydrocarbon impacted soil in the treatment cells is naturally attenuating within the lifts. Laboratory analytical results are attached.

Laboratory analytical results indicated chloride concentrations were less than the NMOCD regulatory standards for Surface Waste Management Facilities for each of the soil samples submitted, with the exception of soil sample TZ Cell 8 G1, which exhibited a chloride concentration of 2,050 mg/Kg. Based on laboratory analytical results from the treatment zone soil sample (TZ Cell 8 G1), Southern Union is

requesting NMOCD approval to dispose of approximately 1,500 cubic yards (cy) of chloride impacted soil from Cell 8 at Sundance Services, Inc (NMOCD Permit # NM-01003).

On NMOCD approval and the subsequent disposal of the soil represented by soil sample TZ Cell 8 G1, Basin, on behalf of Southern Union will conduct chloride field tests to determine if the soil beneath the Cell 8 treatment zone has been impacted. This determination will be achieved by collecting a series of soil samples six (6)-inches to one (1)-foot below ground surface (bgs) from Cell 8 and analyzing the soil samples for chloride concentrations. Results from the chloride field test will be reported to the NMOCD and confirmation laboratory analysis will be conducted, if requested by the NMOCD.

Should you have any questions or concerns, please contact Rose Slade at 432-940-5147 or me at (575) 707-3476.

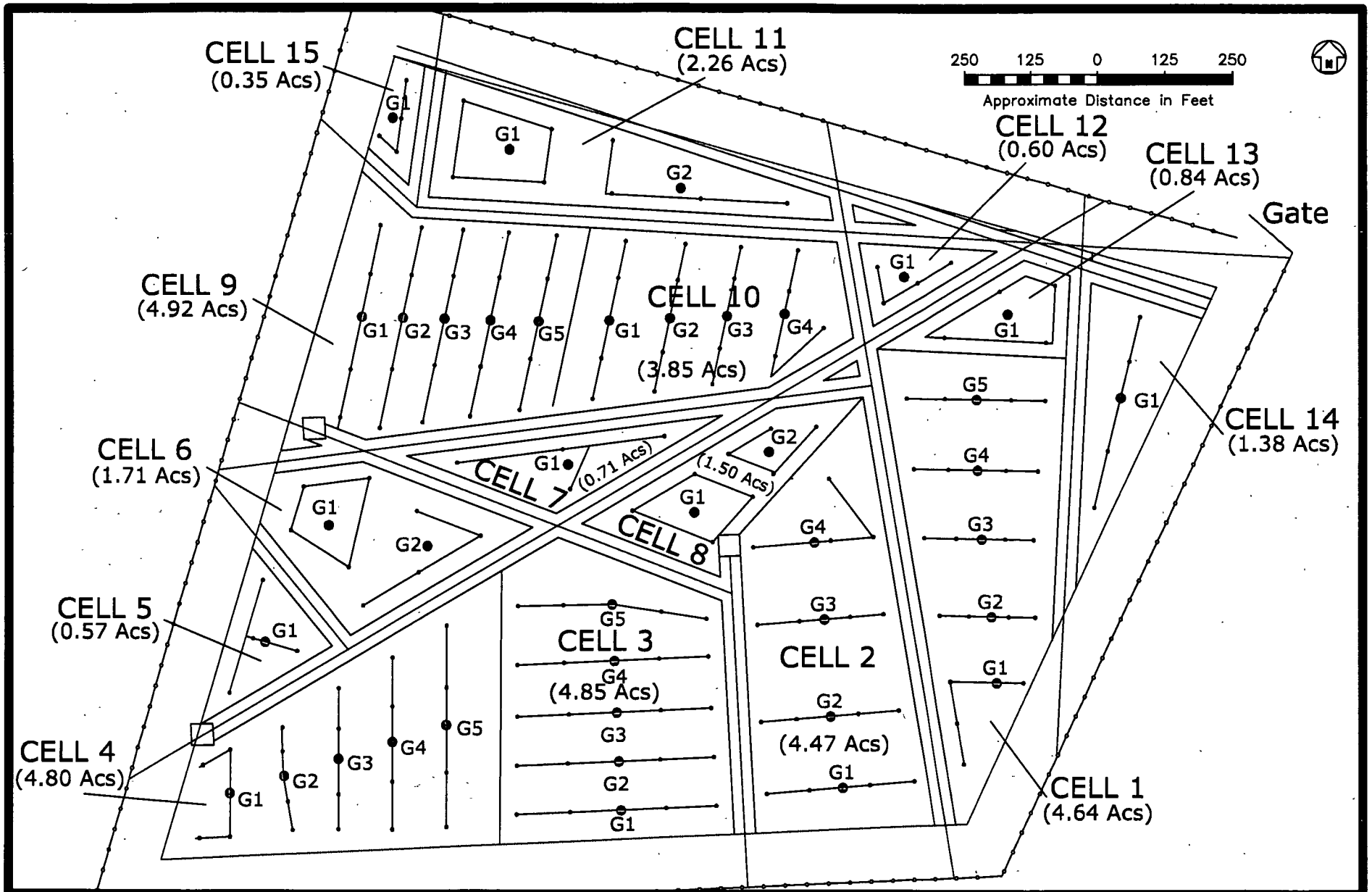
Respectfully submitted,

Joel Lowry

Joel W. Lowry
Basin Environmental Consulting, LLC

Cc:
Rose Slade, Southern Union Gas Services, Monahans, Texas (rose.slade@sug.com)
Joel Lowry, Basin Environmental Consulting, Lovington, NM (jwlowry@basin-consulting.com)

Attachments: Site and Sample Location Map
2009 Concentrations of Benzene, BTEX, TPH and Chlorides in the Treatment Zone.



Legend:
- Pipeline
- Fenceline
- Landfarm Extent
- Individual Cell Extent
- Vadose Zone Sample Location
- Treatment Zone Composite Sample Location

Figure 1
Site and Sample Location Map
Southern Union Gas Services
Landfarm
Lea County, New Mexico
NM2-19-0

Basin Environmental Consulting

Prep By: CDS	Checked By: CDS
February 19, 2009	Scale: Approximately 1"=100'

TABLE 1

2009 CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN THE TREATMENT ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD Permit #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030						METHOD: 8015M					TOTAL TPH C_6-C_{28} (mg/Kg)	TOTAL TPH C_6-C_{35} (mg/Kg)	EPA 300 Chloride (mg/kg)
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M,P-XYLENES (mg/Kg)	O-XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C_6-C_{12} (mg/Kg)	GRO C_6-C_{10} (mg/Kg)	DRO C_{12}-C_{28} (mg/Kg)	DRO C_{10}-C_{28} (mg/Kg)	ORO C_{28}-C_{35} (mg/Kg)			
Cell #7 - Comp	-	4/20/2009	-	-	-	-	-	-	-	<10 0	-	55 1	-	55 1	-	-
Cell #11 - Comp	-	4/20/2009	-	-	-	-	-	-	-	<10 0	-	114	-	114	-	-
Cell #12 - Comp	-	4/20/2009	-	-	-	-	-	-	-	<10 0	-	<10 0	-	<10 0	-	-
Cell #13 - Comp	-	4/20/2009	-	-	-	-	-	-	-	<10 0	-	754	-	754	-	-
Cell #14 - Comp	-	4/20/2009	-	-	-	-	-	-	-	<10 0	-	161	-	161	-	-
Cell #2 North Comp	-	4/21/2009	-	-	-	-	-	-	-	<10 0	-	696	-	696	-	-
Cell #2 South Comp	-	4/21/2009	-	-	-	-	-	-	-	<10 0	-	1,080	-	1,080	-	-
Cell #15 Comp	-	4/21/2009	-	-	-	-	-	-	-	<10 0	-	179	-	179	-	-
TZ Cell 14 C1	-	12/15/2009	-	-	-	-	-	-	<17 6	-	61 5	-	<17 6	-	61 5	<4 92
TZ Cell 1 G1	-	12/15/2009	-	-	-	-	-	-	<16 2	-	670	-	81	-	751	61 5
TZ Cell 1 G2	-	12/15/2009	-	-	-	-	-	-	<15 8	-	582	-	74	-	656	98
TZ Cell 1 G3	-	12/15/2009	-	-	-	-	-	-	<16 4	-	1,060	-	134	-	1,194	231
TZ Cell 1 G4	-	12/15/2009	-	-	-	-	-	-	53 7	-	1,230	-	113	-	1,396 7	300
TZ Cell 1 G5	-	12/15/2009	-	-	-	-	-	-	<18 3	-	189	-	21 5	-	210 5	44 8
TZ Cell 2 G1	-	12/15/2009	-	-	-	-	-	-	<18 8	-	65 2	-	<18 8	-	65 2	7 83
TZ Cell 2 G2	-	12/15/2009	-	-	-	-	-	-	<16 0	-	307	-	50 4	-	357 4	161
TZ Cell 2 G3	-	12/15/2009	-	-	-	-	-	-	<18 9	-	140	-	19.6	-	159 6	144
TZ Cell 2 G4	-	12/15/2009	-	-	-	-	-	-	<19 1	-	136	-	21 8	-	157 8	45 6
TZ Cell 3 G1	-	12/15/2009	-	-	-	-	-	-	<307	-	3,860	-	538	-	4,398	16 2
TZ Cell 3 G2	-	12/15/2009	-	-	-	-	-	-	<16 8	-	630	-	67 5	-	697 5	26 3
TZ Cell 3 G3	-	12/15/2009	-	-	-	-	-	-	<80 9	-	2,930	-	365	-	3,295	26 6
TZ Cell 3 G4	-	12/15/2009	-	-	-	-	-	-	<81.9	-	2,120	-	247	-	2,367	15 8
TZ Cell 3 G5	-	12/15/2009	-	-	-	-	-	-	<16.8	-	489	-	47 4	-	536.4	17.8
TZ Cell 4 G1	-	12/15/2009	-	-	-	-	-	-	<18.1	-	428	-	32 2	-	460 2	18
TZ Cell 4 G2	-	12/15/2009	-	-	-	-	-	-	<80 1	-	3,320	-	339	-	3,659	39 7
TZ Cell 4 G3	-	12/15/2009	-	-	-	-	-	-	<19.6	-	436	-	31.4	-	467 4	9 49
TZ Cell 4 G4	-	12/15/2009	-	-	-	-	-	-	<18 3	-	302	-	22.4	-	324 4	16 1
TZ Cell 4 G5	-	12/15/2009	-	-	-	-	-	-	<16 3	-	985	-	87 8	-	1,072 8	31
TZ Cell 8 G1	-	12/15/2009	-	-	-	-	-	-	<218	-	3,910	-	405	-	4,315	2,050

TABLE 1

2009 CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN THE TREATMENT ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD Permit #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030						METHOD: 8015M					TOTAL TPH C_6-C_{28} (mg/Kg)	TOTAL TPH C_6-C_{35} (mg/Kg)	EPA 300 Chloride (mg/kg)
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M,P-XYLENES (mg/Kg)	O-XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C_6-C_{12} (mg/Kg)	GRO C_6-C_{10} (mg/Kg)	DRO C_{12}-C_{28} (mg/Kg)	DRO C_{10}-C_{28} (mg/Kg)	ORO C_{28}-C_{35} (mg/Kg)			
TZ Cell 8 G2	-	12/15/2009	-	-	-	-	-	-	<18 6	-	95	-	<18 6	-	95	<10 4
TZ Cell 7 G1	-	12/15/2009	-	-	-	-	-	-	<18 5	-	267	-	30 9	-	297 9	17 1
TZ Cell 5 G1	-	12/15/2009	-	-	-	-	-	-	<15.3	-	82 2	-	51 9	-	134 1	<4 28
TZ Cell 6 G1	-	12/15/2009	-	-	-	-	-	-	<18 4	-	98 7	-	18 7	-	117 4	<20 6
TZ Cell 6 G2	-	12/15/2009	-	-	-	-	-	-	<18 5	-	177	-	30	-	207	36 5
TZ Cell 9 G1	-	12/15/2009	-	-	-	-	-	-	<17 7	-	71.9	-	18	-	89 9	156
TZ Cell 9 G2	-	12/15/2009	-	-	-	-	-	-	<16 2	-	194	-	71 7	-	265 7	152
TZ Cell 9 G3	-	12/15/2009	-	-	-	-	-	-	<17 0	-	86 9	-	28 8	-	115 7	58 6
TZ Cell 9 G4	-	12/15/2009	-	-	-	-	-	-	<16 3	-	210	-	58 2	-	268 2	43 5
TZ Cell 9 G5	-	12/15/2009	-	-	-	-	-	-	<15.4	-	164	-	63 5	-	227 5	81 6
TZ Cell 10 G1	-	12/15/2009	-	-	-	-	-	-	<17 8	-	276	-	50.9	-	326 9	9 63
TZ Cell 10 G2	-	12/15/2009	-	-	-	-	-	-	<16 2	-	217	-	52.4	-	269 4	11 9
TZ Cell 10 G3	-	12/15/2009	-	-	-	-	-	-	<17.0	-	96 8	-	24.1	-	120 9	9 06
TZ Cell 10 G4	-	12/15/2009	-	-	-	-	-	-	<18 9	-	129	-	19.2	-	148.2	10
TZ Cell 15 G1	-	12/15/2009	-	-	-	-	-	-	<16 7	-	226	-	95	-	321	<46.9
TZ Cell 11 G1	-	12/15/2009	-	-	-	-	-	-	26 7	-	589	-	27 9	-	643 6	128
TZ Cell 11 G2	-	12/15/2009	-	-	-	-	-	-	27	-	488	-	49.7	-	564.7	161
TZ Cell 12 G1	-	12/15/2009	-	-	-	-	-	-	<16.2	-	302	-	38 1	-	340.1	<22 6
TZ Cell 13 G1	-	12/15/2009	-	-	-	-	-	-	20	-	597		64 6	-	681 6	291

TABLE 4

2009 CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN THE VADOSE ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD Permit #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030						METHOD: 8015M					TOTAL TPH C_6-C_{28} (mg/Kg)	TOTAL TPH C_6-C_{35} (mg/Kg)	EPA 300 Chloride (mg/kg)
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M,P-XYLENES (mg/Kg)	O-XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C_6-C_{12} (mg/Kg)	GRO C_6-C_{10} (mg/Kg)	DRO C_{12}-C_{28} (mg/Kg)	DRO C_{10}-C_{28} (mg/Kg)	ORO C_{28}-C_{35} (mg/Kg)			
Cell #7 - Core @ 24"	2' bgs	4/20/2009	<0 050	<0 050	<0 050	<0.0300		<0 050	-	<10 0	-	<10 0	-	<10 0	-	<16
Cell #11 - Core @ 24"	2' bgs	4/20/2009	<0 050	<0.050	<0 050	<0 0300		<0 050	-	<10 0	-	<10 0	-	<10.0	-	48
Cell #12 - Core @ 24"	2' bgs	4/20/2009	<0 050	<0 050	<0 050	<0 0300		<0 050	-	<10 0	-	<10 0	-	<10 0	-	<16
Cell #13 - Core @ 24"	2' bgs	4/20/2009	<0 050	<0.050	<0 050	<0 0300		<0 050	-	<10 0	-	<10 0	-	<10 0	-	32
Cell #14 - Core @ 24"	2' bgs	4/20/2009	<0.050	<0 050	<0 050	<0 0300		<0 050	-	<10 0	-	<10 0	-	<10 0	-	<16
Cell #2 Core @ 24"	2' bgs	4/21/2009	<0.050	<0 050	<0 050	<0 0300		<0 050	-	<10 0	-	<10 0	-	<10 0	-	<16
Cell #15 Core @ 24"	2' bgs	4/21/2009	<0.050	<0 050	<0 050	<0 0300		<0 050	-	<10.0	-	<10 0	-	<10 0	-	16
VZ Cell 14 C1	3'-4' bgs	12/16/2009	<0.0011	<0.0023	<0 0011	<0 0023	<0 0011	<0.0023	<17 0	-	<17 0	-	<17.0	-	<17 0	25 1
VZ Cell 1 G1	3'-4' bgs	12/16/2009	<0 0011	<0.0023	<0.0011	<0 0023	<0 0011	<0 0023	<17 0	-	<17 0	-	<17.0	-	<17 0	<4 79
VZ Cell 1 G2	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0.0011	<0 0022	<0 0011	<0.0022	<16 2	-	<16 2	-	<16.21	-	<16 2	<4 55
VZ Cell 1 G3	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0.0022	<0 0011	<0 0022	<16 6	-	<16 6	-	<16 6	-	<16 6	46 9
VZ Cell 1 G4	3'-4' bgs	12/16/2009	<0 0011	<0.0021	<0 0011	<0 0021	<0 0011	<0 0021	<16 1	-	<16 1	-	<16.1	-	<16 1	15.7
VZ Cell 1 G5	3'-4' bgs	12/16/2009	<0 0011	<0 0021	<0 0011	<0.0021	<0 0011	<0 0021	<15 8	-	<15 8	-	<15.8	-	<15.8	4 57
VZ Cell 2 G1	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0.0011	<0.0022	<0 0011	<0 0022	<16 2	-	<16 2	-	<16.2	-	<16 2	14 4
VZ Cell 2 G2	3'-4' bgs	12/16/2009	<0 0011	<0.0022	<0.0011	<0 0022	<0 0011	<0 0022	<16 1	-	<16 1	-	<16 1	-	<16 1	<4.53
VZ Cell 2 G3	3'-4' bgs	12/16/2009	<0 0011	<0 0023	<0.0011	<0 0023	<0 0011	<0 0023	<17 1	-	<17 1	-	<17 1	-	<17 1	31 2
VZ Cell 2 G4	3'-4' bgs	12/16/2009	<0.0011	<0 0021	<0 0011	<0.0021	<0 0011	<0 0021	<16 1	-	<16 1	-	<16 1	-	<16 1	10 6
VZ Cell 3 G1	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0.0011	<0 0022	<0 0011	<0.0022	<16 7	-	<16 7	-	<16 7	-	<16 7	7 03
VZ Cell 3 G2	3'-4' bgs	12/16/2009	<0 0011	<0 0023	<0 0011	<0 0023	<0 0011	<0 0023	<16 9	-	<16 9	-	<16 9	-	<16 9	<16 9
VZ Cell 3 G3	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0.0011	<0.0022	<0 0011	<0 0022	<16 6	-	<16 6	-	<16 6	-	<16 6	11.5
VZ Cell 3 G4	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0 0011	<0.0022	<0 0011	<0 0022	<16 6	-	<16 6	-	<16 6	-	<16 6	5.35
VZ Cell 3 G5	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 9	-	<16 9	-	<16 9	-	<16 9	<4.73
VZ Cell 4 G1	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0 0011	<0.0022	<0 0011	<0 0022	<16 9	-	<16 9	-	<16 9	-	<16.9	<4 74
VZ Cell 4 G2	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0 0011	<0.0022	<0.0011	<0 0022	<16 2	-	<16 2	-	<16 2	-	<16 2	8 56
VZ Cell 4 G3	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0.0022	<0 0011	<0 0022	<16 4	-	<16 4	-	<16.4	-	<16 4	12 9
VZ Cell 4 G4	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 6	-	<16 6	-	<16 6	-	<16 6	<4.64
VZ Cell 4 G5	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 6	-	<16 6	-	<16 6	-	<16.6	<4.64
VZ Cell 8 G1	3'-4' bgs	12/16/2009	<0 0012	<0 0024	<0 0012	<0.0024	<0 0012	<0 0024	<17 7	-	<17 7	-	<17.7	-	<17 7	63

TABLE 4

2009 CONCENTRATIONS OF BENZENE, BTEX, TPH AND CHLORIDE IN THE VADOSE ZONE

SOUTHERN UNION GAS SERVICES
SOUTHERN UNION LAND FARM
LEA COUNTY, NEW MEXICO
NMOCD Permit #NM-02-19

SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	METHOD: EPA SW 846-8021B, 5030						METHOD: 8015M					TOTAL TPH C_6-C_{28} (mg/Kg)	TOTAL TPH C_6-C_{35} (mg/Kg)	EPA 300 Chloride (mg/kg)
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	M,P-XYLENES (mg/Kg)	O-XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C_6-C_{12} (mg/Kg)	GRO C_6-C_{10} (mg/Kg)	DRO C_{12}-C_{28} (mg/Kg)	DRO C_{10}-C_{28} (mg/Kg)	ORO C_{28}-C_{35} (mg/Kg)			
VZ Cell 8 G2	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0.0011	<0 0022	<16 5	-	<16 5	-	<16 5	-	<16 5	33 4
VZ Cell 7 G1	3'-4' bgs	12/16/2009	<0 0011	<0 0021	<0 0011	<0.0021	<0 0011	<0 0021	<16 2	-	<16 2	-	<16 2	-	<16 2	<4 55
VZ Cell 5 G1	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 6	-	<16 6	-	<16 6	-	<16 6	<4 65
VZ Cell 6 G1	3'-4' bgs	12/16/2009	<0 0011	<0.0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 7	-	<16.7	-	<16 7	-	<16.7	<4 68
VZ Cell 6 G2	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0.0011	<0 0022	<0 0011	<0 0022	<16 7	-	<16 7	-	<16 7	-	<16 7	<4 68
VZ Cell 9 G1	3'-4' bgs	12/16/2009	<0 0012	<0 0023	<0.0012	<0.0023	<0 0012	<0 0023	<17 8	-	<17.8	-	<17 8	-	<17 8	9.3
VZ Cell 9 G2	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0.0011	<0 0022	<0 0011	<0 0022	<16 4	-	<16 4	-	<16 4	-	<16 4	5 13
VZ Cell 9 G3	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0.0022	<16 1	-	<16 1	-	<16 1	-	<16 1	10 7
VZ Cell 9 G4	3'-4' bgs	12/16/2009	<0.0012	<0 0023	<0 0012	<0.0023	<0 0012	<0 0023	<17 4	-	<17.4	-	<17 4	-	<17 4	19 9
VZ Cell 9 G5	3'-4' bgs	12/16/2009	<0.0011	<0 0023	<0.0011	<0.0023	<0 0011	<0 0023	<17 1	-	<17 1	-	<17 1	-	<17 1	27 5
VZ Cell 10 G1	3'-4' bgs	12/16/2009	<0 0011	<0 0021	<0 0011	<0 0021	<0 0011	<0 0021	<16 0	-	<16 0	-	<16 0	-	<16 0	43 9
VZ Cell 10 G2	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 2	-	<16 2	-	<16.2	-	<16 2	9 7
VZ Cell 10 G3	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 1	-	<16 1	-	<16 1	-	<16 1	173
VZ Cell 10 G4	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 2	-	<16 2	-	<16 2	-	<16 2	<4 55
VZ Cell 15 G1	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 2	-	<16 2	-	<16 2	-	<16 2	17
VZ Cell 11 G1	3'-4' bgs	12/16/2009	<0.0012	<0 0023	<0 0012	<0 0023	<0 0012	<0 0023	<17 2	-	<17 2	-	<17.2	-	<17.2	<4 83
VZ Cell 11 G2	3'-4' bgs	12/16/2009	<0 0011	<0 0022	<0 0011	<0.0022	<0 0011	<0 0022	<16 7	-	<16 7	-	<16 7	-	<16 7	9 78
VZ Cell 12 G1	3'-4' bgs	12/16/2009	<0.0011	<0 0022	<0 0011	<0 0022	<0 0011	<0 0022	<16 4	-	<16.4	-	<16 4	-	<16 4	14 8
VZ Cell 13 G1	3'-4' bgs	12/16/2009	<0 0011	<0 0021	<0 0011	<0.0021	<0 0011	<0 0021	<15 7	-	<15 7	-	<15.7	-	<15 7	81 4
Background	-	**4/11/2001**	**<0.025**	**<0.025**	**<0.025**	**<0.04**	**<0.025**	-	-	-	-	-	-	**134**	**134**	**<10**

SRES Landfarm 2005 Activity

DATE	Company	Activity
1/4/2005	Ocotillo Env.	Blade off weeds, grub mesquite, build berms.
1/6/2005	Ocotillo Env.	Grub mesquites, rebuild berms.
1/7/2005	Ocotillo Env.	Grub mesquites, level cells.
1/10/2005	Ocotillo Env.	Grub mesquites, level cells.
1/11/2005	Ocotillo Env.	Load, haul, and spread caliche on roads. Grub mesquites.
1/15/2005	Ocotillo Env.	Plow landfarm
1/16/2005	Ocotillo Env.	Plow landfarm
2/2/2005	Ocotillo Env.	Blend soil, level piles to plow, grub mesquites.
2/9/2005	Ocotillo Env.	Measure and layout grid for sampling cells #3,4,5,6,& 10
2/10/2005	Ocotillo Env.	Collect samples, run PID, composite bags, Jar samples. Cells #3 and #4
2/11/2005	Ocotillo Env.	Core sample center of cells #3, #4, and #6. Run PID, deliver samples to lab, Grub mesquites.
2/14/2005	Ocotillo Env.	Collect composite samples, core samples cell #10, run PID, jar samples, plug core hole.
2/15/2005	Ocotillo Env.	Collect samplesc cell #2, run PID, Jar samples, deliver to Lab, grub mesquites and level cells.
2/16/2005	Ocotillo Env.	Grub mesquites, level cells.
2/25/2005	ELOT	Run 11 TPH and 4 BTEX soil samples.
3/8/2005	Ocotillo Env.	Spread and level soil to plow.
3/9/2005	Ocotillo Env.	Grub mesquites, repair berms, level cell bottom.
4/12/2005	Ocotillo Env.	Level soil to plow, grub mesquites, level cell bottom.
4/30/2005	Ocotillo Env.	Plow cells #2,3,4, and 6
5/1/2005	Ocotillo Env.	Plow cells #9, 10
5/2/2005	Ocotillo Env.	Level soil piles, grub mesquites, bury brush pile. Cell #1 and 7
5/10/2005	Ocotillo Env.	Grub mesquites.
5/20/2005	Ocotillo Env.	Level soil piles, grub mesquites.
5/23/2005	Ocotillo Env.	Grub mesquites, level cell bottom.
6/12/2005	Ocotillo Env.	Plow cells #2,3,4, and 5
6/13/2005	Ocotillo Env.	Plow cells #6,7,9, and 10
6/20/2005	Ocotillo Env.	Level soil for plowing, grub mesquites.
6/22/2005	Ocotillo Env.	Grub mesquites.
6/23/2005	Ocotillo Env.	Level cells, grub mesquites, remove large rocks, plow landfarm.
6/24/2005	Ocotillo Env.	Grub mesquites, work on perimeter road.
6/27/2005	Ocotillo Env.	Grub and pile up mesquites.
6/28/2005	Ocotillo Env.	Grub and pile up mesquites.
6/29/2005	Ocotillo Env.	Grub mesquites, re-build berms.
7/23/2005	Ocotillo Env.	Plow cells #1,2,3,4, and 5
8/11/2005	Ocotillo Env.	Plow cells #2,3,4, and 5
8/12/2005	Ocotillo Env.	Plow cells #6,7,9, and 10
8/18/2005	Ocotillo Env.	Level soil piles, dig out mesquite stumps, remove rocks.
8/23/2005	Ocotillo Env.	Plow cells #6,7,9, and 10
8/28/2005	Ocotillo Env.	Plow cells #1,2,3,4, and 5
8/29/2005	Ocotillo Env.	Plow cells #6,7,9, and 10
9/19/2005	Ocotillo Env.	Grub mesquites, rebuild berms.
9/24/2005	Ocotillo Env.	Plow cells #1,2,3,4, and 5
9/25/2005	Ocotillo Env.	Plow cells #6,7,9, and 10
10/8/2005	Ocotillo Env.	Plow cells #1,2,3,4, and 5
10/9/2005	Ocotillo Env.	Plow cells #6,7,9, and 10
10/14/2005	Ocotillo Env.	Grub mesquites, rebuild berms.
10/22/2005	Ocotillo Env.	Plow cells #1,2,3,4, and 5
10/24/2005	Ocotillo Env.	Sample Cell #2
10/25/2005	Ocotillo Env.	Sample Cell #3

SRES Landfarm 2005

Date Collected	Location	GRO	DRO	Total	Chloride	Benzene	Toluene	Ethylbenzene	p/m-Xylene	o-Xlyene
		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
	Cell #2									
2/15/2005	SC-Comp.	ND	346	346						
2/15/2005	MC-Comp.	ND	195	195						
2/15/2005	NC-Comp.	ND	116	116						
10/25/2005	2'-Core	ND	32.9	32.9		ND	ND	ND	ND	ND
10/25/2005	Cell #2-Comp.	ND	237	237						
10/25/2005	Unit #7-#5	ND	93.4	93.4						
11/29/2005	Cell #2@24"				20.6					
	Cell #3									
2/10/2005	#3-Comp.	ND	156	156						
2/10/2005	#3 Core @ 24 inch					ND	ND	J(0.0223)	0.054	0.0259
10/25/2005	2'-Core	ND	ND	ND		ND	ND	ND	ND	ND
10/25/2005	Cell #3-Comp.	ND	248	248						
10/25/2005	Unit #23-4	ND	13.4	13.4						
11/29/2005	Cell #3@24"				9.81					
	Cell #4									
2/10/2005	#4-Comp.	ND	441	441						
2/10/2005	#4 Core @ 24 inch					ND	ND	J(0.0178)	0.0428	J(0.0167)
10/26/2005	Cell #4-Comp.	ND	282	282		ND	ND	ND	ND	ND
10/26/2005	2'-Core	ND	ND	ND		ND	ND	ND	ND	ND
11/29/2005	Cell #4@24"				7.24					

SRES Landfarm 2005

Date Collected	Location	GRO	DRO	Total	Chloride	Benzene	Toluene	Ethylbenzene	p/m-Xylene	o-Xlyene
		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
	Cell #6									
2/11/2005	#6-Comp.	ND	218	218						
2/11/2005	#6 Core @ 24 inch					ND	ND	ND	ND	ND
10/26/2005	Cell #6-Comp.	ND	76.6	76.6		ND	ND	ND	ND	ND
10/26/2005	2'-Core	ND	ND	ND		ND	ND	ND	ND	ND
11/29/2005	Cell #6@24"				8.81					
	Cell #7									
10/26/2005	Cell #7-Comp.	ND	214	214		ND	ND	ND	ND	ND
10/26/2005	2'-Core	ND	ND	ND		ND	ND	ND	ND	ND
11/29/2005	Cell #7@24"				8.45					
	Cell #9									
10/28/2005	2' Core	ND	ND	ND		ND	ND	ND	ND	ND
10/28/2005	Unit-8-#1	ND	ND	ND		ND	ND	ND	ND	ND
10/28/2005	Cell #9-Comp.	J(5.52)	355	355						
11/29/2005	Cell #9@24"				123					
	Cell #10									
2/14/2005	Cell #10-Comp.	ND	154	154						
2/14/2005	Cell #10-Core @ 24 inches					ND	ND	ND	ND	ND
10/27/2005	Cell #10	ND	103	103		ND	ND	ND	ND	ND
10/27/2005	2'-Core	ND	ND	ND		ND	ND	ND	ND	ND
11/29/2005	Cell #10@24"				855					

SRES Landfarm 2005 Activity

DATE	Company	Activity
10/26/2005	Ocotillo Env.	Sample Cell #4
10/27/2005	Ocotillo Env.	Sample Cell #10
10/28/2005	Ocotillo Env.	Sample Cell #9
10/31/2005	Ocotillo Env.	Rebuild Berms
11/1/2005	Ocotillo Env.	Grub mesquites, rebuild berms.
11/4/2005	ELOT	Run 3 TPH and 1 BTEX soil samples.
11/4/2005	ELOT	Run 3 TPH and 1 BTEX soil samples.
11/5/2005	Ocotillo Env.	Plow cells #2,3,4, and 5
11/6/2005	Ocotillo Env.	Plow cells #7,9, and 10
11/14/2005	ELOT	Run 8 TPH and 8 BTEX soil samples.
11/14/2005	ELOT	Run 3 TPH and 2 BTEX soil samples.
11/19/2005	Ocotillo Env.	Plow cells #2,3, and 7
11/20/2005	Ocotillo Env.	Plow cells #1, 4, and 9
11/29/2005	Ocotillo Env.	Core sample cells #2,3,4,6,7,9,10 for chloride samples.
11/30/2005	Ocotillo Env.	Grub mesquites.

TONY SANDIE

SOUTHERN UNION GAS

Attachment 2-19

Sid Richardson Lea County Landfarm

Job #	Site Name	Date hauled	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Cell 6	Cell 7	Cell 8	Cell 9	Cell 10	Cell 11	Cell 12	Cell 13	Cell 14	Cell 15	Generated	RCRA
01053	M. Deck	7/9/2001			260													Gath.pipeline	Exempt
01055	Bettis	7/3/2001			900													Gath.pipeline	Exempt
01056	Myers	8/31/2001			204													Gath.pipeline	Exempt
01066	Bettis #2	9/12/2001			160													Gath.pipeline	Exempt
01073	Boyd-Hill "B"	11/5/2001			336													Gath.pipeline	Exempt
01074	Trunk MC 16"	11/13/2001			252													Gath.pipeline	Exempt
Cell Totals cu.yds.			**0**	**0**	**2112**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**		
2001 Total		**2112**																	
Cell	**Capacity cu.yds.**	**% Full**																	
2	7200	1.94%																	
3	7800	27.08%																	

Sid Richardson Lea County Landfarm

Job #	Site Name	Date hauled	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Cell 6	Cell 7	Cell 8	Cell 9	Cell 10	Cell 11	Cell 12	Cell 13	Cell 14	Cell 15	Generated	RCRA
2001-003	C3-4"	2/22/2002			564			60										Gath.pipeline	Exempt
2001-006	House 4"	1/4/2002		140														Gath.pipeline	Exempt
2002-001	Carlson 8"	3/15/2002		168														Gath.pipeline	Exempt
2002-004	4-C-4 10"	4/19/2002		96														Gath.pipeline	Exempt
2002-006	Adobe	4/2/2002		9														Gath. Tank runover	Exempt
2002-012	Halley drums	4/30/2002					11											Compressor site	Non-exempt
2002-019	Owens 4"	7/12/2002		564														Gath.pipeline	Exempt
2002-020	Putnam Treater	7/30/2002		2														Gath. pipeline	Exempt
2002-021	Crawford mill	7/30/2002		4														pigging waste	Exempt
2002-022	Howe Comp.	7/30/2002		4														pigging waste	Exempt
2002-025	Keystone W-20"	9/10/2002		612														Gath.pipeline	Exempt
2002-026	Howe Disch.8"	9/12/2002		84														Gath.pipeline	Exempt
2002-027	State JM 4"	9/25/2002		72														Gath.pipeline	Exempt
2002-035	Lanehart 10"	11/8/2002		96														Gath.pipeline	Exempt
2002-039	Keystone M-20"	12/17/2002		180														Gath.pipeline	Exempt
2002 Cell Totals cu.yds.			**0**	**2031**	**564**	**0**	**11**	**60**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**		
2002 Total		**2666**																	
Land Farm total		**4778**	**0**	**2031**	**2676**	**0**	**11**	**60**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**		

Cell	Capacity cu.yds.	% Full
2	7200	28.21%
3	7800	34.31%
5	900	1.22%
6	2750	2.18%

Sid Richardson Lea County Landfarm

Job #	Site Name	Date hauled	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Cell 6	Cell 7	Cell 8	Cell 9	Cell 10	Cell 11	Cell 12	Cell 13	Cell 14	Cell 15	Generated	RCRA
2003-001	2C 20"	2/28/2003			1760													Gath.pipeline	Exempt
2003-002	2C 20" old drip	3/15/2003				1290												Gath.pipeline	Exempt
2003-004	Kennan 4" Loop	4/30/2003				792												Gath.pipeline	Exempt
2003-006	Halley drums	5/28/2003					3											Compressor site	Non-exempt
2003-007	Bettis MF-16	6/6/2003				852												Gath.pipeline	Exempt
2003-008	Bettis MF-16	6/2/2003				750												Gath.pipeline	Exempt
2003-011	Bettis Boyd 10"	6/27/2003				108												Gath.pipeline	Exempt
2003-012	Trunk "A" C-drip	7/2/2003				660												Gath.pipeline	Exempt
2003-014	Texas H.P. 18" #1	7/21/2003				324												Gath.pipeline	Exempt
2003-015	Texas H.P. 18" #2	8/1/2003				564												Gath.pipeline	Exempt
2003-016	Waddell TXL 16"	7/1/2003				96												Gath.pipeline	Exempt
2003-017	Texas H.P. 18" #3	8/20/2003				1548												Gath.pipeline	Exempt
2003-019	2B Loop line	11/10/2003				528												Gath.pipeline	Exempt
2003-020	F.S. Drip Tank	10/27/2003			1500													Gath.pipeline	Exempt
2003-023	Station 143	8/26/2003					30											Compressor site	Non-exempt
	W.T.G. Comp.	8/26/2003					7											Compressor site	Non-exempt
	Howe Pigging	10/9/2003				1.5												pigging waste	Exempt
	W.T.G. Pigging	10/9/2003				3												pigging waste	Exempt
	Bedford Pigging	10/9/2003				1												pigging waste	Exempt
	California Pigging	12/8/2003				3												pigging waste	Exempt
2003 Cell Totals cu.yds.			**0**	**0**	**3260**	**7520.5**	**40**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**		
2003 Total		**10821**																	
Land Farm total		**15599**	**0**	**2031**	**5936**	**7520.5**	**51**	**60**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**		
Cell	**Capacity cu.yds.**	**% Full**																	
2	7200	28.21%																	
3	7800	76.10%																	
4	7700	97.67%																	
5	900	5.67%																	
6	2750	2.18%																	
9	7900	0.00%																	

Cell Volumes

Sid Richardson Lea County Landfarm

Job #	Site Name	Date hauled	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Cell 6	Cell 7	Cell 8	Cell 9	Cell 10	Cell 11	Cell 12	Cell 13	Cell 14	Cell 15	Generated	RCRA
2003-021	Kennan	1/13/2004									24							Gath.pipeline	Exempt
2003-029	Fullerton 16"	1/6/2004									156							Gath.pipeline	Exempt
2003-031	MF-5	1/14/2004									48							Gath.pipeline	Exempt
2003-032	Drip Tank #108	1/27/2004									12							Gath.pipeline	Exempt
2004-004	2A2-14" Doom	2/4/2004										3048						Gath.pipeline	Exempt
2004-005	4" Scrubber Line	3/9/2004									252							Gath.pipeline	Exempt
2004-006	Boyd Lateral	4/9/2004									144							Gath.pipeline	Exempt
2004-010	L-5 10" "Deck"	3/25/2004									540							Gath.pipeline	Exempt
2004-011	6" Jct. "Deck"	4/1/2004									312							Gath.pipeline	Exempt
2004-014	2A2-14" Doom	5/14/2004									288							Gath.pipeline	Exempt
2004-015	2A2-14" Doom	5/17/2004									1224							Gath.pipeline	Exempt
2004-016	L-6 Barber Est.	6/24/2004									744							Gath.pipeline	Exempt
2004-017	Penney 4"	6/17/2004									60							Gath.pipeline	Exempt
2004-019	Plains Truck yd.	7/6/2004									240							Gath.pipeline	Exempt
2004-021	Penney 4"	8/9/2004									156							Gath.pipeline	Exempt
2004-023	Maralo 4"	9/8/2004										120						Gath.pipeline	Exempt
2004-026	California B-1 #3	9/23/2004									24							Gath.pipeline	Exempt
2004-028	California B-1 #5	10/14/2004									432							Gath.pipeline	Exempt
2004-029	California B-1 #6	10/13/2004									72							Gath.pipeline	Exempt
2004-030	Dunbar 10"	10/29/2004									196							Gath.pipeline	Exempt
2004-031	Texas H.P. #1 Tx.	11/4/2004									516							Gath.pipeline	Exempt
2004-033	Texas H.P. #3 Tx.	11/11/2004									294							Gath.pipeline	Exempt
2004-035	Texas H.P. #2 NM	12/7/2004									406							Gath.pipeline	Exempt
2004-036	Texas H.P. #3 NM	12/16/2004							56			154						Gath.pipeline	Exempt
	WTG Spare unit	4/14/2004					1											Compressor site	Non-exempt
BGT-001	North Eunice Comp	6/15/2004									588							Gath.pipeline	Exempt
	Jal #3 Temp. Pit	9/10/2004									96							Gath.pipeline	Exempt
2004 Cell Totals cu.yds.			**0**	**0**	**0**	**0**	**1**	**0**	**56**	**0**	**6824**	**3322**	**0**	**0**	**0**	**0**	**0**		
2004 Total		**10203**																	
Land Farm total		**25802**	**0**	**2031**	**5936**	**7520.5**	**52**	**60**	**56**	**0**	**6824**	**3322**	**0**	**0**	**0**	**0**	**0**		

Cell	Capacity cu.yds.	% Full
2	7200	28.21%
3	7800	76.10%
4	7700	97.67%
5	900	5.78%
6	2750	2.18%
7	1140	4.91%
9	7900	86.38%
10	6200	53.58%

Cell Volumes

Sid Richardson Lea County Landfarm

Job #	Site Name	Date hauled	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Cell 6	Cell 7	Cell 8	Cell 9	Cell 10	Cell 11	Cell 12	Cell 13	Cell 14	Cell 15	Generated	RCRA
2004-036	Texas H.P. #3 NM	1/13/05										224						Gath.pipeline	Exempt
2004-037	Texas H.P. #4 NM	1/24/2005										420						Gath.pipeline	Exempt
2005-001	Walton Line 1-191	1/31/2005									60							Gath.pipeline	Exempt
2005-003	16" NNG Transfer	2/17/2005									112							Gath.pipeline	Exempt
2005-004	Bedford Comp.	2/22/2005									228							Gath.pipeline	Exempt
2005-006	Drip Tank #72	3/11/2005									72							Gath.pipeline	Exempt
2005-009	Steeler 4"	4/25/2005							230									Gath.pipeline	Exempt
2005-010	Trunk O-6	4/13/2005									300							Gath.pipeline	Exempt
2005-012	4C4 Doom	5/11/2005	3888						612									Gath.pipeline	Exempt
2005-017	Trestle/Apache	11/3/2005	204															Gath.pipeline	Exempt
AFE-G-63071	Halley Plant	1/22/2005	12															Gath.pipeline	Exempt
2005-022	Bedford/Fulfer	12/1/2005	180															Gath.pipeline	Exempt
2005-023	Trunk "O"	12/19/2005	180															Gath.pipeline	Exempt
2005 Cell Totals cu.yds.			**4464**	**0**	**0**	**0**	**0**	**0**	**842**	**0**	**772**	**644**	**0**	**0**	**0**	**0**	**0**		
2005 Total		**6722**																	
Land Farm total		**32524**	**4464**	**2031**	**5936**	**7520.5**	**52**	**60**	**898**	**0**	**7596**	**3966**	**0**	**0**	**0**	**0**	**0**		

Cell	Capacity cu.yds.	% Full
1	7476	59.71%
2	7200	28.21%
3	7800	76.10%
4	7700	97.67%
5	900	5.78%
6	2750	2.18%
7	1140	78.77%
9	7900	96.15%
10	6200	63.97%

Sid Richardson Lea County Landfarm

Job #	Site Name	Date hauled	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Cell 6	Cell 7	Cell 8	Cell 9	Cell 10	Cell 11	Cell 12	Cell 13	Cell 14	Cell 15	Generated	RCRA
2005-024	D.T. #108	1/5/2006	84															Gath.pipeline	Exempt
Coyanosa	Soil Piles	1/11/2006															252	Gath.pipeline	Exempt
2006-002	A-7 Loop Line	1/19/2006	792										888			936	288	Gath.pipeline	Exempt
2006-003	Weir 4" to 4C	2/2/2006														576			
2006-004	Boyd 10" #1	3/6/2006											504						
2006 Cell Totals cu.yds.			**876**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**1392**	**0**	**0**	**1512**	**540**		
2006 Total		**4320**																	
Land Farm total		**33400**	**5340**	**2031**	**5936**	**7520.5**	**52**	**60**	**898**	**0**	**7596**	**3966**	**1392**	**0**	**0**	**1512**	**540**		
Cell	**Capacity cu.yds.**	**% Full**																	
1	7476	71.43%																	
2	7200	28.21%																	
3	7800	76.10%																	
4	7700	97.67%																	
5	900	5.78%																	
6	2750	2.18%																	
7	1140	78.77%																	
9	7900	96.15%																	
10	6200	63.97%																	
11	3640	38.24%																	
12	966	0.00%																	
13	1353	0.00%																	
14	2223	68.02%																	
15	564	95.74%																	