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
220 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

Risk, Bedrock +-

Submit 1 copy to appropriate District Office and 1 copy to the Santa Fe Office

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

30-045-11995

Operator: Meridian by EPFS Telephone

DEC 2002
RECEIVED
OIL CONS. DIV.
DIST. 3

Address:

Facility Or Well Name: Hubbell #3, Meter 73300

Location: Unit or Qtr/Qtr Sec O Sec 18 T 29 R 10 County San Juan

Pit Type: Separator ____ Dehydrator X Other ____

Land Type: BLM X, State ____, Fee ____ Other ____

Pit Location: Pit dimensions: length 22', width 21', depth 2'
(Attach diagram)

Reference: wellhead X, other ____

Footage from reference: 89'

Direction from reference: 261 Degrees X East North ____ of ____ West South ____

Depth To Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water.)	Less than 50 feet	(20 points)
	50 feet to 99 feet	(10 points)
	Greater than 100 feet	(0 points) 10
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.)	Yes	(20 points)
	No	(0 points) 0
Distance To Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches.)	Less than 200 feet	(20 points)
	200 feet to 1000 feet	(10 points)
	Greater than 1000 feet	(0 points) 10

RANKING SCORE (TOTAL POINTS): 20

Date Remediation Started: 07/15/94 Date completed: 07/15/94

Remediation Method: (Check all appropriate sections.) Excavation _____ Approx. cubic yards _____

Landfarmed _____ Insitu Bioremediation _____

Other Backfill pit without excavation

Remediation Location: (i.e. landfarmed onsite, name and location of offsite facility) Onsite N/A Offsite N/A

General Description of Remedial Action: EPNG lines marked. Gray soil, strong hydrocarbon. Hit sandstone 4'.

Ground Water Encountered: No X Yes _____ Depth _____

Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths)

Sample location Four walls and center of pit composite

Sample depth 4'

Sample Date 07/15/94 Sample time 11:23

Sample Results

Benzene(ppm) Not reported.

Total BTEX(ppm) Not reported.

Field headspace(ppm) 378

TPH 456

Ground Water Sample: Yes _____ No X (If yes, attach sample results)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Date 1/8/03

Signature Scott T. Pope

Printed Name Scott T. Pope and Title Senior Envl. Scientist

elpaso

PIT CLOSURE REQUEST

Hubbell #3
Meter/Line ID 73300

SITE DETAILS

Legals - Twn: 29N	**Rng: 10W**	**Sec: 18**	**Unit: O**
NMOCD Hazard Ranking: 20		**Land Type: BLM**	
Operator: Meridian Oil Inc		**Pit Closure Date: 7/15/94**	

RATIONALE FOR RISK-BASED CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A test pit was excavated to 4 feet (ft) below ground surface (bgs) where sandstone was encountered and a soil sample was collected for field headspace and laboratory analysis for TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 378 ppm; laboratory analysis showed a TPH concentration of 456 mg/kg. The TPH measurement exceeded recommended remediation levels for the Hazard Ranking Score of 20.

No soil was disposed of offsite. The pit was backfilled with site soil, topped with clean soil from the surrounding berms, and graded in a manner to direct surface runoff away from the pit area.

A Phase II boring was completed with refusal at 14 ft bgs. No groundwater was encountered in the soil boring. One laboratory sample was collected at 14-15 ft bgs. Headspace analysis indicated an organic vapor content of 855 ppm, laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3 mg/kg, and a TPH concentration of <20 mg/kg. The benzene, total BTEX and TPH concentrations were below recommended remediation levels for the Hazard Ranking Score.

No Phase III excavation was done.

El Paso Field Services requests closure of the above mentioned pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over eight years.
- Bedrock was encountered at 4 feet bgs (test pit) and 14 feet bgs (soil boring) making additional excavation impractical and further vertical migration of contaminants unlikely.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- The clean soil from the berms placed on top of the excavation would limit the potential for direct contact with hazardous constituents by livestock or the public; i.e., current direct contact exposure pathways are unlikely to be completed.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Groundwater was not encountered in the soil boring at 14 ft bgs; local geologic features indicate the depth to groundwater is greater than 50 ft bgs.

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73300 Location: Hubbell #3
Operator #: _____ Operator Name: _____ P/L District: _____
Coordinates: Letter: D Section 18 Township: 29 Range: 10
Or Latitude _____ Longitude _____
Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 4/13/98 Area: ____ Run: ____

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☐ (1)
Outside ☒ (2)

Land Type:
BLM ☒ (1)
State ☐ (2)
Fee ☐ (3)
Indian _____

Depth to Groundwater
Less Than 50 Feet (20 points) ☐ (1)
50 Ft to 99 Ft (10 points) ☒ (2)
Greater Than 100 Ft (0 points) ☐ (3)

Wellhead Protection Area
Is it less than 1000 ft from wells, springs or other sources of fresh water extraction?, or; Is it less than 200 ft from a private domestic water source?

☐ (1) YES (20 points) ☐ (2) NO (0 points)

Horizontal Distance to Surface Water Body
Less Than 200 Ft (20 points) ☐ (1)
200 Ft to 1000 Ft (10 points) ☒ (2)
Greater Than 1000 Ft (0 points) ☐ (3)
Name of Surface Water Body Citizens Ditch

(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 20 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is ≤100' vertical from centerof San Juan R. & ~300' From Citizens Ditch

(assess) 12/16/97

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK139	945689
MTR CODE | SITE NAME:	73300	N/A
SAMPLE DATE | TIME (Hrs):	7-15-94	1123
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7/19/94	7/19/94
DATE OF BTEX EXT. | ANAL.:	N/A	N/A
TYPE | DESCRIPTION:	VG	Tan/Lt. Grey Med Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	456	MG/KG			2.05	28
HEADSPACE PID	378	PPM				
PERCENT SOLIDS	90.4	%				

– TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 –

Surrogate Recovery was at N/A % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: [signature] Date: 8/8/94

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	HAB57	980764
MTR CODE | SITE NAME:	73300	Hubbell 3
SAMPLE DATE | TIME (Hrs):	10/29/98	1159
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	11/9/98	11/10/98
DATE OF BTEX EXT. | ANAL.:	10/3/98	11/6/98
TYPE | DESCRIPTION:	VG	SOIL

Field Remarks: 14-15'

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.5	MG/KG				
TOLUENE	<0.5	MG/KG				
ETHYL BENZENE	<0.5	MG/KG				
TOTAL XYLENES	<1.5	MG/KG				
TOTAL BTEX	<3	MG/KG				
TPH (MOD.8015)	<20	MG/KG				
HEADSPACE PID	855	PPM				
PERCENT SOLIDS	92.4	%				

-- TPH is by EPA Method 8015 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 100.4 % for this sample All QA/QC was acceptable.

tive:

DF = Dilution Factor Used

Approved By: John Fowler Date: 12/3/98

PINNACLE LABORATORIES

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMOTOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : EL PASO FIELD SERVICES
PROJECT # : (none)
PROJECT NAME : PHASE II DRILLING

PINNACLE I.D.: 811012

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	980760	NON-AQ	10/28/98	11/9/98	11/9/98	1
02	980761	NON-AQ	10/28/98	11/9/98	11/9/98	1
03	980762	NON-AQ	10/28/98	11/9/98	11/10/98	1

PARAMETER	DET. LIMIT	UNITS	01	02	03
FUEL HYDROCARBONS, C6-C10	10	**MG/KG**	< 10	**20**	< 10
FUEL HYDROCARBONS, C10-C22	5.0	**MG/KG**	**5.1**	**480**	**5.5**
FUEL HYDROCARBONS, C22-C36	5.0	**MG/KG**	< 5.0	**460**	< 5.0
CALCULATED SUM:			**5.1**	**960**	**5.5**
SURROGATE:					
O-TERPHENYL (%)			131	156 **	125
SURROGATE LIMITS	(66 - 151)				

CHEMIST NOTES:
**= HIGH SURROGATE RECOVERY DUE TO MATRIX INTERFERENCE.

PINNACLE LABORATORIES

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMOTOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : EL PASO FIELD SERVICES
PROJECT # : (none)
PROJECT NAME : PHASE II DRILLING

PINNACLE I.D.: 811012

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	980763	NON-AQ	10/29/98	11/9/98	11/10/98	1
05	980764	NON-AQ	10/29/98	11/9/98	11/10/98	1
06	980765	NON-AQ	10/29/98	11/9/98	11/10/98	1

PARAMETER	DET. LIMIT	UNITS	04	05	06
FUEL HYDROCARBONS, C6-C10	10	**MG/KG**	**88**	< 10	< 10
FUEL HYDROCARBONS, C10-C22	5.0	**MG/KG**	**56**	< 5.0	< 5.0
L HYDROCARBONS, C22-C36	5.0	**MG/KG**	**40**	< 5.0	< 5.0
CULATED SUM:			**184**		
SURROGATE:					
O-TERPHENYL (%)			129	124	126
SURROGATE LIMITS	(66 - 151)				

CHEMIST NOTES:
N/A

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH- 1
Well # NA
Page 1 of 1

PHILIP SERVICES CORP.
[redacted]roe Road
[redacted]n, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Number 19643 Phase 1001.77
Project Name EPFS PITS >10
Project Location HUBBELL #3 73500

Elevation
Borehole Location LTR: O S: 18 T: 29R: 10
GWL Depth NA
Drilled By K. PADILLA
Well Logged By H. BRADBURY
Date Started 10/29/98
Date Completed 10/29/98

Drilling Method 4 1/4 ID HSA
Air Monitoring Method PID

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: PPM BZ	BH	S/HS	Drilling Conditions & Blow Counts
0				EXCAVATION SAMPLE COLLECTED AT 4'						BZ=Breathing Zone BH=Borehole S/HS=Sample/Headspace
5	1	5-7	24	LT BR SANDY CLAY, FINE SAND, MOD PLASTICITY, SOFT, DRY			0	0	824 / 3084	1133 HRS
10	2	10-11	12	LT BR SANDSTONE, FINE SAND, MOD CEMENTATION, DRY			0	0	1599 / 2790	1147 HRS
15	3	14-15	12	LT BR SANDSTONE, FINE SAND, MOD CEMENTATION, DRY			0	323	143 / 855	1159 HRS
20				TOB 15'						
25										
30										
35										
40										

Comments: HAB57 14-15' SENT TO LAB FOR TPH, BTEX GW NOT ENCOUNTERED
BH GROUTED TO SURFACE
AUGER REFUSAL AT 14'

Geologist Signature Holly Bradbury

8/18/98\Drillog