Denny Foust
DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

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

NICKSON #13E
Meter/Line ID - 95421

SITE DETAILS

Legals - Twn: 26 **Rng:** 08 **Sec:** 26 **Unit:** E
NMOCD Hazard Ranking: 10 **Land Type:** 2 - Federal
Operator: MERIT ENERGY COMPANY **Pit Closure Date:** 07/21/94

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: 95421 Location: NICKSON #13E
Operator #: 0177 Operator Name: MERIT ENERGY CO. P/L District: BALLARD
Coordinates: Letter: E Section 26 Township: 26 Range: 8
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 6·16·94 Area: 07 Run: 51

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 _____
(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 : TWO PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY. LOCATION IS IN A CANYON AT THE BASE OF SOME CLIFFS. REDLINE AND TOPO CONFIRMED LOCATION IS INSIDE V.Z.

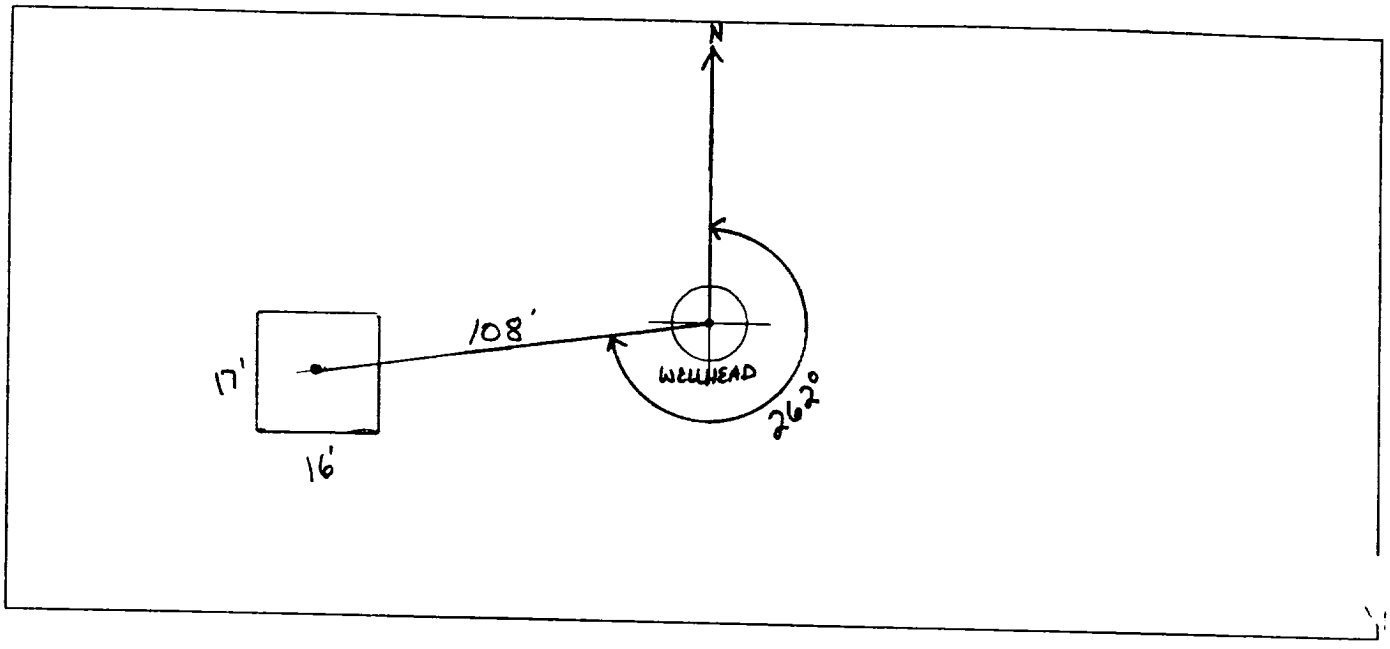
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 262° Footage from Wellhead 108'

b) Length : 17' Width : 16' Depth : 2'



REMARKS

Remarks :

TOOK PICTURES AT 10:24 A.M.

END DUMP

Completed By:

Robert Thompson

Signature

6-16-94

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 95421 Location: Nickson #13 E

Coordinates: Letter: E Section 26 Township: 26 Range: 8

Or Latitude _____ Longitude _____

Date Started : 7/21/94 Run: 07 51

FIELD OBSERVATIONS

Sample Number(s): KD 162 _____ _____ _____

Sample Depth: 3' Feet

Final PID Reading 210 ppm PID Reading Depth 3' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 10

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ Tierra ☐

Other Facility ☐ Name: _____

Pit Closure Date: 7/21/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 3', Hit Sandstone, Took PID Sample, Closed pit. Pit had about 6" of oil sitting in it, Sample was very wet.

Signature of Specialist: Kenny Davis

(SP3191) 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:	KD 162	94/5738
MTR CODE | SITE NAME:	95421	N/A
SAMPLE DATE | TIME (Hrs):	7-21-94	1530
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-26-94	7-26-94
DATE OF BTEX EXT. | ANAL.:	7/27/94	7/27/94
TYPE | DESCRIPTION:	VC	Grey/Black clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	1.1	MG/KG	5			
TOLUENE	9.6	MG/KG	5			
ETHYL BENZENE	1.8	MG/KG	5			
TOTAL XYLENES	23	MG/KG	5			
TOTAL BTEX	36	MG/KG				
TPH (418.1)	17,400	MG/KG			0.51	28
HEADSPACE PID	210	PPM				
PERCENT SOLIDS	82.9	%				

– 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: J.S. Date: 8/12/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

74/07/26 11:37

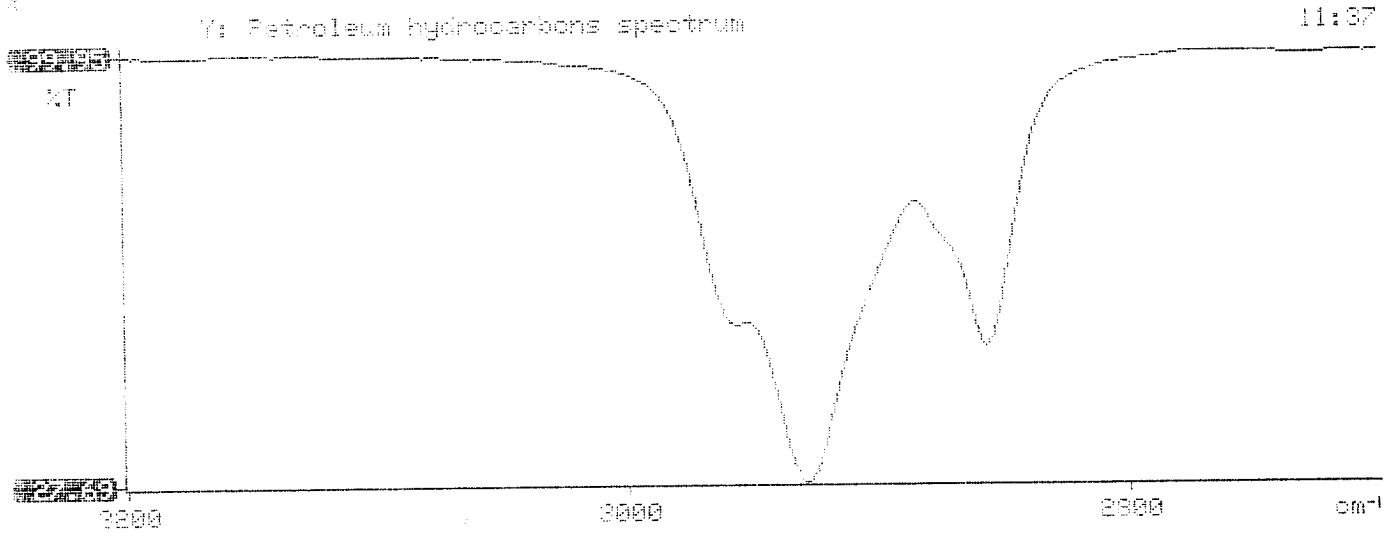
Sample identification
745738

Initial mass of sample, g
0.510

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
17433.946

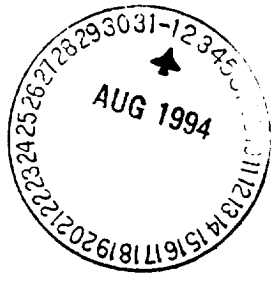
Net absorbance of hydrocarbons (2930 cm-1)
0.356



Analytical Technologies, Inc.

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

ATI I.D. **407410**



July 29, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/27/94**, 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.: 407410
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945736	NON-AQ	07/21/94	07/27/94	07/27/94	10
02	945737	NON-AQ	07/21/94	07/27/94	07/27/94	1
03	945738	NON-AQ	07/21/94	07/27/94	07/27/94	5

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.25	<0.025	1.1
TOLUENE	MG/KG	32	<0.025	9.6
ETHYLBENZENE	MG/KG	17	<0.025	1.8
TOTAL XYLENES	MG/KG	240	<0.025	23
SURROGATE: BROMOFLUOROBENZENE (%)		145*	88	99

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

Burlington Environmental Inc.
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 ~~Nickson~~ #13E 95421

Elevation
Borehole Location ~~Letter~~ E-S26-T26-R8
GWL Depth
Logged By J.F. LaBarbera
Drilled By ~~K. Padilla~~ M. Donahue
Date/Time Started 7/31/95 - 1425
Date/Time Completed - 1502

Well Logged By J.F. LaBarbera
Personnel On-Site ~~K. Padilla, F. Rivera, D. Charlie~~
Contractors On-Site ~~M Donahue~~, J O'Keefe, D Scott
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	Air Monitoring Units: ppm BH	Air Monitoring Units: ppm H/S	Drilling Conditions & Blow Counts
0				Fill						
5				LS Gray, v hard, vfn, SANDSTONE As 5'- Olive, hard, SILTSTONE	X					
10	1	8-8.5	5	lt olive, v hard, SILTSTONE, dry, tr v fn sand, v sl odor;			0	1	143/0	1430
15	2	13-13.15	2	AA, olive, no odor noted TOB at 13.15'			4	0	27/0	1442
20										
25										
30										
35										
40										

Comments: Sample JFL 3L from 13-13.15' sent to lab for BTEX/TPH analysis

Geologist Signature John Paul LaBarbera

El Paso Natural Gas Company

Phase II Drilling

FIELD SERVICES LABORATORY
ANALYTICAL REPORT

Nickson #13E (13-13.5')

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JFL 36	947112
MTR CODE | SITE NAME:	95421	N/A
SAMPLE DATE | TIME (Hrs):	07/31/95	14:42
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8-1-95	8-1-95
DATE OF BTEX EXT. | ANAL.:	8-3-95	8-5-95
TYPE | DESCRIPTION:	VG	Brown sand & clay

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	0.052	MG/KG	1			
TOTAL BTEX	0.052	MG/KG				
TPH (418.1)	153	MG/KG			2.01	28
HEADSPACE PID	32	PPM				
PERCENT SOLIDS	91.5	%				

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

The Surrogate Recovery was at 91 % for this sample All QA/QC was acceptable.

Narrative: ATI Results for BTEX and mod 8015 attached

DF = Dilution Factor Used

Approved By: _____ Date: 8/22/95

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

95/08/01 16:27

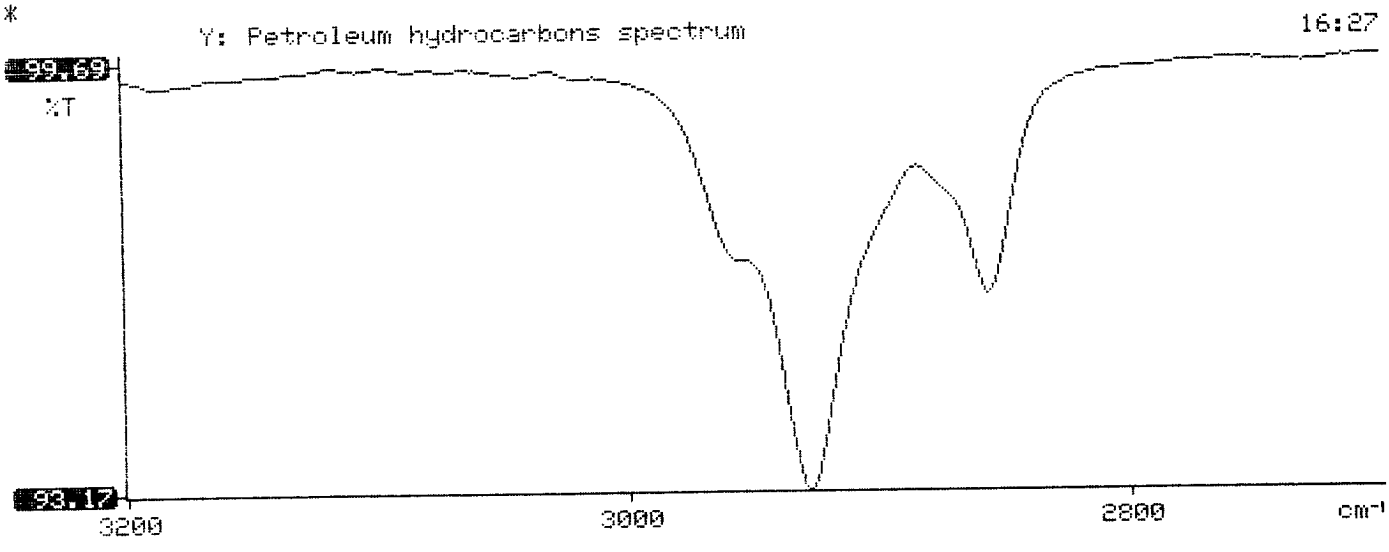
Sample identification
947112

Initial mass of sample, g
2.010

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
153.005

Net absorbance of hydrocarbons (2930 cm-1)
0.029



Analytical **Technologies,** Inc.

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

ATI I.D. **508322**

August 8, 1995

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

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

Attention: John Lambdin

On **08/03/95**, 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.

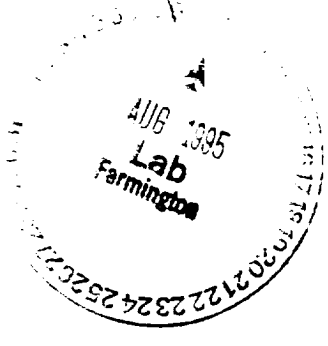
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

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 ATI I.D.: 508322

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	947111	NON-AQ	07/31/95	08/03/95	08/05/95	1
05	947112	NON-AQ	07/31/95	08/03/95	08/05/95	1
06	947113	NON-AQ	07/31/95	08/03/95	08/05/95	1

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	<0.025	<0.025	<0.025
ETHYLBENZENE	MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES	MG/KG	0.039	0.052	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		85	91	92

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : EL PASO NATURAL GAS ATI I.D.: 508322

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
02	947109	NON-AQ	07/31/95	08/03/95	08/03/95	1
05	947112	NON-AQ	07/31/95	08/03/95	08/03/95	1

PARAMETER	UNITS	02	05
FUEL HYDROCARBONS	MG/KG	<5	22
HYDROCARBON RANGE		-	C14-C30
HYDROCARBONS QUANTITATED USING		-	DIESEL
SURROGATE:			
O-TERPHENYL (%)		93	88