

GW – 269

**GENERAL
CORRESPONDENCE**

YEAR(S): 2008 - 2013

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LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
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F.L. HEIDEL
(1913-1985)

July 2, 2009

NMOCD

Attn: Leonard Lowe
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Southern Union Gas Services/Boyd Compressor Site GW-269

Dear Mr. Lowe,

As per our conversation, I am writing this letter on behalf this firm's client, Mr. Bill Sims, regarding Southern Union's remediation activities at the Boyd Compressor Site GW-269. Attached for your review is Mr. Tony Savoie's December 15, 2008 email to Mr. Wayne Price, your December 17, 2008 letter response to Mr. Savoie and Southern Union's analytical results for soil samples of MW #1 taken on or about January 14, 2009.

Despite Mr. Savoie's statement in the attached email that ".....the chloride impacted soil was excavated and removed from location to a depth of 20ft. Below Ground Surface...", Mr. Sims is concerned that the horizontal and vertical extent of chloride contamination was not properly delineated at this site. As proof of such, Mr. Sims would direct you to Southern Union's soil analyticals for monitor well #1. Those soil analyticals show chloride levels at the monitor well #1 location to be 6180 ppm at 15 ft. BGS and 8740 ppm at 20 ft BGS. These results indicate that not all of the chloride contaminated soils have been excavated from the site.

Mr. Sims would like to schedule a meeting with you and Southern Union to discuss his concerns as to whether contamination at the Boyd Compressor Site has been properly delineated and what other remediation activities, if any, need to be undertaken.

I look forward to hearing from you.

10/15

Letter to Leonard Lowe, NMOCD

Re: *Southern Union Gas Services/Boyd Compressor Site GW-269*

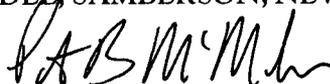
July 2, 2009

Page two.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:



Patrick B. McMahon

PBM:jo

Enclosure

cc: Bill Sims

Aaron Shields, Southern Union Gas Services

207-15

Sample: 185178 - MW-1-15

Laboratory: Midland
 Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A
 QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
 Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		6180	mg/Kg	50	4.00

Sample: 185178 - MW-1-15

Laboratory: Midland
 Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A
 QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD
 Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By: LD

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		80.9	mg/Kg	1	100	81	10 - 250.4

Sample: 185178 - MW-1-15

Laboratory: Midland
 Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035
 QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME
 Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.887	mg/Kg	1	1.00	89	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.887	mg/Kg	1	1.00	89	63.8 - 141

3 of 15

Sample: 185179 - MW-1-20

Laboratory: Midland	Analytical Method: SM 4500-C1 B	Prep Method: N/A
Analysis: Chloride (Titration)	Date Analyzed: 2009-01-23	Analyzed By: AR
QC Batch: 56283	Sample Preparation: 2009-01-23	Prepared By: AR
Prep Batch: 48075		

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		8740	mg/Kg	50	4.00

Sample: 185179 - MW-1-20

Laboratory: Midland	Analytical Method: Mod. 8015B	Prep Method: N/A
Analysis: TPH DRO	Date Analyzed: 2009-01-16	Analyzed By: LD
QC Batch: 56106	Sample Preparation: 2009-01-19	Prepared By: LD
Prep Batch: 47935		

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		87.0	mg/Kg	1	100	87	10 - 250.4

Sample: 185179 - MW-1-20

Laboratory: Midland	Analytical Method: S 8015B	Prep Method: S 5035
Analysis: TPH GRO	Date Analyzed: 2009-01-20	Analyzed By: ME
QC Batch: 56157	Sample Preparation: 2009-01-20	Prepared By: ME
Prep Batch: 47995		

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.920	mg/Kg	1	1.00	92	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.913	mg/Kg	1	1.00	91	63.8 - 141

10/15

Sample: 185180 - MW-1-25

Laboratory: Midland	Analytical Method: SM 4500-C1 B	Prep Method: N/A
Analysis: Chloride (Titration)	Date Analyzed: 2009-01-23	Analyzed By: AR
QC Batch: 56283	Sample Preparation: 2009-01-23	Prepared By: AR
Prep Batch: 48075		

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		8470	mg/Kg	50	4.00

Sample: 185180 - MW-1-25

Laboratory: Midland	Analytical Method: Mod. 8015B	Prep Method: N/A
Analysis: TPH DRO	Date Analyzed: 2009-01-16	Analyzed By: LD
QC Batch: 56106	Sample Preparation: 2009-01-19	Prepared By: LD
Prep Batch: 47935		

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		81.2	mg/Kg	1	100	81	10 - 250.4

Sample: 185180 - MW-1-25

Laboratory: Midland	Analytical Method: S 8015B	Prep Method: S 5035
Analysis: TPH GRO	Date Analyzed: 2009-01-20	Analyzed By: ME
QC Batch: 56157	Sample Preparation: 2009-01-20	Prepared By: ME
Prep Batch: 47995		

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.939	mg/Kg	1	1.00	94	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.930	mg/Kg	1	1.00	93	63.8 - 141

5 of 15

Sample: 185181 - MW-1-30

Laboratory: Midland	Analytical Method: SM 4500-C1 B	Prep Method: N/A
Analysis: Chloride (Titration)	Date Analyzed: 2009-01-23	Analyzed By: AR
QC Batch: 56283	Sample Preparation: 2009-01-23	Prepared By: AR
Prep Batch: 48075		

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		11000	mg/Kg	50	4.00

Sample: 185181 - MW-1-30

Laboratory: Midland	Analytical Method: Mod. 8015B	Prep Method: N/A
Analysis: TPH DRO	Date Analyzed: 2009-01-16	Analyzed By: LD
QC Batch: 56106	Sample Preparation: 2009-01-19	Prepared By: LD
Prep Batch: 47935		

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		81.4	mg/Kg	1	100	81	10 - 250.4

Sample: 185181 - MW-1-30

Laboratory: Midland	Analytical Method: S 8015B	Prep Method: S 5035
Analysis: TPH GRO	Date Analyzed: 2009-01-20	Analyzed By: ME
QC Batch: 56157	Sample Preparation: 2009-01-20	Prepared By: ME
Prep Batch: 47995		

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.921	mg/Kg	1	1.00	92	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.903	mg/Kg	1	1.00	90	63.8 - 141

6 of 15

Sample: 185182 - MW-1-35

Laboratory: Midland
Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A
QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		10900	mg/Kg	50	4.00

Sample: 185182 - MW-1-35

Laboratory: Midland
Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A
QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD
Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By: LD

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		57.5	mg/Kg	1	100	58	10 - 250.4

Sample: 185182 - MW-1-35

Laboratory: Midland
Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035
QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME
Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.926	mg/Kg	1	1.00	93	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.917	mg/Kg	1	1.00	92	63.8 - 141

7 of 15

Sample: 185183 - MW-1-40

Laboratory: Midland
Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A
QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		6830	mg/Kg	50	4.00

Sample: 185183 - MW-1-40

Laboratory: Midland
Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A
QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD
Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By: LD

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		77.0	mg/Kg	1	100	77	10 - 250.4

Sample: 185183 - MW-1-40

Laboratory: Midland
Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035
QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME
Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.925	mg/Kg	1	1.00	92	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.912	mg/Kg	1	1.00	91	63.8 - 141

807 15

Sample: 185184 - MW-1-45

Laboratory: Midland
 Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A
 QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
 Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		5900	mg/Kg	50	4.00

Sample: 185184 - MW-1-45

Laboratory: Midland
 Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A
 QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD
 Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By: LD

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		82.5	mg/Kg	1	100	82	10 - 250.4

Sample: 185184 - MW-1-45

Laboratory: Midland
 Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035
 QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME
 Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.909	mg/Kg	1	1.00	91	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.907	mg/Kg	1	1.00	91	63.8 - 141

9015

Sample: 185185 - MW-1-50

Laboratory: Midland
 Analysis: Chloride (Titration) Analytical Method: SM 4500-Cl B Prep Method: N/A
 QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
 Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		5760	mg/Kg	50	4.00

Sample: 185185 - MW-1-50

Laboratory: Midland
 Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A
 QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD
 Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By: LD

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		80.8	mg/Kg	1	100	81	10 - 250.4

Sample: 185185 - MW-1-50

Laboratory: Midland
 Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035
 QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME
 Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.890	mg/Kg	1	1.00	89	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.841	mg/Kg	1	1.00	84	63.8 - 141

10/15

Sample: 185186 - MW-1-55

Laboratory: Midland
 Analysis: Chloride (Titration) Analytical Method: SM 4500-C1 B Prep Method: N/A
 QC Batch: 56283 Date Analyzed: 2009-01-23 Analyzed By: AR
 Prep Batch: 48075 Sample Preparation: 2009-01-23 Prepared By: AR

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		1300	mg/Kg	50	4.00

Sample: 185186 - MW-1-55

Laboratory: Midland
 Analysis: TPH DRO Analytical Method: Mod. 8015B Prep Method: N/A
 QC Batch: 56106 Date Analyzed: 2009-01-16 Analyzed By: LD
 Prep Batch: 47935 Sample Preparation: 2009-01-19 Prepared By: LD

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<50.0	mg/Kg	1	50.0

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		78.1	mg/Kg	1	100	78	10 - 250.4

Sample: 185186 - MW-1-55

Laboratory: Midland
 Analysis: TPH GRO Analytical Method: S 8015B Prep Method: S 5035
 QC Batch: 56157 Date Analyzed: 2009-01-20 Analyzed By: ME
 Prep Batch: 47995 Sample Preparation: 2009-01-20 Prepared By: ME

Parameter	Flag	RL Result	Units	Dilution	RL
GRO		<1.00	mg/Kg	1	1.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.958	mg/Kg	1	1.00	96	67.5 - 135.2
4-Bromofluorobenzene (4-BFB)		0.967	mg/Kg	1	1.00	97	63.8 - 141

11 of 15

Lowe, Leonard, EMNRD

From: Savoie, Tony [tony.savoie@sug.com]
Sent: Monday, December 15, 2008 7:00 AM
To: Price, Wayne, EMNRD; Lowe, Leonard, EMNRD
Subject: Boyd Compressor GW-269
Attachments: Analytical Summary.xlsm

Follow Up Flag: Follow up
Flag Status: Flagged

<<Analytical Summary.xlsm>> Dear Wayne, Southern Union Gas Services is requesting your consideration for closure of the excavation associated with the removal of a leaking fiberglass tank located at our Boyd Compressor Site GW-269.

Facts:

The leaking tank was removed and the chloride impacted soil was excavated and removed from location to a depth of 20 ft. Below Ground Surface "BGS"

The excavation was backfilled with clean soil to a depth of 10ft. BGS and a ramp was constructed to allow an air rotary rig access to the center of the below grade tank location. Soil Samples were collected at 5 ft. intervals starting at a depth of 30 ft. BGS the soil samples were analyzed on-site by a field technician employed by Straub Drilling. Also 2 samples were selected and sent to a lab for comparison.

The Highest chloride reading was at 30 ft. BGS at 7197 mg/kg The Lowest chloride reading was at 60 ft. BGS at 80 mg/kg The driller estimated the depth to water to be between 52 to 54 ft. BGS.

A table with all of the site analytical is attached.

The samples associated with the leaking tank start at line 64 through 70 We would like for you to consider the placement of a 30 mil liner in the bottom of the excavation which is 10 ft. BGS and backfilling with clean soil.

Once the area has been backfilled and stabilized we plan on putting in 3 monitor wells, one up-gradient and 2 down-gradient. We hope to place one of the down-gradient wells directly in line with the Tank location.

However if 4th. well is required after determining gradient flow it will be placed as close to the source point as possible.

I have not submitted a written plan for closure to the landowner. I will forward this information along with your response to him.

Thanks,

Tony

The message is ready to be sent with the following file or link attachments:

Analytical Summary.xlsm

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Private and confidential as detailed here: <http://www.sug.com/disclaimers/default.htm#Mail> .
If you cannot access the link, please e-mail sender.

This inbound email has been scanned by the MessageLabs Email Security System.

12 of 15


New Mexico Energy, Minerals and Natural Resources Department

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Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



December 17, 2008

Mr. Tony Savoie
Southern Union Gas
P.O. Box 1226
Jal, New Mexico 88252

Re: GW-269, Boyd Compressor Station, Below Grade Tank Work Assessment

Dear Mr. Savoie

The Environmental Bureau of the New Mexico Oil Conservation Division (NMOCD) has received the site follow up report for the release at the Boyd compressor station dated December 15, 2008, and has conducted a review of the report. The OCD hereby approves the anticipated actions at the site as specified in the report. However, the OCD recommends locating the groundwater monitor wells as specified below (see attached schematic for details):

MW-1, down gradient and adjacent to the localize area of the release, but not close enough to penetrate through the 30 Mil liner.

MW-2, down gradient of the release.

MW-3, down gradient of the release.

Southern Union Gas may place a monitor well up-gradient of the incident but are not required to. The initial sampling should include the parameters specified in the attached list.

Please be advised that the NMOCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions pertaining to this process please call me at (505) 476-3492 or e-mail me at leonard.lowe@state.nm.us.

Sincerely,

Leonard Lowe
Environmental Engineer


130715

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, December 17, 2008 10:24 AM
To: Tony Savoie
Cc: Price, Wayne, EMNRD; Hansen, Edward J., EMNRD
Subject: GW-269, Boyd Compressor Station
Attachments: GW-269, work plan assessment.pdf; Analytical Parameters for water.pdf

Mr. Savoie,

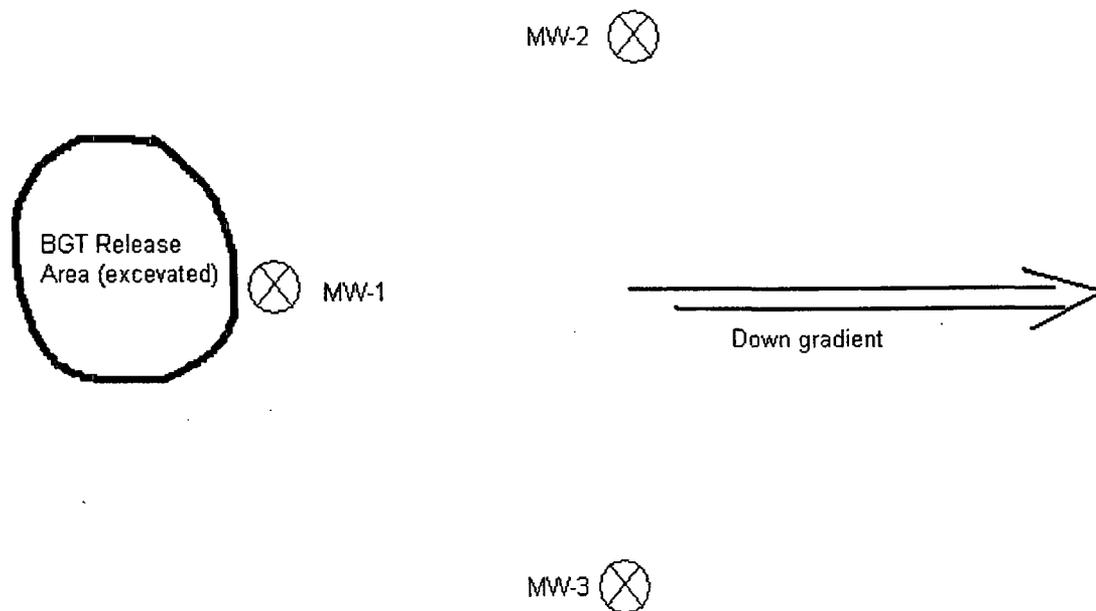
If you have any questions please feel free to contact me.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>

Schematic for location of monitor wells



15 of 15

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, December 17, 2008 10:24 AM
To: Tony Savoie
Cc: Price, Wayne, EMNRD; Hansen, Edward J., EMNRD
Subject: GW-269, Boyd Compressor Station
Attachments: GW-269, work plan assessment.pdf; Analytical Parameters for water.pdf

Mr. Savoie,

If you have any questions please feel free to contact me.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



December 17, 2008

Mr. Tony Savoie
Southern Union Gas
P.O. Box 1226
Jal, New Mexico 88252

Re: GW-269, Boyd Compressor Station, Below Grade Tank Work Assessment

Dear Mr. Savoie

The Environmental Bureau of the New Mexico Oil Conservation Division (NMOCD) has received the site follow up report for the release at the Boyd compressor station dated December 15, 2008, and has conducted a review of the report. The OCD hereby approves the anticipated actions at the site as specified in the report. However, the OCD recommends locating the groundwater monitor wells as specified below (see attached schematic for details):

MW-1, down gradient and adjacent to the localize area of the release, but not close enough to penetrate through the 30 Mil liner.

MW-2, down gradient of the release.

MW-3, down gradient of the release.

Southern Union Gas may place a monitor well up-gradient of the incident but are not required to. The initial sampling should include the parameters specified in the attached list.

Please be advised that the NMOCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions pertaining to this process please call me at (505) 476-3492 or e-mail me at leonard.lowe@state.nm.us.

Sincerely,

Leonard Lowe
Environmental Engineer

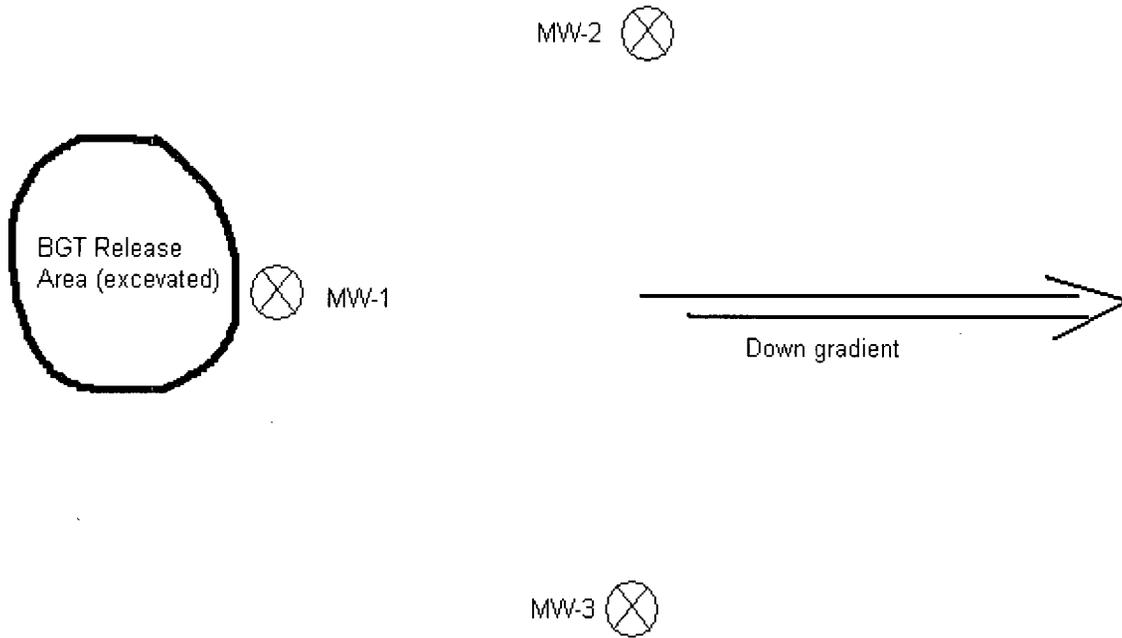
Oil Conservation Division * 1220 South St. Francis Drive

* Santa Fe, New Mexico 87505

* Phone: (505) 476-3440 * Fax (505) 476-3462* <http://www.emnrd.state.nm.us>



Schematic for location of monitor wells



NMOCD - Analytical Parameters for Initial Groundwater Sampling (5-29-08)

Field Parameters

specific conductance
pH
temperature
depth to water

General Chemistry

Calcium
Magnesium
Potassium
Sodium
Chloride
Sulfate
Bicarbonate Alkalinity
Carbonate Alkalinity
Nitrate
Phosphate
Fluoride
Total Dissolved Solids (TDS)

RCRA Metals

Arsenic
Barium
Cadmium
Chromium
Lead
Mercury
Selenium
Silver

Additional WQCC Metals

Copper
Iron
Manganese
Zinc
Aluminum
Boron
Cobalt
Molybdenum
Nickel

All compounds listed in U.S. EPA SW-846 Methods: 8260 (VOCs) & 8270 (SVOCs)

Lowe, Leonard, EMNRD

From: Savoie, Tony [tony.savoie@sug.com]
Sent: Monday, December 15, 2008 7:00 AM
To: Price, Wayne, EMNRD; Lowe, Leonard, EMNRD
Subject: Boyd Compressor GW-269
Attachments: Analytical Summary.xlsm

Follow Up Flag: Follow up
Flag Status: Flagged

<<Analytical Summary.xlsm>> Dear Wayne, Southern Union Gas Services is requesting your consideration for closure of the excavation associated with the removal of a leaking fiberglass tank located at our Boyd Compressor Site GW-269.

Facts:

The leaking tank was removed and the chloride impacted soil was excavated and removed from location to a depth of 20 ft. Below Ground Surface "BGS"
The excavation was backfilled with clean soil to a depth of 10ft. BGS and a ramp was constructed to allow an air rotary rig access to the center of the below grade tank location. Soil Samples were collected at 5 ft. intervals starting at a depth of 30 ft. BGS the soil samples were analyzed on-site by a field technician employed by Straub Drilling. Also 2 samples were selected and sent to a lab for comparison.
The Highest chloride reading was at 30 ft. BGS at 7197 mg/kg The Lowest chloride reading was at 60 ft. BGS at 80 mg/kg The driller estimated the depth to water to be between 52 to 54 ft. BGS.

A table with all of the site analytical is attached.

The samples associated with the leaking tank start at line 64 through 70 We would like for you to consider the placement of a 30 mil liner in the bottom of the excavation which is 10 ft. BGS and backfilling with clean soil.

Once the area has been backfilled and stabilized we plan on putting in 3 monitor wells, one up-gradient and 2 down-gradient. We hope to place one of the down-gradient wells directly in line with the Tank location.

However if 4th. well is required after determining gradient flow it will be placed as close to the source point as possible.

I have not submitted a written plan for closure to the landowner. I will forward this information along with your response to him.

Thanks,
Tony

The message is ready to be sent with the following file or link attachments:

Analytical Summary.xlsm

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

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If you cannot access the link, please e-mail sender.

This inbound email has been scanned by the MessageLabs Email Security System.

Boyd Compressor

Date Collected	Report #	Depth Of Sample	Location	C-6-C10 mg/kg	C10-C28 mg/kg	C28-C35 mg/kg	C6-C35 mg/kg	TPH 418.1 mg/kg	Chloride mg/kg Field Test	Chloride mg/kg Lab	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	p/m-Xylene mg/kg	o-Xylene mg/kg	Status of Soil
9/18/2007			Compressor Locations													Removed Blended On Site
9/18/2007	289820	2 ft. B.G.S.	Surface Composite @ 3'					51400								Removed Blended On Site
9/18/2007	289820	4 ft. B.G.S.	#1 Core @ 2'					54800								Removed Blended On Site
9/18/2007	289820	2 ft. B.G.S.	#1 Core @ 4'					31900								Removed Blended On Site
9/18/2007	289820	4 ft. B.G.S.	#2 Core @ 2'					43300								Removed Blended On Site
9/18/2007	289820	4 ft. B.G.S.	#2 Core @ 4'					1240								Removed Blended On Site
9/18/2007	289820	6 ft. B.G.S.	#2 Core @ 6'					4700								Removed Blended On Site
9/18/2007	289820	8 ft. B.G.S.	#2 Core @ 8'					59200								Removed Blended On Site
9/18/2007	289820	10 ft. B.G.S.	#2 Core @ 10'					61700								Removed Blended On Site
7/29/2008	308900-002	20 ft.	S.B.2	ND	74.1	47.2	121.3				ND	ND	ND	ND	ND	Excavated and blended on-site
7/29/2008	308900-002	25 ft.	S.B.2	ND	29.9	26.1	56				ND	ND	ND	ND	ND	Left in Place
8/21/2008	310769-001		Comp. Floor 1	374	3370	4940	8684									Removed Blended On Site
8/21/2008	310769-002		Comp Floor S.E. Corner	ND	93.4	88.6	182									Removed Blended On Site
8/21/2008	310769-003		Comp. Floor 2	204	2890	497	3591									Removed Blended On Site
8/28/2008	311359-001		Center Deep Floor	ND	62.5	44.7	107.2				ND	ND	ND	ND	ND	Left in place/Bottom Hole sample
8/28/2008	311359-002		North Wall Center Deep	ND	23.7	ND	23.7									Left in place/Bottom Hole sample
8/28/2008	311359-003		Center Deep Wall Composite	ND	21.3	ND	21.3									Left in place/Bottom Hole sample
8/28/2008	311359-004		East Wall Intermediate	ND	ND	ND	ND									Left in place/Bottom Hole sample
8/28/2008	311359-005		Wall Composite Intermediate	ND	24.1	ND	24.1									Left in place/Bottom Hole sample
9/5/2008	H15879-1		N.E. Bottom	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/5/2008	H15879-2		Walls	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/5/2008	H15879-3		E.S. Bottom Wall	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/5/2008	H15879-4		S.W. Bottom Wall	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/5/2008	H15879-5		W.N. Top Wall	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/5/2008	H15879-6		Floor	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/5/2008	H15879-7		N.W. Floor	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/11/2008	H15910-1		L.L. R.P.	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/11/2008	H15910-2		L.L. Floor composite	<25.0	<25.0	<25.0	<25.0			<16						Left in place/Bottom Hole sample
9/11/2008	H15910-3		L.L. N.W. Bottom	<25.0	<25.0	<25.0	<25.0			48						Left in place/Bottom Hole sample
9/11/2008	H15910-4		L.L. Walls	<25.0	<25.0	<25.0	<25.0									Left in place/Bottom Hole sample
9/11/2008	H15910-7	Soil Pile	Stockpile E	49.8	2770	159	2979									StockPile E Blended on-site
9/15/2008	H15932-2	Soil Pile	Stockpile E *Blending Test*	<25.0	<25.0	<25.0	<25.0									Left in Place
9/16/2008	H15932-2	Soil Pile	Stockpile E	<25.0	<25.0	<25.0	<25.0			96						StockPile E Blended on-site
9/22/2008	H15959-1	Soil Pile	Stockpile FA	<25.0	<25.0	<25.0	<25.0									Stockpile used for Blending
9/22/2008	H15959-2	Soil Pile	Stockpile FB	<25.0	<25.0	<25.0	<25.0									Stockpile used for Blending
9/26/2008	H15991-1	Blended Soil Pile	Stockpile EA	<25.0	130	<25.0	130									Reworked and Sampled again
10/1/2008	H16019-1	Blended Soil Pile	Stockpile EA	<25.0	126	<25.0	126									Reworked and Sampled again
10/6/2008	H16051-1	Blended Soil Pile	Stockpile EA	<25.0	<25.0	<25.0	<25.0									Ready For Backfill
10/6/2008	H16051-2	Blended Soil Pile	Stockpile EB	<25.0	<25.0	<25.0	<25.0									Ready For Backfill
10/8/2008	H16074-1	Blended Soil Pile	Stockpile EC	<25.0	78.3	<25.0	78.3									Ready For Backfill
10/10/2008	H16098-1	Blended Soil Pile	Stockpile ED	<25.0	30.8	<25.0	30.8									Ready For Backfill
10/16/2008	H16130-1	Blended Soil Pile	Stockpile EF	<25.0	89.4	<10.0	89.4									Ready For Backfill
10/20/2008	H16146-1	Blended Soil Pile	Stockpile EG	<10.0	<10.0	<10.0	<10.0									Ready For Backfill
10/22/2008	H16174-1	Blended Soil Pile	Stockpile EH	<10.0	18.0	<10.0	18.0									Ready For Backfill
10/24/2008	H16196-1	Blended Soil Pile	Stockpile EI	<10.0	60.2	<10.0	60.2									Ready For Backfill
10/27/2008	H16202-1	Blended Soil Pile	Stockpile EJ	<10.0	52.0	<10.0	52.0									Ready For Backfill
10/29/2008	H16215-1	Blended Soil Pile	Stockpile EK	<10.0	30.8	<10.0	30.8									Ready For Backfill
10/31/2008	H16249-1	Blended Soil Pile	Stockpile EL	<10.0	35.5	<10.0	35.5									Ready For Backfill
11/3/2008	H16261-1	Blended Soil Pile	Stockpile EM	<10.0	50.6	<10.0	50.6									Ready For Backfill
11/4/2008	H16268-1	Blended Soil Pile	Stockpile EN	<10.0	36.2	<10.0	36.2									Ready For Backfill
11/6/2008	H16279-1	Blended Soil Pile	Stockpile EO	<10.0	48.2	<10.0	48.2									Ready For Backfill
11/6/2008	H16279-2	Blended Soil Pile	Stockpile EP	<10.0	42.0	<10.0	42.0									Ready For Backfill

Boyd Compressor

Date Collected	Report #	Depth Of Sample	Location	C-6-C10 mg/kg	C10-C28 mg/kg	C28-C35 mg/kg	C6-C35 mg/kg	TPH 418.1 mg/kg	Chloride mg/kg	Chloride mg/kg	Chloride 4500 Cl.B mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	p/m-Xylene mg/kg	o-Xylene mg/kg	Status of Soil
11/11/2008	H16305-1	Blended Soil Pile	Stockpile EQ	<10.0	50.4	<10.0	50.4					<0.001	<0.001				Ready For Backfill
11/11/2008	H16305-2	Blended Soil Pile	Stockpile ER	<10.0	117	<10.0	117					<0.001	<0.001				Reworked and Sampled again
11/17/2008	H16349-1	Blended Soil Pile	Stockpile EQ & ER	<10.0	66.2	<10.0	66.2					<0.001	<0.001				Ready For Backfill
Below Grade Tank Location																	
6/18/2008	H15011-1	Surface to 8 ft.	North Wall N.E.T.	<10.0	<10.0							<0.001	<0.001				Left in place
6/18/2008	H15011-2	Surface to 8 ft.	West Wall W.C.T.	<10.0	<10.0				272			<0.001	<0.001				Left in place
6/18/2008	H15011-3	8 ft.	Floor	<10.0	<10.0							<0.001	<0.001				Removed Hauled to Texas for Backfill
6/18/2008	H15011-4	Surface to 8 ft.	North Wall	<10.0	<10.0				7440			<0.001	<0.001				Left in place
6/18/2008	H15011-5	Surface to 8 ft.	East Wall	<10.0	<10.0												Left in place
6/18/2008	H15011-6	Surface to 8 ft.	South Wall	<10.0	<10.0												Left in place
6/18/2008	H15011-7	Surface to 8 ft.	West Wall	<10.0	<10.0												Left in place
7/17/2008	H-15175-1	Soil Pile Composite	Stockpile "B"								880						Removed Hauled to Texas for Backfill
7/17/2008	H-15175-2	Soil Pile Composite	Stockpile "A"								768						Removed Hauled to Texas for Backfill
7/17/2008	H-15186-2	8 ft.	NW Corner								80						Left in Place
7/17/2008	H-15186-3	Surface to 8 ft.	West Ramp Wall								16						Left in Place
7/17/2008	H-15186-4	10 ft.	2 FT.B. Floor								13200						Removed Hauled to Texas for Backfill
7/17/2008	H-15186-5	12 ft.	4 FT.B. Floor								13200						Removed Hauled to Texas for Backfill
7/17/2008	H-15186-6	14 ft.	6 FT.B. Floor								11600						Removed Hauled to Texas for Backfill
7/17/2008	H-15186-7	16 ft.	8 FT.B. Floor								12400						Removed Hauled to Texas for Backfill
7/17/2008	H-15186-8	18 ft.	10 FT.B. Floor								16000						Removed Hauled to Texas for Backfill
7/17/2008	H-15186-9	20 ft.	12 FT.B. Floor								26000						Removed Hauled to Texas for Backfill
7/17/2008	308364	8 ft.	8 ft. frm floor								15300						Removed Hauled to Texas for Backfill
7/23/2008	H15238-1	Soil Pile Composite	StockPile "C"	<10.0	<10.0						256						Removed Hauled to Texas for Backfill
9/11/2008	H15910-5	Surface	Soil Surface under Stockpile AB Floor								<16						Left in Place
9/11/2008	H15910-6	Soil Pile Composite	AB Composite								704						Removed Hauled to Texas for Backfill
9/16/2008	H15932-1	Soil Pile Test	Stock Pile "C"								480						Removed Hauled to Texas for Backfill
				C-6-C12 mg/kg	C12-C28 mg/kg	C28-C35 mg/kg	C6-C35 mg/kg				EPA 300 mg/kg						

Lowe, Leonard, EMNRD

From: Savoie, Tony [tony.savoie@sug.com]
Sent: Thursday, October 02, 2008 11:26 AM
To: Lowe, Leonard, EMNRD
Subject: Re: Boyd Compressor GW-269

I talked with Wayne a couple of weeks ago regarding the chloride closure and ladowner concerns.
I will call you later to discuss.
Tony

Sent using BlackBerry

----- Original Message -----

From: Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us>
To: Savoie, Tony
Cc: Price, Wayne, EMNRD <wayne.price@state.nm.us>
Sent: Thu Oct 02 12:24:55 2008
Subject: RE: Boyd Compressor GW-269

Tony,

Good morning.

What is the status of the clean up for closure of GW-269? The last I recall you were going to get me some sample results.

“From: Savoie, Tony [<mailto:tony.savoie@sug.com>]
Sent: Monday, June 30, 2008 9:34 AM
To: Lowe, Leonard, EMNRD
Subject: RE: Boyd Compressor Station BGT closure

The BGT was used to store water and or sediment that was drained from the Above ground storage tank. SUGS never used the BGT for this purpose, so it is hard to say when it was last used. It was empty the first time I looked at it in 2002. We removed the BGT and discovered that the bolts used to secure the two sections of the fiberglass tank had corroded and probably allowed some of the fluid to leak from the tank into the ground, we are in the process of determining the extent of the contamination found under the tank. We are sampling for TPH, BTEX, and Chlorides. I will pass the results of the analytical on to you as soon as this is accomplished. We will not backfill any of the excavations until you have had a chance to review the data.

Our Landfarm was first permitted for Sid Richardson Energy Services, we submitted and received the name change information from Sid Richardson to Southern Union Gas Services from Brad Jones on 10/19/06.

Our permit number is NM-02-0019

”

Let me know.

10/23/2008

GW-269

Lowe, Leonard, EMNRD

From: Savoie, Tony [tony.savoie@sug.com]
Sent: Monday, June 30, 2008 10:48 AM
To: Lowe, Leonard, EMNRD
Subject: RE: Boyd Compressor Station BGT closure

It was a single walled fiberglass tank.
 Tony

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, June 30, 2008 11:48 AM
To: Savoie, Tony
Subject: RE: Boyd Compressor Station BGT closure

Is the BGT single or double walled?

From: Savoie, Tony [mailto:tony.savoie@sug.com]
Sent: Monday, June 30, 2008 9:34 AM
To: Lowe, Leonard, EMNRD
Subject: RE: Boyd Compressor Station BGT closure

The BGT was used to store water and or sediment that was drained from the Above ground storage tank. SUGS never used the BGT for this purpose, so it is hard to say when it was last used. It was empty the first time I looked at it in 2002. We removed the BGT and discovered that the bolts used to secure the two sections of the fiberglass tank had corroded and probably allowed some of the fluid to leak from the tank into the ground, we are in the process of determining the extent of the contamination found under the tank. We are sampling for TPH, BTEX, and Chlorides. I will pass the results of the analytical on to you as soon as this is accomplished. We will not backfill any of the excavations until you have had a chance to review the data.

Our Landfarm was first permitted for Sid Richardson Energy Services, we submitted and received the name change information from Sid Richardson to Southern Union Gas Services from Brad Jones on 10/19/06.

Our permit number is NM-02-0019

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, June 30, 2008 10:20 AM
To: Savoie, Tony
Subject: RE: Boyd Compressor Station BGT closure

Tony,

Clarification: the BGT on this facility was used to store water from the scrubber? When was the last time this BGT contained liquid?

Do your land farms have an NM-XXX OCD number?

llowe

From: Savoie, Tony [mailto:tony.savoie@sug.com]
Sent: Monday, June 30, 2008 6:19 AM

7/2/2008

To: Lowe, Leonard, EMNRD
Subject: RE: Boyd Compressor Station BGT closure

Sorry about the delay in response, I have been on vacation.
I used the new BGT closure guidelines for my remediation plan.
Yes, we do operate a centralized landfarm. We do not accept any wastes generated outside of SUGS facilities. We do not deal with drilling pit wastes, however we have started sampling all of our remediation projects for chlorides. And have sampled the landfarm for chlorides the last two sampling events.

Thanks,
Tony

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Thursday, June 26, 2008 5:56 PM
To: Savoie, Tony
Subject: Boyd Compressor Station BGT closure
Importance: High

Tony,

I have reviewed your submitted closure plan for the Boyd Compressor Station.

I have made some points.

Being that the new pit rule is in effect, which includes Below Grade Tanks, I can not make a sufficient determination to conclude your submitted closure plan for this facility.

Wayne is out providing guidance on the new pit rule this week.

He will be in the office next week and as his schedule will allow I will present my conclusions to him. We are in the stages of the fine line between old rule and new rule.

One question for now: Does SUG have their own land farms? You are aware of chloride limits for land farms, right?

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
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Santa Fe, N.M. 87505
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Website: <http://www.emnrd.state.nm.us/ocd/>

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