EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Denied for now
DEPUTY OIL & GAS INSPECTOR

DEC 2 1998
Approved

SAN JUAN 28-6 #75
Meter/Line ID - 71850

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

SITE DETAILS

Legals - Twn: 27 **Rng:** 06 **Sec:** 03 **Unit:** N
NMOCD Hazard Ranking: 40
Land Type: 2 - Federal
Operator: MERIDIAN OIL INC
Pit Closure Date: 09/24/95

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: 71850 Location: San Juan 28-6 # 75
Operator #: _____ Operator Name: Meridian P/L District: Bloomfield
Coordinates: Letter: N Section 03 Township: 27 Range: 06
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 3/9/95 Area: 10 Run: 52

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 Munoz Creek
(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: 40 **POINTS**

REMARK

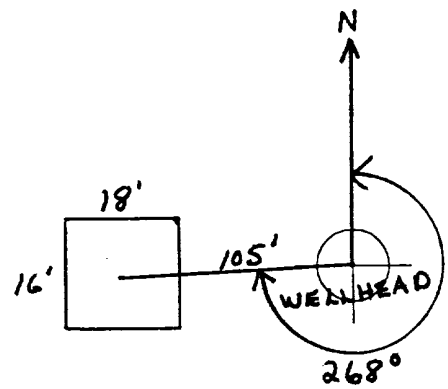
Remarks : Redline shows inside Topo shows Inside VZ
2 pits on loc 1 has Dehy in service, Old Dehy
pit belongs to EPNG Will close old Dehy pit
Dig + Haul

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 268° Footage from Wellhead 105'

b) Length : 18' Width : 16' Depth : 2'



REMARKS

Remarks :

Photos: 13:30

Completed By:

James L Pearce

Signature

3/9/95

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 71850 Location: SAN JUAN 28-6 # 75

Coordinates: Letter: N Section 03 Township: 27 Range: 06

Or Latitude _____ Longitude _____

Date Started : 3-24-95 Run: 10 52

FIELD OBSERVATIONS

Sample Number(s): KP 463 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 329 PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 120

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☐ ☒ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 3-24-95 Pit Closed By: B.E.I

REMARKS

Remarks : No Line markers. Pit has water in it had to solidify Pit before we could haul off. At 12' soil gray with a H.C odor. Closed Pit

Signature of Specialist: Kelly Padilla

(SP3191) 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:	KP463	946757
MTR CODE | SITE NAME:	71850	N/A
SAMPLE DATE | TIME (Hrs):	3-24-95	1430
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	3/28/95	3/28/95
DATE OF BTEX EXT. | ANAL.:	4/4/95	4/5/95
TYPE | DESCRIPTION:	VC	Gray sand & clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 1.02	MG/KG	0.40816		2.45	20
TOLUENE	33.6	MG/KG	↓		↓	↓
ETHYL BENZENE	5.49	MG/KG	↓		↓	↓
TOTAL XYLENES	70.0	MG/KG	↓		↓	↓
TOTAL BTEX	109	MG/KG				
TPH (418.1)	2810 ~~2644~~ 3/29/95	MG/KG			2.02	25
HEADSPACE PID	329	PPM				
PERCENT SOLIDS	85.3	%				

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

The Surrogate Recovery was at 101 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: JR Date: 4/18/95

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**********************************************************
*                    Test Method for                     *
*      Oil and Grease and Petroleum Hydrocarbons         *
*                   in Water and Soil                    *
*                                                        *
*            Perkin-Elmer Model 1600 FT-IR               *
*                   Analysis Report                      *
**********************************************************

 97/03/08  15:09

  Sample Identification
 94078"

  Initial mass of sample, g
 2.020

  Volume of sample after extraction, ml
 28.000

  Petroleum hydrocarbons, ppm
 2814.000
  Net absorbance of hydrocarbons (2930 cm-1)
 0.254
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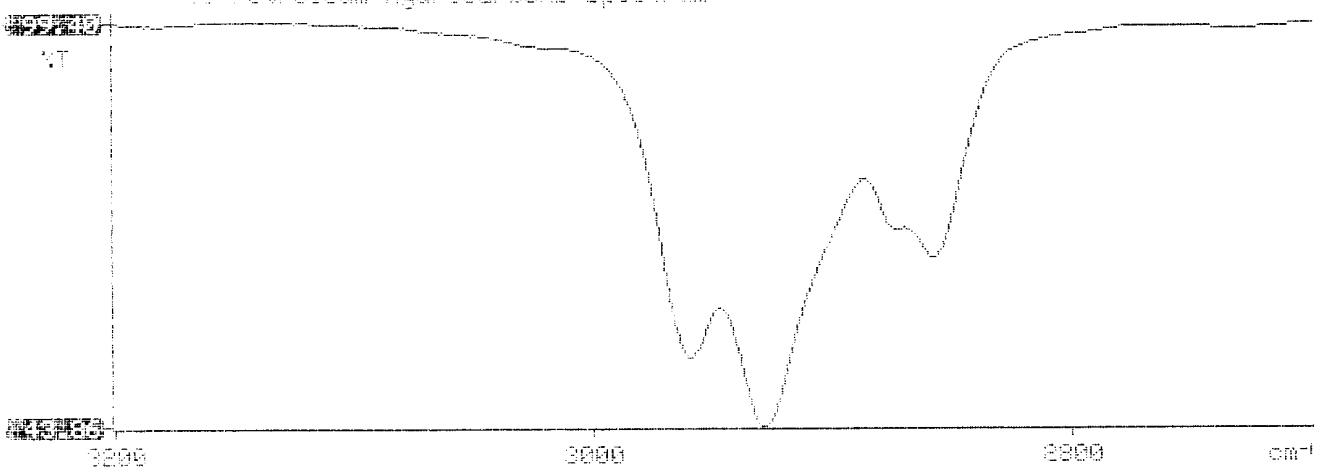
Y: Petroleum hydrocarbons spectrum 15:10



BTEX SOIL SAMPLE WORKSHEET

File	946757A	**Date Printed**	4/7/95
Soil Mass (g)	2.45	**Multiplier (L/g)**	0.00204
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.40816

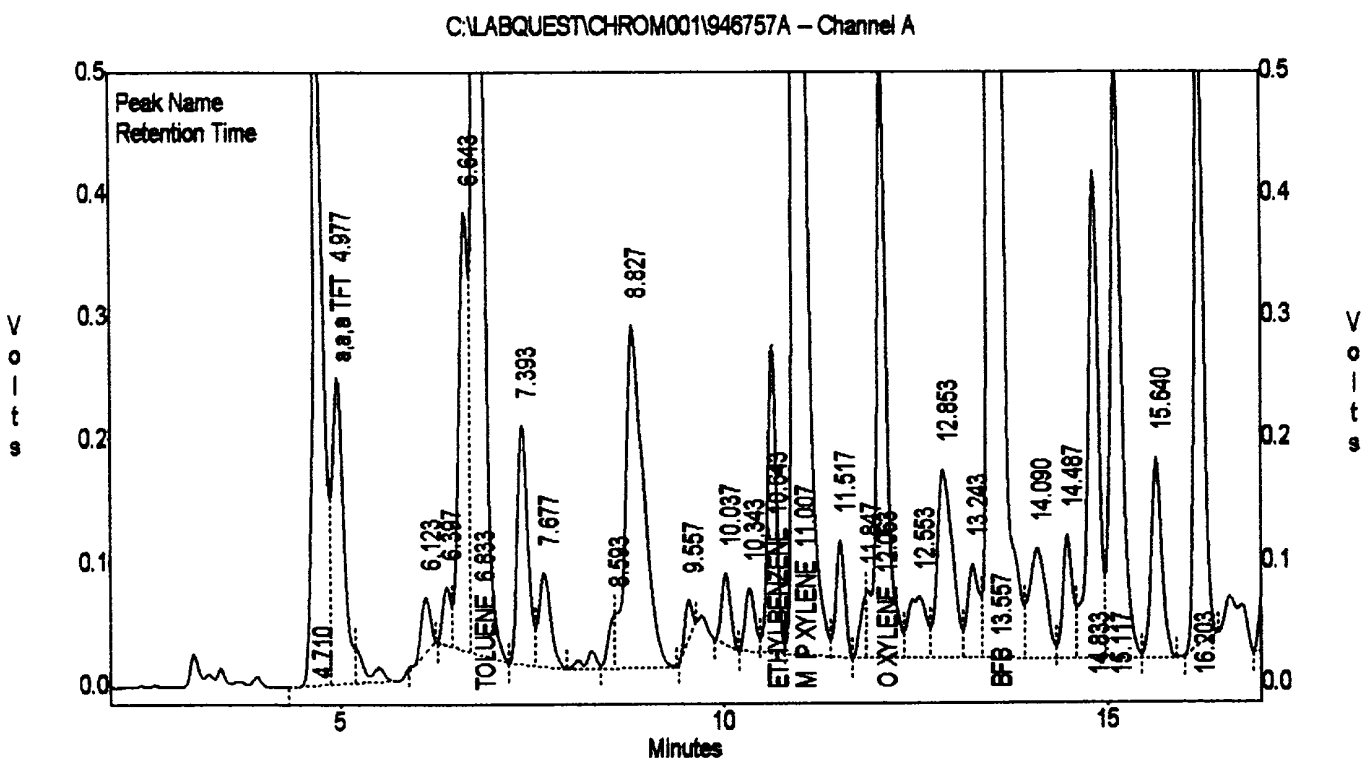
				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	1.020
Toluene (ug/L)	82.39	**Toluene (mg/Kg):**	**33.629**	1.020
Ethylbenzene (ug/L)	13.46	**Ethylbenzene (mg/Kg):**	**5.494**	1.020
p & m-xylene (ug/L)	139.21	p & m-xylene (mg/Kg):	56.820	2.041
o-xylene (ug/L)	32.26	o-xylene (mg/Kg):	13.167	1.020
		Total xylenes (mg/Kg):	**69.988**	3.061
		Total BTEX (mg/Kg):	**109.110**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\946757A
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 946757,2.45/100uL
Acquired : Apr 05, 1995 12:59:11
Printed : Apr 06, 1995 12:37:15
User : Tony

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	3.403	0	0.00000	0.0000
a,a,a TFT	4.977	2603181	17915.06641	142.4697
TOLUENE	6.833	13067234	152782.21875	82.3883
ETHYLBENZENE	10.643	1952299	137111.50000	13.4645
M & P XYLENE	11.007	22739872	163191.95313	139.2100
O XYLENE	12.063	4576223	131788.42188	32.2568
BFB	13.557	57217044	563092.56250	100.8586
Totals :		102155856		510.6479

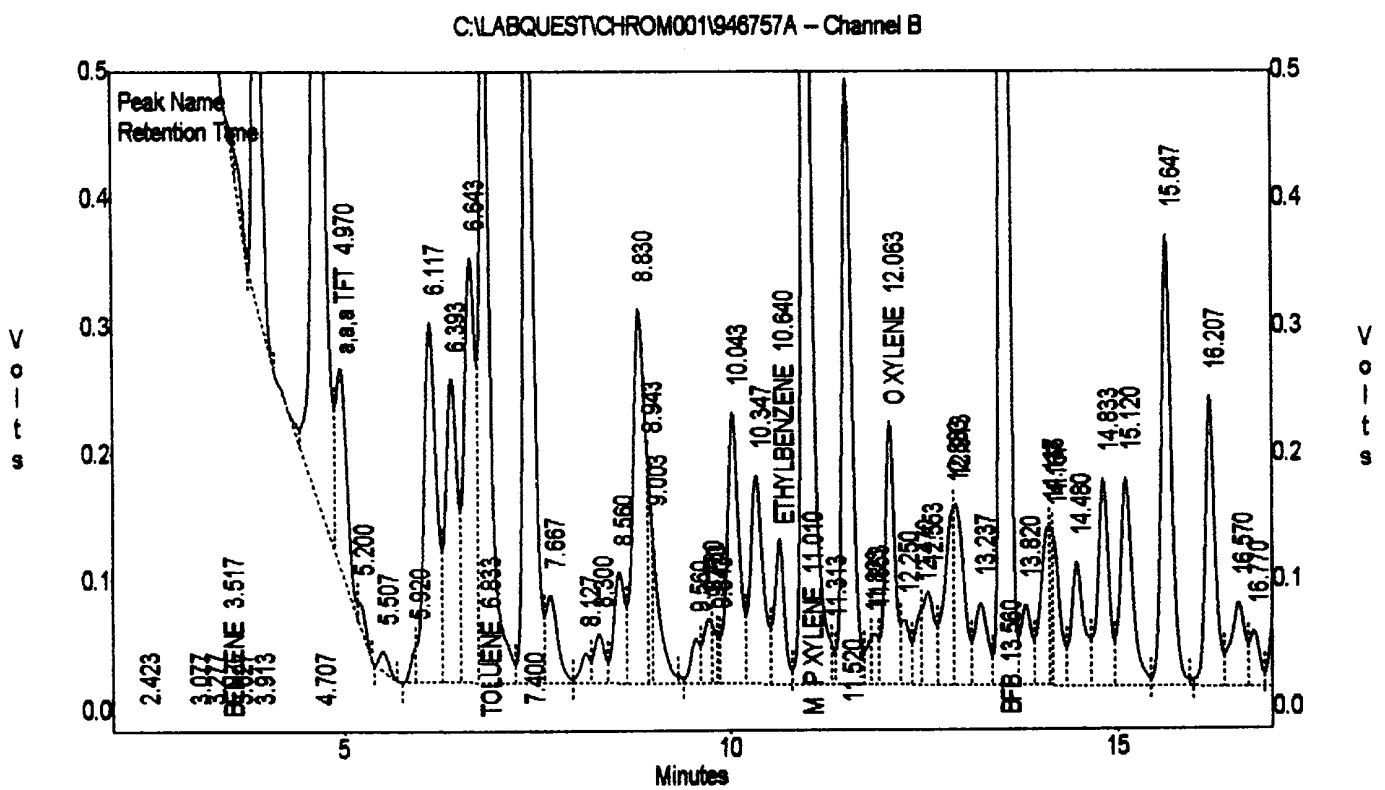


EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\946757A
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 946757,2.45/100uL
Acquired : Apr 05, 1995 12:59:11
Printed : Apr 06, 1995 12:37:21
User : Tony

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	3.517	72237	68742.85938	1.3242
a,a,a TFT	4.970	1509446	9297.03906	154.9164
TOLUENE	6.833	5734690	47965.40234	112.0108
ETHYLBENZENE	10.640	1009442	46856.76953	20.1218
M & P XYLENE	11.010	8550913	48130.08203	168.6860
O XYLENE	12.063	1808453	46848.81250	35.8600
BFB	13.560	12757276	96504.81250	130.4205
Totals :		31442460		623.3397



PHASE II

RECORD OF SUBSURFACE EX RATION

Borehole # BH-1
Well #
Page 1 of 1

Philip Environmental Services Corp.
4000 Monroe Road
Farmington, New Mexico 87401
(506) 326-2262 FAX (506) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase ~~601~~ 6000
Project Location San Juan 28-6 #75, 71850

Elevation
Borehole Location T27, R6, S3, N
GWL Depth
Logged By S.Kelly
Drilled By K. Padilla
Date/Time Started 7/12/95, 1420.
Date/Time Completed 7/12/95, 1600

Well Logged By S.Kelly
Personnel On-Site K. Padilla, F. Rivera, D. Charley
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/HS~~ S	Drilling Conditions & Blow Counts
0				Backfill to 12'.						
5										
10							2	303		drilling feels like rock at 12'.
15	1	15-16.5	.2/1.5'	SILT, greenish grey, hard, dry		17			6/205	1450
20	2	20-21.5	.3'/1.5'	SAND, light brown, fine to med. sand, dense, dry					1/X	slow drilling 1505
25				BOH - 21.5						
30										
35										
40										

Comments: 20-21.5' sample (SEK 37) sent to lab. (BTEX & TPH.) Not enough sample recovered to take headspace. BH grouted to surface.

Geologist Signature Sarah Kelly

El Paso Natural Gas Company

Phase II

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

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	SEV 37	94698 3
MTR CODE | SITE NAME:	71850	N/A
SAMPLE DATE | TIME (Hrs):	7-12-95	1505
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-13-95	7-13-95
DATE OF BTEX EXT. | ANAL.:	07-17-95	07-17-95
TYPE | DESCRIPTION:	V G	

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	51.6	MG/KG			2.05	28
HEADSPACE PID	1	PPM				
PERCENT SOLIDS	94.8	%				

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

The Surrogate Recovery was at 99 % for this sample All QA/QC was acceptable.

Narrative: ATI Results for BTEX and Modified 8015 attached

DF = Dilution Factor Used

Approved By: JP Date: 8/3/95

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**********************************************************
*                    Test Method for                     *
*      Oil and Grease and Petroleum Hydrocarbons         *
*                    in Water and Soil                   *
*                                                        *
*             Perkin-Elmer Model 1600 FT-IR              *
*                    Analysis Report                     *
**********************************************************
*
 95/07/13  14:29
*
*  Sample identification
 946983 ~~DUP~~ KDK 7/14/95
*
*  Initial mass of sample, g
 2.050
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 51.630
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.017
*
*
*
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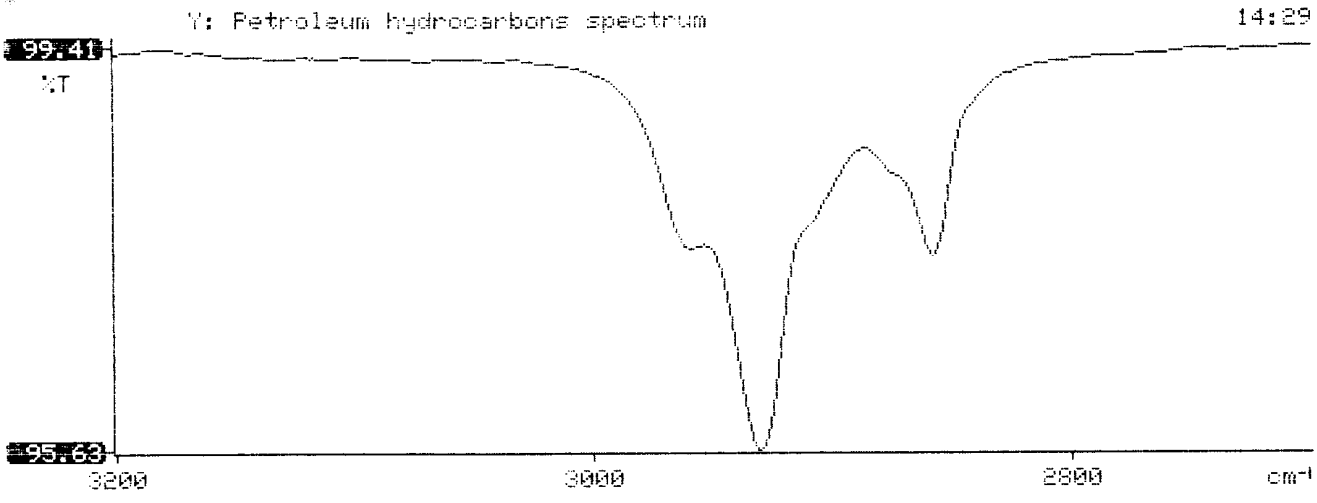

Analytical **Technologies,** Inc.

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

ATI I.D. **507340**

July 20, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I PHASE II 24324

Attention: John Lambdin

On **07/14/95**, 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.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507340
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE/PHASE I PHASE II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
14	946983	NON-AQ	07/12/95	07/17/95	07/18/95	1
15	946984	NON-AQ	07/12/95	07/17/95	07/18/95	20
16	946985	NON-AQ	07/12/95	07/17/95	07/18/95	1

PARAMETER	UNITS	14	15	16
BENZENE	MG/KG	<0.025	<0.5	<0.025
TOLUENE	MG/KG	<0.025	6.2	<0.025
ETHYLBENZENE	MG/KG	<0.025	4.1	<0.025
TOTAL XYLENES	MG/KG	<0.025	50	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		99	203*	100

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507340

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I PHASE II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
12	946981	NON-AQ	07/12/95	07/14/95	07/14/95	1
14	946983	NON-AQ	07/12/95	07/14/95	07/15/95	1
15	946984	NON-AQ	07/12/95	07/14/95	07/17/95	10

PARAMETER	UNITS	12	14	15
FUEL HYDROCARBONS	MG/KG	82	<5	1400
HYDROCARBON RANGE		C10-C32	-	C6-C14
HYDROCARBONS QUANTITATED USING		DIESEL	-	GASOLINE
SURROGATE:				
O-TERPHENYL (%)		118	108	83