

Dennis A. Trust
EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE
DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

Approved
SAN JUAN 29-6 UNIT #95
Meter/Line ID - 75647

RECEIVED
JUL 2 1999

SITE DETAILS

Legals - Twn: 29 Rng: 06
NMOCD Hazard Ranking: 10
Operator: PHILLIPS PETROLEUM COMPAN

Sec: 34 Unit: L
Land Type: 4 - Fee

OIL CON. DIV.
DIST. 3

Pit Closure Date: 06/22/94

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:

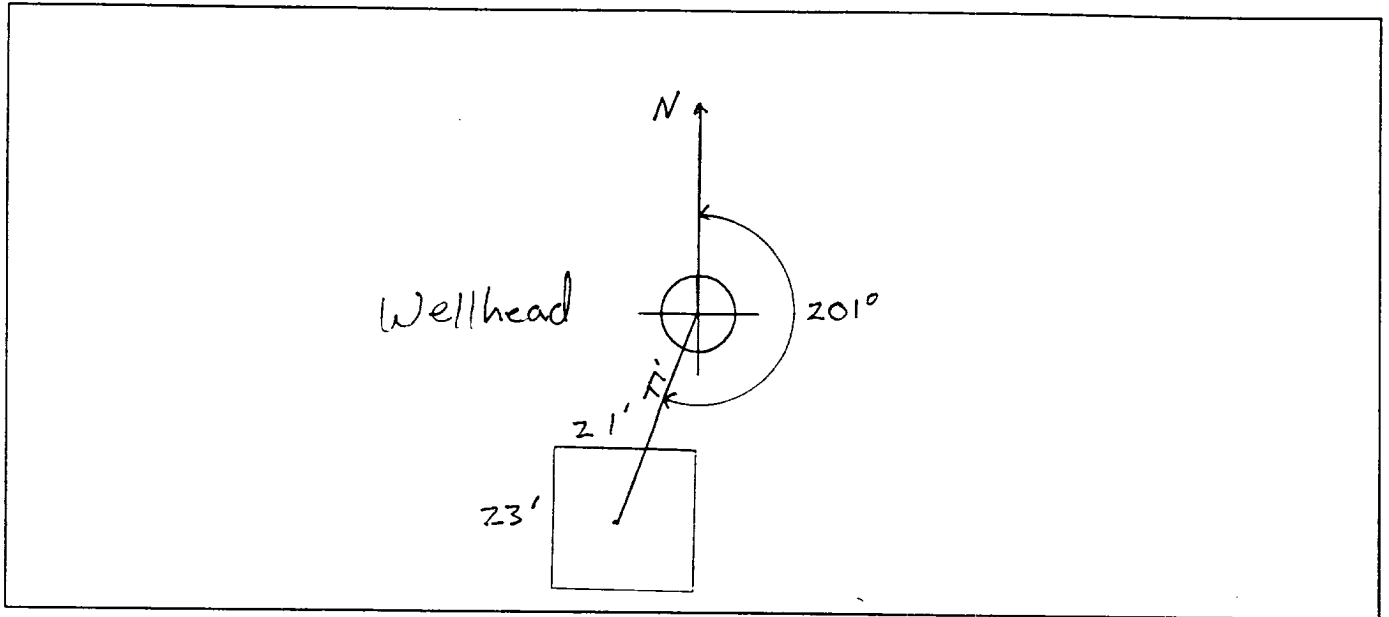
- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All 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>75647</u> Location: <u>San Juan 29-6 unit #95</u> Operator #: <u>7035</u> Operator Name: <u>Phillips</u> P/L District: <u>Bloomfield</u> Coordinates: Letter: <u>6</u> Section <u>34</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>6-4-94</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 type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" 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>Two pits on location. one adjacent to separator with a test pit dug in it. The dehy pit is dry. location is on south side of Fourmile Canyon. Redline & Topo confirm location is inside V.Z.</u></p> <p style="text-align: right;"><u>DIG & HAVE</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 201 Footage from Wellhead 77
 b) Length : 23 Width : 21 -Depth : 5



REMARKS :

Photos - ~1140
Dump truck - bob tail?

Completed By:

Ken Walter
 Ken Walter Signature

6-4-94
 Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>75647</u> Location: <u>San Juan 29-6 unit #95</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>34</u> Township: <u>24</u> Range: <u>6</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6-22-94</u> Area: <u>10</u> Run: <u>91</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD 113</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>764 ppm</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-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>120</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>6-22-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Pit was highly Contaminated, Excavated pit to 12', took PID Sample, closed pit.</u></p>
<p>Signature of Specialist: <u>Romy Deane</u></p>	



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

Field ID		Lab ID
SAMPLE NUMBER:	KD 6-23-94 6-22 KD 113	945490
MTR CODE SITE NAME:	75647	N/A
SAMPLE DATE TIME (Hrs):	6-22-94	1320
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	6/23/94	6/23/94
DATE OF BTEX EXT. ANAL.:	6/24/94	6/28/94
TYPE DESCRIPTION:	VC	gray sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.12	MG/KG	5			
TOLUENE	<0.12	MG/KG	5			
ETHYL BENZENE	1.1	MG/KG	5			
TOTAL XYLENES	13	MG/KG	5			
TOTAL BTEX	14	MG/KG				
TPH (418.1)	2050	MG/KG			2.02	28
HEADSPACE PID	264	PPM				
PERCENT SOLIDS	82.6	%				

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

The Surrogate Recovery was at 145 % 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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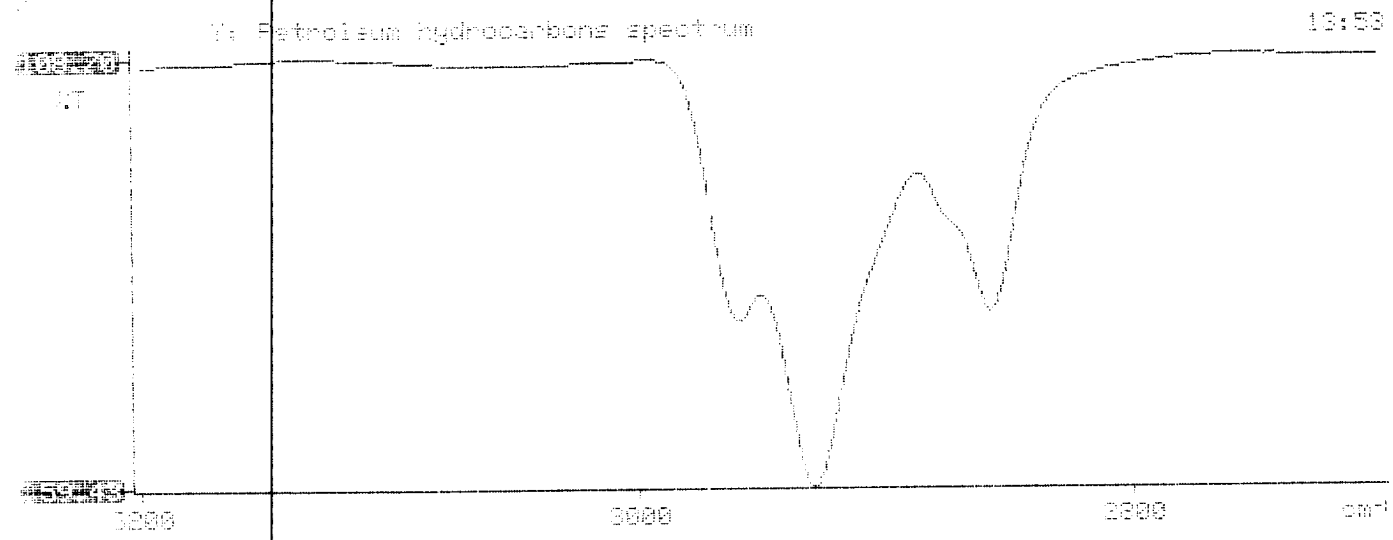
*****
Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil
*****
Perkin-Elmer Model 1600 FT-IR
Analysis Report
*****

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14/06/93 13:53
Sample Identification
#5496
Initial mass of sample, g
1.010
Volume of sample after extraction, ml
35.000
Petroleum hydrocarbons, ppm
2648.605
Net absorbance of hydrocarbons (2930 cm-1)
0.260

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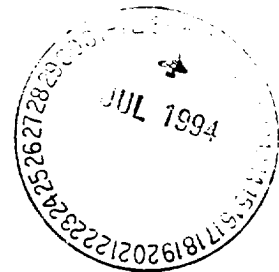
Analytical **Technologies, Inc.**

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

ATI I.D. **406402**

July 1, 1994

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



Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/24/94**, 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.: 406402
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945477	NON-AQ	06/20/94	06/24/94	06/29/94	5
02	945478	NON-AQ	06/20/94	06/24/94	06/28/94	1
03	945496	NON-AQ	06/22/94	06/24/94	06/28/94	5
PARAMETER			UNITS	01	02	03
BENZENE			MG/KG	<0.12	<0.025	<0.12
TOLUENE			MG/KG	11	<0.025	<0.12
ETHYLBENZENE			MG/KG	1.5	<0.025	1.1
TOTAL XYLENES			MG/KG	3.7	0.035	13
SURROGATE:						
BROMOFLUOROBENZENE (%)				95	102	145*

*Outside ATI Quality Control Limits Due to Matrix Interference.

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Philip Environmental Services Corp.

4000 Monroe Road

Farmington, New Mexico 87401

(505) 326-2262 FAX (505) 326-2388

Borehole #

BH-1

Well #

Page

of 1

Project Name

EPNG Pits

Project Number

14509

Phase

601-6000

Project Location

San Juan 29-6, #95, 75647

Elevation

Borehole Location

T29, R6, S34, L

GWL Depth

Logged By

S. Kelly

Drilled By

F. Rivera

Date/Time Started

3/10/95, 1025

Date/Time Completed

3/10/95, 1140

Well Logged By

S. Kelly

Personnel On-Site

F. Rivera, M. Donohue, J. O'Keefe

Contractors On-Site

Client Personnel On-Site

Drilling Method

4 1/4" ID HSA

Air Monitoring Method

CGI, PID

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: NDU BZ BH			Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15										
20	18-20	18-20	.4'	SAND, light tan, fine sand, very dense, dry.						110Z drills like rock
25				TOB-20.0'						
30										
35										
40										

Comments:

18'-20' sample (SEK 60) sent to lab (BTEX & TPH). Sample was bagged and iced prior to being put in jar. Barely enough material to collect sample, chunks of sandstone in sample. BH grouted to surface.

Geologist Signature

S. Kelly

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:	SEK 60	947204
MTR CODE SITE NAME:	75647	San Juan 29-6, #95
SAMPLE DATE TIME (Hrs):	08-10-95	11:02
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL.:	8/11/95	8/11/95
DATE OF BTEX EXT. ANAL.:	8/18/95	8/18/95
TYPE DESCRIPTION:	VG	Cylind brown sand & clay

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.025	MG/KG	1			
TOLUENE	40.025	MG/KG	1			
ETHYL BENZENE	40.025	MG/KG	1			
TOTAL XYLENES	40.025	MG/KG	1			
TOTAL BTEX	40.10	MG/KG				
TPH (418.1)	67.1	MG/KG			2.10	28
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	95.7	%				

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

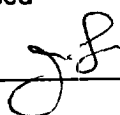
The Surrogate Recovery was at 95 for this sample All QA/QC was acceptable.

Narrative:

AT 1 Results attached.

DF = Dilution Factor Used

Approved By:



Date:

8/28/95

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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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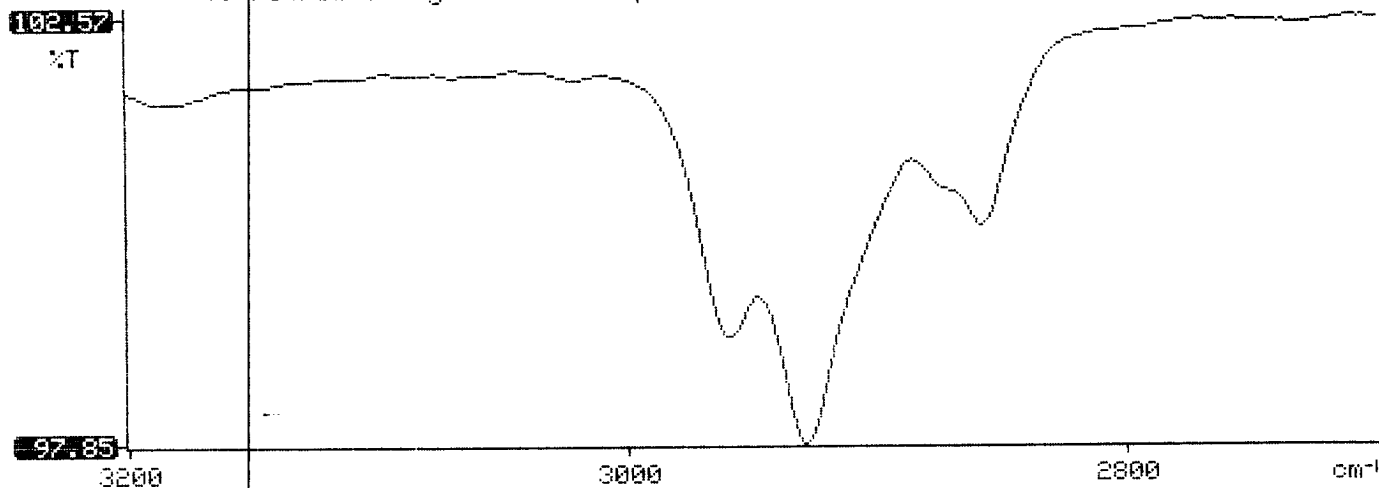
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*      95/08/11  13:48
*
*      Sample identification
*      947204
*
*      Initial mass of sample, g
*      2.100
*
*      Volume of sample after extraction, ml
*      28.000
*
*      Petroleum hydrocarbons, ppm
*      67.120
*      Net absorbance of hydrocarbons (2930 cm-1)
*      0.019
*
*
*

```

Y: Petroleum hydrocarbons spectrum

13:48





Analytical **Technologies, Inc.**

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

ATI I.D. 508390

August 23, 1995

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

Project Name/Number: PIT CLOSURE/PHASE II & III 24324

Attention: John Lambdin

On 08/16/95, 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

MR:jt

Enclosure

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager





Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO ATI I.D.: 508390
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE/PHASE II & III

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	947204	NON-AQ	08/10/95	08/18/95	08/18/95	1
08	947205	NON-AQ	08/10/95	08/18/95	08/18/95	1
09	947206	NON-AQ	08/10/95	08/18/95	08/18/95	1

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	<0.025	<0.025	<0.025
ETHYLBENZENE	MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES	MG/KG	<0.025	<0.025	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%)	95	93	88
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