Denny
DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

Approved

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

GRAHAM WN FED #7
Meter/Line ID - 87023

RECEIVED
JUL 2 1998
OIL CON. DIV.

SITE DETAILS

Legals - Twn: 27 **Rng:** 08 **Sec:** 04 **Unit:** F
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 08/03/94**

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

GENERAL

Meter: 87023 Location: GRAHAM UN FED. #7
Operator #: 0286 Operator Name: CONOCO P/L District: BALLARD
Coordinates: Letter: F Section 4 Township: 22 Range: 8
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 6.9.94 Area: 07 Run: 32

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 FRESNO 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: 40 **POINTS**

REMARKS

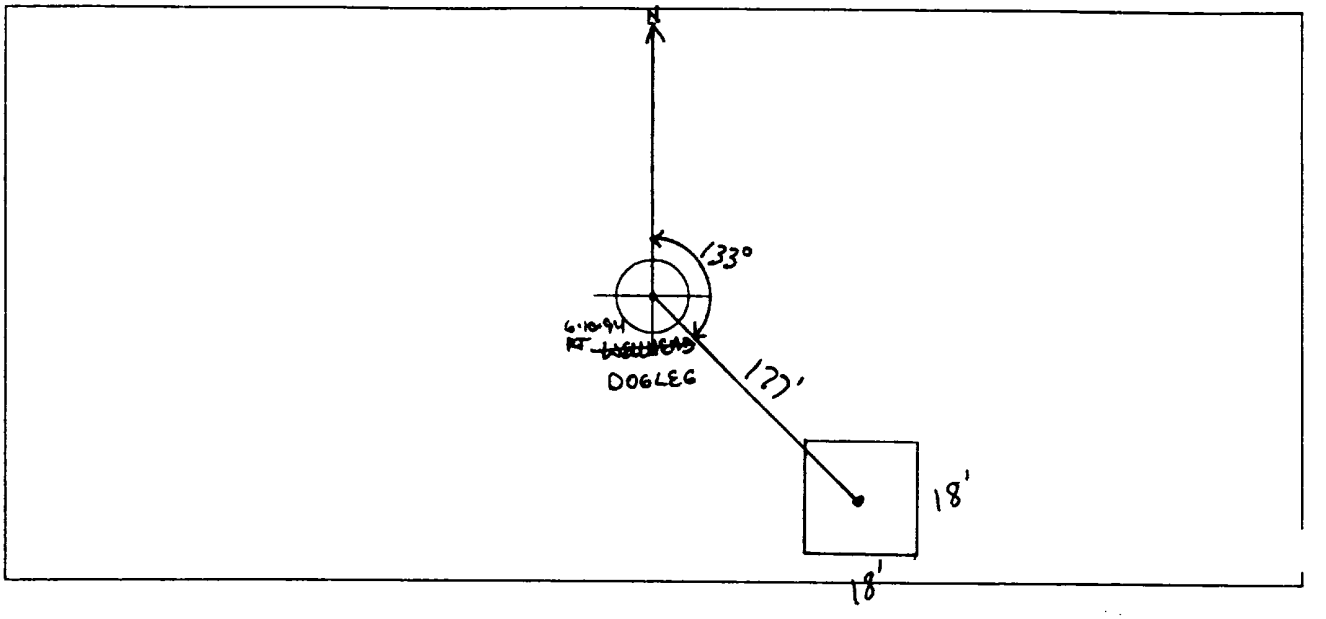
Remarks : ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS IN FRESNO CANYON WEST OF LARGO WASH. WELLHEAD FOR THIS LOCATION IS UP ON TOP OF A CLIFF AND THE PIT AND METER HOUSE ARE IN THE CANYON. ROUTING AND TOPO SHOW THIS LOCATION IS OUTSIDE V.2. BECAUSE WELLHEAD IS UP ON THE CLIFF, BUT I MARKED IT INSIDE V.2. BECAUSE THE PIT IS DOWN IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 133° ~~Footage~~ from ~~Wellhead~~ DOGLEG 177'

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



REMARKS

Remarks :

TOOK PICTURES AT 12:32 P.M.
END DUMP
MEASURED DISTANCE FROM PIT TO THE DOGLEG OF THIS LOCATION.

Completed By:

Robert Thompson
Signature

6-9-94
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 87023 Location: Graham WN Fed #7

Coordinates: Letter: F Section 4 Township: 27 Range: 8

Or Latitude _____ Longitude _____

Date Started : 8/3/94 Run: 07 32

FIELD OBSERVATIONS

Sample Number(s): KD 184 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 297 PID Reading Depth 12 Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 40

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 8/3/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', Took PID Sample, Closed pit

Signature of Specialist: Kurt Dan

(SP3181) 03/16/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD184	945828
MTR CODE | SITE NAME:	87023	N/A
SAMPLE DATE | TIME (Hrs):	8-3-94	1405
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8-4-94	8-4-94
DATE OF BTEX EXT. | ANAL.:	8/8/94	8/9/94
TYPE | DESCRIPTION:	VC	Coarse Brown sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.25	MG/KG	10			
TOLUENE	<0.25	MG/KG	10			
ETHYL BENZENE	0.59	MG/KG	10			
TOTAL XYLENES	14	MG/KG	10			
TOTAL BTEX	15	MG/KG				
TPH (418.1)	696	MG/KG			2.16	28
HEADSPACE PID	297	PPM				
PERCENT SOLIDS	87.7	%				

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

The Surrogate Recovery was at 110 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

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

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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                   *
********************************************************
*
 94/08/04   12:07
*
*  Sample identification
 945828
*
*  Initial mass of sample, g
 2.160
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 696.333
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.096
*
*
*
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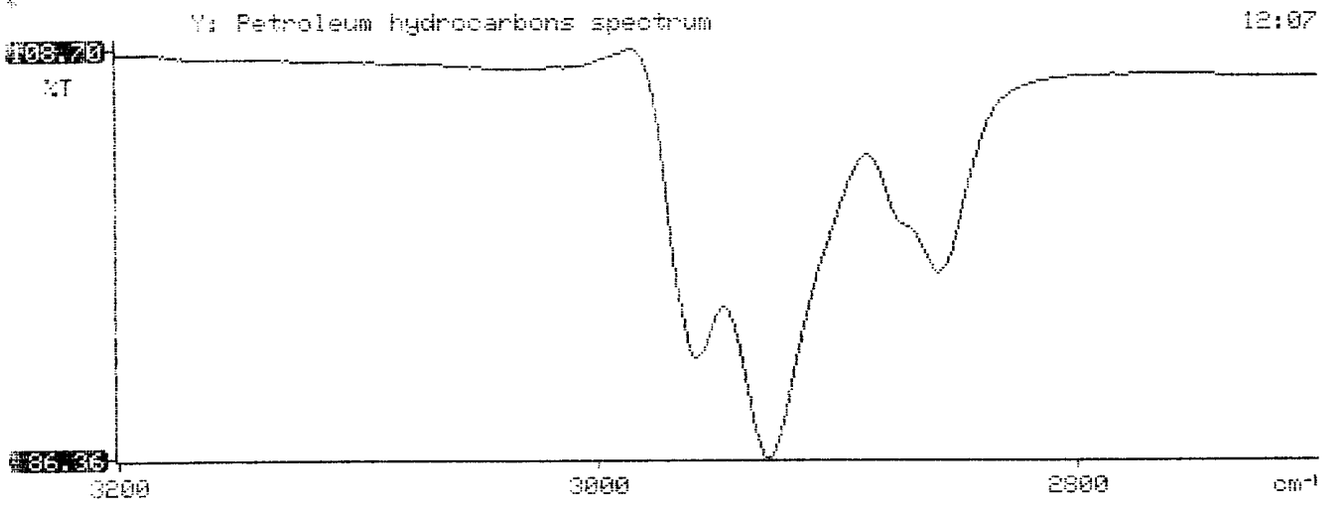


Analytical **Technologies,** Inc.

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

ATI I.D. **408328**

August 11, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **08/05/94**, 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.

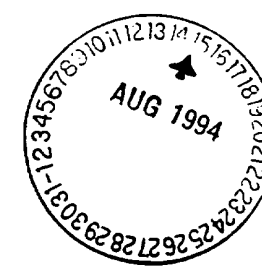
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

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.: 408328

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
10	945828	NON-AQ	08/03/94	08/08/94	08/09/94	10

PARAMETER	UNITS	10
BENZENE	MG/KG	<0.25
TOLUENE	MG/KG	<0.25
ETHYLBENZENE	MG/KG	0.59
TOTAL XYLENES	MG/KG	14

SURROGATE:

BROMOFLUOROBENZENE (%) 110

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Burlington Environmental Inc.
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Borehole # BH-1
Well #
Page 1 of 1

Project Name EPNG PITS
Project Number 14509 Phase 6000.77
Project Location Graham WN Fed #7 87023

Elevation
Borehole Location Letter F-SW-T27-R8
GWL Depth
Logged By J.F. LaBarbera
Drilled By K. Padilla
Date/Time Started 7/7/95 - 1935
Date/Time Completed - 1210

Well Logged By J.F. LaBarbera
Personnel On-Site K. Padilla, F. Rivera, D. Charlie
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				Fill						
5										
10										
15	1	1240 15-16	12	Brown, loose, fn to coarse, SAND, v sl odor, damp, fn gravel.	SW		0	27	8991/187	164
20	2	1340 20-21.25	15	AA, no odor	SW		0	8	1980/1860	Re-checking PID cleaned/calibrated
25	3	1510 25-26.5	18	AA TOB at 1510 26.5	SW		0	2	38/24	113
30										
35										
40										

Comments: Pumphouse and fence removed - just across wash from Dawson A#4
Sample JFL9 sent to lab for BTEX/TPH analysis.

Geologist Signature

7/14/95\DRILLOG.XLS

El Paso Natural Gas Company

Phase II
Graham WN Fed #7
(25-26.5')

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

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JFL 9	947008
MTR CODE | SITE NAME:	87023	N/A
SAMPLE DATE | TIME (Hrs):	7/17/95	11:33
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-18-95	7-18-95
DATE OF BTEX EXT. | ANAL.:	7-19-95	7-20-95
TYPE | DESCRIPTION:	VG	Brown sand

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)	45.5	MG/KG			1.99	28
HEADSPACE PID	38	PPM				
PERCENT SOLIDS	95.6	%				

-- 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 attached.

DF = Dilution Factor Used

Approved By: _____ 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                     *
**********************************************************
*
 95/07/18  10:27
*
*  Sample identification
 947008
*
*  Initial mass of sample, g
 1.990
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 45.523
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.016
*
*
*
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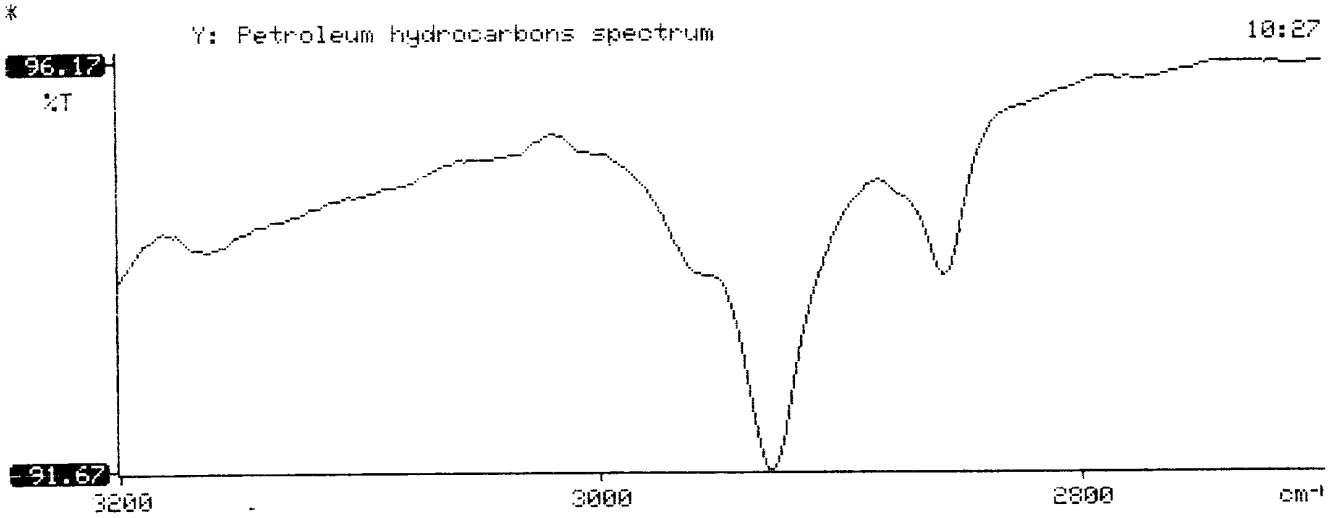

Analytical **Technologies,** Inc.

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

ATI I.D. **507358**

July 25, 1995

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

Project Name/Number: PIT CLOSURE/PHASE II DRIL M/W 24324

Attention: John Lambdin

On **07/19/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous and 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

JUL 1995
Lab
Farmington

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507358

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE II DRIL

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
11	947006	NON-AQ	07/14/95	07/19/95	07/19/95	1
12	947007	NON-AQ	07/17/95	07/19/95	07/20/95	1
13	947008	NON-AQ	07/17/95	07/19/95	07/20/95	1

PARAMETER	UNITS	11	12	13
BENZENE	MG/KG	0.026	<0.025	<0.025
TOLUENE	MG/KG	0.19	0.076	<0.025
ETHYLBENZENE	MG/KG	0.052	<0.025	<0.025
TOTAL XYLENES	MG/KG	0.5	0.13	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		110	94	99