REMEDIATION SUMMARY & SOIL CLOSURE REQUEST

Property:

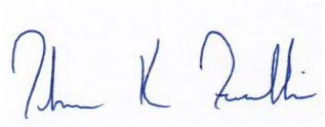
REGENCY FIELD SERVICES LLC.
Highway 18 Drip Tanks
Historical Release Site
Lea County, New Mexico
Unit Letter "D", Section 32, Township 24 South, Range 37 East
Latitude 32.180428, Longitude -103.192786
NMOCD Reference # 1RP-2041

October 2014
Apex Project No. 7030714G072

Prepared for:

Regency Field Services LLC
301 Commerce Street, Suite 700
Fort Worth, TX 76109
Attn: **Ms. Crystal Callaway, BSN, RN, CHMM**

Prepared by:



Thomas Franklin
Project Manager

Liz Scaggs
Senior Technical Review

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CLOSURE REQUEST

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1.0 INTRODUCTION

1.1 Site Description & Background

Apex TITAN, Inc. (Apex) has prepared this Closure Request for the Regency Field Services, LLC (Regency) Highway 18 Drip Tanks as the result of a leaking above ground storage tank (referred to hereinafter as the "Site" or "subject Site"). Remedial actions were reportedly conducted in accordance with New Mexico Energy, Minerals, and Natural Resources Department (EMNRD), Oil Conservation Division (NMOCD) rules (*NMAC 19.15.29 Release Notification*) and the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* as guidance.

The Highway 18 Drip Tanks location is located off of Highway 18, approximately four (4) miles north of Jal, New Mexico (GPS 32.180428, -103.192786). On December 18, 2008, a one hundred (100) barrel tank was removed and from a visual inspection it appeared that the tank had been leaking. According to documentation, the release was reported by the operator at the time, Southern Union Gas, to the New Mexico Oil Conservation Division (NMOCD) on December 19, 2008. The NMOCD C-141 form indicated the release affected approximately twenty five square feet (25 ft^2). Regency Field Services, LLC. has subsequently acquired this site.

The previous remedial activities were reportedly conducted by Ocotillo Environmental and Basin Environmental (Basin). This Closure Request is solely based upon the interpretation of the data provided.

1.2 Project Objective

The objective of the Closure Report is to present documentation of the activities that were performed to date and to request closure of the site.

1.3 Standard of Care

Apex's services will be performed in accordance with standards customarily provided by a firm rendering the same or similar services in the area during the same time period.

Apex makes no warranties, express or implied, as to the services performed hereunder. Additionally, Apex does not warrant the work of third parties supplying information used in the report (e.g. laboratories, regulatory agencies, or other third parties). This scope of services will be performed in accordance with the scope of work agreed with the client.

1.4 Reliance

This report has been prepared for the exclusive use of Regency, and any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the Site) is prohibited without the express written authorization of Regency and Apex. Any unauthorized distribution or reuse is at the client's sole risk. Notwithstanding the foregoing, reliance by authorized parties will be subject to the terms, conditions and limitations stated in the proposal, the report, and Apex's Agreement. The limitation of liability defined in the agreement is the aggregate limit of Apex's liability to the client.

2.0 SITE RANKING & PROPOSED REMEDIAL ACTION GOALS

The Site is subject to regulatory oversight by the NMOCD. To address activities related to releases, the NMOCD utilizes the *Guidelines for Remediation of Leaks, Spills and Releases* as guidance, in addition to the NMOCD rules, specifically NMAC 19.15.29 *Release Notification*. These documents establish investigation and abatement action requirements for sites subject to reporting and/or corrective action.

In accordance with the NMOCD's *Guidelines for Remediation of Leaks, Spills and Releases*, Apex utilized the general site characteristics to determine the appropriate "ranking" for the Site. The ranking criteria and associated scoring are provided in the table below:

Ranking Criteria			**Ranking Score**
Depth to Groundwater	<50 feet	20	**10**
	50 to 99 feet	10	
	>100 feet	0	
Wellhead Protection Area, <1,000 feet from a water source, or; <200 feet from private domestic water source.	Yes	20	**0**
	No	0	
Distance to Surface Water Body	<200 feet	20	**0**
	200 to 1,000 feet	10	
	>1,000 feet	0	
Total Ranking Score			**10**

Based on Apex's evaluation of the scoring criteria, the Site would have a Total Ranking Score of 10. This ranking is based on the following:

- The depth to the initial groundwater-bearing zone is 50 to 99 feet at the Site.

- The impacted area is greater than 200 feet from a private domestic water source.
- Distance to the nearest surface water body is greater than 1,000 ft.

Based on a Total Ranking Score of 10, cleanup goals for soils remaining in place include: 10 milligrams per kilogram (mg/Kg) for benzene, 50 mg/Kg for total benzene, toluene, ethlybenzene and xylene (BTEX) and, 1,000 mg/Kg for total petroleum hydrocarbons (TPH).

3.0 INITIAL RESPONSE, EXCAVATION & TREATMENT ACTIVITIES

3.1 Initial Response

According to the initial C-141, Southern Union Gas responded to a report of a leaking tank. Through visual inspection, an area of oil saturated soil measuring approximately twenty five square feet (25 sq^2) was discovered under the eastern above ground storage tank. The area was reportedly remediated by Ocotillo Environmental in 2009 as shown in Figure 4, Appendix A, the final disposition of the impacted soil is unknown.

3.2 Excavation Confirmation Soil Sampling Program

Based on the information provided, confirmation soil samples of the remediated area were collected by Basin and analyzed for BTEX, TPH and chloride. The results of the confirmation samples were compared to the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* (Section VI A. Contaminated Soils) as shown in Table 1, Appendix B, as provided by Basin Environmental. The sample results did not exceed the NMOCD clean-up goals as discussed in Section 2.0 above.

4.0 LABORATORY ANALYTICAL METHODS

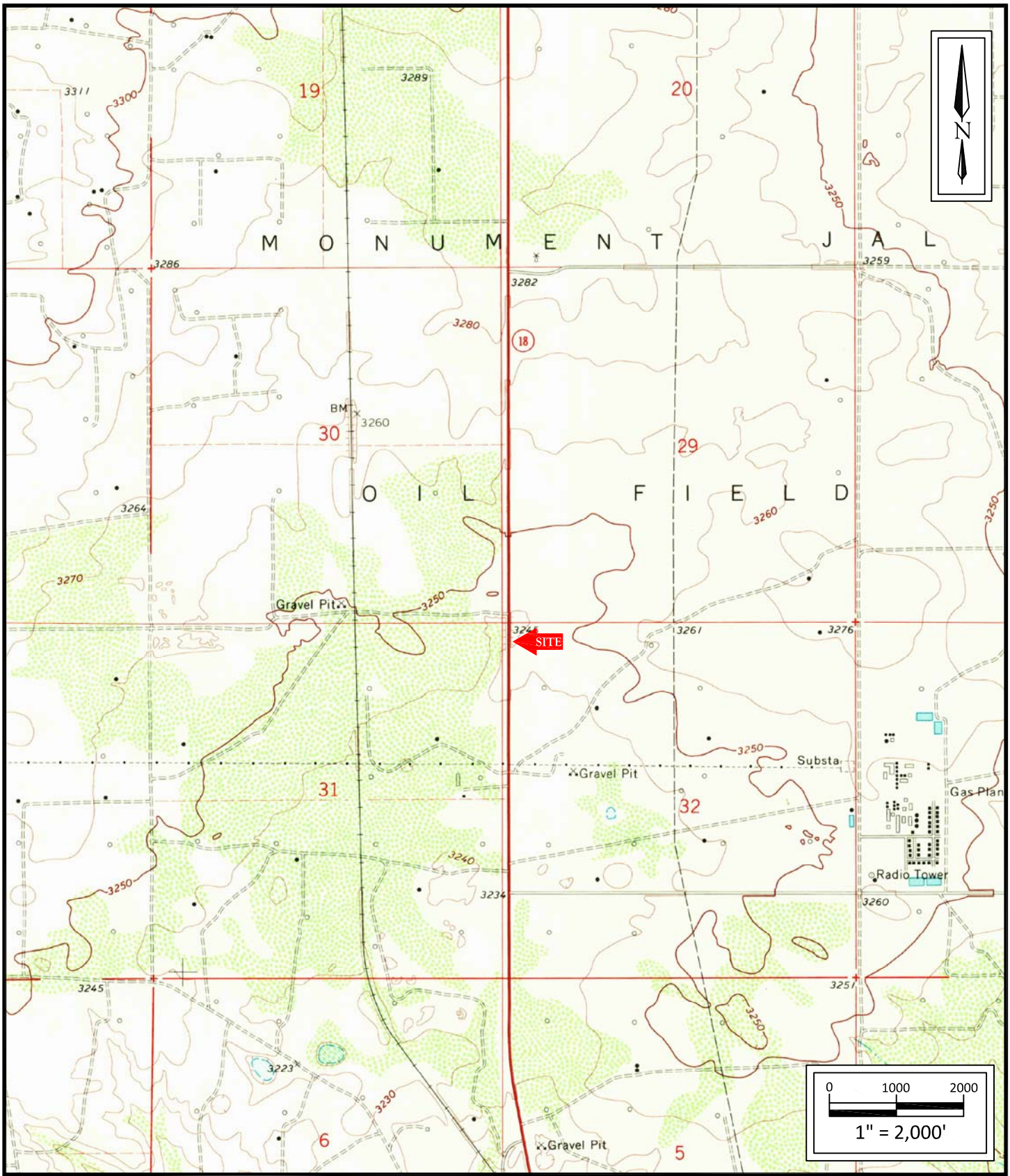
The samples were analyzed for TPH GRO/DRO utilizing EPA method SW-846 8015, BTEX using EPA method SW-846 8021B and chlorides utilizing EPA method SW-846 300.1. Copies of the laboratory analysis provided by Basin are shown in Appendix D.

5.0 SITE RESTORATION / CLOSURE REQUEST

Based upon the data provided, and the photos shown in Appendix C, the site was brought to grade. Based upon the response actions and laboratory analytical results, no additional investigation and/or remediation appears warranted at this time. Regency respectfully requests closure of this site. Copies of the Initial and Final C-141 are provided in Appendix E.

APPENDIX A

Figures



Regency - Hwy 18 Drip Tanks
Rural Lea County, New Mexico
32.180339N, 103.192841W

Project No. 7030714G072.001

Apex TITAN, Inc.
505 N. Big Springs Street, Suite 301A
Midland, Texas 79701
Phone: (432) 695-6016
www.apexcos.com
A Subsidiary of Apex Companies, LLC

FIGURE 1
Topographic Map
Jal NW, NM Quadrangle
1969

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FIGURE 2
Site Vicinity Map
2014 Aerial Photograph
Source: Google Earth

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FIGURE 3
Site Plan

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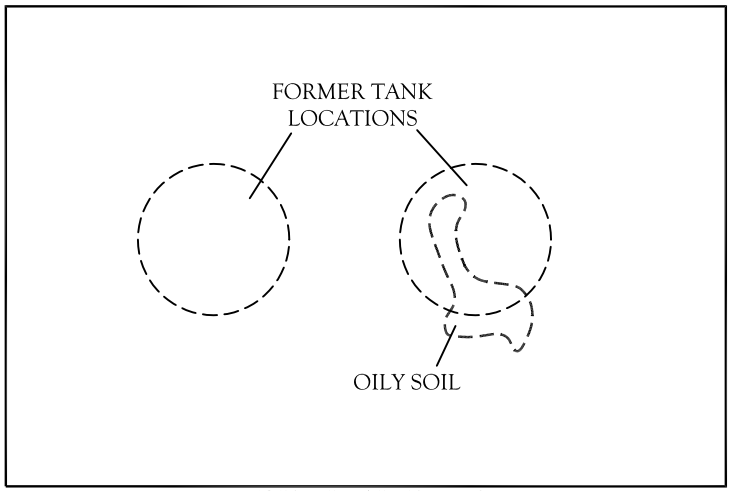

N

0 6 12

1" = 12'

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FIGURE 4
Remediation Area

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APPENDIX B

Soil Analytical Results

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES
HIGHWAY 18 DRIP TANKS HISTORICAL
HISTORICAL RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REF: # N/A

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
				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)		CHLORIDE (mg/Kg)
AST @ Surface	Surface	10/23/2013	In-Situ	<0.00103	<0.00205	<0.00103	<0.00205	<0.00205	<15.4	31.4	<15.4	31.4	9.53
AST @ 18"	18"	10/23/2013	In-Situ	<0.00106	<0.00211	<0.00106	<0.00211	<0.00211	<15.5	66	<15.5	66.1	3.50
NMOCD Standard				**10**				**50**				**1,000**	**250**

- = Not analyzed.

APPENDIX C

Photos

View South – Remediated Area of Drip Tanks

View South – Remediated Area of Drip Tanks

APPENDIX D

Laboratory Data Reports & Chain-of-Custody Documents

Analytical Report 472752

for

Regency Gas

Project Manager: Joel Lowry

HWY 18 Drip Tanks Horizontal

28-OCT-13

Collected By: Client

12600 West I-20 East Odessa, Texas 79765

Xenco-Houston (EPA Lab code: TX00122):
Texas (T104704215-13-15-TX), Arizona (AZ0765), Arkansas (08-039-0), Connecticut (PH-0102), Florida (E871002)
Illinois (002082), Indiana (C-TX-02), Iowa (392), Kansas (E-10380), Kentucky (45), Louisiana (03054)
New Hampshire (297408), New Jersey (TX007), New York (11763), Oklahoma (9218), Pennsylvania (68-03610)
Rhode Island (LAO00312), USDA (S-44102), DoD (L11-54)

Xenco-Atlanta (EPA Lab Code: GA00046):
Florida (E87429), North Carolina (483), South Carolina (98015), Kentucky (85), DoD (L10-135)
Louisiana (04176), USDA (P330-07-00105)

Xenco-Tampa Mobile (EPA Lab code: FL01212): Florida (E84900)
Xenco-Lakeland: Florida (E84098)
Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-TX)
Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295-TX)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757)
Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)
Xenco Tucson (EPA Lab code:AZ000989): Arizona (AZ0758)

28-OCT-13

Project Manager: **Joel Lowry**
Regency Gas
801 South Loop 464
Monahans, TX 79756

Reference: XENCO Report No(s): **472752**
HWY 18 Drip Tanks Horizontal
Project Address: Lea County, NM

Joel Lowry:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 472752. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 472752 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Kelsey Brooks
Project Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.
Certified and approved by numerous States and Agencies.
A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Odessa - San Antonio - Tampa - Lakeland - Atlanta - Phoenix - Oklahoma - Latin America

Sample Cross Reference 472752

Regency Gas, Monahans, TX

HWY 18 Drip Tanks Horizontal

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
AST @ Surface	S	10-23-13 10:50		472752-001
AST @ 18"	S	10-23-13 11:00		472752-002

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None

Certificate of Analysis Summary 472752

Regency Gas, Monahans, TX

Project Name: HWY 18 Drip Tanks Horizontal

Project Id:
Contact: Joel Lowry
Project Location: Lea County, NM

Date Received in Lab: Wed Oct-23-13 01:45 pm
Report Date: 28-OCT-13
Project Manager: Kelsey Brooks

Analysis Requested									
	Lab Id:	472752-001		472752-002					
	Field Id:	AST @ Surface		AST @ 18"					
	Depth:								
	Matrix:	SOIL		SOIL					
	Sampled:	Oct-23-13 10:50		Oct-23-13 11:00					
BTEX by EPA 8021B	***Extracted:***	Oct-25-13 17:00		Oct-25-13 17:00					
	Analyzed:	Oct-25-13 22:59		Oct-25-13 23:15					
	Units/RL:	mg/kg	RL	mg/kg	RL				
Benzene		ND	0.00103	ND	0.00104				
Toluene		ND	0.00205	ND	0.00207				
Ethylbenzene		ND	0.00103	ND	0.00104				
m,p-Xylenes		ND	0.00205	ND	0.00207				
o-Xylene		ND	0.00103	ND	0.00104				
Total Xylenes		ND	0.00103	ND	0.00104				
Total BTEX		ND	0.00103	ND	0.00104				
Inorganic Anions by EPA 300/300.1	***Extracted:***	Oct-25-13 10:00		Oct-25-13 10:00					
	Analyzed:	Oct-25-13 13:46		Oct-25-13 14:32					
	Units/RL:	mg/kg	RL	mg/kg	RL				
Chloride		9.53	2.06	91.8	4.15				
Percent Moisture	***Extracted:***								
	Analyzed:	Oct-24-13 15:40		Oct-24-13 15:40					
	Units/RL:	%	RL	%	RL				
Percent Moisture		3.02	1.00	3.50	1.00				
TPH By SW8015 Mod	***Extracted:***	Oct-24-13 18:00		Oct-24-13 18:00					
	Analyzed:	Oct-24-13 23:29		Oct-24-13 23:54					
	Units/RL:	mg/kg	RL	mg/kg	RL				
C6-C12 Gasoline Range Hydrocarbons		ND	15.4	ND	15.5				
C12-C28 Diesel Range Hydrocarbons		31.4	15.4	66.1	15.5				
C28-C35 Oil Range Hydrocarbons		ND	15.4	ND	15.5				
Total TPH		31.4	15.4	66.1	15.5				

Kelsey Brooks
Project Manager

Flagging Criteria

X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.

B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.

D The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.

E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.

F RPD exceeded lab control limits.

J The target analyte was positively identified below the quantiation limit and above the detection limit.

U Analyte was not detected.

L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.

H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

K Sample analyzed outside of recommended hold time.

JN A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

** Surrogate recovered outside laboratory control limit.

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit **SDL** Sample Detection Limit **LOD** Limit of Detection

PQL Practical Quantitation Limit **MQL** Method Quantitation Limit **LOQ** Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

+ NELAC certification not offered for this compound.

***** (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

Form 2 - Surrogate Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Orders : 472752,

Project ID:

Lab Batch #: 926041 **Sample:** 472752-001 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/24/13 23:29

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	101	99.5	102	70-135	
o-Terphenyl	45.8	49.8	92	70-135	

Lab Batch #: 926041 **Sample:** 472752-002 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/24/13 23:54

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	99.0	99.7	99	70-135	
o-Terphenyl	45.9	49.9	92	70-135	

Lab Batch #: 926183 **Sample:** 472752-001 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/25/13 22:59

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0276	0.0300	92	80-120	
4-Bromofluorobenzene	0.0294	0.0300	98	80-120	

Lab Batch #: 926183 **Sample:** 472752-002 / SMP **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/25/13 23:15

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0284	0.0300	95	80-120	
4-Bromofluorobenzene	0.0300	0.0300	100	80-120	

Lab Batch #: 926041 **Sample:** 645922-1-BLK / BLK **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 10/24/13 21:20

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	92.6	100	93	70-135	
o-Terphenyl	44.2	50.0	88	70-135	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = 100 * A / B

All results are based on MDL and validated for QC purposes.

Form 2 - Surrogate Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Orders : 472752,

Project ID:

Lab Batch #: 926183 **Sample:** 645979-1-BLK / BLK **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 10/25/13 22:27

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0278	0.0300	93	80-120	
4-Bromofluorobenzene	0.0278	0.0300	93	80-120	

Lab Batch #: 926041 **Sample:** 645922-1-BKS / BKS **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 10/24/13 20:27

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	85.1	100	85	70-135	
o-Terphenyl	48.6	50.0	97	70-135	

Lab Batch #: 926183 **Sample:** 645979-1-BKS / BKS **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 10/25/13 21:39

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0298	0.0300	99	80-120	
4-Bromofluorobenzene	0.0328	0.0300	109	80-120	

Lab Batch #: 926041 **Sample:** 645922-1-BSD / BSD **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 10/24/13 20:54

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	121	100	121	70-135	
o-Terphenyl	58.2	50.0	116	70-135	

Lab Batch #: 926183 **Sample:** 645979-1-BSD / BSD **Batch:** 1 **Matrix:** Solid

Units: mg/kg **Date Analyzed:** 10/25/13 21:55

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0304	0.0300	101	80-120	
4-Bromofluorobenzene	0.0326	0.0300	109	80-120	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = 100 * A / B

All results are based on MDL and validated for QC purposes.

Form 2 - Surrogate Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Orders : 472752,

Project ID:

Lab Batch #: 926041 **Sample:** 472753-001 S / MS **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/25/13 00:44

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	107	99.7	107	70-135	
o-Terphenyl	60.3	49.9	121	70-135	

Lab Batch #: 926183 **Sample:** 472753-001 S / MS **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/26/13 01:23

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0296	0.0300	99	80-120	
4-Bromofluorobenzene	0.0330	0.0300	110	80-120	

Lab Batch #: 926041 **Sample:** 472753-001 SD / MSD **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/25/13 01:08

SURROGATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1-Chlorooctane	97.2	99.8	97	70-135	
o-Terphenyl	57.8	49.9	116	70-135	

Lab Batch #: 926183 **Sample:** 472753-001 SD / MSD **Batch:** 1 **Matrix:** Soil

Units: mg/kg **Date Analyzed:** 10/26/13 01:39

SURROGATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
1,4-Difluorobenzene	0.0285	0.0300	95	80-120	
4-Bromofluorobenzene	0.0317	0.0300	106	80-120	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = 100 * A / B

All results are based on MDL and validated for QC purposes.

BS / BSD Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Order #: 472752 **Project ID:**

Analyst: ARM **Date Prepared:** 10/25/2013 **Date Analyzed:** 10/25/2013

Lab Batch ID: 926183 **Sample:** 645979-1-BKS **Batch #:** 1 **Matrix:** Solid

Units: mg/kg

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Benzene	<0.00100	0.100	0.0903	90	0.100	0.0894	89	1	70-130	35	
Toluene	<0.00200	0.100	0.0915	92	0.100	0.0901	90	2	70-130	35	
Ethylbenzene	<0.00100	0.100	0.0951	95	0.100	0.0941	94	1	71-129	35	
m,p-Xylenes	<0.00200	0.200	0.193	97	0.200	0.191	96	1	70-135	35	
o-Xylene	<0.00100	0.100	0.0982	98	0.100	0.0974	97	1	71-133	35	

Analyst: AMB **Date Prepared:** 10/25/2013 **Date Analyzed:** 10/25/2013

Lab Batch ID: 926161 **Sample:** 646017-1-BKS **Batch #:** 1 **Matrix:** Solid

Units: mg/kg

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

Inorganic Anions by EPA 300/300.1 Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Chloride	<2.00	50.0	46.1	92	50.0	47.2	94	2	80-120	20	

Relative Percent Difference RPD = 200*|(C-F)/(C+F)|
Blank Spike Recovery [D] = 100*(C)/[B]
Blank Spike Duplicate Recovery [G] = 100*(F)/[E]
All results are based on MDL and Validated for QC Purposes

BS / BSD Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Order #: 472752 **Project ID:**

Analyst: ARM **Date Prepared:** 10/24/2013 **Date Analyzed:** 10/24/2013

Lab Batch ID: 926041 **Sample:** 645922-1-BKS **Batch #:** 1 **Matrix:** Solid

Units: mg/kg

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
C6-C12 Gasoline Range Hydrocarbons	<15.0	1000	1040	104	1000	1290	129	21	70-135	35	
C12-C28 Diesel Range Hydrocarbons	<15.0	1000	1040	104	1000	1280	128	21	70-135	35	

Relative Percent Difference RPD = 200*|(C-F)/(C+F)|
Blank Spike Recovery [D] = 100*(C)/[B]
Blank Spike Duplicate Recovery [G] = 100*(F)/[E]
All results are based on MDL and Validated for QC Purposes

Form 3 - MS Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Order #: 472752

Lab Batch #: 926161 **Project ID:**

Date Analyzed: 10/25/2013 **Date Prepared:** 10/25/2013 **Analyst:** AMB

QC- Sample ID: 472752-001 S **Batch #:** 1 **Matrix:** Soil

Reporting Units: mg/kg

Inorganic Anions by EPA 300	MATRIX / MATRIX SPIKE RECOVERY STUDY					
Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Chloride	9.53	51.6	57.4	93	80-120	

Matrix Spike Percent Recovery [D] = 100*(C-A)/B
Relative Percent Difference [E] = 200*(C-A)/(C+B)
All Results are based on MDL and Validated for QC Purposes

BRL - Below Reporting Limit

Form 3 - MS / MSD Recoveries

Project Name: HWY 18 Drip Tanks Horizontal

Work Order # : 472752 **Project ID:**

Lab Batch ID: 926183 **QC- Sample ID:** 472753-001 S **Batch #:** 1 **Matrix:** Soil

Date Analyzed: 10/26/2013 **Date Prepared:** 10/25/2013 **Analyst:** ARM

Reporting Units: mg/kg

MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY

BTEX by EPA 8021B Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	Spiked Sample %R [D]	Spike Added [E]	Duplicate Spiked Sample Result [F]	Spiked Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Benzene	<0.00110	0.110	0.0934	85	0.109	0.0936	86	0	70-130	35	
Toluene	<0.00220	0.110	0.0932	85	0.109	0.0936	86	0	70-130	35	
Ethylbenzene	<0.00110	0.110	0.0936	85	0.109	0.0945	87	1	71-129	35	
m,p-Xylenes	<0.00220	0.220	0.184	84	0.218	0.190	87	3	70-135	35	
o-Xylene	<0.00110	0.110	0.0965	88	0.109	0.0980	90	2	71-133	35	

Lab Batch ID: 926041 **QC- Sample ID:** 472753-001 S **Batch #:** 1 **Matrix:** Soil

Date Analyzed: 10/25/2013 **Date Prepared:** 10/24/2013 **Analyst:** ARM

Reporting Units: mg/kg

MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY

TPH By SW8015 Mod Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	Spiked Sample %R [D]	Spike Added [E]	Duplicate Spiked Sample Result [F]	Spiked Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
C6-C12 Gasoline Range Hydrocarbons	<16.4	1100	1300	118	1100	1230	112	6	70-135	35	
C12-C28 Diesel Range Hydrocarbons	31.1	1100	1310	116	1100	1230	109	6	70-135	35	

Matrix Spike Percent Recovery [D] = 100*(C-A)/B

Matrix Spike Duplicate Percent Recovery [G] = 100*(F-A)/E

Relative Percent Difference RPD = 200*|(C-F)/(C+F)|

ND = Not Detected, J = Present Below Reporting Limit, B = Present in Blank, NR = Not Requested, I = Interference, NA = Not Applicable

N = See Narrative, EQL = Estimated Quantitation Limit, NC = Non Calculable - Sample amount is > 4 times the amount spiked.

Sample Duplicate Recovery

Project Name: HWY 18 Drip Tanks Horizontal

Work Order #: 472752

Lab Batch #: 925982 **Project ID:**

Date Analyzed: 10/24/2013 15:40 **Date Prepared:** 10/24/2013 **Analyst:** WRU

QC- Sample ID: 472748-001 D **Batch #:** 1 **Matrix:** Soil

Reporting Units: %

Percent Moisture Analyte	SAMPLE / SAMPLE DUPLICATE RECOVERY Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Percent Moisture	1.98	1.92	3	20	

Spike Relative Difference RPD 200 * | (B-A)/(B+A) |
All Results are based on MDL and validated for QC purposes.

BRL - Below Reporting Limit

Xenco Laboratories

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST 472752

12600 West I-20 East
Odessa, Texas 79765

Phone: 432-563-1800
Fax: 432-563-1713

Project Manager: Joel Lowry

Company Name: Basin Environmental Service Technologies, LLC

Company Address: P.O. Box 301

City/State/Zip: Lovington, NM 88260

Telephone No: (575)396-2378 Fax No: (575) 396-1429

Sampler Signature: Joel Lowry

Project Name: HWY 18 Drip Tanks Historical

Project #:

Project Loc: Lea County, NM

PO #:

Report Format: [X] Standard [ ] TRRP [ ] NPDES

e-mail: cyndi.inskeep@regencygas.com, pm@basinenv.com, rachel.johnson@sug.com

(lab use only)

ORDER #:

LAB # (lab use only)	FIELD CODE	Beginning Depth	Ending Depth	Date Sampled	Time Sampled	Field Filtered	Total # of Containers	Preservation & # of Containers: Ice	HNO3	HCl	H2SO4	NaOH	Na2S2O3	None	Other (Specify)	Matrix: DW=Drinking Water SL=Sludge GW=Groundwater S=Soil/Soil NP=Non-Potable Specify Othe	Analyze For: TCLP: TPH: 418.1 8015M 8015B	TPH: TX 1005 TX 1006	Cations (Ca, Mg, Na, K)	Anions (Cl, SO4, Alkalinity)	SAR / ESP / CEC	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	TOTAL: BTEX 8021B/5030 or BTEX 8260	RCI	N.O.R.M.	CHLORIDES	Total Dissolved Solids		RUSH TAT (Pre-Schedule) 24, 48, 72 hrs	Standard TAT 4 DAY
	AST @ Surface			10/23/13	10:50		1	X								S	1								X			X				X
	AST @ 18"			10/23/13	11:00		1	X								S	1								X			X				X

Special Instructions:

Laboratory Comments:

Sample Containers Intact?	Y	N
VOCs Free of Headspace?	Y	N
Labels on container(s)	Y	N
Custody seals on container(s)	Y	N
Custody seals on cooler(s)	Y	N
Sample Hand Delivered	Y	N
by Sampler/Client Rep. ?	Y	N
by Courier? UPS DHL	FedEx	Lone Star

Temperature Upon Receipt: 12.3 °C

Relinquished by:	Date	Time	Received by:	Date	Time
Joel Lowry	10/23/13	12:00		10/23/13	12:00
Relinquished by:	Date	Time	Received by:	Date	Time
	10/23/13	1:45		10/23/13	145
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
			Via Fedex	10-24-13	15:00

XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: Regency Gas

Date/ Time Received: 10/23/2013 01:45:00 PM

Work Order #: 472752

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used :

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	12.3
#2 *Shipping container in good condition?	**Yes**
#3 *Samples received on ice?	**Yes**
#4 *Custody Seals intact on shipping container/ cooler?	**N/A**
#5 Custody Seals intact on sample bottles?	**N/A**
#6 *Custody Seals Signed and dated?	**N/A**
#7 *Chain of Custody present?	**Yes**
#8 Sample instructions complete on Chain of Custody?	**Yes**
#9 Any missing/extra samples?	**No**
#10 Chain of Custody signed when relinquished/ received?	**Yes**
#11 Chain of Custody agrees with sample label(s)?	**Yes**
#12 Container label(s) legible and intact?	**Yes**
#13 Sample matrix/ properties agree with Chain of Custody?	**Yes**
#14 Samples in proper container/ bottle?	**Yes**
#15 Samples properly preserved?	**Yes**
#16 Sample container(s) intact?	**Yes**
#17 Sufficient sample amount for indicated test(s)?	**Yes**
#18 All samples received within hold time?	**Yes**
#19 Subcontract of sample(s)?	**No**
#20 VOC samples have zero headspace (less than 1/4 inch bubble)?	**N/A**
#21 <2 for all samples preserved with HNO3,HCL, H2SO4?	**N/A**
#22 >10 for all samples preserved with NaAsO2+NaOH, ZnAc+NaOH?	**N/A**

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst:	PH Device/Lot#:

Checklist completed by: Candace James — Date: 10/24/2013

Candace James

Checklist reviewed by: Kelsey Brooks — Date: 10/24/2013

Kelsey Brooks

APPENDIX E

Initial and Final C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

RECEIVED
DEC 19 2008
HOBBSOCD

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Southern Union Gas Services, Ltd.	Contact	Tony Savoie
Address	P.O. Box 1226 Jal, N.M. 88252	Telephone No.	575-395-2116
Facility Name	Lea County Field Dept.	Facility Type	Natural Gas Gathering

Surface Owner: State of New Mexico	Mineral Owner: State	Lease No.

LOCATION OF RELEASE

API# 30-025-34555.00.00

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	32	24S	37E					Lea

Latitude N32 10.833 Longitude W103 11.562

NATURE OF RELEASE

Type of Release : Crude Oil	Volume of Release: Less Than 5 bbls	Volume Recovered None
Source of Release : 100 bbl Steel Storage Tank	Date and Hour of Occurrence Unknown	Date and Hour of Discovery 12/18/08 8:00 a.m.
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
The drip tank facility was being removed from its current location. When the east 100 bbl tank was removed it appears to have been leaking from the clean-out hatch or piping. There was some evidence of oil saturated soil beneath the tank when it was removed for the location.

Describe Area Affected and Cleanup Action Taken. An area of oil saturated soil measuring approximately 25 sq. ft. under the tank location and inside the earthen tank containment. All of the affected release area will be remediated in accordance to the NMOCD guidelines for leaks and spills.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability, should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Tony Savoie	OIL CONSERVATION DIVISION
Printed Name: John A. Savoie	Approved by District Supervisor: Johnson
Title: Waste Management and Remediation Specialist	ENVIRONMENTAL ENGINEER
E-mail Address: tony.savoie@sug.com	Approval Date: 12.19.08 Expiration Date: 2.19.09
Date: 12/19/08 Phone: 575-395-2116	Conditions of Approval: SUBMIT FINAL C-141 W/DOCS BY Attached ☐ IRP-2041

* Attach Additional Sheets If Necessary

PGRL 0835844089

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: Regency Field Services LLC.	Contact: Crystal Callaway
Address: 301 Commerce Street, Suite 700, Fort Worth, TX 76102	Telephone No.: (817) 302-9407
Facility Name: Hwy 18 Drip Tanks	Facility Type: Natural Gas Gathering

Surface Owner: State of New Mexico	Mineral Owner: State	API No. 30-025-34555-00-00

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	32	24S	37E					Lea

Latitude 32.180428 **Longitude** -103.192786

NATURE OF RELEASE

Type of Release: Crude Oil	Volume of Release: <5 bbls Oil	Volume Recovered: None
Source of Release: 100 bbl Steel Storage Tank	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 10/18/2008 8:00 a.m.
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

The drip tank facility was being removed from its current location. When the east 100 bbl tank was removed it appears to have been leaking from the clean-out hatch or piping. There was some evidence of oil saturated soil beneath the tank when it was removed from the location. An area of oil saturated soil measuring approximately 25 sq. ft. under the tank location and inside the earthen tank containment will be remediated in accordance to the NMOCD guidelines for leaks and spills.

Describe Area Affected and Cleanup Action Taken.*

The impacted area was reportedly remediated by Ocotillo Environmental in 2009. Based on the information provided by Basin Environmental, confirmation samples were collected and sent to an NMOCD approved laboratory, which determined concentrations of BTEX, TPH and chloride were less than the NMOCD regulatory standards. Subsequently, the site was backfilled and the surface has been restored.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Crystal Callaway	OIL CONSERVATION DIVISION
Printed Name: CRYSTAL CALLAWAY	Approved by Environmental Specialist:
Title: Sr. Env. Remediation Spec	Approval Date: / Expiration Date:
E-mail Address: Crystal.Callaway@RegencyGas.com	Conditions of Approval: / Attached ☐
Date: 11/3/14 Phone: 817-302-6514	

* Attach Additional Sheets If Necessary