EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

RECEIVED

NELLIE PLATERO #4
Meter/Line ID - 71399

SITE DETAILS

Legals - Twn: 27 **Rng:** 09 **Sec:** 11 **Unit:** J
NMOCD Hazard Ranking: 40 **Land Type:** 3 - Navajo
Operator: TEXACO E&P INC **Pit Closure Date:** 08/17/94

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

5

71399

GENERAL

Meter: 71399 Location: Nellie Patero Well No. 4
Operator #: 0263 Operator Name: Texaco P/L District: Ballard
Coordinates: Letter: J Section 11 Township: 27 Range: 9
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: ___
Site Assessment Date: 6-15-94 Area: 11 Run: 71

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☒ (1)
Outside ☐ (2)

Land Type:
BLM ☐ (1)
State ☐ (2)
Fee ☐ (3)
Indian Eastern 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

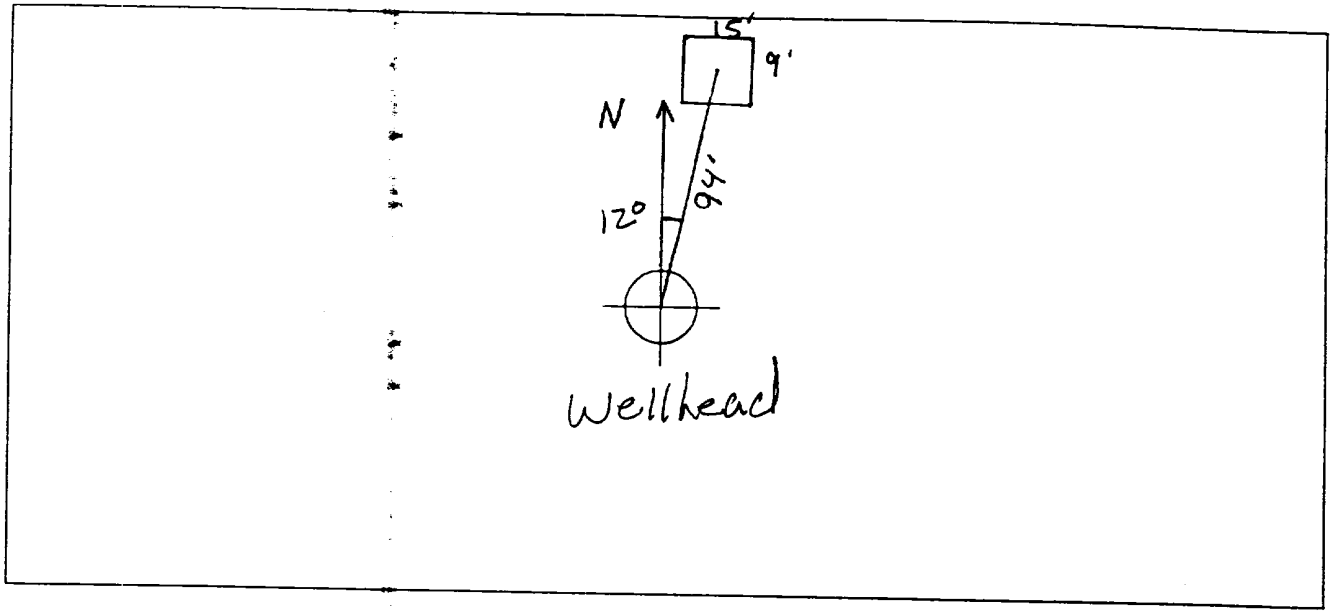
Remarks : one pit on location - dry
Inside V.Z. on Redline & Topo
Dry Hole

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 12 Footage from Wellhead 94

b) Length : 15 Width : 9 Depth : 3



REMARKS

Remarks : Photos - 0954 hrs.

Completed By:

Signature

6-15-94

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 71399 Location: Nellie Pl A Tero well No. 4

Coordinates: Letter: J Section 11 Township: 27 Range: 9

Or Latitude _____ Longitude _____

Date Started : 8-17-94 Run: 11 71

8/18/94 BR

FIELD OBSERVATIONS

Sample Number(s): KP192 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 456 PID Reading Depth 12' Feet

	Yes	No	
Groundwater Encountered	☐	☒	Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒	Approx. Cubic Yards 50
Onsite Bioremediation	☐	
Backfill Pit Without Excavation	☐	

Soil Disposition:

Envirotech	☒	☐	Tierra
Other Facility	☐	Name:	_____

Pit Closure Date: _____ Pit Closed By: BEI

REMARKS

Remarks : Some LINE markers ON LOCATION. Started Remediating to 12' Soil Turned Light gray At 12' soil turned Light Brown with A smell. Closed Pit.

Signature of Specialist: Kelly Padilla

(SP3191) 03/16/94

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP192	945955
MTR CODE | SITE NAME:	71399	Nellie Platero #4
SAMPLE DATE | TIME (Hrs):	8/17/94	1610
PROJECT:	PHASE I	
DATE OF TPH EXT. | ANAL.:	8/18/94	8/18/94
DATE OF BTEX EXT. | ANAL.:	8/22/94	8/23/94
TYPE | DESCRIPTION:	VC	Brown fine sand

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.25	MG/KG	10	D		
TOLUENE	4.10	MG/KG	10	D		
ETHYL BENZENE	0.54	MG/KG	10	D		
TOTAL XYLENES	18.0	MG/KG	10	D		
TOTAL BTEX	22.6	MG/KG				
TPH (418.1)	392	MG/KG			2.10	28
HEADSPACE PID	456	PPM				
PERCENT SOLIDS	96.4	%				

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

The Surrogate Recovery was at 149 for this sample All QA/QC was acceptable.
The "D" qualifier indicates reported result for this analyte is calculated basd on a secondary dilution factor.

Narrative:
ATI Results Attached. Surrogate Recovery was outside ATI QC limits due to matrix interference

DF = Dilution Factor Used

Approved By: John Austin INGVZPIT.XLS Date: 9/2/94

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:	KP 192	945955
MTR CODE | SITE NAME:	71399	N/A
SAMPLE DATE | TIME (Hrs):	8/17/94	1610
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8/18/94	8/18/94
DATE OF BTEX EXT. | ANAL.:	8/22/94	8/23/94
TYPE | DESCRIPTION:	VG VC (8/18/94)	Brown fine sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.25	MG/KG	10			
TOLUENE	4.1	MG/KG	10			
ETHYL BENZENE	0.54	MG/KG	10			
TOTAL XYLENES	18	MG/KG	10			
TOTAL BTEX	23	MG/KG				
TPH (418.1)	392	MG/KG			2.10	28
HEADSPACE PID	456	PPM				
PERCENT SOLIDS (8/19/94)	~~92.2~~	96.4 %				

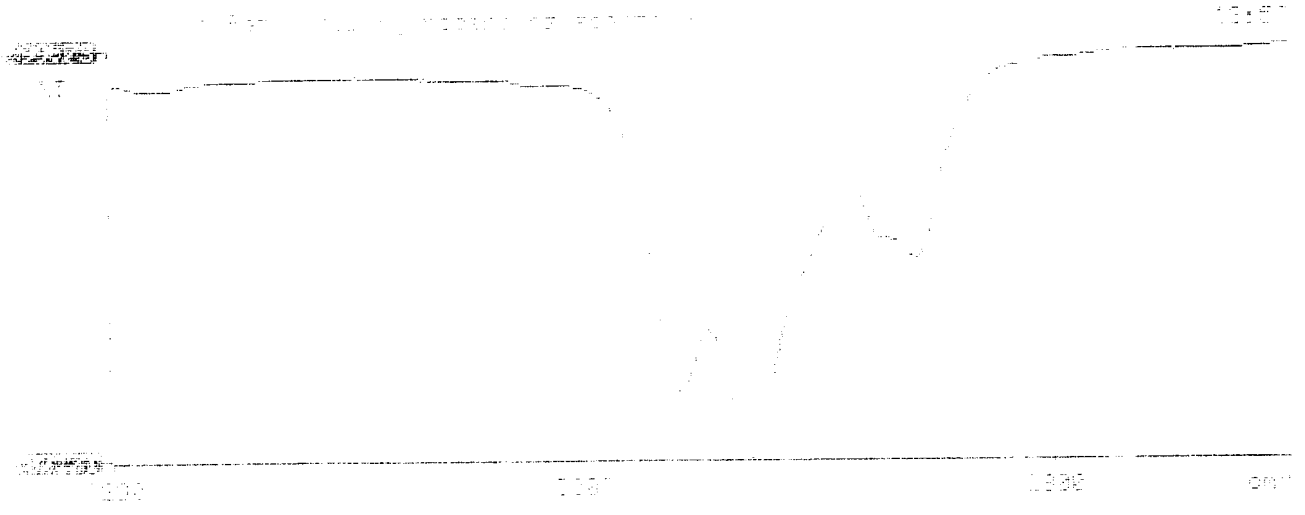
-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 149 % 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: _____ Date: 9/2/94



Analytical Technologies, Inc.

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

ATI I.D. **408380**

August 24, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

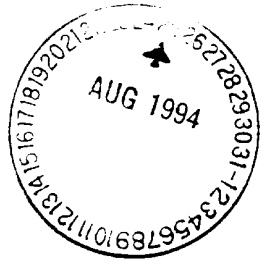
On **08/19/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

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



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : El PASO NATURAL GAS CO. ATI I.D.: 408380

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945953	NON-AQ	08/17/94	08/22/94	08/22/94	20
08	945954	NON-AQ	08/17/94	08/22/94	08/23/94	10
09	945955	NON-AQ	08/17/94	08/22/94	08/23/94	10

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	<0.5	<0.25	<0.25
TOLUENE	MG/KG	31	4.0	4.1
ETHYLBENZENE	MG/KG	3.9	0.42	0.54
TOTAL XYLENES	MG/KG	63	6.7	18
SURROGATE:				
BROMOFLUOROBENZENE (%)		106	85	149*

*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 SERVICES INC.
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPFS GW PITS
Project Number 17520 Phase 6001.77
Project Location Nellie Platero #4 - 71399

Elevation
Borehole Location J Ltr I - S27 T 9 - R
GWL Depth N/A
Logged By D Cesark
Drilled By M Donohue
Date/Time Started 2/11/97 - 1035
Date/Time Completed " - 1135

Well Logged By D Cesark
Personnel On-Site D. Charley
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										
5				BACKFILL TO 12'						
10										
15	1	13-15'	18"	WELL-GRADED SANDS, LITTLE TO NO FINES, LT BROWN, NO STAINING, SLT SWEET ODOR	SW				0/1	1045
20	2	18-20'	24"	CLAYEY SAND, LT-GRAY, NO STAINING, SLT SWEET ODOR	SC				0/1	1100
25				TD = 20'						
30										
35										
40										

Comments: TD = 20' DRC 4 COLLECTED FROM 18-20' (& NOT 13-15') BECAUSE SOIL @ 13-15 WAS SUSPECT FILL MATERIAL. DRC 4 SUBMITTED TO LAB FOR BTEX + TPH ANALYSES. GW NOT ENCOUNTERED. GROUTED TO SURFACE

Geologist Signature

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	DRC4	970091
MTR CODE | SITE NAME:	71399	Nellie Platero #4
SAMPLE DATE | TIME (Hrs):	2/11/97	1100
PROJECT:	Phase II Drilling 18-20'	
DATE OF TPH EXT. ANAL.:	2/13/97	2/13/97
DATE OF BTEX EXT. | ANAL.:	2/14/97	2/14/97
TYPE | DESCRIPTION:	VG	Brown and yellow 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)	<10	MG/KG			2.44	28
HEADSPACE PID	1	PPM				
PERCENT SOLIDS	87.9	%				

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

The Surrogate Recovery was at 92.5 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 2-19-97

EL PASO FIELD SERVICES LABORATORY
EPA METHOD 8020 - BTEX

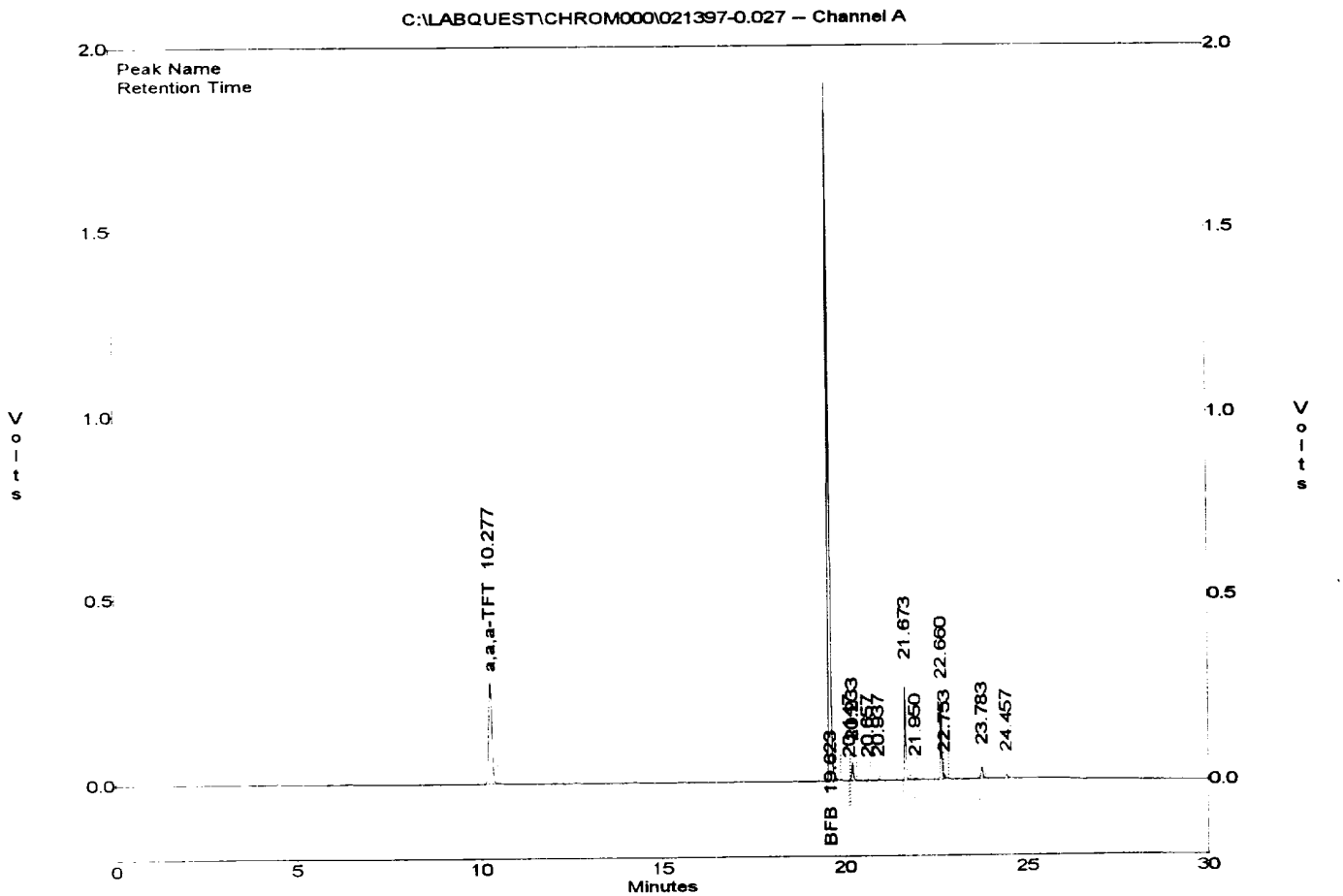
File : C:\LABQUEST\CHROM000\021397-0.027
Method : C:\LABQUEST\METHODS\0-021297.MET
Sample ID : 970091,5.11G,50U
Acquired : Feb 14, 1997 10:02:31
Printed : Feb 14, 1997 10:32:54
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.050	0	0.0000
a,a,a-TFT	10.277	1769983	93.7894
TOLUENE	12.567	0	0.0000
ETHYLBENZENE	16.790	0	0.0000
M,P-XYLENES	17.170	0	0.0000
O-XYLENE	18.310	0	0.0000
BFB	19.623	6758786	92.5243

Channel A Group Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
TOTAL XYLENES		0	0.0000



BTEX SOIL SAMPLE WORKSHEET

File	: 970091	Date Printed	: 2/18/97		
Soil Mass (g)	: 5.11	Multiplier (L/g)	: 0.00098		
Extraction vol. (mL)	: 10	CAL FACTOR (Analytical):	200		
Shot Volume (uL)	: 50	CAL FACTOR (Report):	0.19569		
		DILUTION FACTOR:	1	Det. Limit	
Benzene (ug/L)	: 0.00	Benzene (mg/Kg):	**0.000**	0.489	
Toluene (ug/L)	: 0.00	Toluene (mg/Kg):	**0.000**	0.489	
Ethylbenzene (ug/L)	: 0.00	Ethylbenzene (mg/Kg):	**0.000**	0.489	
p & m-xylene (ug/L)	: 0.00	p & m-xylene (mg/Kg):	0.000	0.978	
o-xylene (ug/L)	: 0.00	o-xylene (mg/Kg):	0.000	0.489	
		Total xylenes (mg/Kg):	**0.000**	1.468	
		Total BTEX (mg/Kg):	**0.000**		

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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                        *
*************************************************************
*
 97/02/13   15:10
*
*  Sample identification
 970091
*
*  Initial mass of sample, g
 2.440
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 -8.933
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.185
*
*
*
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