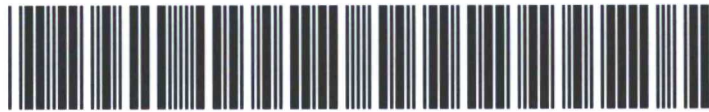




AE Order Number Banner

Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



App Number: pLWJ1034741173

1RP - 2667

SOUTHERN UNION GAS SERVICES LTD

3/8/2016

Basin Environmental Service Technologies, LLC

3100 Plains Highway
P. O. Box 301
Lovington, New Mexico 88260

jwlowry@basinenv.com

Office: (575) 396-2378 Fax: (575) 396-1429

HOBBS OCD

MAR 19 2013

RECEIVED



Geoff Leking
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division (District 1)
1625 French Drive
Hobbs, New Mexico 88240

approved
Geoffrey Leking
Environmental Specialist

Re: Request to Backfill
Line #101 (NMOCD Reference # 1RP-2667)
Unit Letter E, Section 23, Township 23 South, Range 36 East
Lea County, New Mexico

NMOCD-DIST 1
3/19/13

Mr. Leking:

This email has been prepared in regard to Southern Union Gas Service's Line #101 Historical Release Site (NMOCD Ref# 1RP-2667). The legal description of the release site is Unit Letter "E", Section 23, Township 23 South, Range 36 East, in Lea County, New Mexico. The property affected by the release is owned by the State of New Mexico. The release site GPS coordinates are 32° 17.414' North and 103° 14.628' West. The depth to groundwater at the release site is approximately 150' bgs. A "Site Location Map" is provided for your convenience.

On December 6, 2010, Southern Union discovered a release had occurred on the Line #101 pipeline. The "Release Notification and Corrective Action Form" (Form C-141) indicated failure of a section of thirty-inch (30") low-pressure pipeline resulted in the release of approximately nine barrels (9 bbls) of crude oil and an unknown volume of natural gas. During initial response activities a vacuum truck was utilized to recover approximately five barrels (5 bbls) of free standing fluid. The release was reported to the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office on December 10, 2010. The initial C-141 indicated the release affected approximately twelve thousand, five hundred square feet (12,500 ft²) of range land.

On February 6, 2013, Basin began delineation activities at the release site. A test trench was advanced within the stained area to approximately ten feet (10') bgs. During the advancement of the test trench, three (3) soil samples (TT-1 @ 6', TT-1 @ 8' and TT-1 @ 10') were collected and submitted to Xenco Laboratories Inc., of Odessa, Texas for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX concentrations were less than the appropriate laboratory method detection limit (MDL) for each of the submitted soil samples. Analytical results indicated TPH concentrations were less than the appropriate laboratory MDL for each of the submitted soil samples with the exception of TT-1 @ 8', which had a concentration of 26.5 mg/Kg. Chloride concentrations ranged from 1.63 mg/Kg for soil sample TT-1 @ 10' to 8.79 mg/Kg for soil sample TT-1 @ 6'. A "Site and Sample Location Map" and "Soil Chemistry Table" have been attached for your convenience.

On February 28, 2013, Basin began excavation activities at the release site. The excavation floor and sidewalls were advanced until chloride field tests and photo-ionization detector (PID) readings suggested concentrations of chloride and TPH were less than NMOCD regulatory remediation action levels established for the site. Impacted material was stockpiled on-site pending final disposition.

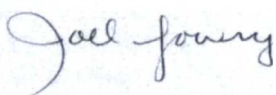
On March 1, 2013, one (1) soil sample (Floor @ 15') was collected from the excavation floor and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated soil sample Floor @ 15' exhibited a BTEX concentration of 0.0200 mg/Kg, a TPH concentration of less than the laboratory MDL and a chloride concentration of less than the laboratory MDL.

On March 6, 2013, six (6) soil samples (South East SW, South West SW, East SW Middle North West SW, North East SW and West SW Middle) were collected from the sidewalls of the excavation and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX concentrations were less than the appropriate laboratory MDL for each of the submitted soil samples. Analytical results indicated TPH concentrations ranged from less than the appropriate laboratory MDL for soil samples East SW Middle and West SW Middle to 96.7 mg/Kg for soil sample North West SW. Chloride concentrations ranged from less than the appropriate laboratory MDL for soil samples East SW Middle and West SW Middle to 8.97 mg/Kg for soil sample North East SW. BTEX, TPH and chloride concentrations were less than NMOCD regulatory remediation action levels for each of the submitted soil samples.

Between February 28, and March 8, 2013, approximately 408 cubic yards of impacted material was hauled to Sundance Services, Inc. for disposal. The final dimensions of the primary excavation were approximately forty-five feet (45') in length, fifteen feet (15') in width, and approximately fourteen feet (15') in depth.

With your permission Southern Union would like to begin backfilling the excavation with locally purchased, non-impacted soil. Upon backfilling the excavation, Basin will prepare a "Remediation Summary and Site Closure Request" detailing remediation activities and the results of confirmation soil sampling. If you have any questions or need any additional information, please feel free to contact me by phone or email.

Respectfully,



Joel W. Lowry
Basin Environmental Service Technologies, LLC

Attachments:

- Attachment #1: Site Location Map
- Attachment #2: Site and Sample Map
- Attachment #3: Soil Chemistry Table

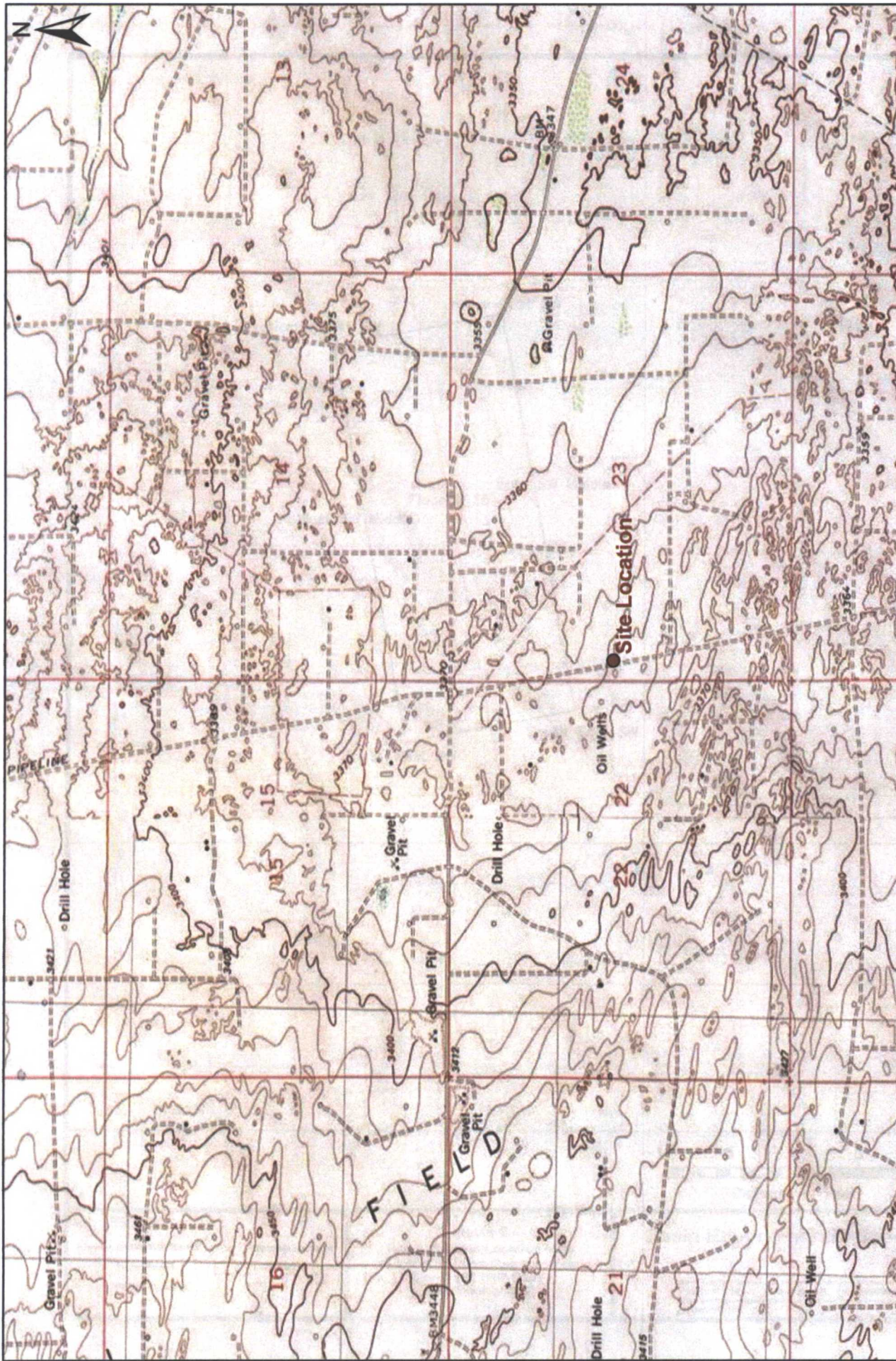
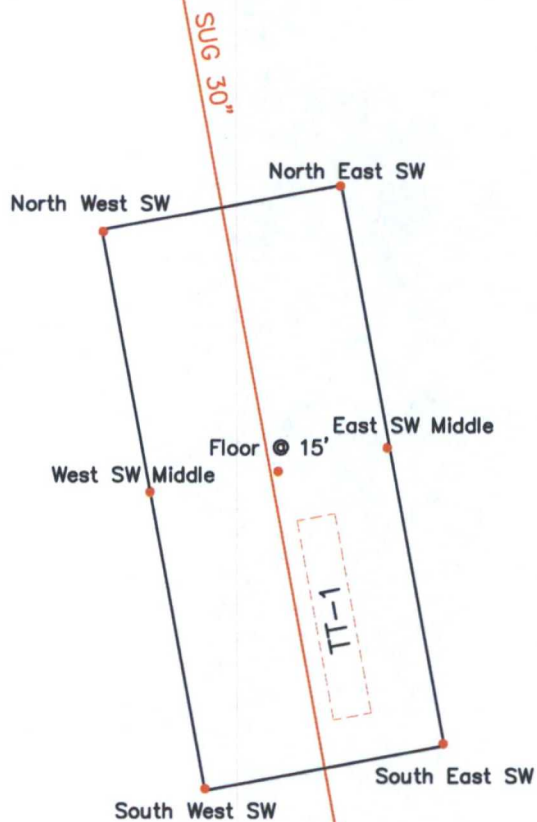


Figure 1
Site Location Map
Southern Union Gas Services
Line #101
Lea County, New Mexico
NMOCD Reference #: 1RP-2667

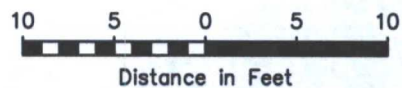
Basin Environmental Service Technologies, LLC
 3100 Plains Hwy.
 Lovington, NM 88260

Drawn By: BJA Checked By: JWL
 March 19, 2013 Scale: 1" = 2000'

Basin Environmental Service Technologies
 Effective Solutions



Flying "E" Road



LEGEND:

- | | |
|---------------------|----------------------|
| — Excavation Extent | ● Sample Location |
| - - - Paved Road | □ Delineation Trench |
| — Buried Pipeline | |

Figure 2
Site & Sample Location Map
Southern Union Gas Services
Line #101 (RP-2667)
Lea County, NM

Basin Environmental Services

Scale: 1" = 10'	Drawn By: JWL	Prepared By: BRB
March 18, 2013		

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES

LINE #101

HISTORICAL RELEASE SITE

LEA COUNTY, NEW MEXICO

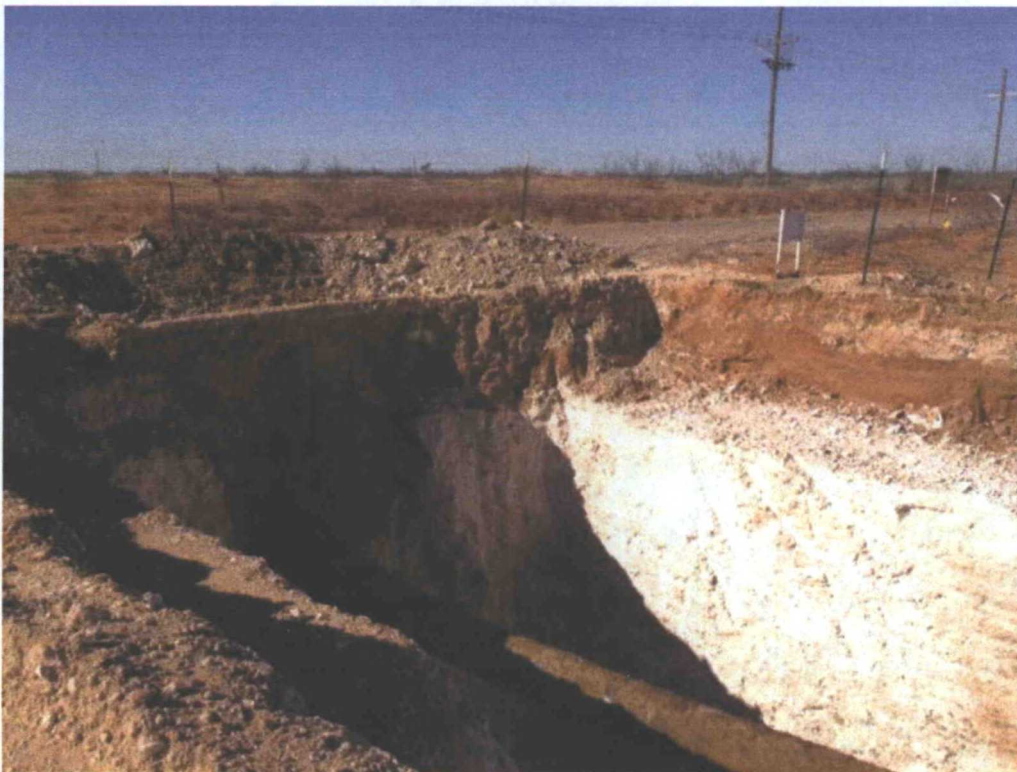
NMOCD REF# 1RP-2667

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO C ₆ -C ₁₂ (mg/Kg)	DRO C ₁₂ -C ₂₈ (mg/Kg)	ORO C ₂₈ -C ₃₅ (mg/Kg)	TOTAL TPH C ₉ -C ₂₈ (mg/Kg)	CHLORIDE (mg/Kg)
TT-1 @ 6'	6'	2/6/2013	Excavated	<0.00137	<0.00273	<0.00137	<0.00273	<0.00273	<20.5	<20.5	<20.5	<20.5	8.79
TT-1 @ 8'	8'	2/6/2013	Excavated	<0.00106	<0.00213	<0.00106	<0.00213	<0.00213	<16.0	26.5	<16.0	26.5	3.65
TT-1 @ 10'	10'	2/6/2013	Excavated	<0.00133	<0.00267	<0.00133	<0.00267	<0.00267	<20.0	<20.0	<20.0	<20.0	1.63
Floor @ 15'	15'	3/1/2013	In-Situ	<0.00109	<0.00218	0.00323	0.0168	0.0200	<16.5	<16.5	<16.5	<16.5	<4.00
South East SW	15'	3/6/2013	In-Situ	<0.00134	<0.00269	<0.00134	<0.00269	<0.00269	<20.1	29.9	<20.1	29.9	4.34
South West SW	15'	3/6/2013	In-Situ	<0.00137	<0.00273	<0.00137	<0.00273	<0.00273	<20.6	27.2	<20.6	27.2	3.26
East SW Middle	15'	3/6/2013	In-Situ	<0.00143	<0.00286	<0.00143	<0.00286	<0.00286	<21.5	<21.5	<21.5	<21.5	<2.00
North West SW	14'	3/6/2013	In-Situ	<0.00113	<0.00227	<0.00113	<0.00227	<0.00227	<17.1	96.7	<17.1	96.7	8.16
North East SW	14'	3/6/2013	In-Situ	<0.00135	<0.00270	<0.00135	<0.00270	<0.00270	<20.3	50.7	<20.3	50.7	8.97
West SW Middle	15'	3/6/2013	In-Situ	<0.00129	<0.00257	<0.00129	<0.00257	<0.00257	<19.3	<19.3	<19.3	<19.3	<2.00
NMOCD Standard				10				50				1,000	500

- = Not analyzed.



Photograph of Excavation at the Line #101 Historical Release Site.



Photograph of Excavation at the Line #101 Historical Release Site.