Bratcher, Mike, EMNRD

From: Joel Lowry <jwlowry@basinenv.com>
Sent: Tuesday, December 11, 2012 10:00 AM
To: Bratcher, Mike, EMNRD
Cc: Rose Slade
Subject: Southern Union Gas -- South Tunstil (5/17/12)
Attachments: South Tunstil 5-17-12(NMOCD).pdf

Follow Up Flag: Follow up
Flag Status: Completed

Mr. Bratcher,

This email has been prepared in regards to Southern Union Gas's South Tunstil (5/17/12) environmental remediation site. The release site is located on property owned by the Bureau of Land Management; the depth to groundwater is approximately 180' bgs.

The release was discovered on May 17, 2012, and was reported to the NMOCD May 18, 2012. The initial C-141 indicated failure of a segment of 6" low pressure steel pipeline resulted in the release of approximately 40 bbls of crude oil, produced water and natural gas mixture. The release impacted approximately 510' of caliche road and 80' of a "dry road drainage". A BLM representative was notified of the release on May 21, 2012.

On August 13, 2012, Basin Environmental responded to the release site. Three (3) initial soil samples (Draw #1, Draw #2 and Draw #3) were collected from the affected wash at approximate 25' intervals. Soil samples were analyzed for concentrations of BTEX constituents, TPH and chloride. Laboratory analytical results indicated BTEX concentrations were less than the appropriate laboratory MDL in each of the submitted soil samples. TPH concentrations ranged from 808 mg/Kg for soil sample Draw #2 to 2,140 mg/Kg for soil sample Draw #3. Chloride concentrations ranged from 92.5 mg/Kg for soil sample Draw #3 to 160 mg/Kg for soil sample Draw #1. BTEX, TPH and chloride concentrations were less than NMOCD regulatory remediation action levels in each of the submitted soil samples.

On August 13, 2012, remediation of the affected "dry road drainage" commenced at the location. This was achieved by releasing a fresh water/fertilizer solution into the wash at a rate sufficient enough to wash the affected soil without disrupting the natural hydraulic characteristics of the wash. A lined temporary catchment was installed down gradient beyond the impacted section of the wash to collect the water /contaminate solution. A two inch (2") trash pump located within the lined temporary catchment transferred the impacted solution into a vacuum truck. The solution was disposed of at an NMOCD approved disposal.

On August 14, 2012, Basin excavated the release point and affected caliche road. The floor and sidewalls of the primary excavation were advanced until photo-ionization readings and chloride field tests suggested TPH and chloride concentrations were less than NMOCD regulatory standards. The final dimensions of the excavation were approximately 15 feet in length, 12 feet in width, and 8 feet in depth. The visibly stained surfaced of the caliche road was scraped up.

On August 14, 2012, Basin collected six (6) confirmation soil samples (West Wall @ 4' bgs, North Wall @ 6' bgs, R.P. Floor @ 5' bgs, R.P. Floor @ 8' bgs, East Wall @ 6' bgs and South Wall @ 6' bgs.) from the excavation floor and sidewalls and submitted them to the laboratory analysis of BTEX, TPH and chloride concentrations. Analytical results indicated BTEX concentrations were less than the appropriate laboratory

MDL for each of the submitted soil samples. TPH concentrations were less than the laboratory MDL for each of the submitted soil samples with the exception of soil samples R.P. Floor @ 5', which had a concentration of 415 mg/Kg. Chloride concentrations ranged from less than the laboratory MDL for soil samples R.P. Floor @ 8' bgs, East Wall @ 6' bgs and South Wall @ 6' bgs to 43.3 mg/Kg for soil sample R.P. Floor @ 5' bgs. BTEX, TPH and chloride concentrations were less than NMOCD regulatory remediation action levels in each of the submitted soil samples.

On October 26, 2012, Basin collected five (5) soil samples (Road 1, Road 2, Road 3, Road 4 and Road 5) from the affected portion of caliche road at approximate 100' intervals and submitted them to the laboratory for analysis of BTEX, TPH and chloride concentrations. Analytical results indicated BTEX concentrations were less than the appropriate laboratory MDL for each of the submitted soil samples. TPH concentrations ranged from less than the laboratory MDL for soil sample Road 1 to 413 mg/Kg for soil sample Road 3. Chloride concentrations ranged from less than the laboratory MDL for soil sample Road 1 to 118.0 mg/Kg for soil sample Road 3. BTEX, TPH and chloride concentrations were less than NMOCD regulatory remediation action levels in each of the submitted soil samples.

With your permission, Southern Union would like to begin backfilling the primary excavation with non-impacted material. Impacted material stockpiled on-site will be transported to an NMOCD approved disposal facility. On completion, Southern Union will submit a "Remediation Summary & Site Closure Request" to the NMOCD, documenting remediation activities and results from confirmation soil samples. The affected "dry road drainage" was sampled prior to the washing efforts and has not been sampled since. Basin would be pleased to sample the affected drainage while backfilling the primary excavation to determine the effects of the washing technique.

For your convenience, a site/sample location map, soil chemistry table and laboratory analytical results are attached.

Respectfully,

Joel Lowry