Jennifer Frost

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

RECEIVED

JUL 2 1998

OIL CON. DIV.

Approved

J.C. GORDON D #2E DK
Meter/Line ID - 94142

SITE DETAILS

Legals - Twn: 27 **Rng:** 10 **Sec:** 22 **Unit:** M
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: AMOCO PRODUCTION COMPANY **Pit Closure Date: 09/07/94**

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: 94142 Location: J. C. Gordon D #2E DK
Operator #: 0203 Operator Name: Amoco P/L District: Angel Peak
Coordinates: Letter: M Section 22 Township: 27 Range: 10
Or Latitude _____ Longitude _____
Pit Type: Dehydrator 1 Location Drip: ✓ cms 8/18/94 Line Drip: ___ Other: _____
Site Assessment Date: 8/18/94 Area: 01 Run: 92

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 East Fork Kutz 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 : Redline Book: Inside, Vulnerable Zone Topo: Inside 1pit. Will close. Pit has very small amount of water in it.

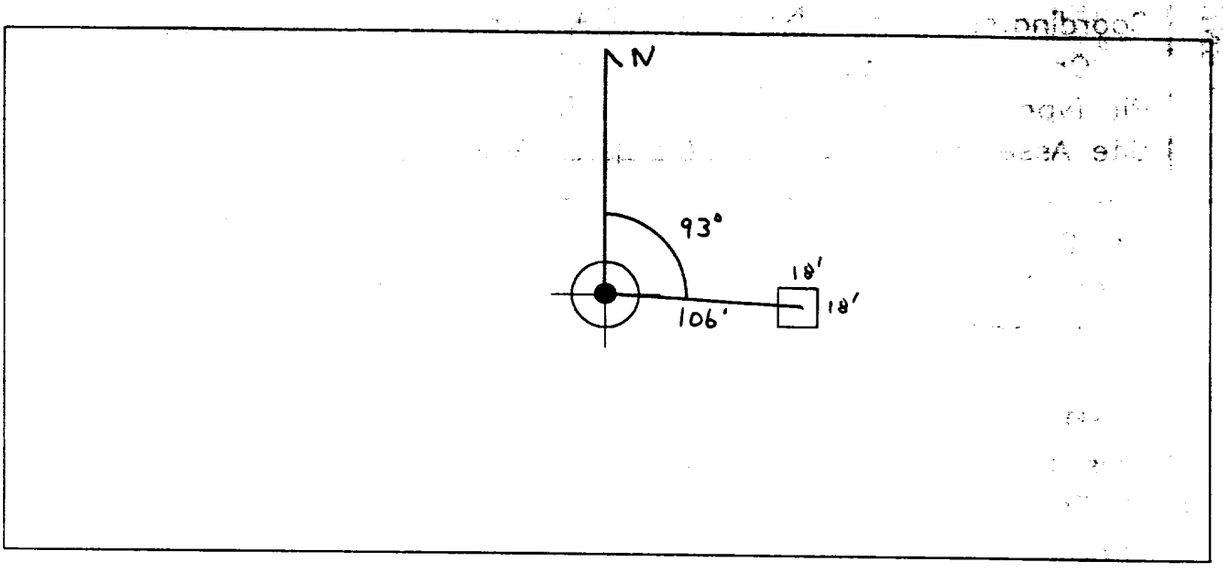
DIG + HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 93° Footage from Wellhead 106'

b) Length : 18' Width : 18' Depth : 3'



REMARKS

Remarks :

Pictures @ 1448

Completed By:

Cory Chase
Signature

8/18/94
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94142 Location: J.C. Gordon D #2E OK

Coordinates: Letter: M Section 22 Township: 27 Range: 10

Or Latitude _____ Longitude _____

Date Started : 9-7-94 Run: 01 92

FIELD OBSERVATIONS

Sample Number(s): MK303 _____ _____ _____

Sample Depth: 10 Feet

Final PID Reading 592 PID Reading Depth 10 Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 40

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 9-7-94 Pit Closed By: BEI

REMARKS

Remarks : Pit had about 6" of water in it soil was black when started digging turn Gray at sample Depth it Rock about 6' Keep Going till 10' couldn't dig any more

Signature of Specialist: Morgan Killion

(SP3181) 03/16/94

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:	MK303	946059
MTR CODE | SITE NAME:	94142	N/A
SAMPLE DATE | TIME (Hrs):	9-7-94	1036
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	9-8-94	9.8.94
DATE OF BTEX EXT. | ANAL.:	9/11/94	9/11/94
TYPE | DESCRIPTION:	VC	LIGHT BROWN SAND & CLAY

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.28	MG/KG	1			
TOLUENE	1.4	MG/KG	1			
ETHYL BENZENE	1.7	MG/KG	1			
TOTAL XYLENES	19	MG/KG	1			
TOTAL BTEX	22	MG/KG				
TPH (418.1)	4020	MG/KG			1.97	28
HEADSPACE PID	592	PPM				
PERCENT SOLIDS	97.3	%				

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

The Surrogate Recovery was at 61 * % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached. * outside ATI quality control limits due to matrix interference

DF = Dilution Factor Used

Approved By: _____ Date: 9/30/94

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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                     *
**********************************************************
*
 94/09/08  14:07
*
*  Sample identification
 946059
*
*  Initial mass of sample, g
 1.970
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 4024.908
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.494
*
*
*
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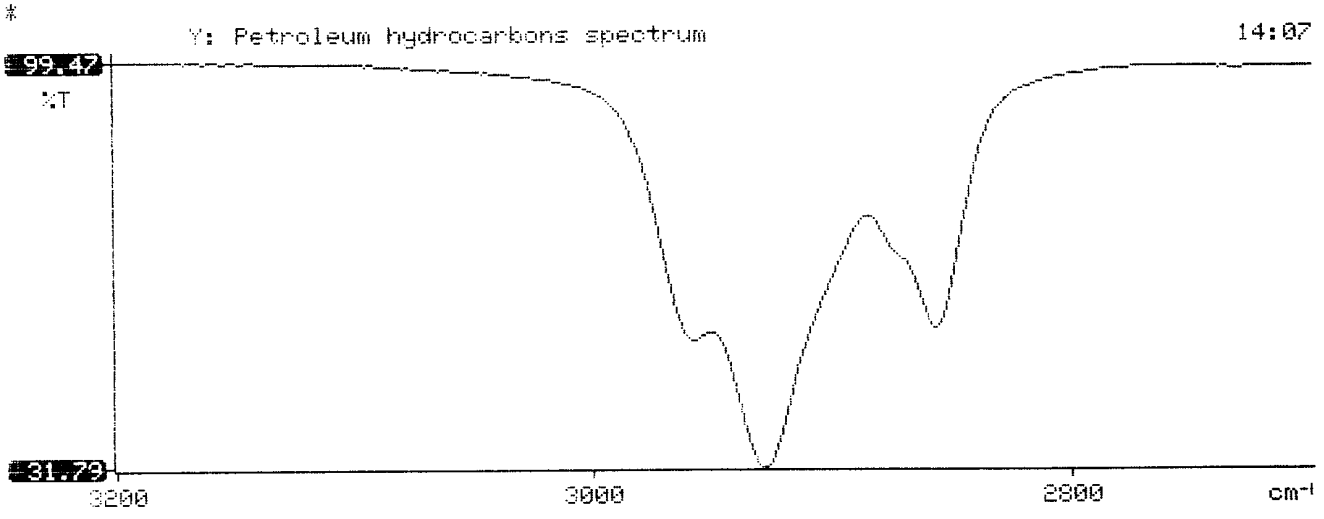

Analytical Technologies, Inc.

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

ATI I.D. **409334**

September 15, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **09/09/94**, 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:jt

Enclosure

SEP 1994

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 409334

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	946054	NON-AQ	09/06/94	09/11/94	09/11/94	1
02	946055	NON-AQ	09/06/94	09/11/94	09/11/94	20
03	946059	NON-AQ	09/07/94	09/11/94	09/11/94	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	2.3	0.28
TOLUENE	MG/KG	2.7	26	1.4
ETHYLBENZENE	MG/KG	0.94	11	1.7
TOTAL XYLENES	MG/KG	8.8	77	19
SURROGATE:				
BROMOFLUOROBENZENE (%)		107	87	61*

*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 J. C. Gordon D #2E DK
94142

Well Logged By Jeff W. Kindley
Personnel On-Site G. Suddwth, D Roberts, H Kaul
Contractors On-Site
Client Personnel On-Site

Drilling Method 4 1/4 ID HSA
Air Monitoring Method PID, CGI

Elevation
Borehole Location T 27, R 10, S 22, M
GWL Depth
Logged By Jeff W. Kindley
Drilled By G. Suddwth
Date/Time Started 08/29/95 1258
Date/Time Completed 08/29/95 1343

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 material to 12'						
5										
10										
15	1	13-15	7 / 10	CL, GRCLAY, Dry, hard, low plasticity, no odor.					25/3	1326 100 blows per Foot
20										
25										
30										
35										
40										

Comments: Auger refusal at 15 feet. Sample collected from 13 to 15 feet and submitted for analysis of BTEX and TPH. (JWK 55)
BH grouted to the surface

Geologist Signature Jeffrey Kindley

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:	JWK 55	947362
MTR CODE | SITE NAME:	94142	J.C. Gordon D #2E DK
SAMPLE DATE | TIME (Hrs):	08-29-95	1326
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/30/95	
DATE OF BTEX EXT. | ANAL.:	8/30/95	9/5/95
TYPE | DESCRIPTION:	VG	Light Grey Sand & Sandstones

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)	39.9	MG/KG			2.04	28
HEADSPACE PID	3	PPM				
PERCENT SOLIDS	91.5	%				

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

The Surrogate Recovery was at 94% 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  13:51
*
*  Sample identification
 947362
*
*  Initial mass of sample, g
 2.040
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 39.947
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.015
*
*
*
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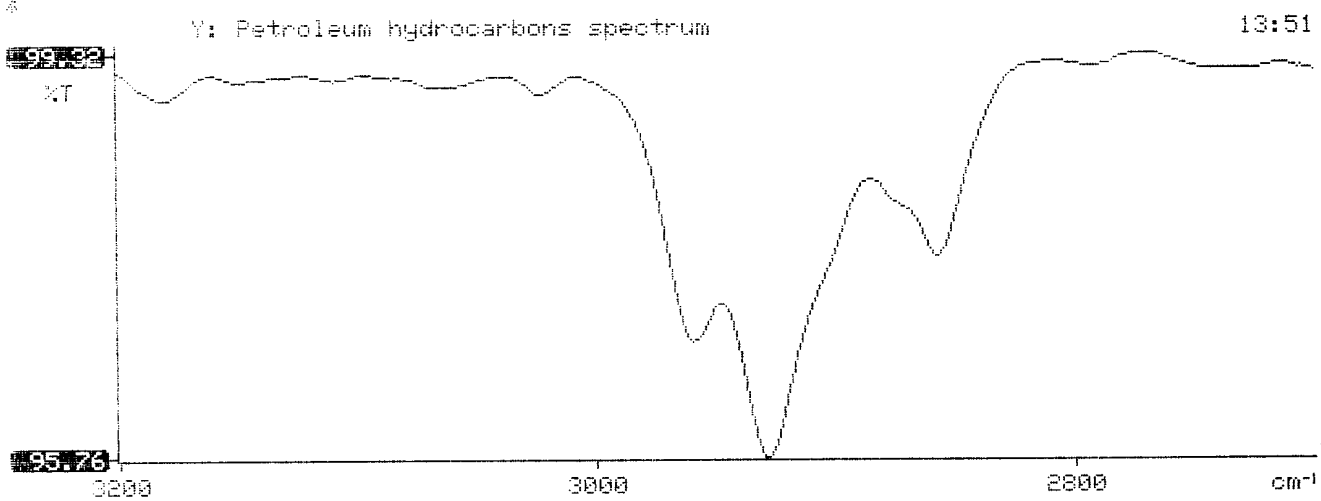

BTEX SOIL SAMPLE WORKSHEET

File :	947362	**Date Printed** :	9/6/95
Soil Mass (g) :	4.99	**Multiplier (L/g)** :	0.00100
Extraction vol. (mL) :	20	**DF (Analytical)** :	200
Shot Volume (uL) :	100	**DF (Report)** :	0.20040

				Det. Limit
Benzene (ug/L) :	0.00	**Benzene (mg/Kg):**	**0.000**	0.501
Toluene (ug/L) :	0.00	**Toluene (mg/Kg):**	**0.000**	0.501
Ethylbenzene (ug/L) :	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.501
p & m-xylene (ug/L) :	0.00	p & m-xylene (mg/Kg):	0.000	1.002
o-xylene (ug/L) :	0.00	o-xylene (mg/Kg):	0.000	0.501
		Total xylenes (mg/Kg):	**0.000**	1.503
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\090595-1.007
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947362,4.99G,100U
Acquired : Sep 04, 1995 14:58:25
Printed : Sep 04, 1995 15:24:49
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.390	0	0.0000
a,a,a TFT	4.937	2126591	89.3559
TOLUENE	6.770	143329	-0.6124
ETHYLBENZENE	10.540	0	0.0000
M & P XYLENE	10.893	299327	-2.5954
O XYLENE	11.877	0	0.0000
BFB	13.443	33001730	93.9559