EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEC 2 1 1998

DEPUTY OIL & GAS INSPECTOR

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

SAN JUAN 28-7 UNIT 72 PC
Meter/Line ID - 74521

SITE DETAILS

Legals - Twn: 28 **Rng:** 07 **Sec:** 35 **Unit:** L
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 07/11/94**

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

GENERAL

Meter: 74521 Location: San Juan 28-7 Unit 72 (PC)
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: L Section 35 Township: 28 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: ✓ Line Drip: ___ Other: _____
Site Assessment Date: 6/3/94 Area: 03 Run: 21

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 Carrizo 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

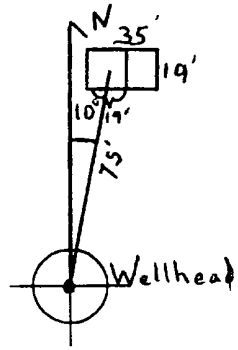
Remarks : Redline - Inside
4 Pits. Will close 1. Pit has Fluid in it
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 10° Footage from Wellhead 75'

b) Length : 35' Width : 19' Depth : 4'



REMARKS

Remarks :

Pictures @ 1252 (19-22)

END Dump

Bermed + Fenced area of pit is 35'x19'. Actual pit is 19'x19'x4'

Completed By:

Cory Chase
Signature

6/3/94
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 74521 Location: San Juan 28-7 Unit 72 (PC)

Coordinates: Letter: L Section 35 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Date Started : 7/11/94 Run: 03 21

FIELD OBSERVATIONS

Sample Number(s): KD 139 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 134 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 100

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 7/11/94 Pit Closed By: BEI

REMARKS

Remarks : Pit had a Lot of fluid on top, Had to use 3 Loads of Backfill to solidify soil. Excavated to 12' Took PID sample, Closed pit

Signature of Specialist: Kurt Donahue

(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 139	94562S
MTR CODE | SITE NAME:	74521	N/A
SAMPLE DATE | TIME (Hrs):	7-11-94	1520
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-12-94	7/12/94
DATE OF BTEX EXT. | ANAL.:	7/14/94	7/16/94
TYPE | DESCRIPTION:	VC	Dark brown Sand/Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.49	MG/KG	1			
TOLUENE	4.0	MG/KG	1			
ETHYL BENZENE	2.5	MG/KG	1			
TOTAL XYLENES	36	MG/KG	1			
TOTAL BTEX	43	MG/KG				
TPH (418.1)	14,200	MG/KG			0.56	28
HEADSPACE PID	134	PPM				
PERCENT SOLIDS	87.9	%				

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

The Surrogate Recovery was at 118 % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached. Surrogate recovery was outside ATI QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By: [signature] Date: 8/8/94

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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                                 *
**********************************************************************
*
 94/07/12   12:28
*
*  Sample identification
 945625
*
*  Initial mass of sample, g
 0.560
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 14214.072
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.498
*
*
*
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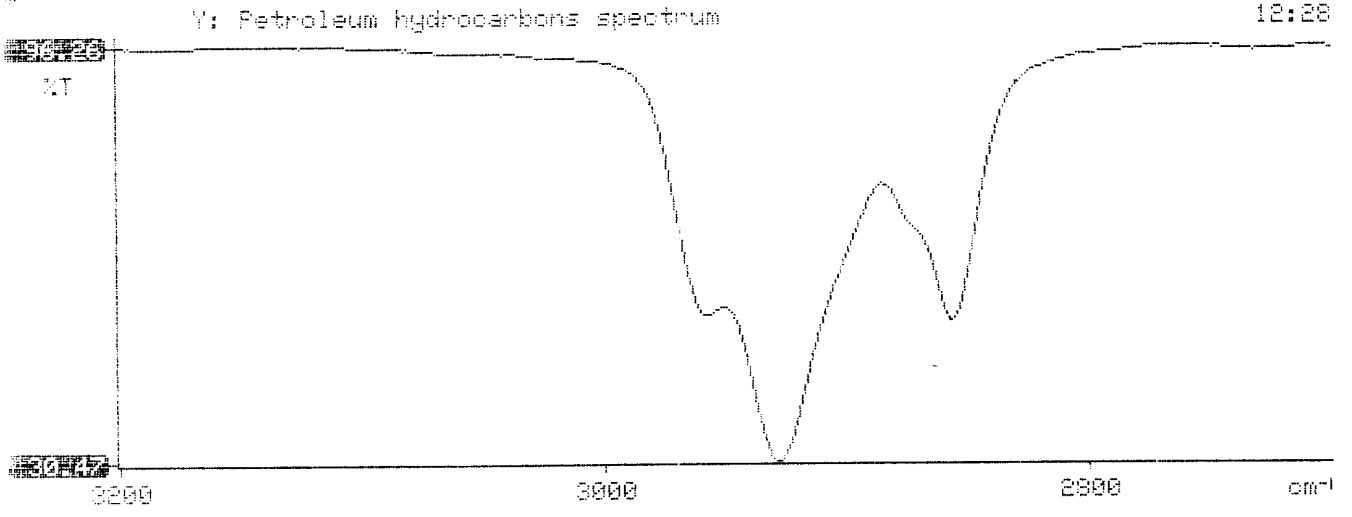
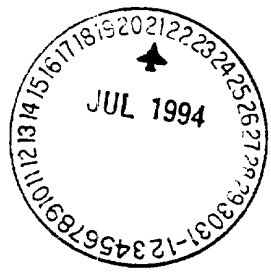


Analytical **Technologies,** Inc.

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

ATI I.D. **407346**



July 20, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/13/94**, 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.

Samples were run by either internal or external surrogate method. The following samples were run by internal surrogate method: 02, 03, 05, 08, 09, 10, and 12.

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.: 407346

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
10	945624	NON-AQ	07/11/94	07/14/94	07/16/94	1
11	945625	NON-AQ	07/11/94	07/14/94	07/16/94	1
12	945626	NON-AQ	07/11/94	07/14/94	07/16/94	5

PARAMETER	UNITS	10	11	12
BENZENE	MG/KG	<0.025	0.49	0.30
TOLUENE	MG/KG	<0.025	4.0	3.0
ETHYLBENZENE	MG/KG	<0.025	2.5	1.2
TOTAL XYLENES	MG/KG	0.17	36	19
SURROGATE:				
BROMOFLUOROBENZENE (%)		88	118*	101

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

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 San Juan 28-7 Unit 72 74521

Elevation
Borehole Location QL-S35-T28-R7
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started CMC 8/31/95 - 9/5/95 -0900
Date/Time Completed 9/5/95 -0945

Well Logged By CM Chance
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 HS	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15	1	15-17	12"	Br SAND, vF-F sand, v loose, sl moist			11	8	15/6	-0906hr
20	2	20-22	12"	AA			0	10	9/2	-0914
25				TDB 22'						
30										
35										
40										

Comments: CMC 99 (20-22') sent to lab (BTEX, TPH). Drilled to 22' because 15ppm sample reading (Did not anticipate it reading <50ppm). BH grouted to surface

Geologist Signature Cory Chance

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:	CMC99	947399
MTR CODE | SITE NAME:	74521	San Juan 28-7 Unit 72
SAMPLE DATE | TIME (Hrs):	09-05-95	
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-6-95	9-6-95
DATE OF BTEX EXT. | ANAL.:	9/6/95	9/11/95
TYPE | DESCRIPTION:	VG	LIGHT BROWN FINE SAND

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	33.6	MG/KG			2.23	28
HEADSPACE PID	2	PPM				
PERCENT SOLIDS	98.5	%				

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

The Surrogate Recovery was at 100% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-13-95

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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                     *
**********************************************************
*
 95/09/06  14:55
*
*  Sample identification
 947399
*
*  Initial mass of sample, g
 2.230
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 33.580
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.015
*
*
*
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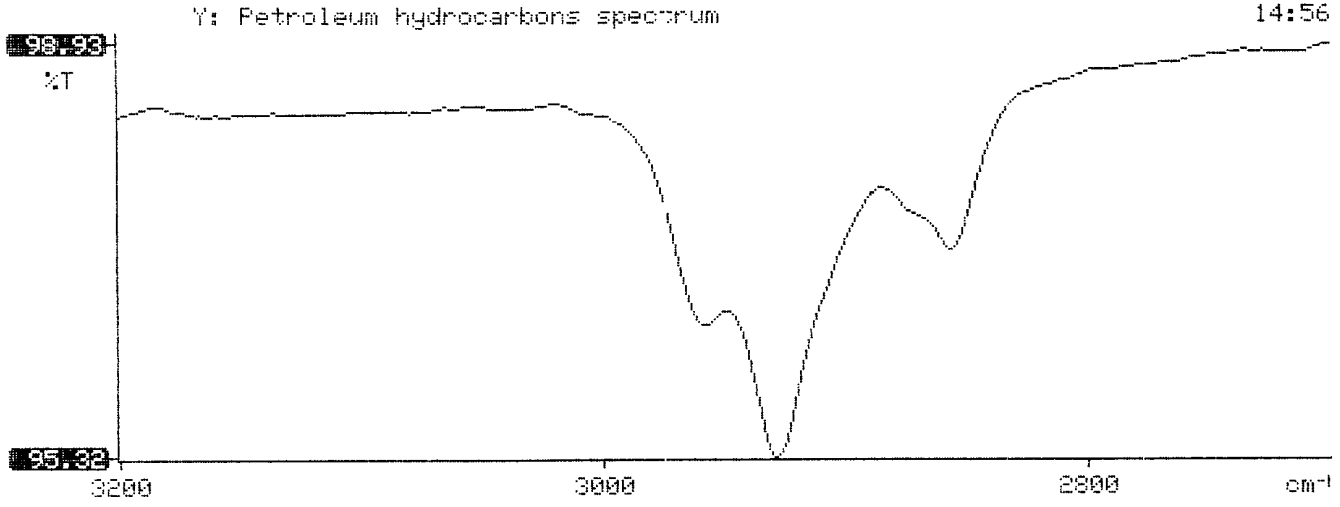

BTEX SOIL SAMPLE WORKSHEET

File	947399	**Date Printed**	9/12/95
Soil Mass (g)	5.03	**Multiplier (L/g)**	0.00099
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19881

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.497
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.497
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.497
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	0.994
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.497
		Total xylenes (mg/Kg):	**0.000**	1.491
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\091195-0.007
Method : C:\LABQUEST\METHODS\9000.met
Sample ID : 947399,5.03G,100U
Acquired : Sep 11, 1995 15:22:24
Printed : Sep 11, 1995 15:52:50
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	7.833	40091	-1.1428
a,a,a-TFT	11.257	12569861	97.3925
TOLUENE	14.290	68549	-2.0950
ETHYLBENZENE	19.310	43849	-1.3699
M,P-XYLENES	19.727	245034	-4.9961
O-XYLENE	20.990	55668	-1.0378
BFB	22.740	113624232	99.6809