

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Navajo Allotted Gas Com B #1A
Meter/Line ID – 90028

SITE DETAILS

Legals - Twn: 28N
NMOCD Hazard Ranking: 30
Operator: Amoco

Rng: 9W

Sec: 36 Unit: O
Land Type: Navajo
Pit Closure Date: 11/18/95

Original
FBI

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 16, 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 40 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 349 ppm; laboratory analysis indicated a benzene concentration of 4.5 mg/kg, a total BTEX concentration of 80 mg/kg, and a TPH concentration of 1980 mg/kg. TPH was above required remediation levels for the Hazard Ranking Score.

On November 15, 1995, a Phase II excavation was conducted to 19 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 166 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 109.7 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 <10 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.

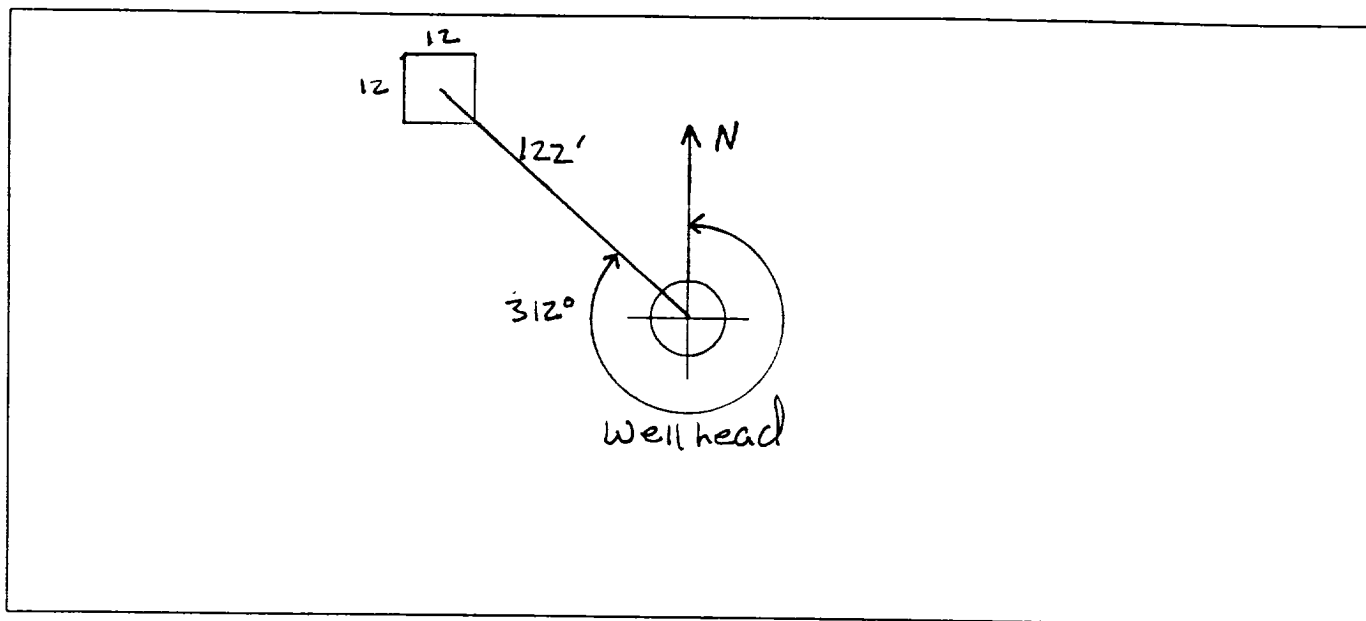
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>90028</u> Location: <u>Navajo Allotted Gas Com 'B' #1A</u> Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>Balkard</u> Coordinates: Letter: <u>O</u> Section <u>36</u> Township: <u>28N</u> Range: <u>9W</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>6-9-92</u> Area: <u>11</u> Run: <u>92</u></p>
	SITE ASSESSMENT
REMARKS	

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 312 Footage from Wellhead 122
b) Length : 12 Width : 12 -Depth : 3



REMARKS

Remarks :

Photos - 1525

Completed By:

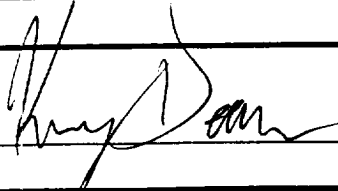
[Signature]

Signature

6-9-97

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>90028</u> Location: <u>NAVAJO Allotted GAS Com 'B' #1A</u></p> <p>Coordinates: Letter: <u>0</u> Section <u>36</u> Township: <u>28N</u> Range: <u>9W</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>8/16/94</u> Run: <u>11</u> <u>92</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD 216</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>349 ppm</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>40</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"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>8/16/94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Excavated pit to 12', took PID sample,</u> <u>closed pit.</u></p>
	<p>Signature of Specialist: <u></u></p>



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 216	945945
MTR CODE SITE NAME:	90028	N/A
SAMPLE DATE TIME (Hrs):	8-16-94	1045
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-18-94	8-18-94
DATE OF BTEX EXT. ANAL.:	8/22/94	8/22/94
TYPE DESCRIPTION:	VL	Gray Fine Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	4.5	MG/KG	10			
TOLUENE	22	MG/KG	10			
ETHYL BENZENE	1.6	MG/KG	10			
TOTAL XYLENES	52	MG/KG	10			
TOTAL BTEX	80	MG/KG				
TPH (418.1)	1980	MG/KG			2.08	28
HEADSPACE PID	349	PPM				
PERCENT SOLIDS	88.8	%				

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

The Surrogate Recovery was at 65 % 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: J-FDate: 9/2/94



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
01	945945	NON-AQ	08/16/94	08/22/94	08/22/94	10
02	945946	NON-AQ	08/16/94	08/22/94	08/22/94	20
03	945949	NON-AQ	08/17/94	08/22/94	08/22/94	20
PARAMETER			UNITS	01	02	03
BENZENE			MG/KG	4.5	<0.5	<0.5
TOLUENE			MG/KG	22	15	42
ETHYLBENZENE			MG/KG	1.6	8.4	4.9
TOTAL XYLENES			MG/KG	52	93	52

SURROGATE:

BROMOFLUOROBENZENE (%)	65*	74	135*
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*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

FIELD PIT REMEDIATION/CLOSURE FORM/PHASE II

GENERAL

Meter: 90028 Location: Near Jo Allotted Gas Com B #1A
 Coordinates: Letter: 0 Section: 36 Township: 28N Range: 9W
 Or Latitude _____ Longitude _____
 Date Started : 11/15/95 Area: 11 Run: 92

FIELD OBSERVATIONS

Sample Number(s): JK139
 Sample Depth: 19' Feet
 Final PID Reading 109.7 PID Reading Depth 19' Feet
 Yes No
 Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet
 Final Dimensions: Length 20 Width 19' Depth 19'

CLOSURE

Remediation Method :
 Excavation ☒ (1) Approx. Cubic Yards 166 LT 12/1/95
 Onsite Bioremediation ☐ (2) APP. ALTON TAMES EPNG.
 Backfill Pit Without Excavation ☐ (3)
 Overburden Cubic Yards 30 yds
 Soil Disposition:
 Envirotech ☒ (1) ☐ (3) Tierra
 Other Facility ☐ (2) Name: _____
 Pit Closure Date: 11-18-95 Pit Closed By: Philip

REMARKS

Remarks : Pit PID Readings (N-6.1) (S-19.0) (E-80.5) (W-0.5)
Less Than 100' From Ephemeral Stream
No Fence No E.P.W.G. ON Site

Signature of Specialist: Joe K. Key



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JK139	947788
MTR CODE SITE NAME:	90028	Navajo Allotted Gas Com B #1A
SAMPLE DATE TIME (Hrs):	11-15-95	1400
PROJECT:	Phase I Navajo	
DATE OF TPH EXT. ANAL.:	11-15-95	
DATE OF BTEX EXT. ANAL.:	11/16/95	11/16/95
TYPE DESCRIPTION:	VG	fine brown sand & clay

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			2.0	28
HEADSPACE PID	109.7	PPM				
PERCENT SOLIDS	92.0	%				

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

The Surrogate Recovery was at 85% for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By: 

Date: 11/21/95

BTEX SOIL SAMPLE WORKSHEET

File	:	947788	Date Printed	:	11/20/95
Soil Mass (g)	:	4.99	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical):		200
Shot Volume (uL)	:	50	CAL FACTOR (Report):		0.20040

			DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000	0.501
Toluene (ug/L)	:	0.21	Toluene (mg/Kg):	0.042	0.501
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000	0.501
p & m-xylene (ug/L)	:	0.17	p & m-xylene (mg/Kg):	0.034	1.002
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000	0.501
			Total xylenes (mg/Kg):	0.034	1.503
			Total BTEX (mg/Kg):	0.076	