

Lenny S. Frost
EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE
DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

SAN JUAN 29-6 UNIT #63
Meter/Line ID - 72677

RECEIVED
JUL 2 1998
OIL CON. DIV.
DIST. 3

Approved

| <u>SITE DETAILS</u> | | | |
|--|----------------|-------------------------------|-----------------------------------|
| Legals - Twn: 29 | Rng: 06 | Sec: 30 | Unit: A |
| NMOCD Hazard Ranking: 10 | | Land Type: 2 - Federal | |
| Operator: PHILLIPS PETROLEUM COMPAN | | | Pit Closure Date: 06/24/94 |

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 | <p>Meter: <u>72677</u> Location: <u>San Juan 29-6 unit #63</u> Operator #: <u>7035</u> Operator Name: <u>Phillips</u> P/L District: <u>Bloomfield</u> Coordinates: Letter: <u>A</u> Section <u>30</u> Township: <u>29</u> Range: <u>6</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>6-6-94</u> Area: <u>10</u> Run: <u>91</u></p> |
| SITE ASSESSMENT | <p>NMOCD Zone: (From NMOCD Maps) Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p>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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____ (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</p> |
| REMARKS | <p>Remarks : <u>one pit on location. Pit is dry</u> <u>site just south of Hwy 64</u> <u>Location inside VZ on Red line & Topo</u></p> |

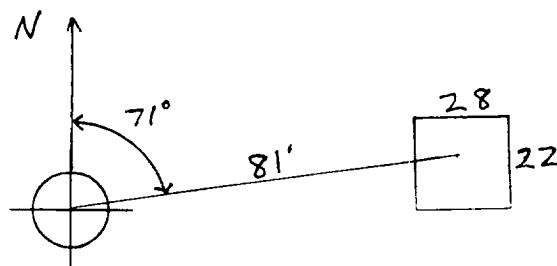
DIG & HALL

(003101) 04/08/04

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 71 Footage from Wellhead 81
b) Length : 28 Width : 22 Depth : 3



REMARKS

Remarks :

Photos - 1256 hrs.

dump truck

Completed By:

[Signature]

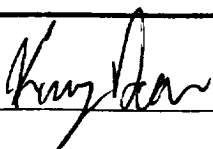
Signature

6-6-94

Date

PHASE I EXCAVATION

FIEL PIT REMEDIATION/CLOSURE FORM

| | |
|---------------------------|--|
| GENERAL | <p>Meter: <u>72677</u> Location: <u>San Juan 29-6 Unit #63</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>30</u> Township: <u>29</u> Range: <u>6</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6-24-94</u> Area: <u>10</u> Run: <u>91</u></p> |
| FIELD OBSERVATIONS | <p>Sample Number(s): <u>KD116</u></p> <p>Sample Depth: <u>12</u> Feet</p> <p>Final PID Reading <u>325 ppm</u> PID Reading Depth <u>12'</u> Feet</p> <p align="center">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p> |
| CLOSURE | <p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>150</u></p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>6-24-94</u> Pit Closed By: <u>BEI</u></p> |
| REMARKS | <p>Remarks : <u>Excavated pit to 12' TOOK PID Sample, closed pit on 6-27-94 - needed 30 yds to finish cap.</u></p> |
| | <p>Signature of Specialist: <u></u></p> |



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

| | Field ID | Lab ID |
|----------------------------|----------|-----------------|
| SAMPLE NUMBER: | KD 116 | 945513 |
| MTR CODE SITE NAME: | 72677 | N/A |
| SAMPLE DATE TIME (Hrs): | 6-24-94 | 1430 |
| SAMPLED BY: | N/A | |
| DATE OF TPH EXT. ANAL.: | 6/27/94 | 6/27/94 |
| DATE OF BTEX EXT. ANAL.: | 6/29/94 | 6/30/94 |
| TYPE DESCRIPTION: | VC | Brown Sand/Clay |

REMARKS:

RESULTS

| PARAMETER | RESULT | UNITS | QUALIFIERS | | | |
|----------------|--------|-------|------------|---|------|-------|
| | | | DF | Q | M(g) | V(ml) |
| BENZENE | 40.12 | MG/KG | 5 | | | |
| TOLUENE | 40.12 | MG/KG | 5 | | | |
| ETHYL BENZENE | 0.47 | MG/KG | 5 | | | |
| TOTAL XYLENES | 12 | MG/KG | 5 | | | |
| TOTAL BTEX | 13 | MG/KG | | | | |
| TPH (418.1) | 177 | MG/KG | | | 2.00 | 28 |
| HEADSPACE PID | 325 | PPM | | | | |
| PERCENT SOLIDS | 88.3 | % | | | | |

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

The Surrogate Recovery was at 193 % 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:

7/17/94

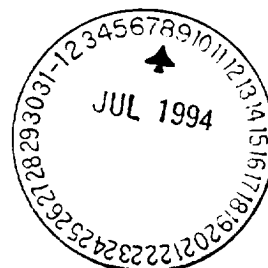
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Analytical **Technologies, Inc.**

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

ATI I.D. **406418**



July 6, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/28/94**, 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



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 406418
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

| SAMPLE ID. # | CLIENT I.D. | MATRIX | DATE SAMPLED | DATE EXTRACTED | DATE ANALYZED | DIL. FACTOR |
|---------------|-------------|--------|--------------|----------------|---------------|-------------|
| 04 | 945512 | NON-AQ | 06/24/94 | 06/29/94 | 06/30/94 | 1 |
| 05 | 945513 | NON-AQ | 06/24/94 | 06/29/94 | 06/30/94 | 5 |
| PARAMETER | | | UNITS | 04 | 05 | |
| BENZENE | | | MG/KG | <0.025 | <0.12 | |
| TOLUENE | | | MG/KG | <0.025 | <0.12 | |
| ETHYLBENZENE | | | MG/KG | <0.025 | 0.47 | |
| TOTAL XYLENES | | | MG/KG | <0.025 | 12 | |

SURROGATE:

BROMOFLUOROBENZENE (%) 98 193*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

PHILIP ENVIRONMENTAL

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

Borehole # BH-1
Well #
Page 1 of 1

Project Name EPNG PITS
Project Number 14509 Phase 6000 77
Project Location San Juan 29-b Unit #63 72677

Elevation
Borehole Location QA-S3D-T29-R6
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 11/3/95-1342
Date/Time Completed 11/3/95-1500

Well Logged By CM Chance
Personnel On-Site K Padilla, 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 | | | Drilling Conditions & Blow Counts |
|-----------------|------------------|--------------------|--|--|----------------|--|------------------------------|-----|------------|--------------------------------------|
| | | | | | | | BZ | BH | HS | |
| 0 | | | | | | | | | | |
| 5 | | | | | | | | | | |
| 10 | | | | | | | | | | |
| 15 | 1 | 15-17 | 3 | Gry sandy CLAY, vF sand, v. soft, dry, med plastic | | | 0 | 380 | 69 447 | 1351h |
| 20 | 2 | 20-22 | 8 | Gry sandy CLAY, vF sand, v soft, dry Gry SAND, v. loose, vF-F sand, dry | | | 0 | 354 | 508 382 | 1359 |
| 25 | 3 | 25-27 | 4 | Gry clayey SAND, v loose, vF-F sand, dry | | | 0 | 360 | 495 245 | 1404 |
| 30 | 4 | 30-32 | 12 | Br SAND, vF-F sand, v. loose, dry | | | 0 | 358 | 96 121 | 1409 |
| 35 | 5 | 35-37 | 8 | Br SAND, vF-F sand, med dense, dry | | | 2 | 290 | 4 11 | 1415 |
| 40 | | | | TDBJ71 | | | | | | |

Comments:

Drilled on NW side of pit ~ 7' away from fence, due to pit having a tank in it.
Duty is discharging into tank. Pit was dug to 12', so will take 1st sample @ 15'
to ensure below excavation depth. CMC 182 (35-37') sent to lab (BTEX, TPH).
BH grouted to surface

Geologist Signature

CM Chance



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

| | Field ID | Lab ID |
|---------------------------|-------------------|-------------------------|
| SAMPLE NUMBER: | CNC182 | 947739 |
| MTR CODE SITE NAME: | 72677 | San Juan 29-6 Unit #63 |
| SAMPLE DATE TIME (Hrs): | 11-3-95 | 1415 |
| PROJECT: | Phase II Drilling | |
| DATE OF TPH EXT. ANAL: | 11-6-95 | |
| DATE OF BTEX EXT. ANAL: | 11/6/95 | 11/6/95 |
| TYPE DESCRIPTION: | VG | LIGHT 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) | 35.8 | MG/KG | | | 223 | 28 |
| HEADSPACE PID | 11 | PPM | | | | |
| PERCENT SOLIDS | 95.1 | % | | | | |

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

The Surrogate Recovery was at 110% for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By:

Date:

11/8/95

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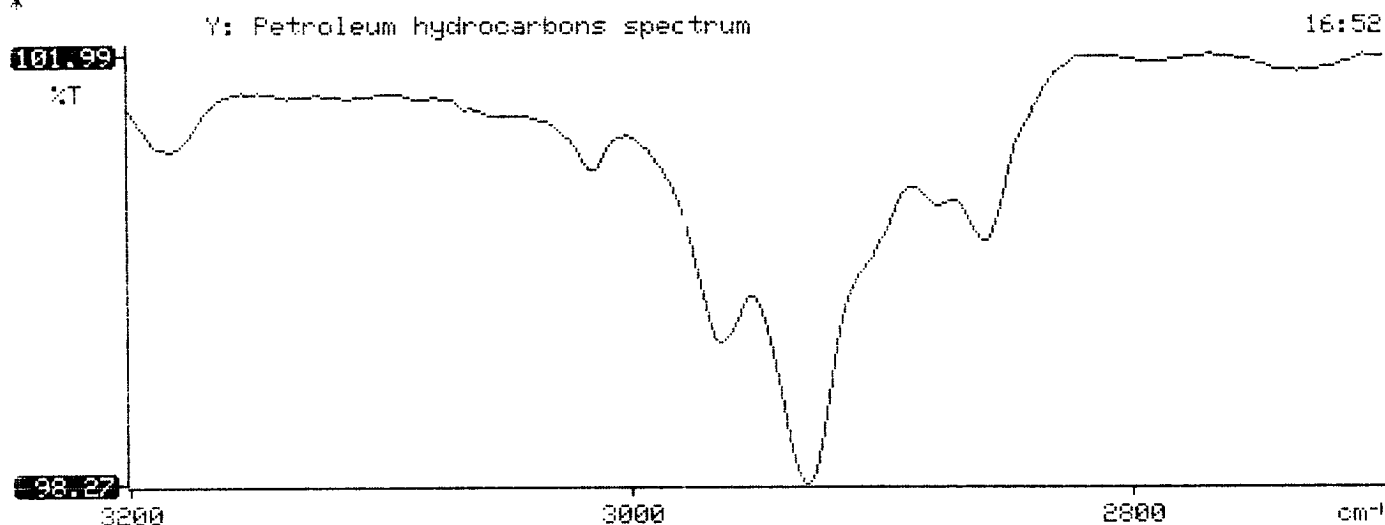
*****
*                               *
*      Test Method for         *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil       *
*                               *
*      Perkin-Elmer Model 1600 FT-IR                   *
*      Analysis Report                                     *
*****

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* 95/11/06 16:52
*
* Sample identification
* 947739
*
* Initial mass of sample, g
* 2.230
*
* Volume of sample after extraction, ml
* 28.000
*
* Petroleum hydrocarbons, ppm
* 35.809
* Net absorbance of hydrocarbons (2930 cm-1)
* 0.015
*
*
*

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BTEX SOIL SAMPLE WORKSHEET

| | | | | | |
|----------------------|---|--------|--------------------------|---|---------|
| File | : | 947739 | Date Printed | : | 11/7/95 |
| Soil Mass (g) | : | 4.94 | Multiplier (L/g) | : | 0.00101 |
| Extraction vol. (mL) | : | 10 | CAL FACTOR (Analytical): | | 200 |
| Shot Volume (uL) | : | 50 | CAL FACTOR (Report): | | 0.20243 |

| | | DILUTION FACTOR: | 1 | Det. Limit |
|---------------------|---|------------------|------------------------|-------------|
| Benzene (ug/L) | : | 0.00 | Benzene (mg/Kg): | 0.000 0.506 |
| Toluene (ug/L) | : | 0.42 | Toluene (mg/Kg): | 0.085 0.506 |
| Ethylbenzene (ug/L) | : | 0.00 | Ethylbenzene (mg/Kg): | 0.000 0.506 |
| p & m-xylene (ug/L) | : | 0.00 | p & m-xylene (mg/Kg): | 0.000 1.012 |
| o-xylene (ug/L) | : | 0.00 | o-xylene (mg/Kg): | 0.000 0.506 |
| | | | Total xylenes (mg/Kg): | 0.000 1.518 |
| | | | Total BTEX (mg/Kg): | 0.085 |

**EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS**

File : C:\LABQUEST\CHROM001\110695-1.008
Method : C:\LABQUEST\METHODS\1-110195.MET
Sample ID : 947739,4.94G,50U
Acquired : Nov 06, 1995 22:03:31
Printed : Nov 06, 1995 22:29:53
User : MARLON

Channel A Results

| COMPONENT | RET TIME | AREA | CONC (ug/L) |
|--------------|----------|----------|-------------|
| BENZENE | 5.573 | 0 | 0.0000 |
| a,a,a TFT | 7.570 | 4897986 | 109.5357 |
| TOLUENE | 9.720 | 140230 | 0.4224 |
| ETHYLBENZENE | 13.790 | 0 | 0.0000 |
| M & P XYLENE | 14.157 | 0 | 0.0000 |
| O XYLENE | 15.290 | 0 | 0.0000 |
| BFB | 16.947 | 66502508 | 109.5386 |

