

Leking, Geoffrey R, EMNRD

From: Joel Lowry <jwlowry@basinenv.com>
Sent: Wednesday, July 24, 2013 7:48 AM
To: Leking, Geoffrey R, EMNRD
Subject: SUGs Drip Tank #61-62 -- Permission to Line and Backfill
Attachments: Drip_Tank_61_62_Permission_Backfill_NMOCD_Letter.pdf; Drip_Tank_61_62_Soil_Chemistry_Table.pdf; Site_Sample_Map Site Map (1).pdf; Drip Tank 61-62_SiteLocationMap.pdf; photo 1.JPG; photo 1.JPG; photo 2.JPG; photo 3.JPG

Geoff,

Please find attached a brief synopsis of remediation activities that have been conducted at the Drip Tank #61-62. The depth to groundwater at the release site is approximately 350'. We hauled off approximately 2/3 of the material derived from the site. We blended the remaining third and plan to use it for backfill, placing it atop the liner. We were only able to dig to approximately 7' bgs as we encountered a near impenetrable layer of calcified rock. If you have any questions or would like any additional information, please feel free to contact me by phone or email. Thanks Geoff and have a great day.

Respectfully,

Joel Lowry

HOBBS OCD

JUL 24 2013

RECEIVED

approved for lining and backfilling

Geoffrey Leking
Environmental Specialist

NMOCD-DIST 1

7-25-13

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

HOBBS OCD

JUL 24 2013

Re: Risk-Based Soil Closure Strategy
Drip Tank #61-62 (NMOCD Reference # 1RP-1818)
Unit Letter D, Section 34, Township 22 South, Range 36 East
Lea County, New Mexico

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Mr. Leking,

This email has been prepared in regard to Southern Union Gas Services' Drip Tank #61-62 (RP-1818) Historical Remediation Site. The legal description of the release site is Unit Letter "D", Section 34, Township 22 South, Range 36 East, in Lea County, New Mexico. The property affected by the release is owned by the Wanda Jones Estate. The release site GPS coordinates are 32° 21.198' North and 103° 15.387' West. The depth to groundwater is approximately 350'.

The Form C-144, dated March 2008, indicated there was a 100 bbl steel below grade tank in need of removal. On or around March 19, 2008, the BGT was removed from the location. Confirmation soil samples collected from the associated excavation indicated soil had not been impacted above NMOCD Regulatory Standards. Please reference the attached "Soil Chemistry Table". During the removal of the on-site BGT, a "historical pit" was discovered in the area.

On April 30, 2013, (3) soil bores were advanced at the location. Soil bores SB-1 and SB-2 were advanced in the area defined by the "historical pit" in an effort to determine the vertical extent of soil impact. During the advancement of the soil bores, soil samples were collected at 10' drilling intervals and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Each of the submitted soil samples exhibited BTEX, TPH and chloride concentrations less than NMOCD Regulatory Standards with the exception of SB-1 @ 5' which had a TPH concentration of 21,500 ppm, SB-2 @ 20' which had a chloride concentration 1,190 ppm and SB-2 @ 30' which had a chloride concentration of 1,100 ppm. SB-3 was advanced beneath a former AST Battery. Each of the submitted soil samples exhibited BTEX, TPH and chloride concentrations less than NMOCD Regulatory Standards.

On June 10, 2013, Basin began excavation activities in the area defined by the "historical pit". The excavation floor was advanced to an impenetrable hard rock layer at approximately 7' bgs; excavation sidewalls were advanced until field tests suggested concentrations of BTEX, TPH and chloride were less than NMOCD Regulatory Standards. Confirmation soil samples were collected from the excavation sidewalls at approximately 50' intervals and submitted to the laboratory for analysis. Laboratory analytical results indicated concentrations of BTEX, TPH and chloride were less than NMOCD Regulatory Standards in each of the submitted sidewall soil samples. When necessary additional delineation samples were collected and analyzed accordingly. Please reference the attached "Site and Sample Location Map".

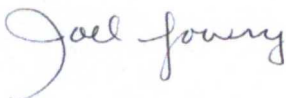
Between June 14, 2013 and July 2, 2013, (3) 5-point composite soil samples (6-14-13 Stockpile, Waste Characterization and 7-2-13 Stockpile) were collected from the on-site material and submitted to the laboratory for analysis. Laboratory analytical results indicated soil sample 6-14-13 exhibited a BTEX concentration of 9.95 ppm, a TPH concentration of 5,542 ppm and a chloride concentration of 208 ppm. Soil sample Waste Characterization exhibited a TPH concentration of 5,106 ppm and a chloride concentration of 224 ppm. Soil Sample 7-2-13 Stockpile exhibited a BTEX concentration of 2.92 ppm, a TPH concentration of 4,237 ppm and a chloride concentration of 224 ppm. Approximately 2,144 yd³ of soil, characterized by soil samples 6-14-13 Stockpile and Waste Characterization, were hauled to Sundance Services landfill. Soil defined by soil sample 7-2-13 stockpile, remains stockpiled on site.

On July 10, 2013, (1) soil sample (SW Floor WC) was collected from what was believed to be the most heavily impacted spot within the excavation floor. The collected soil sample was submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX concentrations were less than the laboratory MDL. Analytical results indicated the TPH concentration was 5,130 ppm and the chloride concentration was 896 ppm. Based on field observations and laboratory analytical results from soil samples SB-2 @ 20', SB-2 @ 30' East SW Floor, SW Floor and SW Floor WC, it was determined that a "Risked-Based" approach should be sought. The final dimensions of the excavation were approximately 175' in length, 35' in width and 7' in depth.

With your permission, Basin would like to install a 20-Mil poly liner in the floor of the excavation at approximately 7' bgs. A one foot layer of non-impacted pad sand will be installed both above and below the liner to maintain its integrity during backfilling activities. Upon installing the liner, Basin requests permission to backfill the excavation with stockpiled soil characterized by soil sample 7-2-13 Stockpile. Additional backfill material will be purchased locally. Upon completing remediation activities, a Soil Closure Report will be prepared, detailing remediation activities and the results of confirmation soil samples.

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

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



1,000 500 0 1,000 2,000
 Distance in Feet

Figure 1
Site Location Map
 Southern Union Gas Services
 Drip Tank #61-62 Historical
 Lea County, New Mexico
 NMOCD Reference #: 1RP-1818



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

Drawn By: BJA	Checked By: JWL
October 16, 2012	Scale: 1" = 2000'

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES
 DRIP TANK #61-62
 HISTORICAL RELEASE SITE
 LEA COUNTY, NEW MEXICO
 NMOCD REF: # 1RP-1818

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M			TOTAL TPH C ₆ -C ₂₈ (mg/Kg)	EPA: 300 CHLORIDE (mg/Kg)
				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)		
Floor Northwest Corner	N/A	3/19/2008	N/A	<0.0011	<0.0022	<0.0011	<0.0022	<0.0022	<16.3	62.9	37.8	100.7	21
#2 Tank Floor	N/A	3/19/2008	N/A	7.894	70.99	87.89	363.9	530.6	10,400	31,700	7,060	49,160	681
Floor Center	N/A	3/19/2008	N/A	-	-	-	-	-	<17.2	21.3	18.4	39.7	160
North Wall East Top	N/A	3/19/2008	N/A	-	-	-	-	-	<15.9	152	80.4	232.4	-
East Wall North Bottom	N/A	3/19/2008	N/A	-	-	-	-	-	27.0	1,150	265	1,442	-
South Wall East Top	N/A	3/19/2008	N/A	-	-	-	-	-	<16.0	1,340	373	1,713	-
West Wall North Bottom	N/A	3/19/2008	N/A	-	-	-	-	-	29.8	338	213	580.8	-
Pit Center Surface	N/A	3/19/2008	N/A	<0.0010	<0.0020	0.0012	0.0042	0.0054	26.3	1,250	1,280	2,556.3	95.7
Pit Center Surface 2ft BGS	N/A	3/19/2008	N/A	-	-	-	-	-	365	4,970	2,010	7,345	-
Pit Center Surface 5ft BGS	N/A	3/19/2008	N/A	-	-	-	-	-	<16.9	23.4	<16.9	23.4	191
#1 Worse Case Surface	N/A	3/19/2008	N/A	<0.0053	0.0135	<0.0053	<0.0053	0.0135	30.3	935	596	1,561.3	63.8
TT-1 @ 14'	14'	10/12/2012	N/A	<0.00108	<0.00216	<0.00108	<0.00216	<0.00216	<16.3	92.6	<16.3	92.6	728
TT-1 @ Surface (pit)	Surface	10/12/2012	In-Situ	<0.00107	<0.00213	<0.00107	<0.00213	<0.00213	<16.1	399	102	501	24.3
TT-1 @ 15' (pit)	15'	10/12/2012	In-Situ	<0.00108	<0.00216	<0.00108	<0.00216	<0.00216	<16.2	45.4	<16.2	45.4	160
SB-1 @ 5'	5'	4/30/2013	In-Situ	-	-	-	-	-	5,160	16,100	211	21,500	186
SB-1 @ 10'	10'	4/30/2013	In-Situ	-	-	-	-	-	25.7	542	42.9	611	581
SB-1 @ 20'	20'	4/30/2013	In-Situ	<0.00107	<0.00213	<0.00107	<0.00213	<0.00213	<16.1	62.1	<16.1	62.1	513
SB-1 @ 30'	30'	4/30/2013	In-Situ	-	-	-	-	-	<15.8	49.2	<15.8	49.2	614
SB-1 @ 40'	40'	4/30/2013	In-Situ	<0.00103	<0.00206	<0.00103	<0.00206	<0.00206	<15.6	17.7	<15.6	17.7	503
SB-1 @ 50'	50'	4/30/2013	In-Situ	-	-	-	-	-	<15.6	<15.6	<15.6	<15.6	624
SB-1 @ 60'	60'	4/30/2013	In-Situ	<0.00104	<0.00209	<0.00104	<0.00209	<0.00209	<15.6	18.2	<15.6	18.2	749
SB-1 @ 70'	70'	4/30/2013	In-Situ	-	-	-	-	-	<15.5	<15.5	<15.5	<15.5	598
SB-1 @ 80'	80'	4/30/2013	In-Situ	<0.00104	<0.00208	<0.00104	<0.00208	<0.00208	<15.6	19.2	<15.6	19.2	540
SB-1 @ 90'	90'	4/30/2013	In-Situ	-	-	-	-	-	<15.3	<15.3	<15.3	<15.3	483
SB-1 @ 100'	100'	4/30/2013	In-Situ	-	-	-	-	-	<15.2	26.6	<15.2	26.6	250
SB-1 @ 101' Core	101'	4/30/2013	In-Situ	<0.00551	<0.0110	<0.00551	<0.0110	<0.0110	<16.5	53.5	<16.5	53.5	226
SB-2 @ 5'	5'	4/30/2013	In-Situ	-	-	-	-	-	1,640	10,100	252	12,000	106
SB-2 @ 10'	10'	4/30/2013	In-Situ	-	-	-	-	-	<16.4	409	42.4	451	510
SB-2 @ 20'	20'	4/30/2013	In-Situ	<0.00107	<0.00213	<0.00107	<0.00213	<0.00213	<16.0	178	17.8	196	1,190
SB-2 @ 30'	30'	4/30/2013	In-Situ	-	-	-	-	-	<15.9	171	18.2	189	1,100
SB-2 @ 40'	40'	4/30/2013	In-Situ	<0.00105	<0.00209	<0.00105	<0.00209	<0.00209	<15.9	26.3	<15.9	26.3	901
SB-2 @ 50'	50'	4/30/2013	In-Situ	-	-	-	-	-	<15.6	23.3	<15.6	23.3	897
SB-2 @ 60'	60'	4/30/2013	In-Situ	<0.00105	<0.00209	<0.00105	<0.00209	<0.00209	<15.7	<15.7	<15.7	<15.7	822
SB-2 @ 70'	70'	4/30/2013	In-Situ	-	-	-	-	-	<15.6	<15.6	<15.6	<15.6	616
SB-2 @ 80'	80'	4/30/2013	In-Situ	<0.00109	<0.00219	<0.00109	<0.00219	<0.00219	<16.6	75.3	<16.6	75.3	487
SB-2 @ 90'	90'	4/30/2013	In-Situ	-	-	-	-	-	<15.6	23.5	<15.6	23.5	409
SB-2 @ 100'	100'	4/30/2013	In-Situ	-	-	-	-	-	<15.4	<15.4	<15.4	<15.4	405
SB-2 @ 101' Core	101'	4/30/2013	In-Situ	<0.00107	<0.00214	<0.00107	<0.00214	<0.00214	<16.2	47.3	<16.2	47.3	413
SB-3 @ Surface	Surface	4/30/2013	In-Situ	<0.00100	<0.00201	<0.00100	<0.00201	<0.00201	<15.2	2380	63	2,440	369
SB-3 @ 5'	5'	4/30/2013	In-Situ	<0.00103	<0.00207	<0.00103	<0.00207	<0.00207	<15.6	21.4	<15.6	21.4	219
SB-3 @ 10'	10'	4/30/2013	In-Situ	-	-	-	-	-	<16.1	<16.1	<16.1	<16.1	7.05
SB-3 @ 15'	15'	4/30/2013	In-Situ	-	-	-	-	-	<16.0	<16.0	<16.0	<16.0	6.28
SB-3 @ 20'	20'	4/30/2013	In-Situ	<0.00107	<0.00214	<0.00107	<0.00214	<0.00214	<16.1	<16.1	<16.1	<16.1	6.73
6-14-13 Stockpile	N/A	6/14/2013	Stockpiled	<0.050	1.02	2.36	6.56	9.95	242	4,000	1,300	5,542	208
6-14-13 North Floor	7'	6/14/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	1,450	669	2,119	208
6-18-13 Stockpile	N/A	6/18/2013	Stockpiled	<0.250	1.19	1.63	5.57	8.39	197	4,100	1,000	5,297	224
South Floor	6'	6/21/2013	In-Situ	<0.0050	<0.0050	<0.0050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	880

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES
 DRIP TANK #61-62
 HISTORICAL RELEASE SITE
 LEA COUNTY, NEW MEXICO
 NMOCD REF: # 1RP-1818

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M			TOTAL	EPA: 300
				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 ₃₆ (mg/Kg)	TPH C ₆ -C ₂₈ (mg/Kg)	CHLORIDE (mg/Kg)
Waste Characterization	N/A	6/21/2013	Stockpiled	-	-	-	-	-	176	3840	1,090	5,106	464
North SW #1	6'	6/24/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	68.6	54	122.6	336
West SW #1	6'	6/24/2013	In-Situ	<0.050	0.059	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	672
West SW #2	6'	6/24/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	352
West SW #3	5.5'	6/24/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	672
East SW #1	6'	6/24/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	847	298	1145	144
East SW #2	6'	6/24/2013	Excavated	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	1,260
Middle Floor	6.5'	6/24/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	<50.0	<50.0	<50.0	208
South SW #1	5.5'	6/25/2013	Excavated	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	1,780
South SW #1b	6'	6/28/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	688
South SW #2b	2'	6/28/2013	In-Situ	<0.050	0.083	0.057	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	272
East SW #2b	6'	6/28/2013	In-Situ	-	-	-	-	-	-	-	-	-	400
East SW #3b	2'	6/28/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	<50.0	<50.0	<50.0	64
East SW Floor	3'	6/28/2013	Excavated	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	1,890
SW Floor	3'	6/28/2013	Excavated	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	1,540
East SW #2c	6'	7/2/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	480
North SW #2	6'	7/2/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	256
7-2-13 Stockpile	N/A	7/2/2013	Stockpiled	<0.050	0.212	1.21	1.49	2.92	77.6	3,140	1,020	4,237	224
West SW #1b	6'	7/9/2013	In-Situ	-	-	-	-	-	-	-	-	-	144
West SW #2b	6'	7/9/2013	In-Situ	-	-	-	-	-	-	-	-	-	208
South SW #2c	6'	7/9/2013	In-Situ	-	-	-	-	-	-	-	-	-	80.0
North SW #1b	6'	7/10/2013	In-Situ	-	-	-	-	-	-	-	-	-	144
North SW #2b	6'	7/10/2013	In-Situ	-	-	-	-	-	-	-	-	-	64
South SW #1c	6'	7/10/2013	In-Situ	-	-	-	-	-	-	-	-	-	256
East SW #2d	6'	7/10/2013	In-Situ	-	-	-	-	-	-	-	-	-	144
West SW #3b	6'	7/10/2013	In-Situ	-	-	-	-	-	-	-	-	-	64
SW Floor WC	7'	7/10/2013	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	3550	1580	5,130	896
NMOCD Standard				10				50				5,000	1,000

