Administrative/Environmental Order



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Report Description

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App Number: pJXK1603348630

1RP - 2752

SOUTHERN UNION GAS SERVICES LTD

3/8/2016

рJXK160334863D 2752

Basin Environmental Service Technologies, LLC

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Geoff Leking		000000000000000000000000000000000000000	-1 Don PIN
New Mexico Energy, Minera	ls and Natural Resources Depa	artment approved MW-	GOTTIFF
New Mexico Oil Conservatio 1625 French Drive	n Division (District 1)	go, Alan you	MAA.
Hobbs, New Mexico 88240		Sterffrey Lek	list

NMOCD-DIST 1

Re: Permission to P&A Dry Monitor Well 8/6/13 Line 290 (East of Jal South) (NMOCD Reference # 1RP-11-11-2752) Unit Letter D, Section 34, Township 25 South, Range 37 East Lea County, New Mexico

Mr. Leking,

This email has been prepared in regard to Regency Field Services, LLC, formerly Southern Union Gas Services' Line 290 (East of Jal South) (1RP-11-11-2752) Historical Remediation Site. The legal description of the release site is Unit Letter "D", Section 34, Township 25 South, Range 37 East, in Lea County, New Mexico. The property affected by the release is owned by George Willis. The release site GPS coordinates are 32°05.467' North and 103°09.406' West. The inferred depth to groundwater was 80-85' bgs prior to the installation of the monitor well. Please reference the attached Site Location Map.

On October 26, 2011, Southern Union discovered a release had occurred on the Line #290 pipeline. Failure of a section of the twelve inch (12") steel, high-pressure natural gas pipeline resulted in the release of approximately twenty barrels (20 bbls) of a mixture of natural gas, crude oil, and produced water. During initial response activities, the pipeline was fitted with a temporary clamp to mitigate the release. Following initial response activities, the affected pipeline segment was replaced with twelve inch (12") steel pipe. The release was reported to the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office on November 3, 2011. The "Release Notification and Corrective Action" (Form C-141) indicated the release affected an area measuring approximately 350' in length and approximately 5' to 10' in width. Please reference the attached Site & Sample Location Map.

On November 15, 2011, one (1) soil boring (SB-1) was advanced at the site in an effort to determine the vertical extent of impacted soil. Soil boring "SB-1" was located at the terminus of the release flowpath. The soil boring was advanced to a total depth of approximately eighty-five feet (85') bgs. Soil samples were collected at five-foot (5') drilling intervals and field-screened using a Photo-Ionization Detector (PID) and/or chloride test kit. Please reference the attached Soil Boring/Monitor Well Logs.

During the advancement of the soil bore, soil samples collected at drilling depths of 5', 15', 25', 35', 45', 55', 65', 75', 80', and 85' bgs were submitted to the laboratory for analysis of BTEX, TPH and/or chloride concentrations. Laboratory analytical results indicated benzene concentrations ranged from less than the laboratory MDL of 0.0207 mg/Kg in soil sample SB-1 @ 55' to 1.70 mg/Kg in soil sample SB-1 @ 15'. Total BTEX concentrations ranged from 0.0440 mg/Kg in soil sample SB-1 @ 45' to 177 mg/Kg in soil sample SB-1 @ 15'. TPH concentrations ranged from 119 mg/Kg in soil sample SB-1 @ 45' to 8,240 mg/Kg in soil sample SB-1 @ 15'. Chloride concentrations ranged from less than the laboratory MDL in soil sample SB-1 @ 15' and SB-1 @ 25' to 490 mg/Kg in soil sample SB-1 @ 55'. Please reference the attached Soil Chemistry Tables.

On May 2, 2012, following NMOCD approval of the *Risk-Based Site Closure Proposal*, Basin began remediation activities at the release site. The excavation floor was advanced and leveled at approximately ten feet (10') bgs, pending the installation of an NMOCD approved twenty (20) mil polyurethane liner. The excavation sidewalls were advanced until laboratory analytical results from confirmation soil samples indicated benzene, BTEX, TPH and chloride concentrations were below NMOCD regulatory standards. Excavated material was stockpiled on-site pending final disposition. Please reference the *Remediation Summary*, *Risk-Based Soil Closure Request & Groundwater Investigation Proposal* dated June 2012 for details of remediation activities.

Between May 2 and May 18, 2012, approximately 2,700 yd³ of impacted material was transported to Sundance Services, Inc. (NMOCD Permit #NM-01-0003), for disposal.

On May 21, 2012, a twenty (20) mil polyurethane liner was installed on the floor of the excavation at approximately ten feet (10') bgs. Approximately one foot (1') of non-impacted pad sand was installed both above and below the liner to protect the liner from damage during installation and backfilling activities. The liner was fitted with 8" PVC conduit in three (3) locations to allow for the installation of groundwater monitor wells without compromising the integrity of the liner.

From May 21 through May 25, 2012, the excavation was backfilled with non-impacted material purchased from the landowner. Backfill was compacted in 18" lifts and contoured to fit the surrounding topography. The final dimensions of the excavation were approximately three hundred feet (300') in length, ranging in width from approximately 12' to approximately 45', and approximately 10' in depth.

Remediation activities conducted at the Line #290 (East of Jal South) release site met the objectives set forth in the *Remediation Summary & Risk-Based Site Closure Proposal* dated April 2012. *A Remediation Summary, Risk Based Soil Closure Request & Groundwater Investigation Proposal* was submitted to the NMOCD and subsequently approved.

On September 4, 2012, in accordance with the Groundwater Investigation portion of the approved proposal, a monitor well (MW-1) was installed in the western portion of the release site in the area defined by soil sample Sample #3. The monitor well was advanced to a depth of 110' bgs. During the installation of the monitor well, soil samples collected at drilling depths of 15', 25', 35', 45', 50', 55', and 60' bgs were submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated benzene concentrations were less than the appropriate laboratory MDL in soil samples MW-1 @ 35' and MW-1 @ 60' to 0.774 mg/Kg in soil sample MW-1 @ 15'. TPH concentrations ranged from 16.9 mg/Kg in soil sample MW-1 @ 45' to 1,470 mg/Kg in soil sample MW-1 @ 15'. Chloride concentrations ranged from 1.13 mg/Kg in MW-1 @ 15' and to 44.1 mg/Kg in soil sample MW-1 @ 55'. Considerable time was given to allow for the monitor well

to make water. It was allowed to remain undisturbed overnight to determine whether groundwater had been reached. Subsequent gauging determined that the monitor well was dry.

Between September 5, 2012, and July 23, 2013, as per the NMOCD, monitor well MW-1 was gauged monthly to check for the presence of groundwater. Monthly gauging of the onsite monitor well indicated there was no groundwater within the red, silty clay zone that characterized the subsurface at the Line 290 East of Jal South release site. Please reference the attached groundwater gauging data sheet.

With NMOCD permission, Regency Field Services would like to Plug and Abandon the onsite monitor well during the week of August 12, 2013. A plugging plan has been submitted to the New Mexico Office of the State Engineer and subsequently approved. Plugging activities will be conducted by a licensed driller, a summary of which will be submitted upon request.

If you have any questions or would like any additional information, please feel free to contact me by phone or email. Thanks.

Respectfully,

Joel founy

Joel W. Lowry Basin Environmental Service Technologies, LLC

Attachments:

Attachment #1: Site Location Map Attachment #2: Site & Sample Location Map Attachment #3: Soil Bore/Monitor Well Logs Attachment #4: Soil Chemistry Table Attachment #5: Groundwater Gauging Data





Soil Boring SB-1

Depth Below Ground Surface	Soil Column	Chloride Field <u>Test</u>	PID <u>Reading</u>	Petroleum Pe <u>Odor</u>	etroleum <u>Stain</u>	Soil Description		Boring SB-1
L.	103 637 9,	632	267	Heavy	None	0' - 1' - Tan fine sand 1' - 7' - Red fine sand	Thick	Drilled November 15, 2011 ness of Bentonite Seat 85 Ft of Exploratory Boring 85 Ft bas
10	2805	168	-	Heavy	None	7' - 9' - Tan fine sand		to Groundwater
15		<120	1,518	Slight	None	9' - 25' - Red fine sand	⊻ ⊻	Indicates the PSH level measured on Indicates the groundwater level
20		<120		Moderate	None		O PID	measured on Indicates samples selected for Laboratory Analysis. Head-space reading in ppm obtained
25	11225		1,415	Slight	None			Head-space reading in ppm obtained with a photo-ionization detector.
30			1,921	Slight	None	25 - 33' - Tan fine sand, calcified sandstone		
36			835	Slight	None	33' - 35' - Gypsum		
- 15 - 20 - 25 - 30 - 40 - 45 - 55 - 55 - 60 - 70 - 75 - 60 - 77 - 75 - 60 - 77 - 75 - 60 - 77 - 75 - 60 - 75 - 60 - 75 - 75 - 75 - 75 - 75 - 75 - 75 - 75	54213 11245 1012		456	Slight	None	35' - 44' - Tan fine sand, sandstone		
45	C) Bi			Slight	None			
50			373	Slight	None			
55			2,352	Moderate	None			
60				Moderate	None	41 MI Deduce for to fire and		
65			1,605	Moderate	None	44' - 81' - Red very fine to fine sand		
-70 -				Moderate	None			
75			864	Moderate	None			
80				Slight	None			
Ees			1,109	Moderate	None	81' - 85' - Red silty clay		

Completion Notes

The soil boring was advanced on date using air rotary drilling techniques.
 The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-1

Southern Union Gas Services Line #290 (East of Jal South) Lea County, New Mexico

Basin Environmental Service Technologies, LLC 3100 Plains Hwy. Lovington, NM 88260 Prep By: JWL Checked By: BJA June 19, 2012

Soil Boring/Monitor Well Log MW-1

				eference #:			September 5	
Soil I Monitor W	Boring/	/_1	Line 2	ern Union G 290 (East of County, Ne	Jal Sout	h)	Prep By: JW	3100 Plains Hwy. Lovington, NM 88260
			Souther		as Sand		an the with 2.) Ma air 3.) Ma 0. 5.) Lin 5.) Lin on 5.) De gr 7.) Bo 60 60 the	established 8° PVC conduit to maintain is integrity of a 20-mil poly inner installed thin the excavation at 10° bgs. onlitor well was advanced on date using rotary drilling techniques. Infor well was constructed with 2° ID, 10-inch factory slotted, threaded joint, shedule 40 PVC pipe. ell is protected with a locked stick-up ell cover and compression cap. the profile log represent approximate undarles. Actual transitions may be adual. undarles de referenced from bund surface. rehole began to collapse at approximate integrity of the borehole.
	L ₁₁₅						1.) Ma	Completion Notes
	110						ŧ	
	-100					85' - 110' Red silty clay		
							2422322	
	- 75 - 75 - 80 - 85 - 85					80' - 85' Red silty sand w/ clay	N92229202222	
	-65					54' - 80' Tan silty sand (sugar sand)		
	- 55 - 60 - 60	<112	160 170	Moderate Moderate	None			
	50		1,110	Strong	None			Screen
	- 40 - 45 - 45		102	Slight	None			Sand Pack
	-35	The second	550 852	Moderate	None	26' - 54' - Tan silty sand w/ sandstone		Grout Surface Seal Bentonite Pellet Seal
	30		760	Strong	None			
	25	<112	504	Strong	None		PID	Laboratory Analysis. Head-space reading in ppm obtained with a photo-ionization detector.
	20	<112	1,700	Strong	None	18' - 26' - Tan siity sand	■	on Indicates the groundwater level measured on Indicates samples selected for
	10	<112	1,700	Strong	None	10' - 12' - Tan fine sand 12' - 18' - Red fine silty sand		Indicates the PSH level measured
						0' - 10' - Backfill	Thickr Depth Depth Groun	ress of Bentonite Seal <u>71 Ft</u> of Exploratory Boring <u>110 Ft bgs</u> to Groundwater <u>85 Ft bgs</u> d Water Elevation
	E° 70					-	Date I	Drilled September 4, 2012

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES LINE #290 (EAST OF JAL SOUTH) LEA COUNTY, NEW MEXICO NMOCD REFERENCE NO: 11P-11-11-2762

					W	METHOD: EPA SW 846-8021B, 6030	SW 846-8021	B, 6030			MET	METHOD: 8016M	W	TOTAL	E 300
CAMPLE LOCATION	SAMPLE	SAMPLE	SOIL	DINTENT	TUTUT	ETHYL-	M.P	ò	TOTAL	TOTAL	GRO	DRO	ORO	HAT	Taino Into
SAMILLE LOCATION	(BGS)	DATE	STATUS	(mg/Kg)	(mg/Kg)	BENZENE (mg/Kg)	XYLENES (mg/Kg)	XYLENE (mg/Kg)	XYLENE (mg/Kg)	BTEX (mg/Kg)	C ₆ -C ₁₂ (mg/Kg)	C ₁₂ -C ₂₈ (mg/Kg)	C ₂₈ -C ₃₅ (mg/Kg)	C ₆ -C ₃₅ (mg/Kg)	(mg/Kg)
Sample #1	7	11/10/2011	Excavated				1000				13,800	4,550	418	18,800	676
Sample #2	1.5'	11/10/2011	Excavated								10,700	3,770	280	14,800	1,150
Sample #3	14'	11/10/2011	-								30,500	8,840	519	39,900	5.62
Sample #4	9	11/10/2011	Excavated								14,800	5,110	466.0	20,400	<4.42
						and a second of the		and the second second	and a second second	Sec. Hall and					にないないで
SB-1 @ 5	22	11/15/2011	Excavated	0.273	3.56	00.7	21.5	9.33	30.8	41.7	1,440	2,010	75.6	3,530	490
201 0 10 201 0 0 10	10	LINZICIAL		0/1	10.0	28.3	20.2	5.05	131	1/1	4,640	3,410	180	8,240	<4.38
SB-1 @ 20	130	LINZ/CL/LL	In-Situ	0./19	4.30	9.03	0.020	11.1	39.0	0.044	0001	1,460	0.00	3,080	<4.3/
20-1 (0 30 20 1 (0 40)	200	LINZICI/LL		0.00700	80400	017.0	0.0240	0.0414	0.0014	0.341	30.9	182	8.012	213	
CD 1 (0 4)	10	1102/01/11	In-Situ	2000/20	20.0102	0.640	0.0213	0.00904	0.0303	0.0440	2003	119 00F	<10.3	ALL P	8.70
CD-1 (0 33	199	11/0/2/1/11	In Citu	1020.02	0.025	0.003	340.0	0.000	0.200	0.420	100	000	1.20	1,300	. 23
SB-1 @ 00 SB-1 @ 75'	157	11/15/2011	In-Situ	0.00054	<0.0105	0.00755	0.0440	0.0300	0.0608	0.0770	41.5	246	42.4	340	10.0
SB-1 @ 80'	80'	11/15/2011	In-Situ	0.00785	0.0254	0.0839	0.264	0.108	0.372	0.489	94.7	444	24.9	564	15.6
SB-1 @ 85'	85'	11/15/2011	In-Situ	0.00955	<0.0106	0.00591	0.0269	0.00976	0.0367	0.0521	25.7	178	<15.9	204	12.8
		A CONTRACTOR		日本のための		の時に、「「「	and the same	The second second	A COLUMN TO A COLUMN		and the state of the			Elite States	
North Wall #1	6	5/3/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	4.32
Northwest Wall	6	5/3/2012	In-Situ							•					9.89
East Wall #1	6,	5/3/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	14.9
South Wall #1	9'	5/3/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	<4.24
		A REAL PROPERTY OF	Statistical Statisticae Statis				and the second		All and a second second	Support Support	Contral Interest				ALC: NOT ALC
South Wall #2	6,	5/4/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	7.16
	State of the second	A CONTRACTOR		Law Marine					100	all a second second		No. of Street, or Stre			
West Wall	6	5/7/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.0	<15.0	<15.0	<15.0	6.40
North Wall #2	6	5/7/2012	In-Situ	<0.0010	<0.0020	<0.0010	0.00215	0.00116	-	0.00331	<15.0	<15.0	<15.0	<15.0	7.13
	and the second second			and the second	and the second se	and the second second	and the second second	and the second second	State of the state			Service and		Constant of	
N. Wall #3	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.2	<15.2	<15.2	<15.2	<1.02
N. Wall #4	6	5/9/2012	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.3	<15.3	<15.3	<15.3	<1.02
C# IIEM. N	5 0	2102/6/6	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.3	<15.3	<15.3	<15.3	<1.02
5. Wall #3		ZLOZIGIC	In-Situ	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0020	<0.0020	<15.1	<15.1	<15.1	<15.1	<1.01
5. Wall #4	5 0	2102IRIC	In-Situ	<0.0010		<0.0010		0100.02	<0.0020	020000	<10.0	<10.0	C.CL>	C.C12	51.03
C. Wall #2	P. Commence	ZINZIENC	nie-li	0100.02	070070	0100.05	20.0020	0100.02	20.0020	0200.02	RCIN	R'CIV	RCIV	RCIV	00.12
N Wall #6	ò	5/17/2012	In-Situ	<0.0010	0 00264	<0.0010	0 00779	0 00135	0 00414	0 00678	<153	<153	<153	<153	538
S Wall #6	.0	5/17/2012	In-Situ	<0.0010	0.00465	<0.0010	0.00263	<0.0010	0.00263	0.00728	<153	<153	<153	<153	16.8
W. Wall #2	6	5/17/2012	1	<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0010	<0.0020	<15.7	<15.7	<15.7	<15.7	4.88
N. Wall #7	<i>.</i> 0	5/17/2012		<0.0010	<0.0020	<0.0010	<0.0020	<0.0010	<0.0010	<0.0020	<15.3	<15.3	<15.3	<15.3	9.57
S. Wall #7	9,	5/17/2012	In-Situ	<0.0010	0.00453	0.00103	0.00381	0.00121	0.00502	0.0106	<15.3	<15.3	<15.3	<15.3	12.9
				Children on N					A STATE	Contraction of the second	Contraction of the second				and the second
MW-1 @ 15' bgs	15'	9/4/2012	In-Situ	<0.0112	0.0967	0.116	0.420	0.141	0.561	0.774	681	748	44.8	1,470	1.13
MW-1 @ 25' bgs	25'	9/4/2012	In-Situ	<0.00106	0.0105	0.00610	0.0229	0.00881	0.0317	0.0483	<16.0	104	<16.0	104	2.75
MW-1 @ 35' bgs	35'	9/4/2012	In-Situ	<0.00104	<0.00208	<0.00104	0.00279	0.00113	0.00392	0.00392	<15.7	95.5	<15.7	95.5	11.9
MW-1 @ 45' bgs	45'	9/4/2012	In-Situ	<0.00102	<0.00205	<0.00102	<0.00205	<0.00102	<0.00205	<0.00205	<15.4	16.9	<15.4	<16.9	37.8
MW-1 @ 50' bgs	50'	9/4/2012	In-Situ	<0.00101	<0.00203	<0.00101	0.00208	<0.00101	0.00208	0.00208	44.8	29.6	<15.3	74.4	28.4
MW-1 @ 55' bgs	55	9/4/2012	In-Situ	<0.00102	<0.00204	<0.00102	0.00263	0.00118	0.00381	0.00381	<15.5	30.2	<15.5	30.2	44.1
MW-1 @ 60' bgs	60.	9/4/2012	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<17.0	31.3	<17.0	31.3	7.59
NHOOD C-Maria	All and a second se	Contraction of the local distance						ALCONT DI LINES		-	A SUPERIOR AND A SUPERIOR	Here have been	and the second second		Trot - and - and -
NINOCU Criteria				0L						00				100	
 = Not analyzed. 															

TABLE 1

GROUNDWATER ELEVATION DATA

SOUTHERN UNION GAS SERVICES LINE 290 EAST OF JAL SOUTH NMOCD REF # 1RP-11-11-2752 LEA COUNTY, NEW MEXICO

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	TOTAL DEPTH	CORRECTED GROUNDWATER ELEVATION
MW-1	9/4/2013	200.00*	-	dry		124.5	-
MW-1	9/7/2013	200.00*	-	dry	-	124.5	-
MW-1	10/26/2013	200.00*	-	dry		124.5	-
MW-1	11/28/2013	200.00*	-	dry	-	124.5	-
MW-1	12/20/2013	200.00*		dry	-	124.5	-
MW-1	1/21/2013	200.00*		dry	-	124.5	
MW-1	2/27/2013	200.00*	-	dry	-	124.5	-
MW-1	3/28/2013	200.00*		dry	-	124.5	
MW-1	4/8/2013	200.00*		dry	124 <u>-</u>	124.5	-
MW-1	5/9/2013	200.00*	-	dry	-	124.5	10 10 10 10 10 10 10 10 10 10 10 10 10 1
MW-1	6/26/2013	200.00*	- C	dry		124.5	
MW-1	7/23/2013	200.00*	-	dry	-	124.5	-

*Arbitrary value. Well has not been surveyed.