Jenny L. Ford
DEPUTY OIL & GAS INSPECTOR
DEC 21 1998
Approved

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

RECEIVED
JUL 2 1998
OIL CON. DIV.
DIST. 3

RINCON UNIT #98
Meter/Line ID - 71895

SITE DETAILS

Legals - Twn: 27 **Rng:** 06 **Sec:** 21 **Unit:** A
NMOCD Hazard Ranking: 10 **Land Type:** 2 - Federal
Operator: UNOCAL CORPORATION **Pit Closure Date:** 12/13/94

RATIONALE FOR RISK-BASED CLOSURE:

The above mentioned production pit was assessed and ranked according to the criteria in the New Mexico Conservation Division's Unlined Surface Impoundment Closure Guidelines.

The primary source, discharge to the pit, has been removed. There has been no discharge to the production pit for at least five years and the pit has been closed for at least three years.

The production pit has been remediated to the practical extent of the trackhoe or to the top of bedrock. Initial laboratory analysis has indicated that the soil remaining at the bottom of the excavation is above standards based on the hazard ranking score. Contaminated soil was removed and transported to an approved landfarm for disposal. The initial excavation was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching any residual hydrocarbons remaining in the soil. Therefore, further mobility of residual hydrocarbons is unlikely.

Since the soil samples from the initial excavation were above standards, a test boring was drilled and a sample was collected to evaluate the vertical extent of impact to soils. Test boring sample results indicated soils below standards beneath the original excavation.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All source material has been removed from the ground surface, eliminating potential direct contact with livestock and the general public.
- Groundwater was not encountered in the initial excavation or test boring; therefore, impact to groundwater is unlikely.
- Soil samples collected beneath the initial excavation were below standards.
- No potential receptors are within 1,000 feet of the site.
- Residual hydrocarbons remaining in the soil at the bottom of the initial excavation will naturally degrade in time with minimal risk to the environment.

J:\18954\rbc

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 71895 Location: RINCON UNIT #98
Operator #: _____ Operator Name: UNOCAL P/L District: BLANCO
Coordinates: Letter: A Section 21 Township: 27 Range: 6
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 11.29.94 Area: 03 Run: 21

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 EPHEMERAL DRAINAGE TO MARTINEZ CANYON.
(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)
Distance to Nearest Ephemeral Stream ☐ (1) < 100'(Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 10 **POINTS**

REMARKS

Remarks : REDLINE & TOPO SHOW LOCATION INSIDE V.Z. TWO PITS ON LOCATION - THEY BELONG TO UNOCAL. EPNG LOCATION DRIP HAS BEEN CLOSED. WILL RE-DIG CLOSED PIT. NOTE ORANGE STAKE.

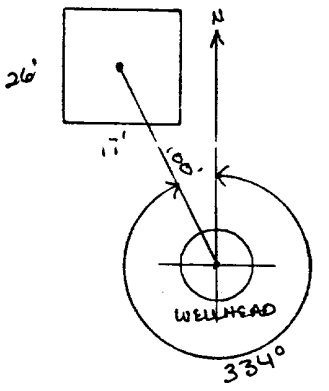
DIG & HAUL.

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 334° Footage from Wellhead 100'

b) Length : 26' Width : 17' Depth : 0



REMARKS

Remarks :

Photos - 1038

Completed By:

Robert Thompson

Signature

11.29.94

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 71895 Location: Rincon Unit #98

Coordinates: Letter: A Section 21 Township: 27 Range: 6

Or Latitude _____ Longitude _____

Date Started : 12/13/94 Run: 03 21

FIELD OBSERVATIONS

Sample Number(s): KD385 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 457 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒	Approx. Cubic Yards 70
Onsite Bioremediation	☐	
Backfill Pit Without Excavation	☐	

Soil Disposition:

Envirotech	☒	☐	Tierra
Other Facility	☐	Name:	_____

Pit Closure Date: 12/13/94 Pit Closed By: BEI

REMARKS

Remarks : Unocal had previously covered pit. Removed 13 yds of overburden, Excavated pit to 12', Took PID Sample, Closed pit.

Signature of Specialist: Kenny Deans

(SP3181) 03/16/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD385	946530
MTR CODE | SITE NAME:	71895	N/A
SAMPLE DATE | TIME (Hrs):	12-13-94	1540
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	12-15-94	12-15-94
DATE OF BTEX EXT. | ANAL.:	12/14/94	12/19/94 12/22/94
TYPE | DESCRIPTION:	VC	Brown sand and clay

REMARKS: BTEX results from ATI and EPNG

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS DF	Q	M(g)	V(ml)	ATI Results
BENZENE	17.4	MG/KG	0.2749		4.85	20	<0.50
TOLUENE	~~18~~ 190	MG/KG	1.0309				<0.50
ETHYL BENZENE	60.9	MG/KG					<0.50
TOTAL XYLENES	599	MG/KG					3.0
TOTAL BTEX	870	MG/KG					4.5
TPH (418.1)	20300	MG/KG			0.36	28	—
HEADSPACE PID	457	PPM					Surrogate % 101 ~~100~~ 12/30/94
PERCENT SOLIDS	89.9	%					Dilution Factor 20

NOT VS

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

The Surrogate Recovery was at 127.7 for this samp All QA/QC was acceptable.

Narrative: BFB collected ATI Results attached

DF = Dilution Factor Used

Approved By: John Fowler Date: 1-6-95

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

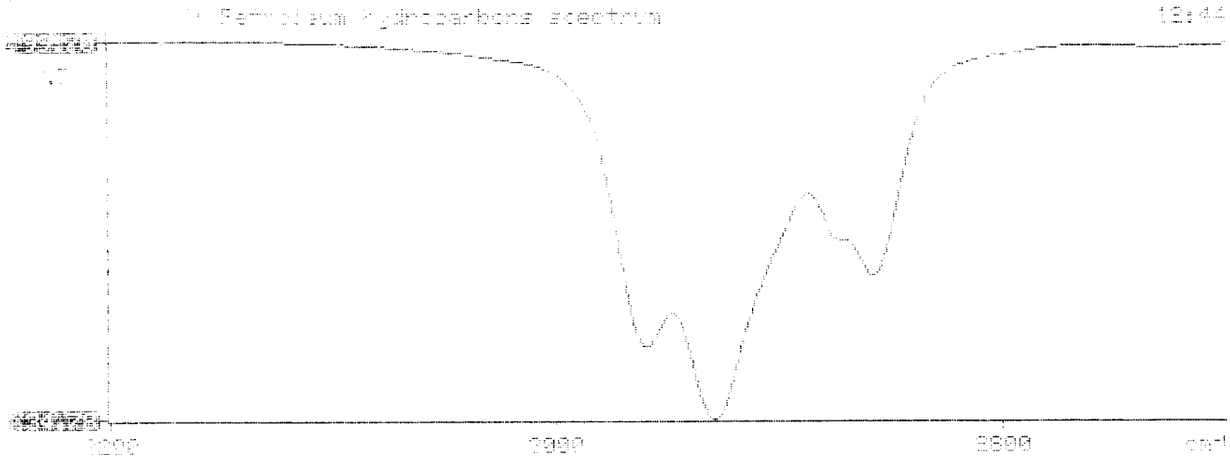
Sample Identification

Initial mass of sample, g

Volume of sample after extraction, ml

Petroleum hydrocarbons, ppm

Net absorbance of hydrocarbons (2930 cm-1)



BTEX SOIL SAMPLE WORKSHEET

File	946530B	**Date Printed**	12/21/94
Soil Mass (g)	4.85	**Multiplier (L/g)**	0.00103
Extraction vol. (mL)	20	**DF (Analytical)**	266.667
Shot Volume (uL)	75	**DF (Report)**	0.27491

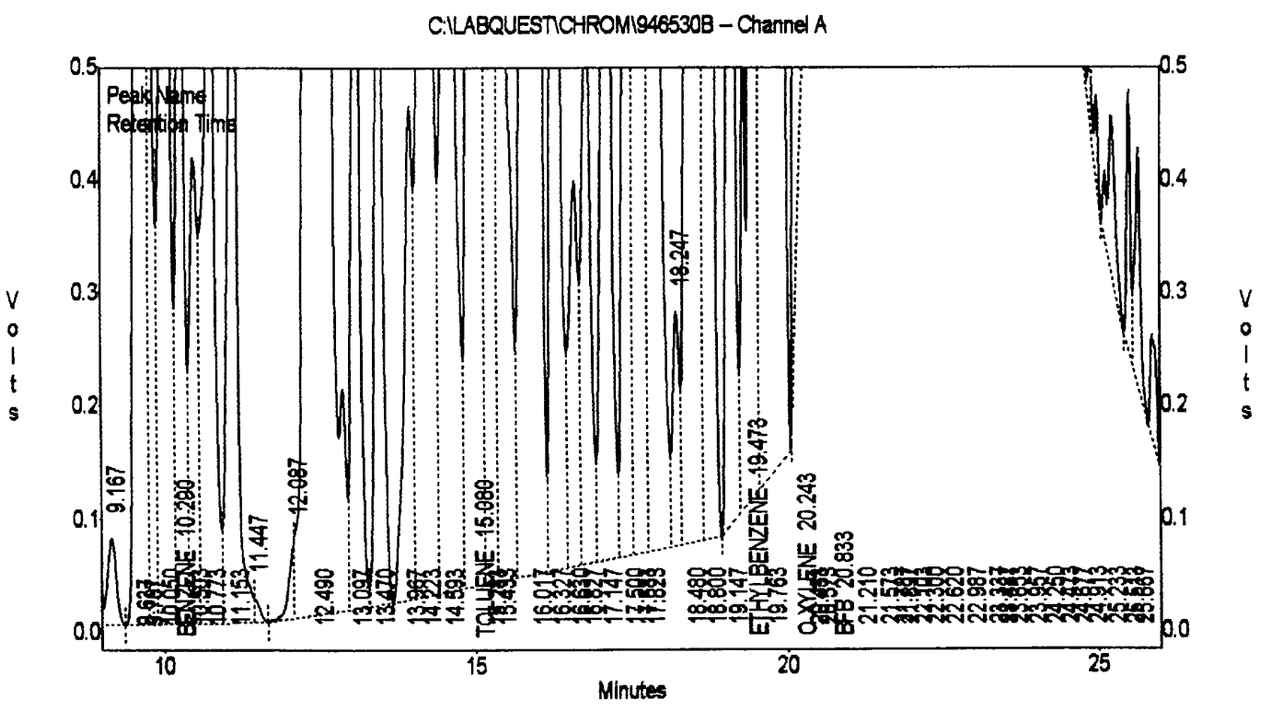
				Det. Limit
Benzene (ug/L)	63.41	**Benzene (mg/Kg):**	**17.432**	1.375
Toluene (ug/L)	626.65	**Toluene (mg/Kg):**	**172.275**	1.375
Ethylbenzene (ug/L)	250.85	**Ethylbenzene (mg/Kg):**	**68.962**	1.375
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	5.498
o-xylene (ug/L)	551.70	o-xylene (mg/Kg):	151.670	2.749
		Total xylenes (mg/Kg):	**151.670**	8.247
		Total BTEX (mg/Kg):	**410.340**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM\946530B
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946530,4.85G/75uL
Acquired : Dec 19, 1994 21:46:46
Printed : Dec 19, 1994 22:13:01
User : Tony

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.290	8538171	131872.92188	63.4143
a,a,a TFT	12.640	0	0.00000	0.0000
TOLUENE	15.080	83989096	148815.51563	626.6501
ETHYLBENZENE	19.473	30118304	132895.85938	250.8475
M & P XYLENE	19.653	0	0.00000	0.0000
O XYLENE	20.243	65733896	142564.65625	551.7007
BFB	20.833	26386354	199747.54688	129.3937
Totals :		214765808		1622.0065

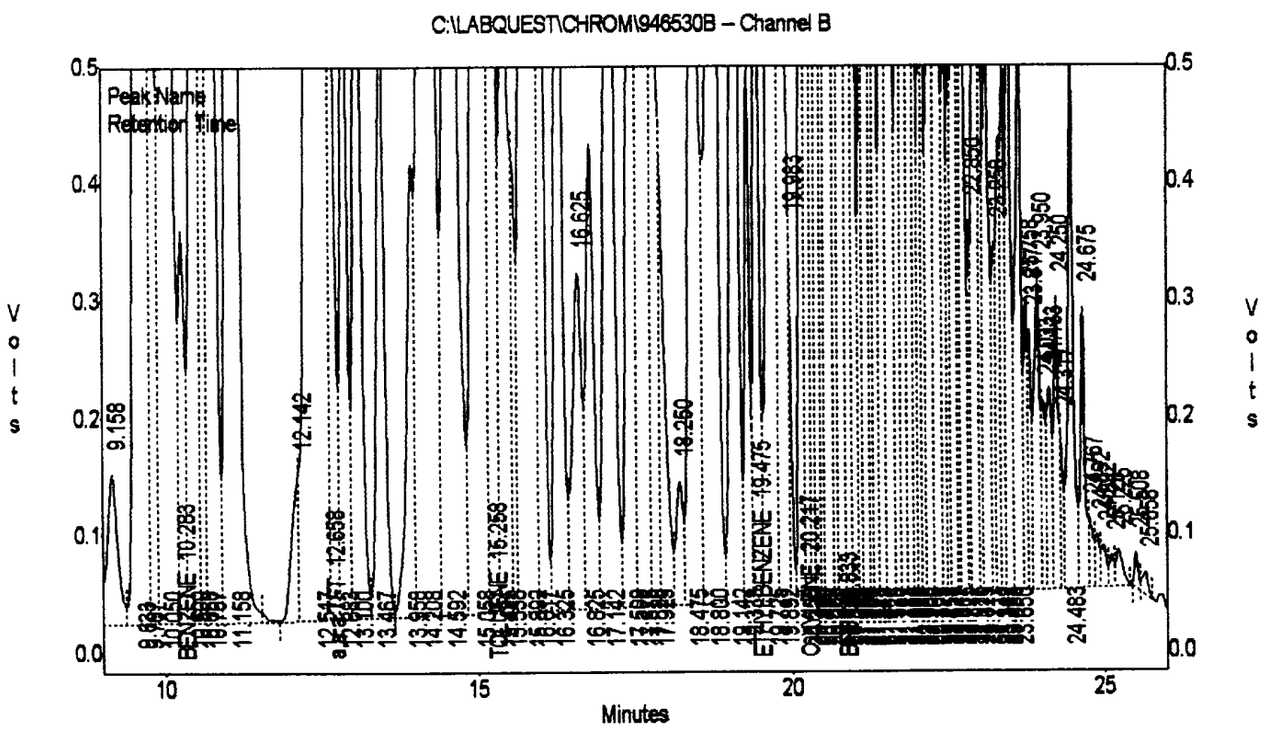


EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM\946530B
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946530,4.85G/75uL
Acquired : Dec 19, 1994 21:46:46
Printed : Dec 19, 1994 22:13:07
User : Tony

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.283	2281686	21915.75586	100.4733
a,a,a TFT	12.658	4967090	2414.15015	1946.3379
TOLUENE	15.258	20488712	24426.96680	907.8944
ETHYLBENZENE	19.475	6005101	22761.56836	279.6465
M & P XYLENE	19.658	0	0.00000	0.0000
O XYLENE	20.217	6938631	23922.60938	326.3670
BFB	20.833	8502846	23067.31836	351.3673
Totals :		49184064		3912.0864



BTEX SOIL SAMPLE WORKSHEET

File	946530C	**Date Printed**	12/26/94
Soil Mass (g)	4.85	**Multiplier (L/g)**	0.00103
Extraction vol. (mL)	20	**DF (Analytical)**	1000
Shot Volume (uL)	20	**DF (Report)**	1.03093

				Det. Limit
Benzene (ug/L)	14.57	**Benzene (mg/Kg):**	**15.021**	5.155
Toluene (ug/L)	183.81	**Toluene (mg/Kg):**	**189. 95**	5.155
Ethylbenzene (ug/L)	59.06	**Ethylbenzene (mg/Kg):**	**60.887**	5.155
p & m-xylene (ug/L)	423.68	p & m-xylene (mg/Kg):	436.784	10.309
o-xylene (ug/L)	157.66	o-xylene (mg/Kg):	162.536	5.155
		Total xylenes (mg/Kg):	**599.320**	15.464
		Total BTEX (mg/Kg):	**86 .722**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

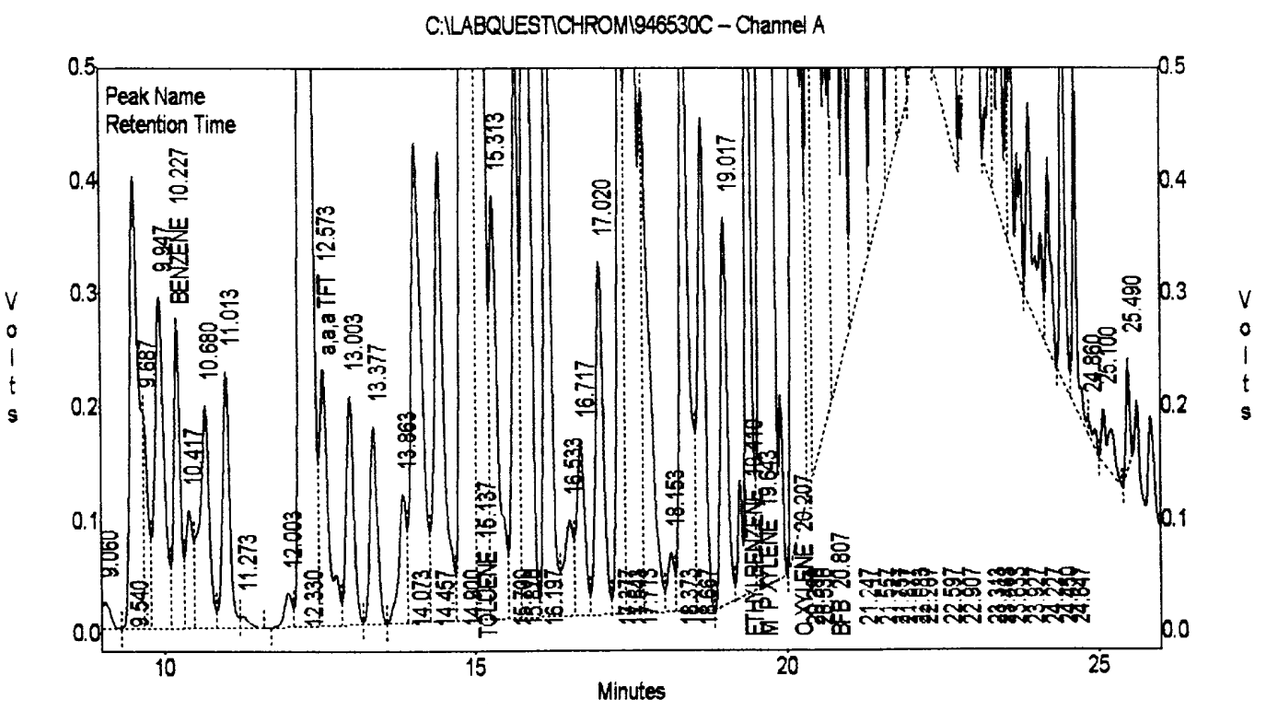
File : C:\LABQUEST\CHROM\946530C
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946530,4.85G/20uL
Acquired : Dec 23, 1994 12:07:05
Printed : Dec 23, 1994 12:33:20
User : Tony

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.227	1961624	131872.92188	14.5693
a,a,a TFT	12.573	2248852	8403.01855	250.8067
TOLUENE	15.137	24635300	148815.51563	183.8062
ETHYLBENZENE	19.410	7091563	132895.85938	59.0638
M & P XYLENE	19.643	54993416	193528.29688	423.6844
O XYLENE	20.207	18792118	142564.65625	157.7211
BFB	20.807	26033040	199747.54688	127.6611

Totals :

135755904		1217.3126



EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

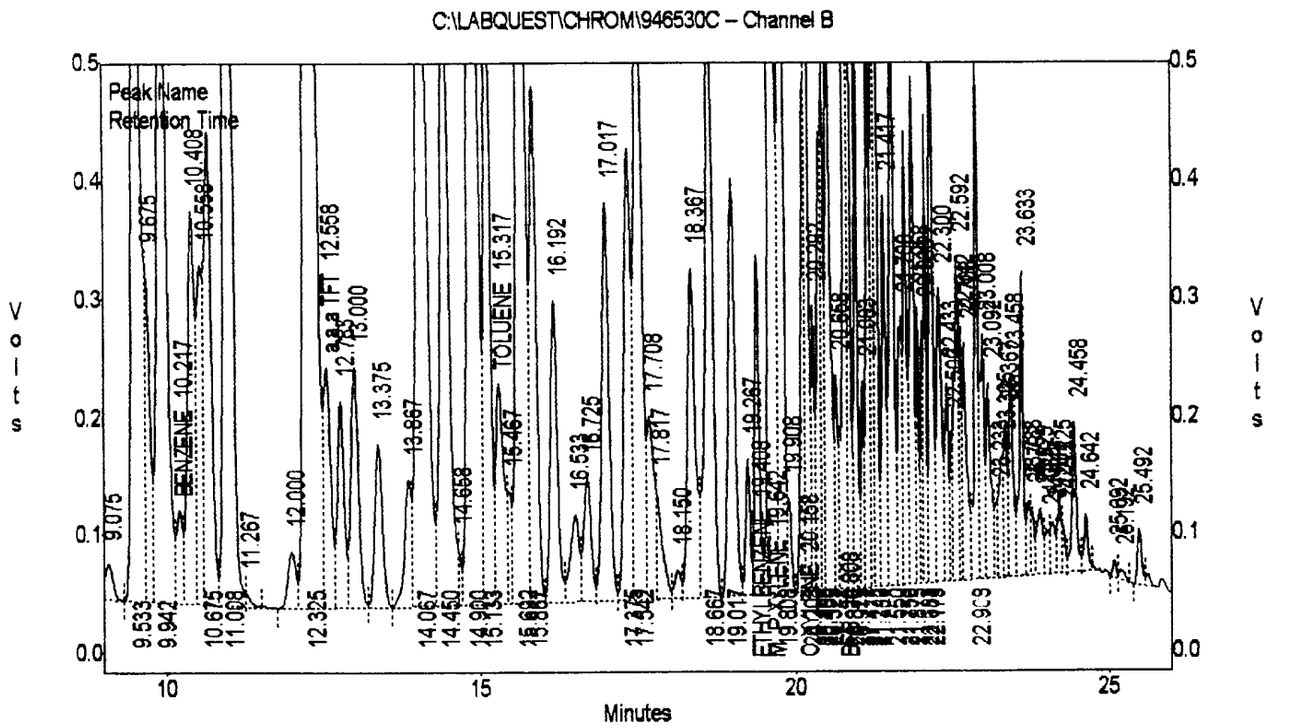
File : C:\LABQUEST\CHROM\946530C
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946530,4.85G/20uL
Acquired : Dec 23, 1994 12:07:05
Printed : Dec 23, 1994 12:33:26
User : Tony

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.217	550855	21915.75586	24.2567
a,a,a TFT	12.558	1594385	2414.15015	624.7546
TOLUENE	15.317	1667087	24426.96680	73.8718
ETHYLBENZENE	19.408	1405817	22761.56836	65.4663
M & P XYLENE	19.642	10563385	24867.57227	502.2694
O XYLENE	20.158	1518804	23922.60938	71.4388
BFB	20.808	4553987	23067.31836	188.1867

Totals :

21854320		1550.2443



Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **412379**

December 29, 1994

El Paso Natural Gas Co.
P.O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **12/16/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

MR:jt

Enclosure

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS ATI I.D.: 412379
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	946530	NON-AQ	12/13/94	12/19/94	12/28/94	20
05	946531	NON-AQ	12/14/94	12/19/94	12/23/94	100
06	946532	NON-AQ	12/14/94	12/19/94	12/23/94	5

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.50	<2.5	<0.13
TOLUENE	MG/KG	<0.50	21	<0.13
ETHYLBENZENE	MG/KG	<0.50	15	0.50
TOTAL XYLENES	MG/KG	3.0	160	4.0
SURROGATE:				
BROMOFLUOROBENZENE (%)		101	*	86

*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

Philip Environmental Services Corp.
4000 Monroe Road
Farmington, New Mexico 87401
(606) 326-2262 FAX (606) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase ~~001~~ 6000
Project Location Rincon Unit # 98, 71895

Elevation
Borehole Location T27, R6, S.21, A
GWL Depth
Logged By S.Kelly
Drilled By M. Donohue.
Date/Time Started 5/22/95, 1340
Date/Time Completed 5/22/95, 1505

Well Logged By S.Kelly
Personnel On-Site M. Donohue, J. O'Keefe
Contractors On-Site
Client Personnel On-Site

Drilling Method 4¼" ID HSA
Air Monitoring Method CGI, 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: NDU BZ	BH	S	Drilling Conditions & Blow Counts
0				Backfill to 12'.						
5										
10										
15										
20	1	18-20		Silty SAND, tan, 5-20% silt, fine sand, dense, dry					2/339	1400
25	2	23-25		SAA					21/7	1412
		29-30	1K			27'				
30	3	25-28	Blzzrd?	SILT, brown, dense, dry					13/2	1420
				TOB 30.0'						
35										
40										

Comments: 28'-30' sample (SEK 67) sent to lab. sample was bagged and iced prior to being put in jar. BH grouted to surface.

Geologist Signature Sarah Kelly

6/14/95\DRILLOG.XLS

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	SEK67	947304
MTR CODE | SITE NAME:	71895	Rincon Unit #98
SAMPLE DATE | TIME (Hrs):	8-22-95	14:20
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/23/95	
DATE OF BTEX EXT. | ANAL.:	8/24/95	
TYPE | DESCRIPTION:	VG	Brown Sand Clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< .5	MG/KG				
TOLUENE	< .5	MG/KG				
ETHYL BENZENE	< .5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	57.0	MG/KG			2.0	28
HEADSPACE PID	2	PPM				
PERCENT SOLIDS	91.6	%				

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

The Surrogate Recovery was at 96% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 8/28/95

```
*********************************************************
*                    Test Method for                    *
*      Oil and Grease and Petroleum Hydrocarbons        *
*                  in Water and Soil                    *
*                                                       *
*             Perkin-Elmer Model 1600 FT-IR             *
*                   Analysis Report                     *
*********************************************************
*
 95/08/23  14:11
*
*  Sample identification
 947304
*
*  Initial mass of sample, g
 2.000
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 57.027
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.017
*
*
*
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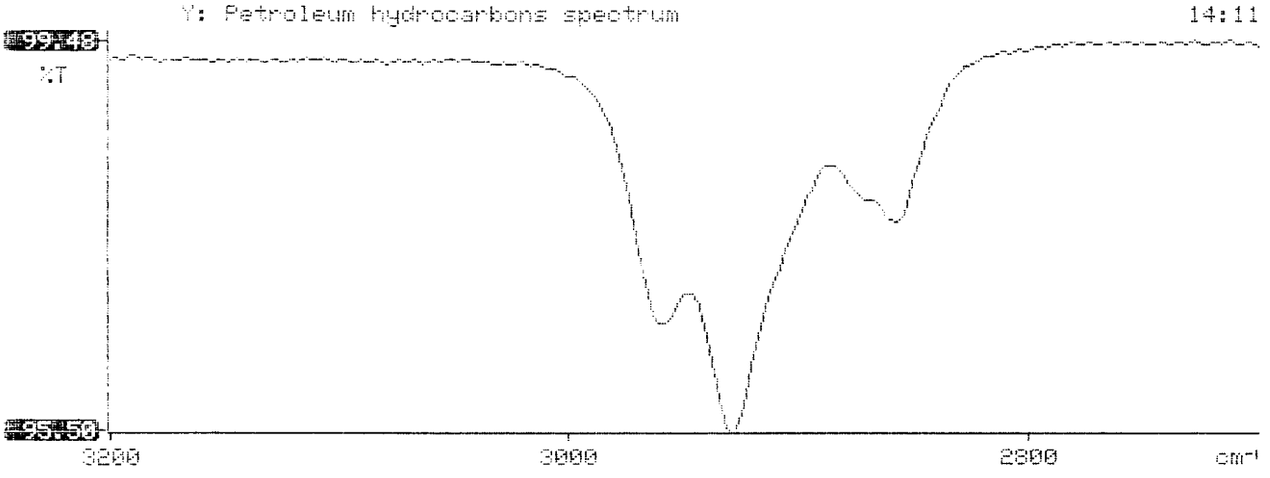

BTEX SOIL SAMPLE WORKSHEET

File :	947304	**Date Printed** :	8/26/95
Soil Mass (g) :	4.98	**Multiplier (L/g)** :	0.00100
Extraction vol. (mL) :	20	**DF (Analytical)** :	200
Shot Volume (uL) :	100	**DF (Report)** :	0.20080

				Det. Limit
Benzene (ug/L) :	0.00	**Benzene (mg/Kg):**	**0.000**	0.502
Toluene (ug/L) :	0.00	**Toluene (mg/Kg):**	**0.000**	0.502
Ethylbenzene (ug/L) :	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.502
p & m-xylene (ug/L) :	0.00	p & m-xylene (mg/Kg):	0.000	1.004
o-xylene (ug/L) :	0.00	o-xylene (mg/Kg):	0.000	0.502
		Total xylenes (mg/Kg):	**0.000**	1.506
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082495-1.023
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947304,4.98G,100U
Acquired : Aug 25, 1995 04:15:33
Printed : Aug 25, 1995 04:41:54
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.443	0	0.0000
a,a,a TFT	4.943	4587749	88.2095
TOLUENE	6.767	173551	-0.2669
ETHYLBENZENE	10.510	0	0.0000
M & P XYLENE	10.837	0	0.0000
O XYLENE	11.907	0	0.0000
BFB	13.393	68959696	95.7325