

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Jennie Bunny ETAL Well #1
Meter/Line ID - 02411

OK

SITE DETAILS

Legals - Twn: 27N
NMOCD Hazard Ranking: 40
Operator: Meridian

Rng: 9W

Sec: 10 Unit: P
Land Type: Navajo
Pit Closure Date: 11/16/95

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RATIONALE FOR CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A Phase I excavation was conducted on August 18, 1994, to 12 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 80 cubic yards of excavated material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 743 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 174 mg/kg, and a TPH concentration of 2110 mg/kg. TPH was above required remediation levels for the Hazard Ranking Score.

On November 5, 1995, a Phase II excavation was conducted to 18 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 120 cubic yards of excavated material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 10.2 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3 mg/kg, and a TPH concentration of 76 mg/kg.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for almost five years.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the excavations.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Based on the Hazard Ranking Score, benzene, total BTEX, and TPH were below required remediation levels for the Hazard Ranking Score.
- Excavated material has been removed from the pit eliminating potential direct contact with livestock and the public.

FIELD PIT SITE ASSESSMENT FORM

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GENERAL

Meter: 02411 Location: Jennie Bunny ETAL Well #1
 Operator #: 2999 Operator Name: Meridian P/L District: Ballard
 Coordinates: Letter: P Section: 10 Township: 27 Range: 9
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 6-14-94 Area: 11 Run: 42

NMOCD Zone:
 (From NMOCD
 Maps)

Inside
 Outside

Land Type:

BLM ☐ (1)
 State ☐ (2)
 Fee ☐ (3)

X Indian Navajo Agency

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 Jaquez 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 : Two pits. Dehy pit is dry

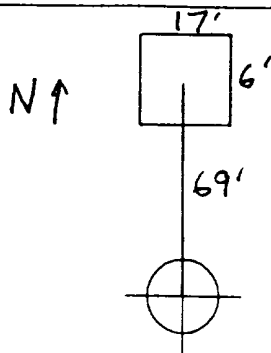
Inside V.Z. Topo & Redline

REMARKS

Dred Haul

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 0 Footage from Wellhead 69
b) Length : 17 Width : 16 -Depth : 3



Remarks :

Photos - 0948

End dump

Completed By:

[Signature]

Signature

6-14-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>02411</u> Location: <u>Jennie Bunny ETAL well #1</u></p> <p>Coordinates: Letter: <u>P</u> Section <u>10</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>8-18-94</u> Run: <u>11</u> <u>42</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KP194</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>743</u> PID Reading Depth <u>12</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>80</u></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>8-18-94</u> Pit Closed By: <u>B.E.I.</u></p>
REMARKS	<p>Remarks : <u>Some L.H. markers started Remediating to 12' At 12 Soil Dark Gray pid 743. Closed Pit.</u></p>
	<p>Signature of Specialist: <u>Kelly Pella</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KT 194	945969
MTR CODE SITE NAME:	02411	N/A
SAMPLE DATE TIME (Hrs):	8-18-94	1305
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-24-94	8/24/94
DATE OF BTEX EXT. ANAL.:	8/25/94	8/26/94
TYPE DESCRIPTION:	VC	light grey coarse sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.5	MG/KG	20			
TOLUENE	15	MG/KG	20			
ETHYL BENZENE	8.3	MG/KG	20			
TOTAL XYLENES	150	MG/KG	20			
TOTAL BTEX	174	MG/KG				
TPH (418.1)	2110	MG/KG			2.12	28
HEADSPACE PID	743	PPM				
PERCENT SOLIDS	93.7	%				

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

The Surrogate Recovery was at 79 % for this sample All QA/QC was acceptable.
Narrative:

HTI results attached.

DF = Dilution Factor Used

Approved By:

Date:

9/30/94



Analytical **Technologies**, Inc.

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

ATI I.D. 408397

August 29, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

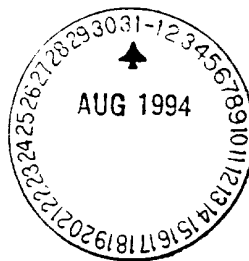
On 08/25/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

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

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 408397
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945969	NON-AQ	08/18/94	08/25/94	08/26/94	20
08	945970	NON-AQ	08/18/94	08/25/94	08/25/94	1
09	945971	NON-AQ	08/18/94	08/25/94	08/26/94	1

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	<0.5	<0.025	<0.025
TOLUENE	MG/KG	15	<0.025	<0.025
ETHYLBENZENE	MG/KG	8.3	<0.025	<0.025
TOTAL XYLENES	MG/KG	150	<0.025	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%)	79	95	98
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FIELD PIT REMEDIATION/CLOSURE FORM/PHASE II

GENERAL

Meter: 02411 Location: Jennie Runny ETAL Well #1
 Coordinates: Letter: P Section 10 Township: 27 Range: 9
 Or Latitude _____ Longitude _____
 Date Started : 4/15/95 Area: 11 Run: 42

FIELD OBSERVATIONS

Sample Number(s): JK13C
 Sample Depth: 18' Feet
 Final PID Reading 10.2 PID Reading Depth 12 Feet
 Yes No
 Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet
 Final Dimensions: Length 18' Width 18' Depth 18'

CLOSURE

Remediation Method :
 Excavation ☒ (1) Approx. Cubic Yards 120 LT 11/20/95
 Onsite Bioremediation ☐ (2) Approved to Close by Altam
 Backfill Pit Without Excavation ☐ (3) James EPNG 11-16-95
 Soil Disposition: Overburden Cubic Yards 30 LT 11/20/95
 Envirotech ☒ (1) ☐ (3) Tierra
 Other Facility ☐ (2) Name: _____
 Pit Closure Date: 11-16-95 Pit Closed By: Phil B

REMARKS

Remarks : Pit PID Readings (N-0.6)(S-2.2)(E-25.0)(W-6.1)
More than 100' From Effluent Stream
No EPNG on site No Fence

Signature of Specialist: [Signature]



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JK136	94 7785
MTR CODE SITE NAME:	02411	Jennie Bunnie BTAL Well #1
SAMPLE DATE TIME (Hrs):	11-15-95	0930
PROJECT:	Phase III Exc.	
DATE OF TPH EXT. ANAL.:	11/17/95	
DATE OF BTEX EXT. ANAL.:	11/16/95	11/16/95
TYPE DESCRIPTION:	VG	Light brown 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)	76	MG/KG			1.99	28
HEADSPACE PID	10.2	PPM				
PERCENT SOLIDS	87.0	%				

-- 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:

DF = Dilution Factor Used

Approved By: JR

Date: 11/21/95

BTEX SOIL SAMPLE WORKSHEET

File	:	947785	Date Printed	:	11/20/95
Soil Mass (g)	:	5.09	Multiplier (L/g)	:	0.00098
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical)	:	200
Shot Volume (uL)	:	50	CAL FACTOR (Report)	:	0.19646

		DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg): 0.000	0.491
Toluene (ug/L)	:	0.26	Toluene (mg/Kg): 0.051	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): 0.051	