Basin Environmental Service Technologies, LLC

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Effective Solutions

REMEDIATION SUMMARY &

SITE CLOSURE REQUEST

SOUTHERN UNION GAS SERVICES
TRUNK "O" TANK BATTERY (1RP-1800)
HISTORICAL RELEASE SITE
Lea County, New Mexico
Unit Letter "H" (SE/NE), Section 28, Township 20 South, Range 37 East
Latitude 32° 32.326' North, Longitude 103° 17.689' West
NMOCD Reference # 1RP-1800

Prepared For:

Southern Union Gas Services
801 S. Loop 464
Monahans, TX 79756

Prepared By:
Basin Environmental Service Technologies, LLC
3100 Plains Highway
Lovington, New Mexico 88260

October 2012

Joel W. Lowry
Project Manager

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1.0 INTRODUCTION & BACKGROUND INFORMATION

Basin Environmental Service Technologies, LLC (Basin), on behalf of Southern Union Gas Services (Southern Union), has prepared this *Remediation Summary & Site Closure Request* for the Trunk "O" Tank Battery Historical Release Site (1RP-1800). The legal description of the release site is Unit Letter "H" (SE/NE), Section 28, Township 20 South, Range 37 East, in Lea County, New Mexico. The geographic coordinates of the release site are 32° 32.326' North latitude and 103° 17.689' West longitude. The property affected by the release is owned by the Millard Deck Estate.

On February 5, 2008, Southern Union filed a "Pit or Below-Grade Tank Registration of Closure Form" (Form C-144) with the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office, registering the Trunk "O" Tank Battery and notifying them of their intentions to remove the on-site below-grade tank (BGT) and remediate the area. The Form C-144 described the BGT as a steel one hundred barrel (100 bbl) tank used to contain produced water and crude oil. The C-144 indicated the tank was installed by El Paso Natural Gas (EPNG) before the BGT regulations were written.

On February 18, 2008, exhumation of the BGT began. Inactive pipelines and plumbing were disconnected, and the BGT was removed and transported to a disposal facility. Five (5) field samples were collected from the excavation floor and sidewalls for photo-ionization detector (PID) analysis. PID readings suggested there were no total petroleum hydrocarbons (TPH) present in the soil surrounding the BGT. General photographs of the release site are provided as Appendix A. The Form C-144 is provided as Appendix C.

On February 21, 2008, the excavated area representing the former BGT location was backfilled with locally purchased, non-impacted material. Excavation backfill was water-packed and compacted in eighteen-inch (18") lifts.

2.0 NMOCD SITE CLASSIFICATION

An NMOCD representative indicated on the initial C-144 that the depth to groundwater is approximately thirty feet (30') below ground surface (bgs). Based on the NMOCD ranking system, twenty (20) points will be assigned to the site as a result of this criterion.

A search of the New Mexico Water Rights Reporting System (NMWRRS) database indicated there is one registered water well located approximately three hundred feet (300') northeast (up-gradient) of the release. Based on the NMOCD ranking system, twenty (20) points will be assigned to the site as a result of this criterion.

There is one surface water body approximately two hundred thirty feet (230') northeast (up-gradient) of the release. Based on the NMOCD ranking system, ten (10) points will be assigned to the site as a result of this criterion.

NMOCD guidelines indicate the Trunk "O" Tank Battery Historical Release Site has an initial ranking score of fifty (50) points. The soil remediation levels for a site with a ranking score of greater than nineteen (>19) points are as follows:

- Benzene – 10 mg/Kg (ppm)
- Benzene, toluene, ethylbenzene and xylene (BTEX) – 50 mg/Kg (ppm)
- Total petroleum hydrocarbons (TPH) – 100 mg/Kg (ppm)

The New Mexico Administrative Code (NMAC) does not currently specify a remediation level for chloride concentrations in soil. Chloride remediation levels are set by the NMOCD on a site-specific basis.

3.0 SUMMARY OF SOIL REMEDIATION ACTIVITIES

On August 10, 2012, Basin responded to the Trunk "O" Tank Battery Historical Release Site. The location characterized by the former BGT was excavated to approximately twelve feet (12') bgs. A series of test trenches were advanced in the undisturbed soil adjacent to the former BGT location in an effort to determine if impacted soil containing BTEX, TPH and chloride concentrations above NMOCD regulatory standards remained in-situ.

Prior to excavating the former BGT location, one (1) surface soil sample (Surface) was collected from the inferred center of the former BGT location and submitted to Permian Basin Environmental Lab, LP, of Midland, Texas for determination of BTEX, TPH and chloride concentrations in accordance with EPA Methods SW 846-8021B, SW 846-8015M and 300.0. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory method detection limit (MDL). Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 31.6 mg/Kg. Table 1 summarizes the "Concentrations of Benzene, BTEX, TPH & Chloride in Soil". Soil sample locations are depicted in Figure 2, "Site & Sample Location Map". Laboratory analytical reports are provided as Appendix B.

Test trench S.E. Wall was advanced to approximately six feet (6') bgs radiating southeast from the former BGT location. During the advancement of the test trench, one (1) soil sample (S.E. Wall @ 6') was collected and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory method detection limit (MDL). Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 93.3 mg/Kg.

Test trench N.E. Wall was advanced to approximately six feet (6') bgs radiating northeast from the former BGT location. During the advancement of the test trench, one (1) soil sample (N.E. Wall @ 6') was collected and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory method detection limit (MDL). Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 327 mg/Kg. Laboratory analytical reports indicated the sidewall defined by soil sample N.E. Wall @ 6' needed further excavation.

Test trench S.W. Wall was advanced to approximately six feet (6') bgs radiating southwest from the former BGT location. During the advancement of the test trench, one (1) soil sample (S.W. Wall @ 6') was collected and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory

MDL. Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 142 mg/Kg.

Test trench N.W. Wall was advanced to approximately six feet (6') bgs radiating northwest from the former BGT location. During the advancement of the test trench, one (1) soil sample (N.W. Wall @ 6') was collected and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL. Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 31.8 mg/Kg.

Following advancement of the test trenches, one (1) soil sample (Floor @ 12') was collected from the floor of the inferred center of the former BGT location and submitted to the laboratory for analysis. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL. Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 192 mg/Kg.

One (1) five-point composite soil sample (Stockpile) was collected from the stockpiled material and submitted for laboratory analysis to determine if the material was suitable for use as backfill. Laboratory analytical results indicated benzene and BTEX concentrations were less than the appropriate laboratory MDL. Analytical results indicated the TPH concentration was less than the laboratory MDL. The chloride concentration was 28.4 mg/Kg.

On September 4, 2012, excavation activities resumed at the Trunk "O" Tank Battery Historical Release Site. As per NMOCD request, the sidewall defined by soil sample N.E. Wall @ 6' was advanced an additional two feet (2'). On removal of the soil defined by soil sample N.E. Wall @ 6', one (1) additional soil sample (North East Wall) was collected from the excavation sidewall and submitted to the laboratory for analysis of chloride concentrations. Laboratory analytical results indicated the chloride concentration was 43.5 mg/Kg.

On September 4, 2012, the excavation was backfilled with the on-site stockpiled material. Prior to backfilling, the final dimensions of the excavation were approximately twenty feet (20') in length, seventeen feet (17') in width, and twelve feet (12') in depth.

4.0 QA/QC PROCEDURES

4.1 Soil Sampling

Soil samples were delivered to Permian Basin Environmental Lab LP, of Midland, Texas, for BTEX, TPH, and/or chloride analyses using the methods described below:

- BTEX concentrations in accordance with EPA Method SW-846 8021b
- TPH concentrations in accordance with modified EPA Method SW-846 8015M
- Chloride concentrations in accordance with EPA Method 300.0

4.2 Decontamination of Equipment

Cleaning of the sampling equipment was the responsibility of the environmental technician. Prior to use, and between each sample, the sampling equipment was cleaned with Liqui-Nox® detergent and rinsed with distilled water.

4.3 Laboratory Protocol

The laboratory was responsible for proper QA/QC procedures after signing the chain-of-custody form(s). These procedures were either transmitted with the laboratory reports or are on file at the laboratory.

5.0 SITE CLOSURE REQUEST

Laboratory analytical results from confirmation soil samples collected from the excavation floor and sidewalls indicated benzene, BTEX, TPH and chloride concentrations were less than NMOCD regulatory standards. Based on these laboratory analytical results, Basin recommends Southern Union provide the NMOCD Hobbs District Office a copy of this *Remediation Summary & Site Closure Request* and request the NMOCD grant site closure to the Trunk "O" Tank Battery Historical Release Site.

6.0 LIMITATIONS

Basin Environmental Service Technologies, LLC, has prepared this *Remediation Summary & Site Closure Request* to the best of its ability. No other warranty, expressed or implied, is made or intended. Basin has examined and relied upon documents referenced in the report and on oral statements made by certain individuals. Basin has not conducted an independent examination of the facts contained in referenced materials and statements. Basin has presumed the genuineness of these documents and statements and that the information provided therein is true and accurate. Basin has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Basin notes that the facts and conditions referenced in this report may change over time, and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Southern Union Gas Services. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of Basin Environmental Service Technologies, LLC, and/or Southern Union Gas Services.

7.0 DISTRIBUTION

Copy 1: Geoffrey Leking
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Oil Conservation Division (District 1)
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Hobbs, NM 88240
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Monahans, Texas 79756
rose.slade@sug.com

Copy 3: Basin Environmental Service Technologies, LLC
P.O. Box 301
Lovington, New Mexico 88260

FIGURES

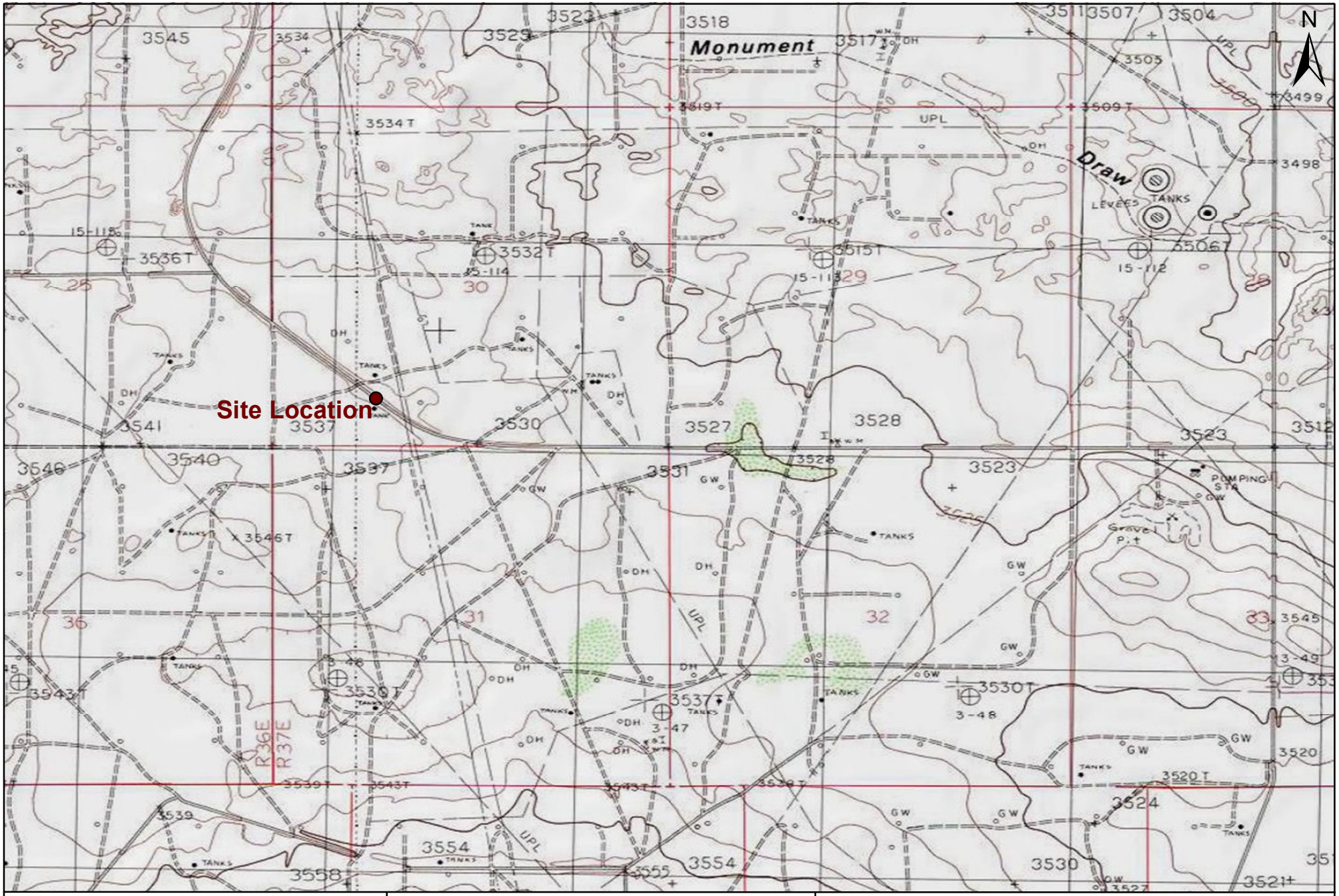

Figure 1
Site Location Map
Southern Union Gas Services
Trunk "O" Tank Battery
Lea County, New Mexico
NMOCD Reference #: 1RP-1800

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

Drawn By: BJA	Checked By: JWL
September 26, 2012	Scale: 1" = 2000'

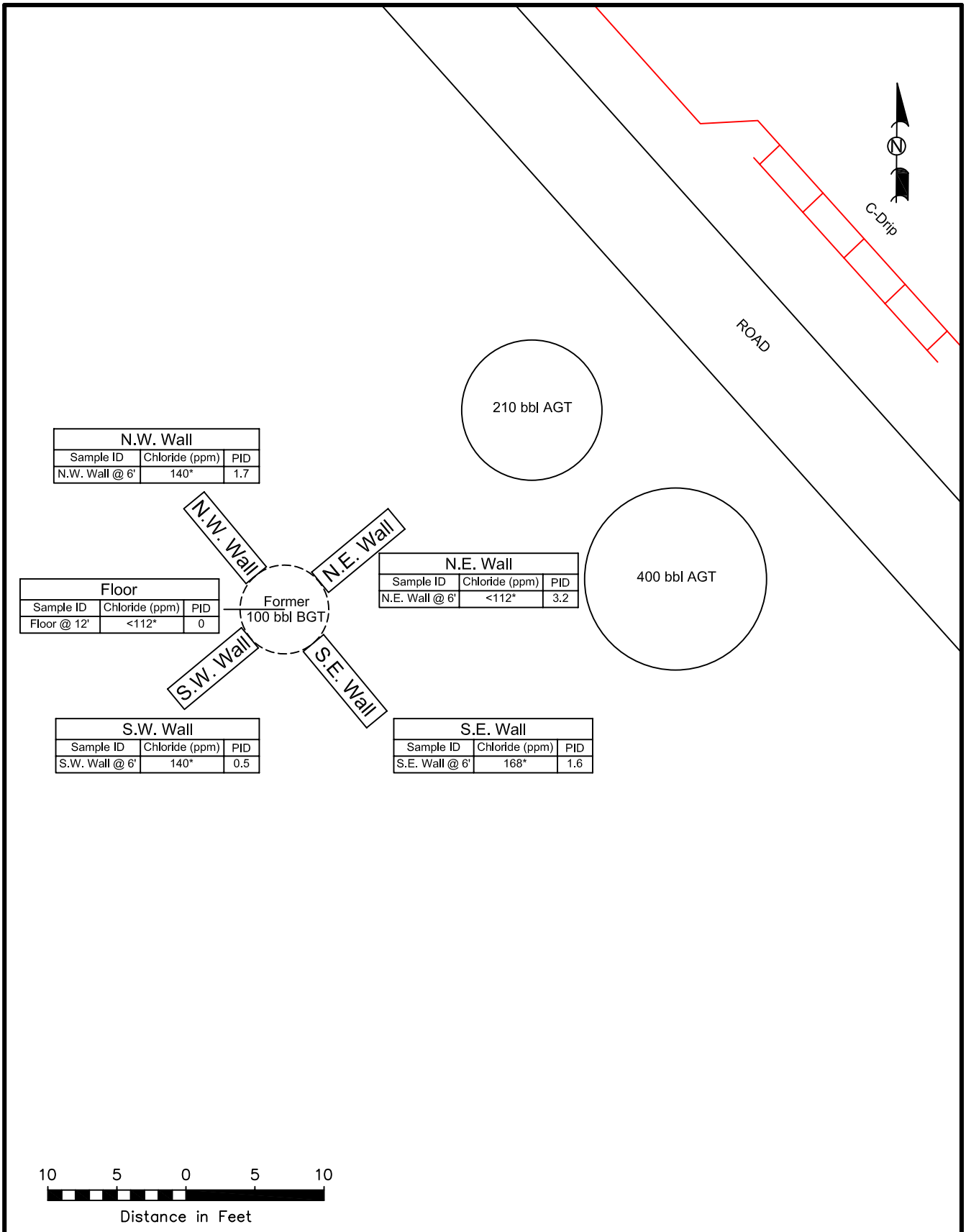

Figure 2
Site & Sample Location Map
Southern Union Gas Services
Trunk "O" Tank Battery (1RP-1800)
Lea County, NM

Basin Environmental Services

Scale: 1" = 10'	Drawn By: JWL	Prepared By: BRB
August 23, 2012		

TABLES

TABLE 1

CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL

SOUTHERN UNION GAS SERVICES
TRUNK "O" TANK BATTERY
HISTORICAL RELEASE SITE
LEA COUNTY, NEW MEXICO
NMOCD REF# 1RP-1800

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M			TOTAL TPH C_6-C_{35} (mg/Kg)	METHOD: E300.0
				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)
Surface	Surface	8/23/2012	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.0	<15.0	<15.0	<15.0	31.6
S.E. Wall	6'	8/23/2012	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.8	<15.8	<15.8	<15.8	93.3
N.E. Wall	6'	8/23/2012	Excavated	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.6	<15.6	<15.6	<15.6	327
S.W. Wall	6'	8/23/2012	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.3	<15.3	<15.3	<15.3	142
N.W. Wall	6'	8/23/2012	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.3	<15.3	<15.3	<15.3	31.8
Floor @ 12'	12'	8/23/2012	In-Situ	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.5	<15.5	<15.5	<15.5	192
Stockpile	N/A	8/23/2012	Excavated	<0.00100	<0.00200	<0.00100	<0.00200	<0.00200	<15.2	<15.2	<15.2	<15.2	28.4
North East Wall	6'	9/4/2012	In-Situ	-	-	-	-	-	-	-	-	-	43.5
NMOCD Standard				**10**				**50**				**100**	**250**

- = Not analyzed.

APPENDICES

Photographs

Photograph of Below Grade Tank prior to removal at the Trunk “O” Tank Battery.

Photograph of exhumed Below Grade Tank at the Trunk “O” Tank Battery.

Photograph of the area excavated during Below Grade Tank removal at the Trunk “O” Tank Battery.

Photograph of the area excavated during Below Grade Tank removal at the Trunk “O” Tank Battery.

Photograph of Former Below Grade Tank Location prior to Initial Investigation
at the Trunk “O” Tank Battery

Photograph of Former Below Grade Tank Location prior to Initial Investigation
at the Trunk “O” Tank Battery

Photograph of excavation and delineation trenches advanced during initial investigation at the Trunk “O” Tank Battery.

Photograph of excavation and delineation trenches advanced during initial investigation at the Trunk “O” Tank Battery.

Photograph of backfilled excavation at the Trunk “O” Tank Battery.

Photograph of backfilled excavation at the Trunk “O” Tank Battery.

Laboratory Analytical Reports

PERMIAN BASIN
ENVIRONMENTAL LAB, LP
10014 SCR 1213
Midland, TX 79706

PBELAB

Analytical Report

Prepared for:

Joel Lowry

Basin Environmental Services

P.O. Box 301

Lovington, NM 88260

Project: Trunk O Tank Battery (RP 1800)

Project Number: SUG Historical Releases

Location: Lea County, New Mexico

Lab Order Number: 2H24006

NELAP/TCEQ # T104704156-12-1

Report Date: 08/28/12

Basin Environmental Services
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Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Surface	2H24006-01	Soil	08/23/12 09:30	08-24-2012 13:55
S.E. Wall	2H24006-02	Soil	08/23/12 10:00	08-24-2012 13:55
N.E. Wall	2H24006-03	Soil	08/23/12 10:30	08-24-2012 13:55
S.W. Wall	2H24006-04	Soil	08/23/12 11:00	08-24-2012 13:55
N.W. Wall	2H24006-05	Soil	08/23/12 12:00	08-24-2012 13:55
Floor @ 12'	2H24006-06	Soil	08/23/12 11:30	08-24-2012 13:55
Stockpile	2H24006-07	Soil	08/23/12 12:00	08-24-2012 13:55

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Organics by GC

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Surface (2H24006-01) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*101 %*	*75-125*		"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*103 %*	*75-125*		"	"	"	"	
C6-C12	**ND**	15.0	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	
>C12-C28	ND	15.0	"	"	"	"	"	"	
>C28-C35	**ND**	15.0	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*97.8 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*100 %*	*70-130*		"	"	"	"	
S.E. Wall (2H24006-02) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*102 %*	*75-125*		"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*101 %*	*75-125*		"	"	"	"	
C6-C12	**ND**	15.8	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	
>C12-C28	**ND**	15.8	"	"	"	"	"	"	
>C28-C35	**ND**	15.8	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.8	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*104 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*108 %*	*70-130*		"	"	"	"	
N.E. Wall (2H24006-03) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*103 %*	*75-125*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*99.7 %*	*75-125*		"	"	"	"	
C6-C12	**ND**	15.6	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Permian Basin Environmental Lab.

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Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

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Organics by GC

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
N.E. Wall (2H24006-03) Soil									
>C12-C28	**ND**	15.6	mg/kg dry	1	EH22706	08/24/12	08/25/12	EPA 8015M	
>C28-C35	**ND**	15.6	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.6	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*103 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*110 %*	*70-130*		"	"	"	"	
S.W. Wall (2H24006-04) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*102 %*	*75-125*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*102 %*	*75-125*		"	"	"	"	
C6-C12	ND	15.3	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	
>C12-C28	**ND**	15.3	"	"	"	"	"	"	
>C28-C35	**ND**	15.3	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.3	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*96.1 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*102 %*	*70-130*		"	"	"	"	
N.W. Wall (2H24006-05) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*101 %*	*75-125*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*101 %*	*75-125*		"	"	"	"	
C6-C12	**ND**	15.3	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	
>C12-C28	**ND**	15.3	"	"	"	"	"	"	
>C28-C35	**ND**	15.3	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.3	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*105 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*113 %*	*70-130*		"	"	"	"	

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Permian Basin Environmental Lab.

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P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

Organics by GC

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Floor @ 12' (2H24006-06) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*101 %*	*75-125*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*101 %*	*75-125*		"	"	"	"	
C6-C12	**ND**	15.5	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	
>C12-C28	**ND**	15.5	"	"	"	"	"	"	
>C28-C35	**ND**	15.5	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.5	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*104 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*110 %*	*70-130*		"	"	"	"	
Stockpile (2H24006-07) Soil									
Benzene	ND	0.00100	mg/kg dry	1	EH22707	08/24/12	08/24/12	EPA 8021B	
Toluene	ND	0.00200	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00200	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: 1,4-Difluorobenzene		*104 %*	*75-125*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*102 %*	*75-125*		"	"	"	"	
C6-C12	**ND**	15.2	mg/kg dry	"	EH22706	08/24/12	08/25/12	EPA 8015M	
>C12-C28	**ND**	15.2	"	"	"	"	"	"	
>C28-C35	**ND**	15.2	"	"	"	"	"	"	
Total Hydrocarbons	ND	15.2	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*100 %*	*70-130*		"	"	"	"	
Surrogate: o-Terphenyl		*103 %*	*70-130*		"	"	"	"	

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Basin Environmental Services
P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

General Chemistry Parameters by EPA / Standard Methods

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Surface (2H24006-01) Soil									
Chloride	**31.6**	1.00	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	ND	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	
S.E. Wall (2H24006-02) Soil									
Chloride	**93.3**	1.05	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	**5.0**	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	
N.E. Wall (2H24006-03) Soil									
Chloride	**327**	1.04	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	**4.0**	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	
S.W. Wall (2H24006-04) Soil									
Chloride	**142**	1.02	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	**2.0**	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	
N.W. Wall (2H24006-05) Soil									
Chloride	**31.8**	1.02	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	**2.0**	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	
Floor @ 12' (2H24006-06) Soil									
Chloride	**192**	1.03	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	**3.0**	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	
Stockpile (2H24006-07) Soil									
Chloride	**28.4**	1.01	mg/kg dry wt. dry	1	EH22705	08/26/12	08/27/12	EPA 300.0	
% Moisture	**1.0**	0.1	%	"	EH22702	08/24/12	08/27/12	% calculation	

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Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

Organics by GC - Quality Control

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EH22706 - 8015M										
Blank (EH22706-BLK1)				Prepared & Analyzed: 08/24/12						
C6-C12	ND	15.0	mg/kg wet							
>C12-C28	ND	15.0	"							
>C28-C35	ND	15.0	"							
Total Hydrocarbons	ND	15.0	"							
Surrogate: 1-Chlorooctane	*114*		*"*	*100*		*114*	*70-130*			
Surrogate: o-Terphenyl	*60.2*		*"*	*50.0*		*120*	*70-130*			
LCS (EH22706-BS1)				Prepared & Analyzed: 08/24/12						
C6-C12	779	15.0	mg/kg wet	1000		77.9	75-125			
>C12-C28	804	15.0	"	1000		80.4	75-125			
>C28-C35	ND	15.0	"	0.00			75-125			
Total Hydrocarbons	ND	15.0	"	0.00			75-125			
Surrogate: 1-Chlorooctane	*129*		*"*	*100*		*129*	*70-130*			
Surrogate: o-Terphenyl	*53.5*		*"*	*50.0*		*107*	*70-130*			
LCS Dup (EH22706-BSD1)				Prepared & Analyzed: 08/24/12						
C6-C12	840	15.0	mg/kg wet	1000		84.0	75-125	7.54	20	
>C12-C28	865	15.0	"	1000		86.5	75-125	7.31	20	
Total Hydrocarbons	ND	15.0	"	0.00			75-125		20	
Surrogate: 1-Chlorooctane	*130*		*"*	*100*		*130*	*70-130*			
Surrogate: o-Terphenyl	*55.8*		*"*	*50.0*		*112*	*70-130*			
Matrix Spike (EH22706-MS1)	**Source: 2H23002-01**			Prepared: 08/24/12 Analyzed: 08/25/12						
C6-C12	864	15.8	mg/kg dry	1050	ND	82.3	75-125			
>C12-C28	977	15.8	"	1050	ND	93.0	75-125			
>C28-C35	ND	15.8	"	0.00	ND		75-125			
Total Hydrocarbons	ND	15.8	"	0.00	ND		75-125			
Surrogate: 1-Chlorooctane	*135*		*"*	*105*		*129*	*70-130*			
Surrogate: o-Terphenyl	*58.0*		*"*	*52.6*		*110*	*70-130*			

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Basin Environmental Services
P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

Organics by GC - Quality Control

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EH22706 - 8015M										
Matrix Spike Dup (EH22706-MSD1)	**Source: 2H23002-01**			Prepared: 08/24/12 Analyzed: 08/25/12						
C6-C12	847	15.8	mg/kg dry	1050	ND	80.7	75-125	1.96	20	
>C12-C28	883	15.8	"	1050	ND	84.1	75-125	10.1	20	
Total Hydrocarbons	ND	15.8	"	0.00	ND		75-125		20	
Surrogate: 1-Chlorooctane	*132*		*"*	*105*		*126*	*70-130*			
Surrogate: o-Terphenyl	*53.9*		*"*	*52.6*		*102*	*70-130*			
Batch EH22707 - General Preparation (GC)										
Blank (EH22707-BLK1)				Prepared & Analyzed: 08/24/12						
Benzene	ND	0.00100	mg/kg wet							
Toluene	ND	0.00200	"							
Ethylbenzene	ND	0.00100	"							
Xylene (p/m)	ND	0.00200	"							
Xylene (o)	ND	0.00100	"							
Surrogate: 4-Bromofluorobenzene	*60.6*		*ug/kg*	*60.0*		*101*	*75-125*			
Surrogate: 1,4-Difluorobenzene	*59.3*		*"*	*60.0*		*98.8*	*75-125*			
LCS (EH22707-BS1)				Prepared & Analyzed: 08/24/12						
Benzene	0.103	0.00100	mg/kg wet	0.100		103	80-120			
Toluene	0.116	0.00200	"	0.100		116	80-120			
Ethylbenzene	0.107	0.00100	"	0.100		107	80-120			
Xylene (p/m)	0.210	0.00200	"	0.200		105	80-120			
Xylene (o)	0.109	0.00100	"	0.100		109	80-120			
Surrogate: 4-Bromofluorobenzene	*62.8*		*ug/kg*	*60.0*		*105*	*75-125*			
Surrogate: 1,4-Difluorobenzene	*59.7*		*"*	*60.0*		*99.5*	*75-125*			
LCS Dup (EH22707-BSD1)				Prepared & Analyzed: 08/24/12						
Benzene	0.106	0.00100	mg/kg wet	0.100		106	80-120	2.87	20	
Toluene	0.118	0.00200	"	0.100		118	80-120	1.71	20	
Ethylbenzene	0.109	0.00100	"	0.100		109	80-120	1.85	20	
Xylene (p/m)	0.216	0.00200	"	0.200		108	80-120	2.82	20	
Xylene (o)	0.111	0.00100	"	0.100		111	80-120	1.82	20	
Surrogate: 4-Bromofluorobenzene	*61.9*		*ug/kg*	*60.0*		*103*	*75-125*			
Surrogate: 1,4-Difluorobenzene	*60.6*		*"*	*60.0*		*101*	*75-125*			

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Organics by GC - Quality Control

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EH22707 - General Preparation (GC)										
Matrix Spike (EH22707-MS1)	**Source: 2H23002-01**			Prepared & Analyzed: 08/24/12						
Benzene	0.0789	0.00100	mg/kg dry	0.105	ND	75.1	80-120			QM-05
Toluene	0.0890	0.00200	"	0.105	ND	84.8	80-120			
Ethylbenzene	0.0814	0.00100	"	0.105	ND	77.5	80-120			QM-05
Xylene (p/m)	0.158	0.00200	"	0.211	ND	74.9	80-120			QM-05
Xylene (o)	0.0835	0.00100	"	0.105	ND	79.5	80-120			QM-05
Surrogate: 1,4-Difluorobenzene	*59.9*		*ug/kg*	*60.0*		*99.8*	*75-125*			
Surrogate: 4-Bromofluorobenzene	*61.3*		*"*	*60.0*		*102*	*75-125*			
Matrix Spike Dup (EH22707-MSD1)	**Source: 2H23002-01**			Prepared & Analyzed: 08/24/12						
Benzene	0.0790	0.00100	mg/kg dry	0.105	ND	75.2	80-120	0.133	20	QM-05
Toluene	0.0882	0.00200	"	0.105	ND	84.0	80-120	0.948	20	
Ethylbenzene	0.0811	0.00100	"	0.105	ND	77.2	80-120	0.388	20	QM-05
Xylene (p/m)	0.157	0.00200	"	0.211	ND	74.4	80-120	0.670	20	QM-05
Xylene (o)	0.0833	0.00100	"	0.105	ND	79.3	80-120	0.252	20	QM-05
Surrogate: 1,4-Difluorobenzene	*59.3*		*ug/kg*	*60.0*		*98.8*	*75-125*			
Surrogate: 4-Bromofluorobenzene	*60.3*		*"*	*60.0*		*100*	*75-125*			

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Basin Environmental Services
P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EH22705 - * DEFAULT PREP *** **										
Blank (EH22705-BLK1)				Prepared: 08/26/12 Analyzed: 08/27/12						
Chloride	ND	1.00	mg/kg dry wt. wet							
LCS (EH22705-BS1)				Prepared: 08/26/12 Analyzed: 08/27/12						
Chloride	9.63		mg/kg Wet	10.0		96.3	80-120			
LCS Dup (EH22705-BSD1)				Prepared: 08/26/12 Analyzed: 08/27/12						
Chloride	9.95		mg/kg Wet	10.0		99.5	80-120	3.27	20	
Duplicate (EH22705-DUP1)		**Source: 2H24006-01**		Prepared: 08/26/12 Analyzed: 08/27/12						
Chloride	31.6	1.00	mg/kg dry wt. dry		31.6			0.00	20	
Matrix Spike (EH22705-MS1)		**Source: 2H24006-01**		Prepared: 08/26/12 Analyzed: 08/27/12						
Chloride	140	1.00	mg/kg dry wt. dry	100	31.6	108	80-120			
Matrix Spike (EH22705-MS2)		**Source: 2H24007-04**		Prepared: 08/26/12 Analyzed: 08/27/12						
Chloride	108	1.09	mg/kg dry wt. dry	109	8.90	90.9	80-120			

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Notes and Definitions

QM-05	The spike recovery was outside acceptance limits for the MS and/or MSD due to matrix interference. The LCS and/or LCSD were within acceptance limits showing that the laboratory is in control and the data is acceptable.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Brent Barron Date: 8/28/2012

Brent Barron, Laboratory Director/Technical Director

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Basin Environmental Services
P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: SUG Historical Releases
Project Manager: Joel Lowry

Fax: (505) 396-1429

Permian Basin Environmental Labs

Company Name: Basin Environmental Service Technologies
Phone #: 575-396-2378
Address: P.O. 301 Lovington, NM, 88260
Fax #: 575-396-1429
Contact Person: Rose Slade (SUG) Joel Lowry (Basin)
E-mail: pm@basinenv.com rose.slade@sug.com
Invoice to: Southern Union Gas Services
Project #: SUG Historical Releases
Project Name: Trunk "O" Tank Battery (RP 1800)
Project Location: (include state) Lea County, New Mexico
Sampler Signature: [signature]

ANALYSIS REQUEST (Circle or Specify Method No.)

LAB # (LAB USE ONLY) 2H24006	FIELD CODE	# CONTAINERS	Matrix: SOIL	Preservative: ICE	Sampling DATE	Sampling TIME	BTEX 8021B	TPH (8015 M Ext "DRO")	Cl, F, SO_4 … (300)
2H24006-01	Surface	1	X	X	8/23	9:30	X	X	X
02	S.E. Wall	1	X	X	8/23	1000	X	X	X
03	N.E. Wall	1	X	X	8/23	1030	X	X	X
04	S.W. Wall	1	X	X	8/23	1100	X	X	X
05	N.W. Wall	1	X	X	8/23	1200	X	X	X
06	Floor @ 12'	1	X	X	8/23	11:30	X	X	X
07	Stockpile	1	X	X	8/23	1200	X	X	X

Other form columns (not marked): Volume/Amount; Matrix: WATER, AIR, SLUDGE; Preservative: HCL, HNO_3, H_2SO_4, NaOH, NONE; MTBE 8021B / 602 / 8260B / 624; BTEX 8021B / 602 / 8260B / 624; TPH 418.1 / TX1005 / DRO / TVHC; PAH 8270C / 625; Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B / 200.7; TCLP Metals Ag As Ba Cd Cr Pb Se Hg; TCLP Volatiles; TCLP Semi Volatiles; TCLP Pesticides; RCI; GC/MS Vol. 8260B / 624; GC/MS Semi. Vol. 8270C/625; PCB's 8082 / 608; Pesticides 8081A / 608; BOD, TSS, pH; Moisture Content; Cl, F, SO_4, NO_3-N, NO_2-N, PO_4-P, Alkalinity 300; Na, Ca, Mg, K, TDS, EC; Turn Around Time if different from standard; Hold

Relinquished by	Company	Date	Time	Received by	Company	Date	Time	
[signature]		8-24-12	0700	[signature]		8-24-12	0700	INST / OBS / COR
[signature]		8-24-12	11:20	[signature]	PBEL	8-24-12	1120	INST / OBS / COR
[signature]	PBEL	8-24-12	1355	[signature]	PBEL	8/24/12	1355	INST / OBS / COR

LAB USE ONLY: Intact Y / N; Headspace Y / N / NA; Log-in Review; Carrier #

REMARKS: 2.6°C

☐ Dry Weight Basis Required
☐ TRRP Report Required
☐ Check If Special Reporting Limits Are Needed

Submittal of samples constitutes agreement to Terms and Conditions

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PERMIAN BASIN
ENVIRONMENTAL LAB, LP
10014 SCR 1213
Midland, TX 79706

PBELAB

Analytical Report

Prepared for:

Joel Lowry

Basin Environmental Services

P.O. Box 301

Lovington, NM 88260

Project: Trunk O Tank Battery (RP 1800)

Project Number: RP-1800

Location: Lea County, NM

Lab Order Number: 2I05001

NELAP/TCEQ # T104704156-12-1

Report Date: 09/07/12

Basin Environmental Services	Project: Trunk O Tank Battery (RP 1800)	Fax: (505) 396-1429
P.O. Box 301	Project Number: RP-1800	
Lovington NM, 88260	Project Manager: Joel Lowry	

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
North East Wall	2I05001-01	Soil	09/04/12 11:00	09-04-2012 17:12

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Basin Environmental Services
P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: RP-1800
Project Manager: Joel Lowry

Fax: (505) 396-1429

General Chemistry Parameters by EPA / Standard Methods

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
North East Wall (2I05001-01) Soil									
Chloride	**43.5**	1.06	mg/kg dry wt. dry	1	EI20702	09/06/12	09/07/12	EPA 300.0	
% Moisture	**6.0**	0.1	%	"	EI20701	09/06/12	09/07/12	% calculation	

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Basin Environmental Services
P.O. Box 301
Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: RP-1800
Project Manager: Joel Lowry

Fax: (505) 396-1429

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Permian Basin Environmental Lab

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI20701 - * DEFAULT PREP *** **										
Blank (EI20701-BLK1)				Prepared: 09/06/12 Analyzed: 09/07/12						
% Moisture	ND	0.1	%							
Duplicate (EI20701-DUP1)	**Source: 2I05001-01**			Prepared: 09/06/12 Analyzed: 09/07/12						
% Moisture	6.0	0.1	%		6.0			0.00	20	
Batch EI20702 - * DEFAULT PREP *** **										
Blank (EI20702-BLK1)				Prepared: 09/06/12 Analyzed: 09/07/12						
Chloride	ND	1.00	mg/kg dry wt. wet							
LCS (EI20702-BS1)				Prepared: 09/06/12 Analyzed: 09/07/12						
Chloride	10.4		mg/kg Wet	10.0		104	80-120			
LCS Dup (EI20702-BSD1)				Prepared: 09/06/12 Analyzed: 09/07/12						
Chloride	10.4		mg/kg Wet	10.0		104	80-120	0.00	20	
Duplicate (EI20702-DUP1)	**Source: 2I05001-01**			Prepared: 09/06/12 Analyzed: 09/07/12						
Chloride	44.3	1.06	mg/kg dry wt. dry		43.5			1.82	20	
Matrix Spike (EI20702-MS1)	**Source: 2I05001-01**			Prepared: 09/06/12 Analyzed: 09/07/12						
Chloride	152	1.06	mg/kg dry wt. dry	106	43.5	102	80-120			
Matrix Spike (EI20702-MS2)	**Source: 2I05002-10**			Prepared: 09/06/12 Analyzed: 09/07/12						
Chloride	96.7	1.01	mg/kg dry wt. dry	101	ND	95.7	80-120			

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Lovington NM, 88260

Project: Trunk O Tank Battery (RP 1800)
Project Number: RP-1800
Project Manager: Joel Lowry

Fax: (505) 396-1429

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By:  Date: 9/7/2012

Brent Barron, Laboratory Director/Technical Director

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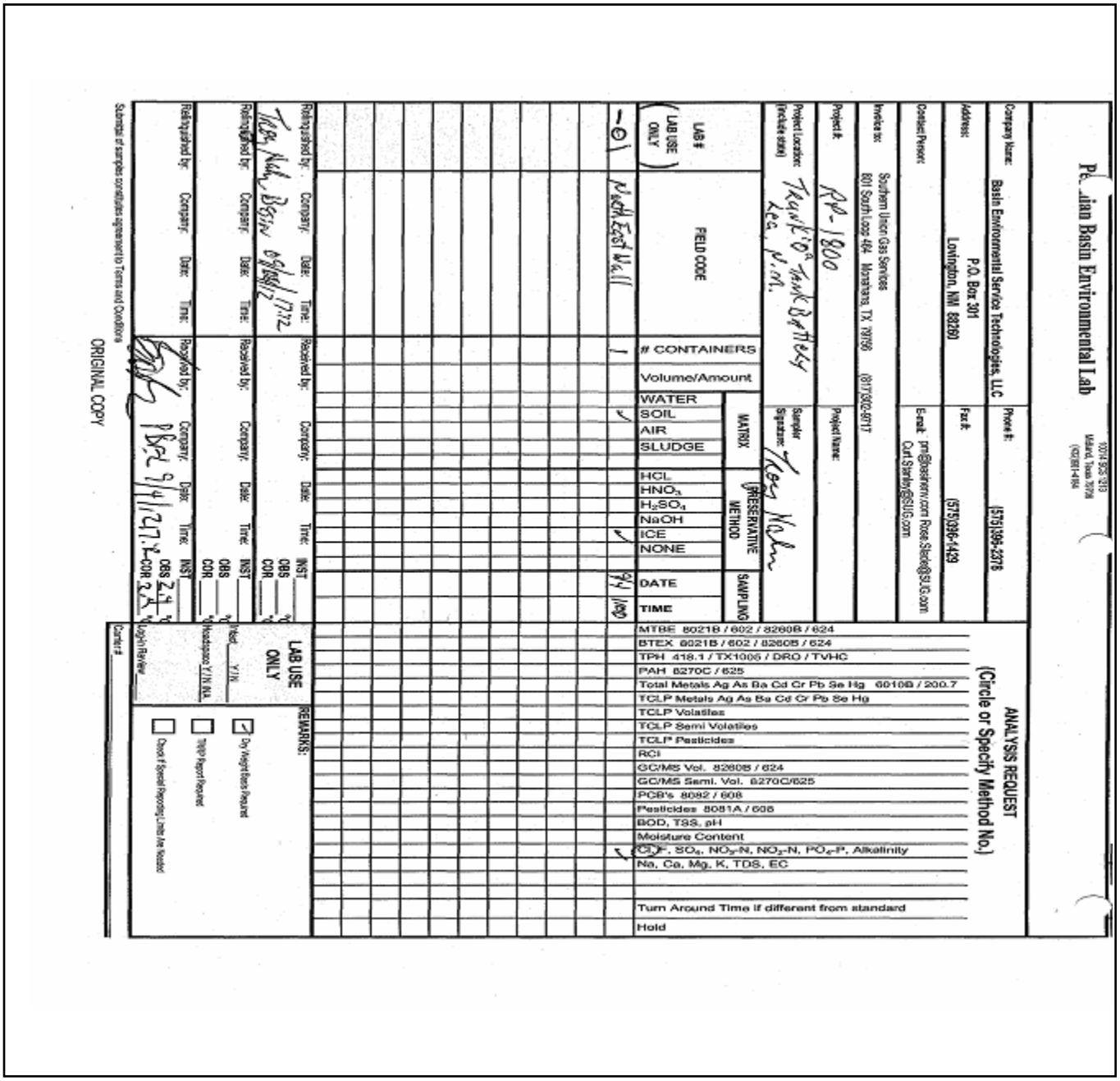
Basin Environmental Services	Project: Trunk O Tank Battery (RP 1800)	Fax: (505) 396-1429
P.O. Box 301	Project Number: RP-1800	
Lovington NM, 88260	Project Manager: Joel Lowry	



Page 1 of 1

Pit of Below-Grade Tank Registration Form

(Form C-144)

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☒ No ☐
Type of action Registration of a pit or below-grade tank ☐ Closure of a pit or below-grade tank ☒

Operator. Southern Union Gas Services Telephone 575-395-2116 e-mail address tony savoie @sug com
Address P.O Box 1226 Jal, New Mexico 88252
Facility or well name: Trunk "O" Tank Battery API # U/L or Qtr/Qtr H Sec 28 T 20 S R 37E
County Lea Latitude 32 deg 32.326 Longitude 103 deg 17 689 NAD: 1927 ☐ 1983 ☒
Surface Owner Federal ☐ State ☐ Private ☒ Indian ☐

Pit	**Below-grade tank**	
Type Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume 100 bbl Type of fluid: Produced water and crude oil Construction material Steel Double-walled, with leak detection? Yes ☐ If not, explain why not WTR30 Tank was installed by EPNG before the BGT regulations were written	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water) 36 ft	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more	(20 points) (10 points) (0 points)
Wellhead protection area (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources) Yes, 287 To Private water well	Yes No	(20 points) (0 points)
Distance to surface water (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses) 227 Horizontal Feet to Monument Draw	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	50 Points

If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility ____ (3) Attach a general description of remedial action taken including remediation start date and end date (4) Groundwater encountered No ☐ Yes ☐ If yes, show depth below ground surface ____ft and attach sample results (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments

I hereby certify that the information above is true and complete to the best of my knowledge and belief **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**

Date 2/14/08 TONY Savoie
Printed Name/Title Waste Management and Remediation Specialist Signature Tony Savoie

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations

Approval
Printed Name/Title ____ Signature Johnson ENVIRONMENTAL ENGINEER Date 2.15.08
RP # 1800

fCOH0806349144

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

Form C-144
Revised August 1, 2011

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action:
- ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
- ☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
- ☐ Modification to an existing permit
- ☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Southern Union Gas Services OGRID #: N/A
Address: 801 S. Loop 464 Monahans, Texas 79756
Facility or well name: Trunk "O" Tank Battery (RP-1800)
API Number: N/A OCD Permit Number:
U/L or Qtr/Qtr H Section 28 Township 20S Range 37E County: Lea Co, NM
Center of Proposed Design: Latitude 32 32.326' Longitude -103 17.689' NAD: ☐ 1927 ☒ 1983
Surface Owner: ☐ Federal ☐ State ☒ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L_____ x W_____ x D_____

3.
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 100 bbl bbl Type of fluid: Produced Water and Crude Oil
Tank Construction material: Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other Tank was installed by EPNG before BGT regulations
Liner type: Thickness N/A mil ☐ HDPE ☐ PVC ☐ Other _____

5.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.

Fencing: Subsection D of 19.15.17.11 NMAC *(Applies to permanent pits, temporary pits, and below-grade tanks)*

☐ Chain link, six feet in height, two strands of barbed wire at top *(Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)*

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

☐ Alternate. Please specify_____

7.

Netting: Subsection E of 19.15.17.11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

8.

Signs: Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☐ Signed in compliance with 19.15.16.8 NMAC

9.

Administrative Approvals and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. **Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.**

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☒ Yes ☐ No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. *(Applies to temporary, emergency, or cavitation pits and below-grade tanks)* - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☒ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. *(Applies to permanent pits)* - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☒ No ☐ NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☒ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☒ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☒ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☒ No

11.
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____

☐ Previously Approved Operating and Maintenance Plan API Number: _____ *(Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)*

13.
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H_2S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.
Proposed Closure: 19.15.17.13 NMAC
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Closed-loop System ☐ Alternative

Proposed Closure Method: ☒ Waste Excavation and Removal
- ☐ Waste Removal (Closed-loop systems only)
- ☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
  - ☐ In-place Burial ☐ On-site Trench Burial
- ☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- ☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- ☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.
Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)
Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please provide the information below) ☐ No

Required for impacted areas which will not be used for future service and operations:
☐ Soil Backfill and Cover Design Specifications - - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☐ No

18.
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.
Operator Application Certification:

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

20.
OCD Approval: ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: _____ **Approval Date:** _____

Title: _____ **OCD Permit Number:** _____

21.
Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ **Closure Completion Date:** 4/3/13

22.
Closure Method:

☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)

☐ If different from approved plan, please explain.

23.
Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

Required for impacted areas which will not be used for future service and operations:

☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24.
Closure Report Attachment Checklist: ***Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.***

☒ Proof of Closure Notice (surface owner and division)
☐ Proof of Deed Notice (required for on-site closure)
☐ Plot Plan (for on-site closures and temporary pits)
☒ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☒ Disposal Facility Name and Permit Number
☒ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique
☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐1927 ☐ 1983

25.
Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Crystal Callaway Title: Senior Environmental Remediation Specialist

Signature: Crystal Callaway Date: 11/17/2014

e-mail address: Crystal.Callaway@Regencygas.com Telephone: 817-807-9407