EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 2 3 1998

RECEIVED

JUL 2 1999

MARRON #39
Meter/Line ID - 71790

SITE DETAILS

Legals - Twn: 27 **Rng:** 08 **Sec:** 23 **Unit:** K
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: M&G DRILLING COMPANY, INC **Pit Closure Date: 06/07/94**

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: 71790 Location: Marron No. 39
Operator #: 7335 Operator Name: R+G Drlg P/L District: Blanco
Coordinates: Letter: K Section 23 Township: 27 Range: 8
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: ✓ Line Drip: ___ Other: _____
Site Assessment Date: 5/24/94 Area: 13 Run: 31

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 Largo/Smith Canyons Confluence
(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 Vulv. - Inside
Pit Will Close. Pit Dry
DIG & HAUL

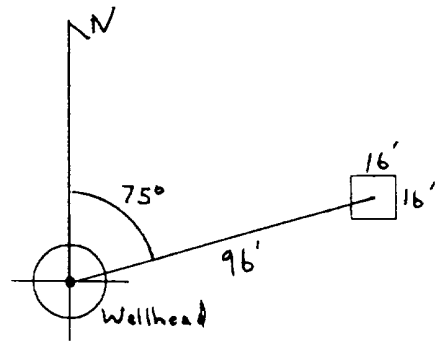
(section) 04/08/94

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 75° Footage from Wellhead 96'

b) Length : 16' Width : 16' Depth : 4'



REMARKS

Remarks :

Pictures @ 1346 (9-12)

Dump Truck

Completed By:

Cory Chase
Signature

5/24/04
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 71790 Location: MARRON #39

Coordinates: Letter: K Section 23 Township: 27 Range: 8

Or Latitude _____ Longitude _____

Date Started : 6-7-94 Area: 13 Run: 31

FIELD OBSERVATIONS

Sample Number(s): KP#86 _____ _____ _____

Sample Depth: 12 Feet

Final PID Reading 268 PID Reading Depth 12 Feet

	Yes	No	
Groundwater Encountered	☐ (1)	☒ (2)	Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 50
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

Envirotech	☐ (1)	☒ (3)	Tierra
Other Facility	☐ (2)	Name:	_____

Pit Closure Date: 6-7-94 Pit Closed By: B.E.J

REMARKS

Remarks : Some LINE MARKERS ON LOCATION. Started Remediation 12' soil DARK Brown Smell Little Bad. At 12' soil still The SAME.

Signature of Specialist: Kelly Padilla

(SP3191) 04/07/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 86	945380
MTR CODE | SITE NAME:	71790	N/A
SAMPLE DATE | TIME (Hrs):	6-7-94	1145
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6/10/94	6/10/94
DATE OF BTEX EXT. | ANAL.:	6/14/94	6/16/94
TYPE | DESCRIPTION:	VC	Brown Sand/Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.25	MG/KG	10			
TOLUENE	1.1	MG/KG	10			
ETHYL BENZENE	<0.25	MG/KG	10			
TOTAL XYLENES	4.9	MG/KG	10			
TOTAL BTEX	6.5	MG/KG				
TPH (418.1)	263	MG/KG			1.99	28
HEADSPACE PID	268	PPM				
PERCENT SOLIDS	86.0	%				

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

The Surrogate Recovery was at 109 % for this sample All QA/QC was acceptable.

Narrative:
ATI Results attached.

DF = Dilution Factor Used

Approved By: _____ Date: 7/17/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

94/06/10 11:24

Sample identification
945180

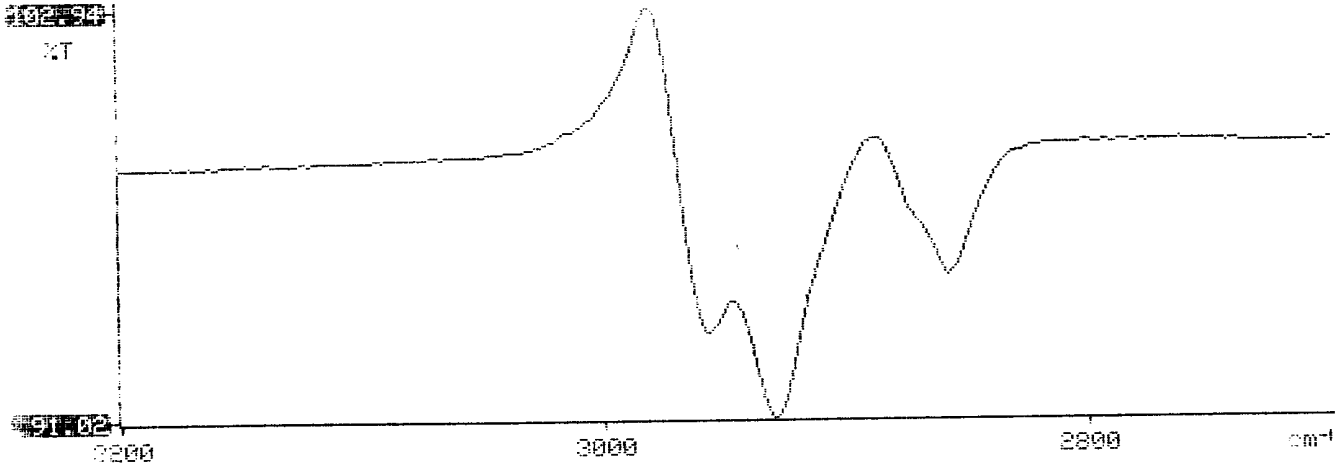
Initial mass of sample, g
1.990

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
262.877

Net absorbance of hydrocarbons (2930 cm-1)
0.035

Y: Petroleum hydrocarbons spectrum 11:24



Analytical **Technologies,** Inc.

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

ATI I.D. **406351**

June 21, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/14/94**, 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:jd

Enclosure

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 406351
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945380	NON-AQ	06/07/94	06/14/94	06/16/94	10
08	945381	NON-AQ	06/07/94	06/17/94	06/17/94	1
09	945382	NON-AQ	06/07/94	06/14/94	06/16/94	1

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	<0.25	<0.025	<0.025
TOLUENE	MG/KG	1.1	<0.025	0.055
ETHYLBENZENE	MG/KG	<0.25	<0.025	<0.025
TOTAL XYLENES	MG/KG	4.9	<0.025	0.032
SURROGATE:				
BROMOFLUOROBENZENE (%)		109	95	92

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 Marcon No. 39 71790

Elevation
Borehole Location QK-S23-T27-R8
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 8/29/95-1000
Date/Time Completed 8/29/95-1030

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"	Rd br SAND, vf sand, tr f sand, loose, dry			0	0	0/0	1010
				TOB 17'						
20										
25										
30										
35										
40										

Comments: CMC 95(15-17') sent to lab (BTEX, TPH) BH grouted to surface

Geologist Signature Tony C 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:	CMC95	947356
MTR CODE | SITE NAME:	71790	Marron No. 39
SAMPLE DATE | TIME (Hrs):	08-29-95	1010
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/30/95	
DATE OF BTEX EXT. | ANAL.:	8/30/95	9/3/95
TYPE | DESCRIPTION:	V6	Light 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)	66.8	MG/KG			2.23	25
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	97.9	%				

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

The Surrogate Recovery was at 88% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-7-95

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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                          *
*************************************************************
*
 95/08/30  13:36
*
*  Sample identification
 947356
*
*  Initial mass of sample, g
 2.230
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 66.832
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.019
*
*
*
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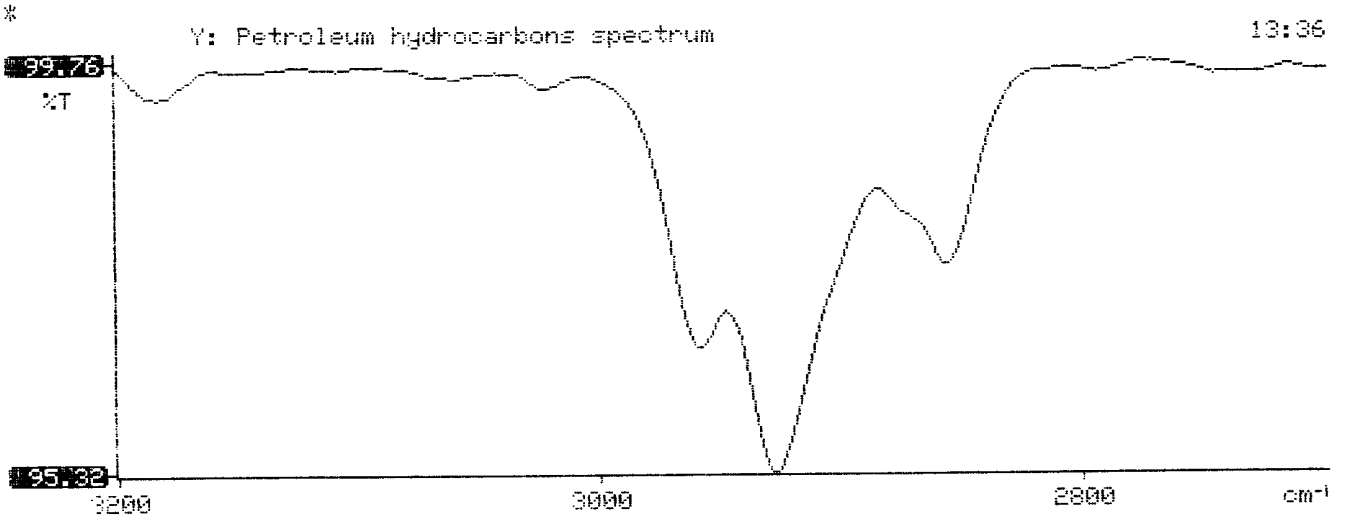

BTEX SOIL SAMPLE WORKSHEET

File	947356	**Date Printed**	9/6/95
Soil Mass (g)	5.06	**Multiplier (L/g)**	0.00099
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19763

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.494
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.494
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.494
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	0.988
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.494
		Total xylenes (mg/Kg):	**0.000**	1.482
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\090395-1.020
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947356,5.06G,100U
Acquired : Sep 03, 1995 02:28:14
Printed : Sep 04, 1995 11:16:27
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.390	0	0.0000
a,a,a TFT	4.923	2057405	86.4489
TOLUENE	6.753	239653	-0.0229
ETHYLBENZENE	10.540	0	0.0000
M & P XYLENE	10.860	331595	-2.3969
O XYLENE	11.877	0	0.0000
BFB	13.407	30792096	87.6651