EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

RECEIVED
JUL 2 1999
OIL CON. DIV.
DIST. 3

Babbit 1 (Pit #2)
Meter/Line ID - 75639

SITE DETAILS

Legals - Twn: 26 **Rng:** 09 **Sec:** 24 **Unit:** J
NMOCD Hazard Ranking: 30 **Land Type:** 4 - Fee
Operator: CONOCO - MESA OPERATING L **Pit Closure Date:** 02/09/95

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.

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 25639 Location: Babbit #1 (Pit #2)
Operator #: 0286 Operator Name: Conoco P/L District: Ballard
Coordinates: Letter: J Section 24 Township: 26 Range: 9
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 02/09/95 Area: 11 Run: 93

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 30 BLANCO 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: 30 **POINTS**

REMARKS

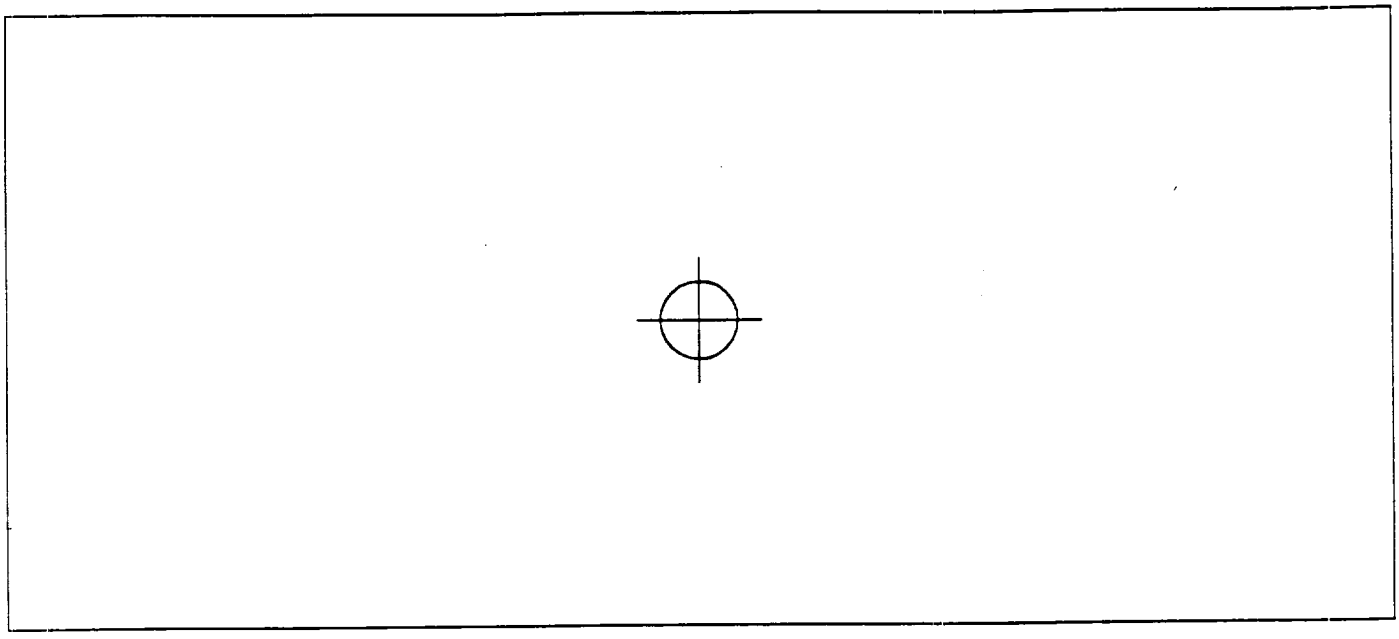
Remarks : SEE PICTURES FOR PIT LOCATION WITH PIT #1

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North _____ Footage from Wellhead _____

b) Length : _____ Width : _____ Depth : _____



REMARKS

Remarks :

Completed By:

_____ _____

Signature Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 75639 Location: BABBITT #1 (Pit #2) Dehy

Coordinates: Letter: J Section 24 Township: 26 Range: 9

Or Latitude _____ Longitude _____

Date Started : 2-9-95 Run: 11 82

FIELD OBSERVATIONS

Sample Number(s): MK 371 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 776 PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 130

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 02-09-95 Pit Closed By: BET

REMARKS

Remarks : Arrived Dug Sample Hole soil Black with Strong Hydrocarbon odor Excavated sides of pit cleaned up but bottom was still black soil strong Hydrocarbon odor

Signature of Specialist: Morgan Killion

(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:	MK 371	9416161
MTR CODE | SITE NAME:	75439	N/A
SAMPLE DATE | TIME (Hrs):	2-9-95	1450
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	2/17/95	2/17/95
DATE OF BTEX EXT. | ANAL.:	2/21/95	2/21/95
TYPE | DESCRIPTION:	VC	Dark Brown clay

Babbitt

REMARKS: Analysis done at ATI

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<1.3	MG/KG	50			
TOLUENE	4.1	MG/KG	50			
ETHYL BENZENE	2.5	MG/KG	50			
TOTAL XYLENES	39.0	MG/KG	50			
TOTAL BTEX	45.6	MG/KG				
TPH (418.1)	2100	MG/KG				
HEADSPACE PID	776	PPM				
PERCENT SOLIDS	81.4	%				

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

The Surrogate Recovery was at 119 % for this sample All QA/QC was acceptable.

Narrative:

ATI Results attached. Outside ATI QC limits due to matrix interference

DF = Dilution Factor Used

Approved By: Date: 3-20-95

Analytical Technologies, Inc.

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

ATI I.D. **502381**

February 23, 1995

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **02/17/95**, 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.

EPA Method 8020 analyses were added on February 21, 1995 for samples 946659, 946660, 946661, 946662, 946663, 946664, 94666, 946667, 946668, 946669, 946680, 946682 per John Lambdin.

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

Letitia Krakowski, Ph.D.
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.: 502381

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
02	946659	NON-AQ	02/09/95	02/21/95	02/22/95	10
03	946660	NON-AQ	02/09/95	02/21/95	02/22/95	10
04	946661	NON-AQ	02/09/95	02/21/95	02/21/95	50

PARAMETER	UNITS	02	03	04
BENZENE	MG/KG	<0.25	<0.25	<1.3
TOLUENE	MG/KG	<0.25	0.41	4.1
ETHYLBENZENE	MG/KG	<0.25	0.93	2.5
TOTAL XYLENES	MG/KG	4.7	0.37	39
SURROGATE:				
TRIFLUOROTOLUENE (%)		92	83	119*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 502381
PROJECT #	: 24324	DATE RECEIVED	: 02/17/95
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 02/17/95

PARAMETER	UNITS	01	02	03	04
PETROLEUM HYDROCARBONS, IR	MG/KG	<20	2400	1400	2100

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

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 Babbit 1 75639

Elevation
Borehole Location T26N, R 9W, S 24, J
GWL Depth
Logged By Jeff W. Kindley
Drilled By G. Suddath
Date/Time Started 08/16/95 0950
Date/Time Completed 08/16/95 1115

Well Logged By Jeff W. Kindley
Personnel On-Site D Roberts, G. Suddath, H Ke
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
0				Back Fill material to 12'						
5										
10										
15										
20	1	18-20	1.0/2.0	SAND, Brown, loose, moist becoming a Clay, brown, moderately dense, moist					12/52	10 16
25	2	23-25	1.2/2.0	SAND, Brown, Fine grained, loose, moist					0/0	10 22
				Boring terminated at 25'						
30										
35										
40										

Comments: Dropped equipment into hole at 10:38, BH grouted

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:	JWK17	947251
MTR CODE | SITE NAME:	75639 (Pit #2)	~~Babbit #~~ Roselynkas Babbit 1
SAMPLE DATE | TIME (Hrs):	08-16-95	10:22
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/17/95	
DATE OF BTEX EXT. | ANAL.:	8/21/95	8/21/95
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)	28.1	MG/KG			2.02	28
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	92.3	%				

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

The Surrogate Recovery was at 107 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: [signature] Date: 8/25/95

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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               *
**************************************************
*
 95/08/17  14:29
*
*  Sample identification
 947251
*
*  Initial mass of sample, g
 2.020
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 28.086
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.014
*
*
*
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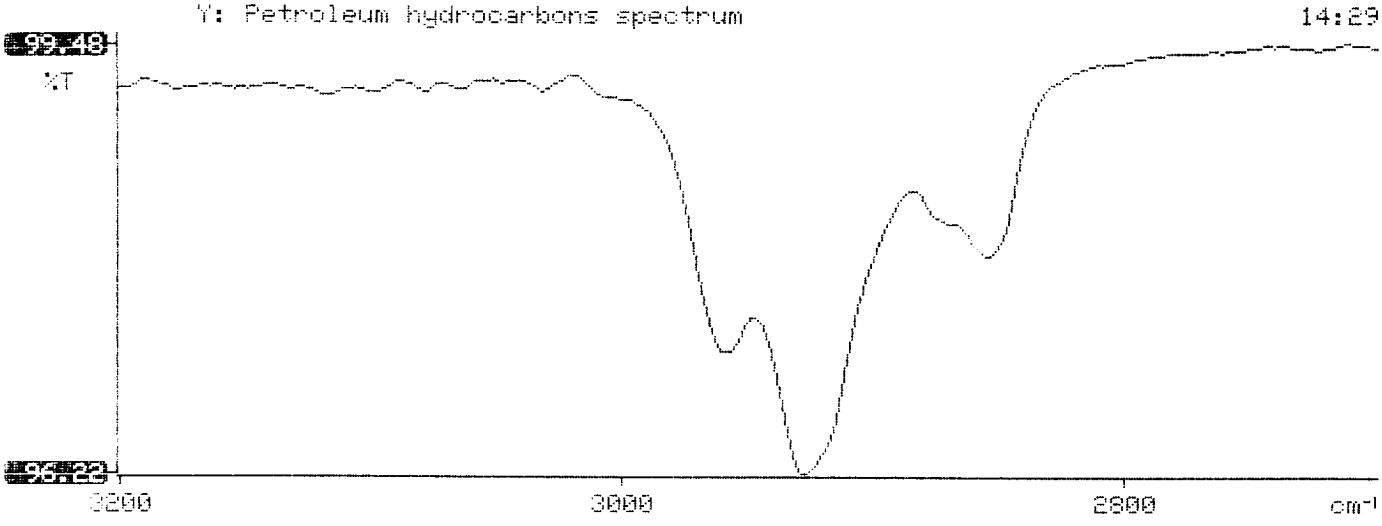

BTEX SOIL SAMPLE WORKSHEET

File	947251	**Date Printed**	8/24/95
Soil Mass (g)	5.09	**Multiplier (L/g)**	0.00098
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19646

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.491
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.491
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.491
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	0.982
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.491
		Total xylenes (mg/Kg):	**0.000**	1.473
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082195.002
Method : C:\LABQUEST\METHODS\9001.met
Sample ID : 947251,5.09G,100U
Acquired : Aug 21, 1995 14:00:00
Printed : Aug 22, 1995 07:08:15
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.467	0	0.0000
a,a,a TFT	4.923	5135470	98.7406
TOLUENE	6.757	90764	-0.4963
ETHYLBENZENE	10.500	0	0.0000
M & P XYLENE	10.867	70488	-4.9691
O XYLENE	11.913	0	0.0000
BFB	13.410	77248544	107.2394