Kenny G Faust
DEPUTY OIL & GAS INSPECTOR

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEC 21 1998

RECEIVED
JUL 1998
OIL CON. DIV.
DIST. 3

MARRON #95
Meter/Line ID - 93441

SITE DETAILS

Legals - Twn: 27 **Rng:** 08 **Sec:** 23 **Unit:** K
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: R & G DRILLING COMPANY **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: 93441 Location: Marron #95
Operator #: 7335 Operator Name: R+G Drlg. Co. 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

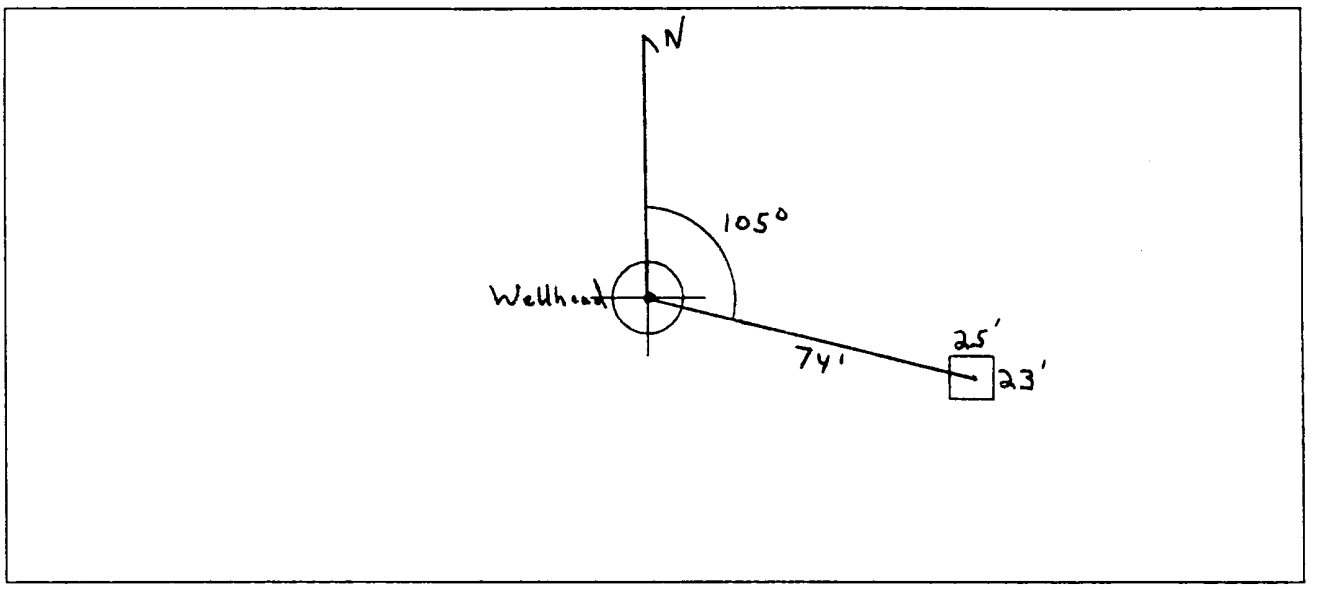
Remarks : Redline & Vuln. - Inside
2 pits. Will close 1. Pit Dry
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 105° Footage from Wellhead 74'

b) Length : 25' Width : 23' Depth : 3'



REMARKS

Remarks :

Pictures @ 1400 (13-16)

Dump Truck

Completed By:

Signature

5/21/94

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 93441 Location: MARRON #95

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

Or Latitude _____ Longitude _____

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

FIELD OBSERVATIONS

Sample Number(s): KP#85 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 638 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: ~~6-6-94~~ 6-7-94 KP 6-6-94 Pit Closed By: B.GI

REMARKS

Remarks : Some LINE markers had to solidify one KP 6-6-94 Side of Berm Because Has some mud in it. Started Remediating to 12' Soil is Black.

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 85	945379
MTR CODE | SITE NAME:	93441	N/A
SAMPLE DATE | TIME (Hrs):	6-7-94	0945
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6/10/94	6/10/94
DATE OF BTEX EXT. | ANAL.:	6/14/94	6/14/94
TYPE | DESCRIPTION:	VC	Grey Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	1.8	MG/KG	20			
TOLUENE	62	MG/KG	20			
ETHYL BENZENE	15	MG/KG	20			
TOTAL XYLENES	240	MG/KG	20			
TOTAL BTEX	319	MG/KG				
TPH (418.1)	7640	MG/KG			1.10	28
HEADSPACE PID	638	PPM				
PERCENT SOLIDS	77.3	%				

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

The Surrogate Recovery was at 135 % 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: 7/7/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

74/06/10 11:35

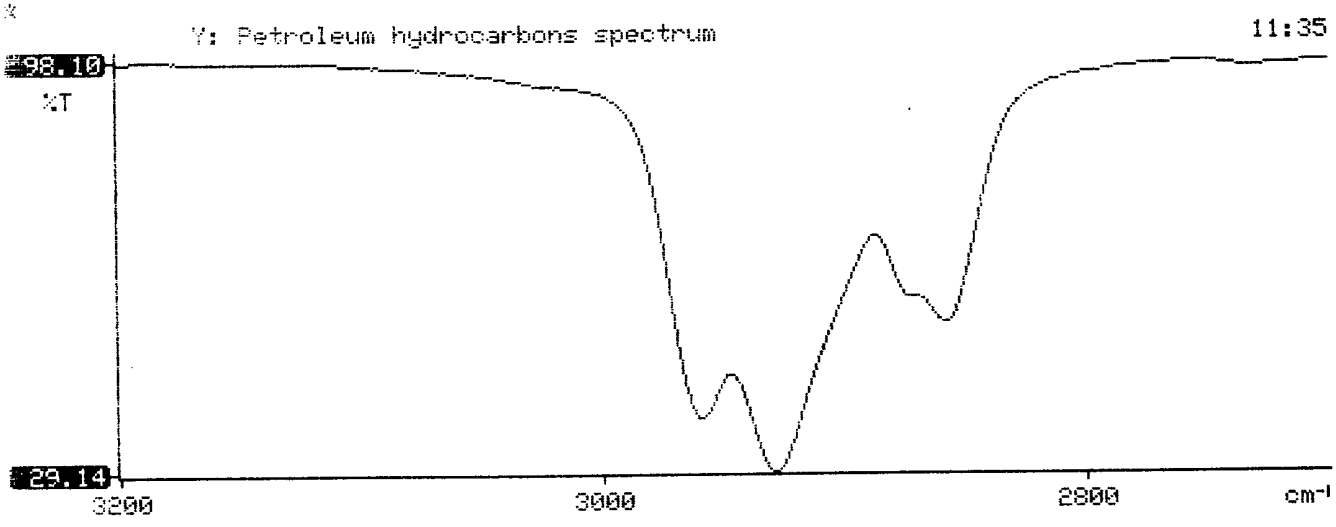
Sample identification
945379

Initial mass of sample, g
1.100

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
7638.501

Net absorbance of hydrocarbons (2930 cm-1)
0.526

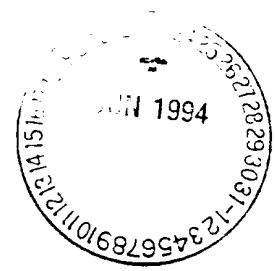


Analytical **Technologies,** Inc.

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
04	945377	NON-AQ	06/07/94	06/14/94	06/14/94	1
05	945378	NON-AQ	06/07/94	06/14/94	06/14/94	1
06	945379	NON-AQ	06/07/94	06/14/94	06/14/94	20

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	1.8
TOLUENE	MG/KG	<0.025	<0.025	62
ETHYLBENZENE	MG/KG	<0.025	<0.025	15
TOTAL XYLENES	MG/KG	<0.025	0.070	240
SURROGATE:				
BROMOFLUOROBENZENE (%)		115	104	135*

*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 Marron # 95 93441

Elevation
Borehole Location QK-S23-T27-R8
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 8/29/95 - 1045
Date/Time Completed 8/29/95 - 1130

Well Logged By CM Chance
Personnel On-Site K Padilla, E. 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'						
15	1	15-17	8"	lt br clayey SILT, v. loose, dry			0	72	77/28	1054 hrs
20	2	20-22	6"	lt br silty SAND, vf-f sand, v. loose, sl moist			0	190	4/17	1100
				TDB 22'						
25										
30										
35										
40										

Comments: CM(96(20-22) sent to lab (BTEX, TPH). BH grouted to surface (Sample bagged & iced prior to containerization.)

Geologist Signature Cindy 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:	CMC 96	947 357
MTR CODE | SITE NAME:	93441	Marron #95
SAMPLE DATE | TIME (Hrs):	08-29-95	1100
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:	VG	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)	61.9	MG/KG			2.04	28
HEADSPACE PID	17	PPM				
PERCENT SOLIDS	95.6	%				

-- 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  13:39
*
*  Sample identification
 947357
*
*  Initial mass of sample, g
 2.040
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 61.918
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.018
*
*
*
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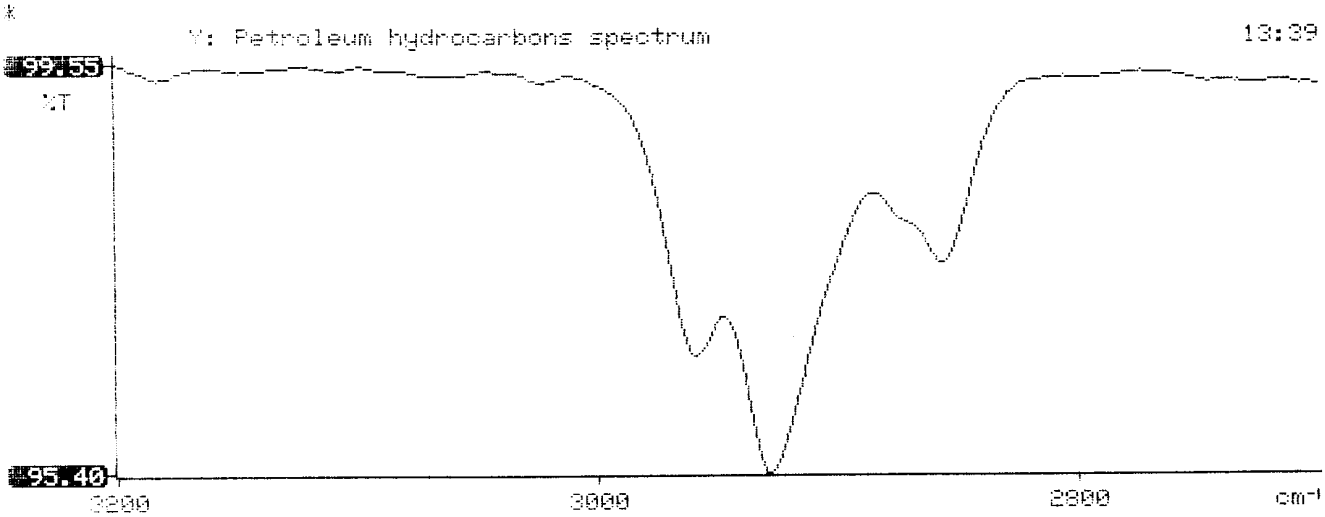

BTEX SOIL SAMPLE WORKSHEET

File	: 947357	**Date Printed**	: 9/6/95		
Soil Mass (g)	: 5.12	**Multiplier (L/g)**	: 0.00098		
Extraction vol. (mL)	: 20	**DF (Analytical)**	: 200		
Shot Volume (uL)	: 100	**DF (Report)**	: 0.19531		
					Det. Limit
Benzene (ug/L)	: 0.00	**Benzene (mg/Kg):**		**0.000**	0.488
Toluene (ug/L)	: 0.14	**Toluene (mg/Kg):**		**0.027**	0.488
Ethylbenzene (ug/L)	: 0.00	**Ethylbenzene (mg/Kg):**		**0.000**	0.488
p & m-xylene (ug/L)	: 0.00	p & m-xylene (mg/Kg):		0.000	0.977
o-xylene (ug/L)	: 0.00	o-xylene (mg/Kg):		0.000	0.488
		Total xylenes (mg/Kg):		**0.000**	1.465
		Total BTEX (mg/Kg):		**0.027**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\090395-1.021
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947357,5.12G,100U
Acquired : Sep 03, 1995 03:03:56
Printed : Sep 04, 1995 11:18:11
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.390	0	0.0000
a,a,a TFT	4.947	2006392	84.3054
TOLUENE	6.767	266039	0.1386
ETHYLBENZENE	10.520	55003	-0.2429
M & P XYLENE	10.870	362834	-2.2047
O XYLENE	11.877	0	0.0000
BFB	13.410	30896634	87.9627