Jerry Sexton
DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

HAMMOND #55
Meter/Line ID - 89142

RECEIVED
JUL 7 1999
OIL CON. DIV.
DIST. 3

SITE DETAILS

Legals - Twn: 27 **Rng:** 08 **Sec:** 26 **Unit:** G
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: GREAT LAKES CHEMICAL CORP **Pit Closure Date: 07/28/94**

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: 89142 Location: Hammond No. 55
Operator #: 4605 Operator Name: Great Lakes Chemical P/L District: Ballard
Coordinates: Letter: G Section 26 Township: 27 Range: 8
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ✓ Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6/13/94 Area: 07 Run: 02

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 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 : RedlineBook-Inside, VunlerableZoneTopo-Inside
2pits. Will closel. Pithasliquid in it. (called Ballard)

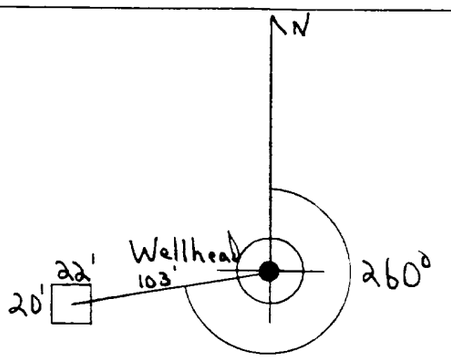
DIGHAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 260° Footage from Wellhead 103'

b) Length : 22' Width : 20' Depth : 3'



REMARKS

Remarks :

Pictures @ 0940 (4-7)

End Dump

Completed By:

Cory Chance
Signature

11/12/04
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 89142 Location: Hammond #55

Coordinates: Letter: G Section 26 Township: 27 Range: 8

Or Latitude _____ Longitude _____

Date Started : 7/28/94 Run: 07 32

FIELD OBSERVATIONS

Sample Number(s): KD 172 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 172 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒	Approx. Cubic Yards 90
Onsite Bioremediation	☐	
Backfill Pit Without Excavation	☐	

Soil Disposition:

Envirotech	☒	☐	Tierra
Other Facility	☐	Name:	_____

Pit Closure Date: 7/28/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', Took P.I.D Sample, Closed Pit.

Signature of Specialist: Kenny Dean

(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:	KD172	945783
MTR CODE | SITE NAME:	89142	N/A
SAMPLE DATE | TIME (Hrs):	7-28-94	1500
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8-2-94	8/2/94
DATE OF BTEX EXT. | ANAL.:	8/4/94	8/5/94
TYPE | DESCRIPTION:	VC	Brown Sand/Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.13	MG/KG	5			
TOLUENE	<0.13	MG/KG	5			
ETHYL BENZENE	0.42	MG/KG	5			
TOTAL XYLENES	6.8	MG/KG	5			
TOTAL BTEX	7.5	MG/KG				
TPH (418.1)	5200	MG/KG			2.04	28
HEADSPACE PID	172	PPM				
PERCENT SOLIDS	88.2	%				

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

The Surrogate Recovery was at 108 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: J.P. Date: 9/2/94

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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             *
**************************************************

 94/08/02  12:59

 Sample identification
 945783

 Initial mass of sample, g
 2.040

 Volume of sample after extraction, ml
 28.000

 Petroleum hydrocarbons, ppm
 5201.381
 Net absorbance of hydrocarbons (2930 cm-1)
 0.663
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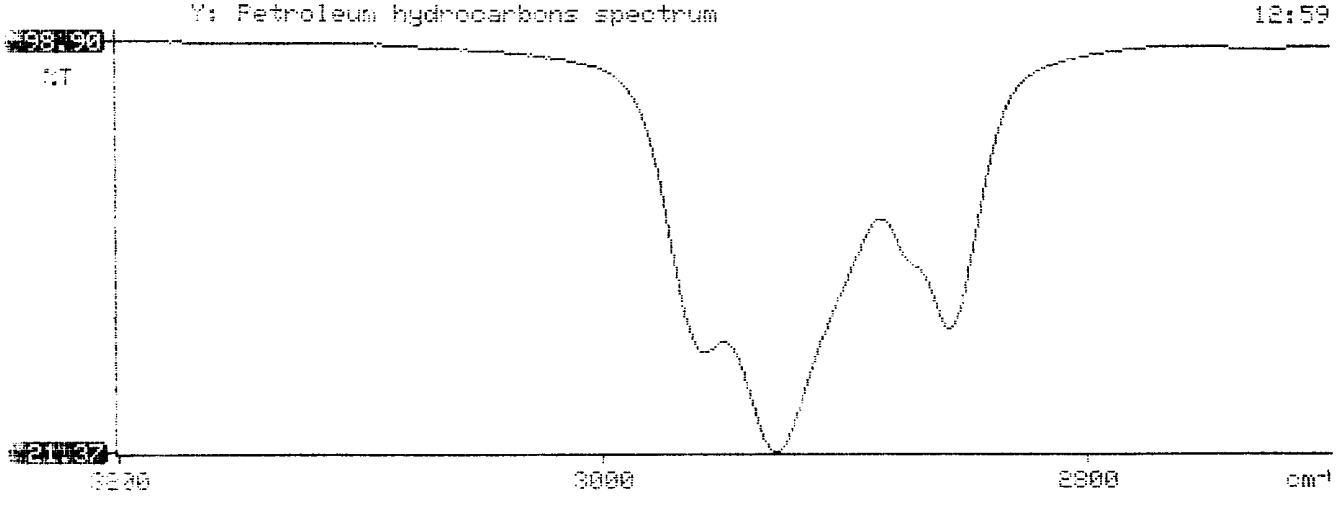

Analytical **Technologies,** Inc.

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

ATI I.D. **408313**

August 12, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **08/03/94**, 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 contrcl data, which follow each set of analyses, are enclosed.

8015 analysis was added on 08/08/94 for sample 945789 per John Lambdin.

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.: 408313
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945781	NON-AQ	07/28/94	08/04/94	08/05/94	10
02	945782	NON-AQ	07/28/94	08/04/94	08/05/94	10
03	945783	NON-AQ	07/28/94	08/04/94	08/05/94	5

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.25	<0.25	<0.13
TOLUENE	MG/KG	10	<0.25	<0.13
ETHYLBENZENE	MG/KG	2.8	2.4	0.42
TOTAL XYLENES	MG/KG	54	37	6.8
SURROGATE:				
BROMOFLUOROBENZENE (%)		71	121*	108

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH1
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: Hammond #55 89148

Elevation:
Borehole Location: Letter G-S26-T27-R8
GWL Depth:
Logged By: John LaBarbera
Drilled By: Mike Donahue
Date/Time Started: 7/19/95 - 1220
Date/Time Completed: - 1325

Well Logged By: John LaBarbera
Personnel On-Site: M Donahue, D Watts, D Charley
Contractors On-Site:
Client Personnel On-Site:

Drilling Method: 4.25" 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	HS	Drilling Conditions & Blow Counts
0–12				Fill						
18	1	18-19.5	18	Brown, soft, v fn sandy, CLAY, wet, odor, med. plasticity. At bottom of spoon, Brown, clayey, silty, fn. SAND, wet.	CL SC		31	2.5	1098 / .5	No H₂O into BH hole
23	2	23-24	12	→ Brown, soft, clayey, SILT, moist, no odor noted. At bottom of spoon - Brown, SC clayey, silty, fn to med SAND	ML		0	24	7 / 4	No H_2O into BH hole
				TOB at 24'						

Comments: Sample JFL 14 sent to lab for BTEX/TPH analysis

Geologist Signature: John LaBarbera

7/11/95\DRILLOG.XLS

El Paso Natural Gas Company

Phase II Drilling
Hammond #55
(23-24')

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JFL 14	947038
MTR CODE | SITE NAME:	89142	N/A
SAMPLE DATE | TIME (Hrs):	07-19-95	12:47
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7.20-95	7.20-95
DATE OF BTEX EXT. | ANAL.:	07-21-95	07-23-95
TYPE | DESCRIPTION:	VG	Brown clay, wet

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	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	49.6	MG/KG			1.99	28
HEADSPACE PID	7	PPM				
PERCENT SOLIDS	82.3	%				

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

The Surrogate Recovery was at 98 % for this sample All QA/QC was acceptable.

Narrative: Att Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 8/3/95

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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                     *
**********************************************************
*
 95/07/20   14:32
*
*  Sample identification
 947038
*
*  Initial mass of sample, g
 1.990
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 49.636
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.016
*
*
*
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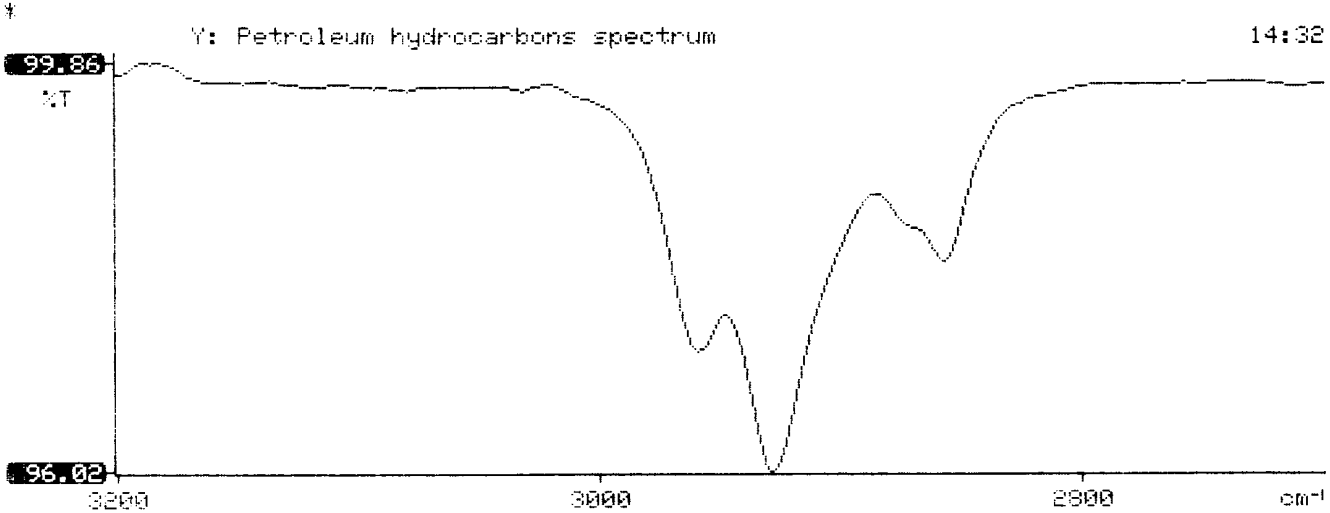


Analytical **Technologies,** Inc.

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

ATI I.D. **507388**

July 26, 1995

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

Project Name/Number: PIT CLOSURE/PHII DRILL I 24324

Attention: John Lambdin

On **07/21/95**, 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.

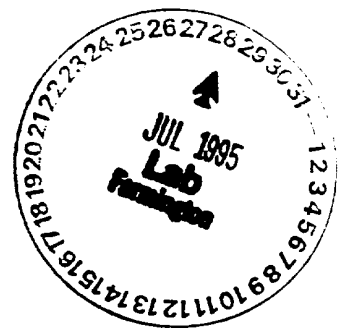
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:gsm

Enclosure



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507388

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHII DRILL I

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	947037	NON-AQ	07/19/95	07/21/95	07/22/95	1
05	947038	NON-AQ	07/19/95	07/21/95	07/23/95	1
06	947039	NON-AQ	07/19/95	07/21/95	07/22/95	50

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	<1.3
TOLUENE	MG/KG	<0.025	<0.025	28
ETHYLBENZENE	MG/KG	<0.025	<0.025	9.0
TOTAL XYLENES	MG/KG	<0.025	<0.025	79
SURROGATE:				
BROMOFLUOROBENZENE (%)		106	98	NA*