Kenny
DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

HUERFANITO #6
Meter/Line ID - 73913

RECEIVED
JUL
OIL CON.

SITE DETAILS

Legals - Twn: 26 **Rng:** 09 **Sec:** 11 **Unit:** N
NMOCD Hazard Ranking: 20 **Land Type:** 2 - Federal
Operator: DUGAN PRODUCTION CORP **Pit Closure Date:** 08/11/94

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.

FIELD PIT SITE ASSESSMENT FORM

9

GENERAL

Disconnected well

Meter: 73-913 Location: Huerfanito No. 6

Operator #: — Operator Name: — P/L District: Ballard

Coordinates: Letter: ~~A~~ 6-21-94 KGW N Section 11 Township: 26N Range: 9W

Or Latitude _____ Longitude _____

Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____

Site Assessment Date: 6-21-94 Area: 11 Run: 91

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 Reed Canyon Wash

(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: 20 **POINTS**

REMARKS

Remarks : Three pits on location. Drydehy pit

*No Meter house or placard to Identify location

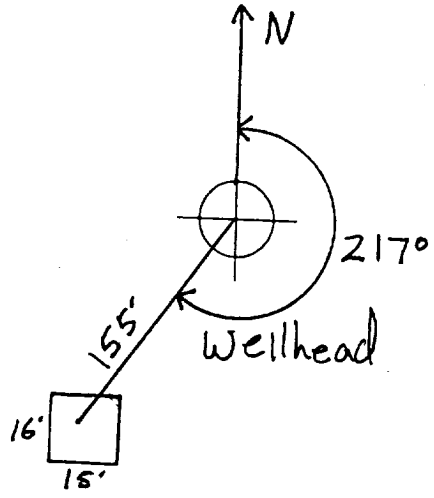
Inside VZ on Redline & Topo

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 217 Footage from Wellhead 155

b) Length : 16 Width : 15 Depth : 3



REMARKS

Remarks :

Photos - 1429

Well disconnected - No placard or Meter house
unknown operator

Completed By:

Signature

6-21-94

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73-913 Location: Huerfanito #6

Coordinates: Letter: N Section 11 Township: 26N Range: 9W

Or Latitude _____ Longitude _____

Date Started : 8/11/94 Run: 11 91

FIELD OBSERVATIONS

Sample Number(s): KD 207 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 605 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 60

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ Tierra ☐

Other Facility ☐ Name: _____

Pit Closure Date: 8/11/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', took P.D sample, Closed pit

Signature of Specialist: [signature]

(SP3191) 03/16/94

SPLIT

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:	KD207	9415902
MTR CODE | SITE NAME:	73913	N/A
SAMPLE DATE | TIME (Hrs):	8/11/94	1230
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8-16-94	8/16/94
DATE OF BTEX EXT. | ANAL.:	~~8/16/94 8/17/94~~ 8/17/94	~~8/17/94 8/18/94~~ 8/30/94
TYPE | DESCRIPTION:	VC	Brown Fine Sand

REMARKS: Split

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS DF	Q	M(g)	V(ml)	ATI Results
BENZENE	<0.063	MG/KG					<0.25 (8/17/94, 8/18/94)
TOLUENE	3.11	MG/KG					2.9
ETHYL BENZENE	1.44	MG/KG					1.4
TOTAL XYLENES	~~8.23~~ 8.5	MG/KG					25
TOTAL BTEX	28.1	MG/KG	0.0253		0.79	20	30
TPH (418.1)	1980	MG/KG			2.18	28	3200 (8/18/94)
HEADSPACE PID	605	PPM					Surrogate % 88
PERCENT SOLIDS	93.9	%					Dilution Factor 10

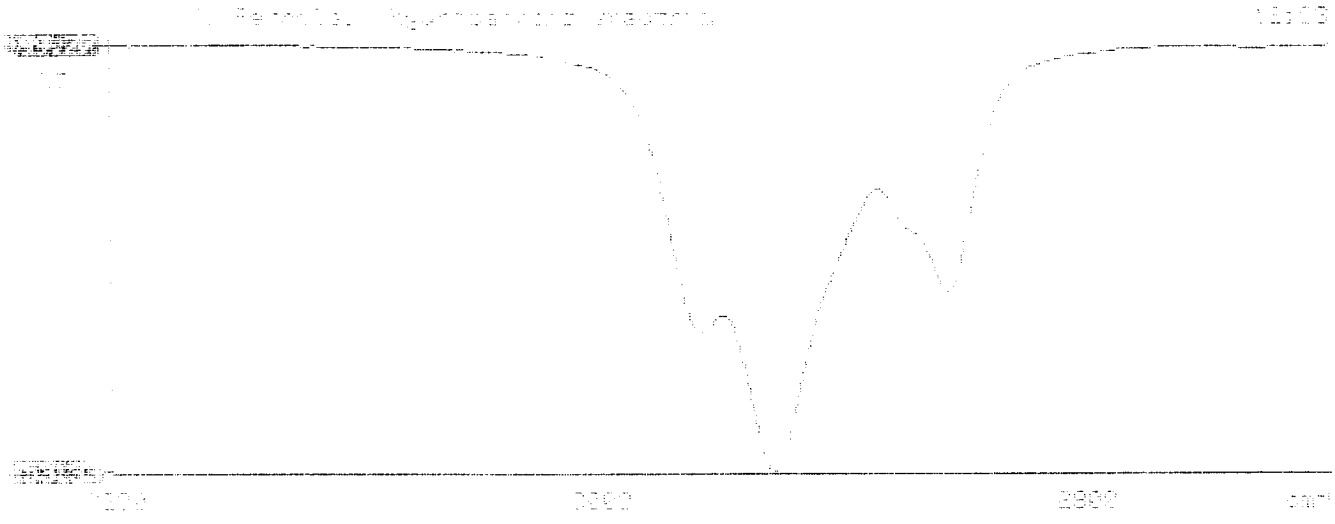
-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 113% for this samp All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: J. L. Date: 9/2/94



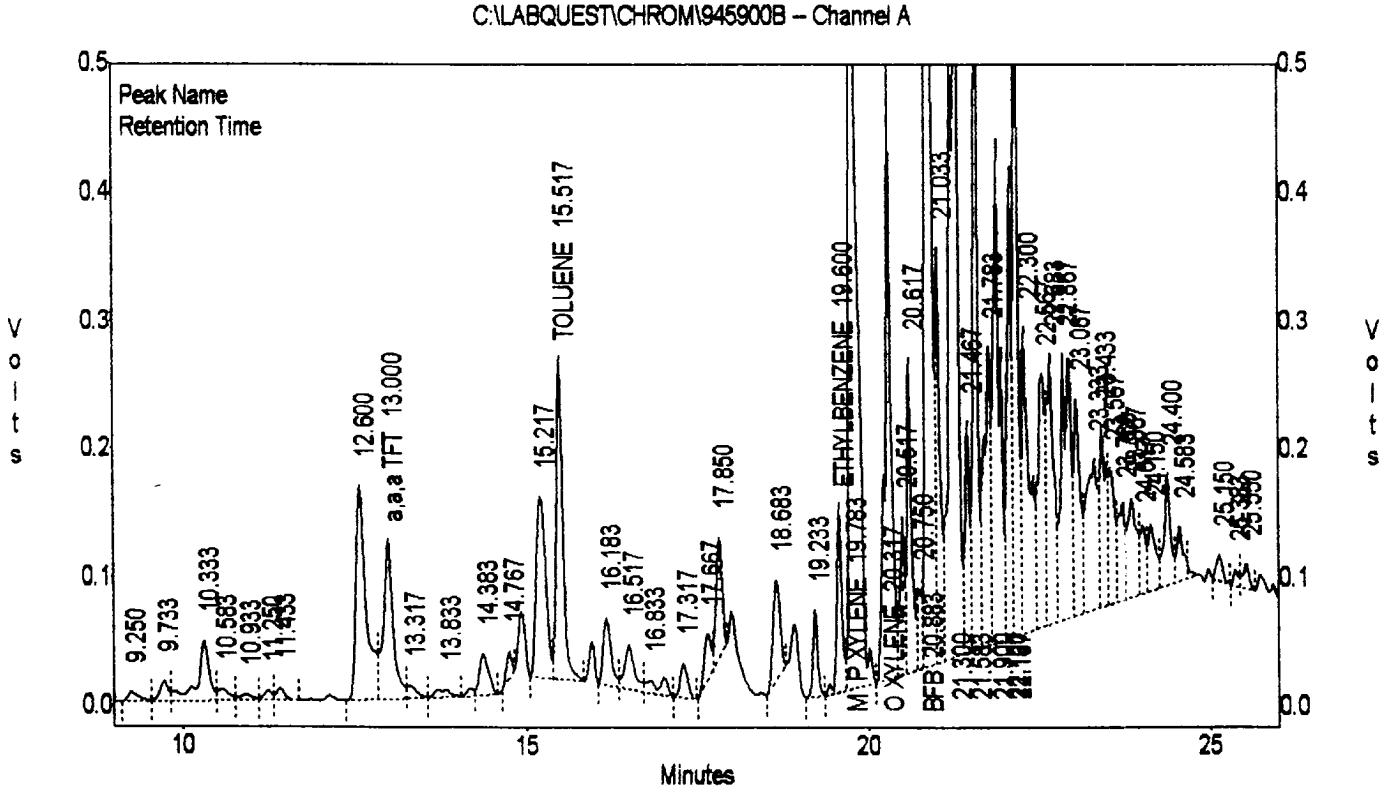
EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM\945900B
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 945900 1/10 0.79G/20ML
Acquired : Aug 30, 1994 10:53:58
Printed : Aug 30, 1994 11:20:12
User : STACY

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)	
BENZENE	10.767	0	0.00000	0.0000	12.5
a,a,a TFT	13.000	1197877	7303.77002	1637.9479	
TOLUENE	15.517	1709070	128167.09375	123.0225	12.3
ETHYLBENZENE	19.600	724739	116407.63281	56.8120	5.6
M & P XYLENE	19.783	9926204	167589.01563	710.1678	71.0
O XYLENE	20.317	2738135	115447.89063	218.4299	21.8
BFB	20.883	20854422	169985.04688	1132.2776	
Totals :		37150448		3878.6577	113

8/31/94



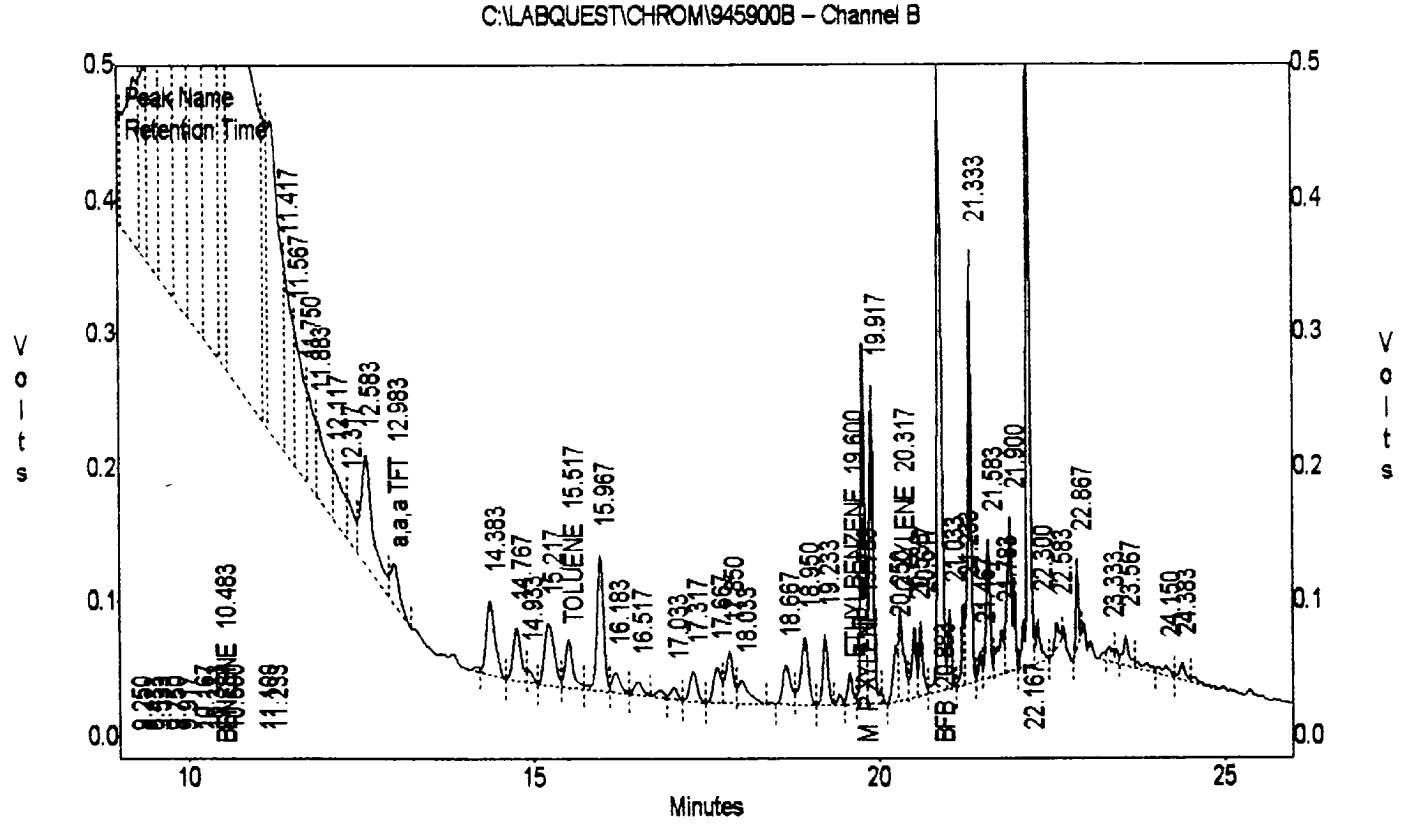
EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM\945900B
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 945900 1/10 0.79G/20ML
Acquired : Aug 30, 1994 10:53:58
Printed : Aug 30, 1994 11:20:18
User : STACY

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.483	1850944	17134.41016	961.9005
a,a,a TFT	12.983	270074	1618.93140	1674.3997
TOLUENE	15.517	270630	16955.15430	141.8973
ETHYLBENZENE	19.600	116959	15800.91699	64.7201
M & P XYLENE	19.783	1119249	16103.94629	619.4233
O XYLENE	20.317	342593	15663.30664	191.9427
BFB	20.883	1996823	18546.16797	1105.2200
Totals :		5967274		4759.5034



Analytical Technologies, Inc.

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

ATI I.D. **408364**

August 24, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **08/17/94**, 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.

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.: 408364

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945898	NON-AQ	08/11/94	08/17/94	08/18/94	1
02	945899	NON-AQ	08/11/94	08/17/94	08/18/94	1
03	945900	NON-AQ	08/11/94	08/17/94	08/18/94	10

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	<0.025	<0.25
TOLUENE	MG/KG	<0.025	<0.025	2.9
ETHYLBENZENE	MG/KG	<0.025	<0.025	1.4
TOTAL XYLENES	MG/KG	<0.025	<0.025	25
SURROGATE:				
BROMOFLUOROBENZENE (%)		98	94	88

Split Sample

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 408364
PROJECT #	: 24324	DATE RECEIVED	: 08/17/94
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 08/18/94

PARAMETER	UNITS	03	19
PETROLEUM HYDROCARBONS, IR	MG/KG	3200	<20

EPNG Sample #945900

Split Sample

PHASE II

RECORD OF SUBSURFACE EXPLORATION

JWK 31

Borehole # BH-1
Well #
Page 1 of 2

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase 6000.77
Project Location Huerfanito No. 6. 73-913

Elevation
Borehole Location T26N, R9W, S11, N
GWL Depth
Logged By Jeff W. Kindley
Drilled By G. Suddath
Date/Time Started 08/18/95 1353
Date/Time Completed 08/18/95 1615

Well Logged By Jeff W. Kindley
Personnel On-Site G. Suddath, D. Roberts, H Keil
Contractors On-Site
Client Personnel On-Site

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

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	Drilling Conditions & Blow Counts
0				Backfill material to 12'						
5										
10										
15										
20	1	18-20	1.0/2.0	SW, gr. sand, coarse grained, dry, very dense, hydrocarbon odor					72/89	1407 60 blows per Foot
25	2	23-25	1.0/2.0	SW, br. sand, coarse grained, dry, very dense, hydrocarbon odor					64/67	1414 100 blows per Foot
30	3	28-30	1.7/2.0	S.A.A.					27/65	1428 95 blows per Foot
35	4	33-35	1.9/2.0	S.A.A.					28/54	1444 88 blows per Foot
40	5	38-40'	1.8/2.0	S.A.A					28/50	1500 100 blows per Foot

Comments:

Geologist Signature Jeffrey Kindley

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 2 of 2

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase 6000.77
Project Location HuerFanito No. 6 73-913

Elevation
Borehole Location T26N, R9W, SW, N
GWL Depth
Logged By Jeff W. Kindley
Drilled By G. Suddurth
Date/Time Started 08/18/95 1353
Date/Time Completed 08/18/95 1615

Well Logged By Jeff W. Kindley
Personnel On-Site G. Suddurth, D. Roberts, M Kai
Contractors On-Site
Client Personnel On-Site

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

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
40										
45	6	43-45	1.1 / 2.0	CL, gr. clay, dry, hard, low plasticity, no odor Boring terminated at 45'					6/10	1520 100 blows per Foot.
10										
15										
20										
25										
30										
35										
40										

Comments: Sample collected From 43 to 45', BTEX, TPH analysis run on soil sample. BH grouted to the surface.

Geologist Signature Jeffrey Kindley

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:	JWK 31	947285
MTR CODE | SITE NAME:	73913	Huerfanito No. 6
SAMPLE DATE | TIME (Hrs):	08-18-95	15:20
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/21/95	8-21-95
DATE OF BTEX EXT. ANAL.:	8/23/95	8/23/95
TYPE | DESCRIPTION:	VG	light gray 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)	~~5~~ 32.9 (RE8/23/95)	MG/KG			2.02	28
HEADSPACE PID	10	PPM				
PERCENT SOLIDS	90.9	%				

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

The Surrogate Recovery was at 104% 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                     *
**********************************************************
*
 95/08/21  16:05
*
*  Sample identification
 947285
*
*  Initial mass of sample, g
 2.020
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 32.855
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.014
*
*
*
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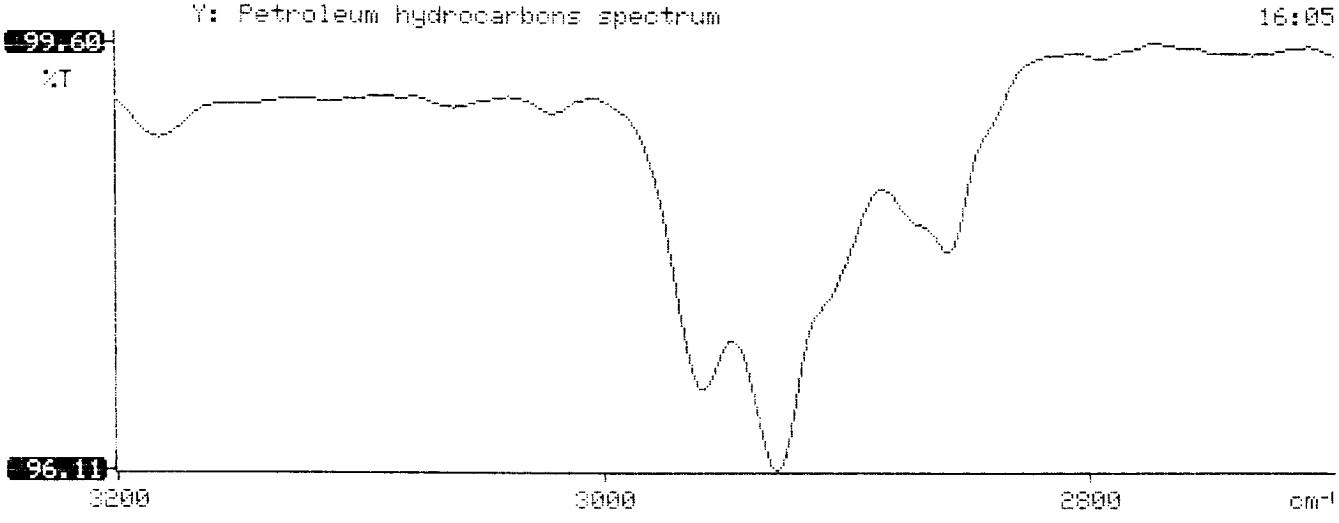

BTEX SOIL SAMPLE WORKSHEET

File	: 947285	**Date Printed**	: 8/25/95		
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\082395-1.022
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947285,4.98G,100U
Acquired : Aug 24, 1995 05:04:15
Printed : Aug 24, 1995 05:30:29
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.440	0	0.0000
a,a,a TFT	4.900	4796137	92.2162
TOLUENE	6.723	56035	-0.5925
ETHYLBENZENE	10.513	0	0.0000
M & P XYLENE	10.867	0	0.0000
O XYLENE	11.957	0	0.0000
BFB	13.383	75152712	104.3299