DEC 2 1 1998

Approved

SAN JUAN 29-6 #65A
Meter/Line ID - 89572

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

SITE DETAILS

Legals - Twn: 29 **Rng:** 06 **Sec:** 19 **Unit:** J
NMOCD Hazard Ranking: 40 **Land Type:** 4 - Fee
Operator: PHILLIPS PETROLEUM COMPAN **Pit Closure Date:** 07/28/95

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: 89572 Location: San Juan 29-6 #65 A
Operator #: _____ Operator Name: Phillips P/L District: Bloomfield
Coordinates: Letter: J Section 19 Township: 29 Range: 06
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 3/7/95 Area: 10 Run: 91

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 Gobernador Wash
(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**

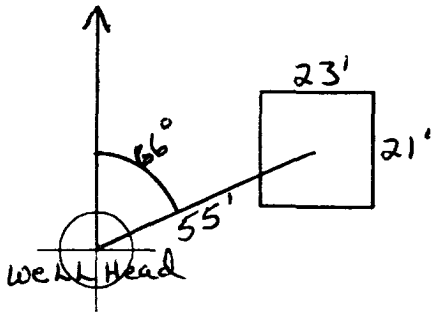
REMARK

Remarks : Redline shows Inside Topo shows Inside VZ
2 pits on loc. Tank pit is lined EPNG owns Dehy pit
Will close Dehy pit
Dig & Haul

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 66° Footage from Wellhead 55'

b) Length : 23' Width : 21' Depth : 4'



Remarks :

Photos : 1240

Completed By:

James L Powers

Signature

3/7/95

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 89572 Location: SAN JUAN 29-6 #65A

Coordinates: Letter: I Section 19 Township: 29 Range: 06

Or Latitude _____ Longitude _____

Date Started : 7-28-95 Run: 10 91

FIELD OBSERVATIONS

Sample Number(s): MK455 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 217 PPM PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 170

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☐ ☒ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 7-28-95 Pit Closed By: Philip

REMARKS

Remarks : Arrived Avg sample Hole soil was Black with strong HYDROCARBON odor TURN Brown last 1' still Had strong HYDROCARBON odor

Signature of Specialist: Morgan Killion

(SP3191) 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:	MK 455	947101
MTR CODE | SITE NAME:	89572	N/A
SAMPLE DATE | TIME (Hrs):	07-28-95	14:50
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-31-95	7-31-95
DATE OF BTEX EXT. | ANAL.:	8-2-95	8-3-95
TYPE | DESCRIPTION:	VC	Dark Brown Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.71	MG/KG	10			
TOLUENE	13	MG/KG	10			
ETHYL BENZENE	0.31	MG/KG	10			
TOTAL XYLENES	63	MG/KG	10			
TOTAL BTEX	77.02	MG/KG				
TPH (418.1)	846	MG/KG			2.03	28
HEADSPACE PID	217	PPM				
PERCENT SOLIDS	83.3	%				

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

The Surrogate Recovery was at 123 % for this sample All QA/QC was acceptable.

Narrative:

ATI Results attached. Surrogate recovery outside ATI QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By: _____ Date: 8/24/95

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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                      *
**********************************************************
*
 95/07/31  15:21
*
*  Sample identification
 947101
*
*  Initial mass of sample, g
 2.030
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 845.764
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.114
*
*
*
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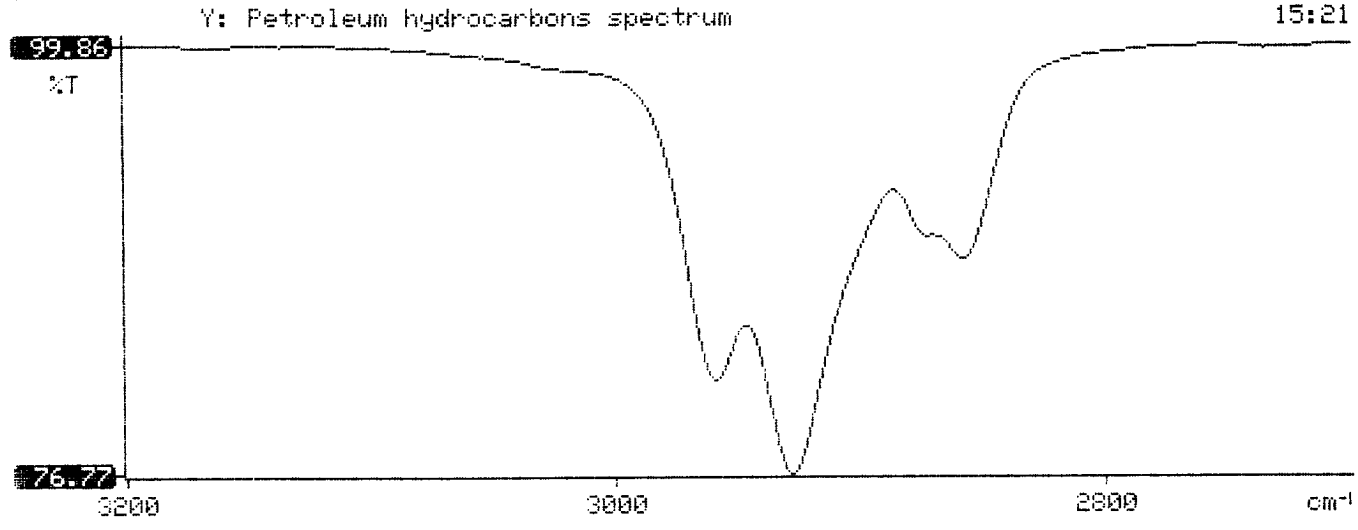


Analytical Technologies, Inc.

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

ATI I.D. **508310**

August 7, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I & PHASE II DRILLING
24324

Attention: John Lambdin

On **08/02/95**, 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.

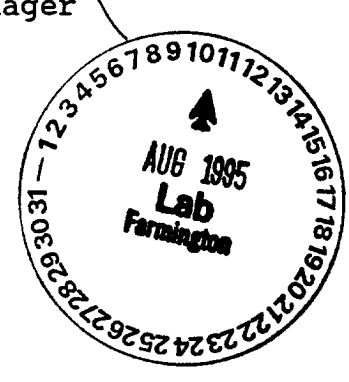
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

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.: 508310

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	947101	NON-AQ	07/28/95	08/02/95	08/03/95	10
02	947104	NON-AQ	07/28/95	08/02/95	08/02/95	1
03	947105	NON-AQ	07/28/95	08/02/95	08/03/95	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	0.71	<0.025	<0.025
TOLUENE	MG/KG	13	<0.025	<0.025
ETHYLBENZENE	MG/KG	0.31	<0.025	<0.025
TOTAL XYLENES	MG/KG	63	<0.025	0.13
SURROGATE:				
BROMOFLUOROBENZENE (%)		123*	104	98

*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 29-6 Unit No 65A 89572

Elevation
Borehole Location QJ - S19 - T29 - R6
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 11/3/95 - 1240
Date/Time Completed 11/3/95 - 1330

Well Logged By CM Chance
Personnel On-Site K Padilla, D. Charley
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	4	Br CLAY, stiff, med plastic, dry			0	4	8/18	1247h
				TDB171						
40										

Comments: CMC179(15-17'), CMC180(Dup of 179) + CMC181(Field Blank) sent to lab (BTEX, TPH). Insufficient volume for "no headspace sample". BH grouted to surface

Geologist Signature Cory 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:	CMC179	947736
MTR CODE | SITE NAME:	89572	San Juan 29-6 Unit No. 65A
SAMPLE DATE | TIME (Hrs):	11-3-95	1247
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	11-6-95	11/6/95
DATE OF BTEX EXT. | ANAL.:	11/6/95	
TYPE | DESCRIPTION:	VG	DARK BROWN CLAY

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	DF	QUALIFIERS Q
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	PPM		
HEADSPACE PID	18	%		
PERCENT SOLIDS	87.5			

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

The Surrogate Recovery was at 112% for this sample All QA/QC

Narrative:

Date:

DF = Dilution Factor Used

Reviewed By:

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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                       *
**********************************************************
*
 95/11/06  15:21
*
*  Sample identification
 947736
*
*  Initial mass of sample, g
 2.010
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 -55.720
*  Net absortance of hydrocarbons (2930 cm-1)
 0.004
*
*
*
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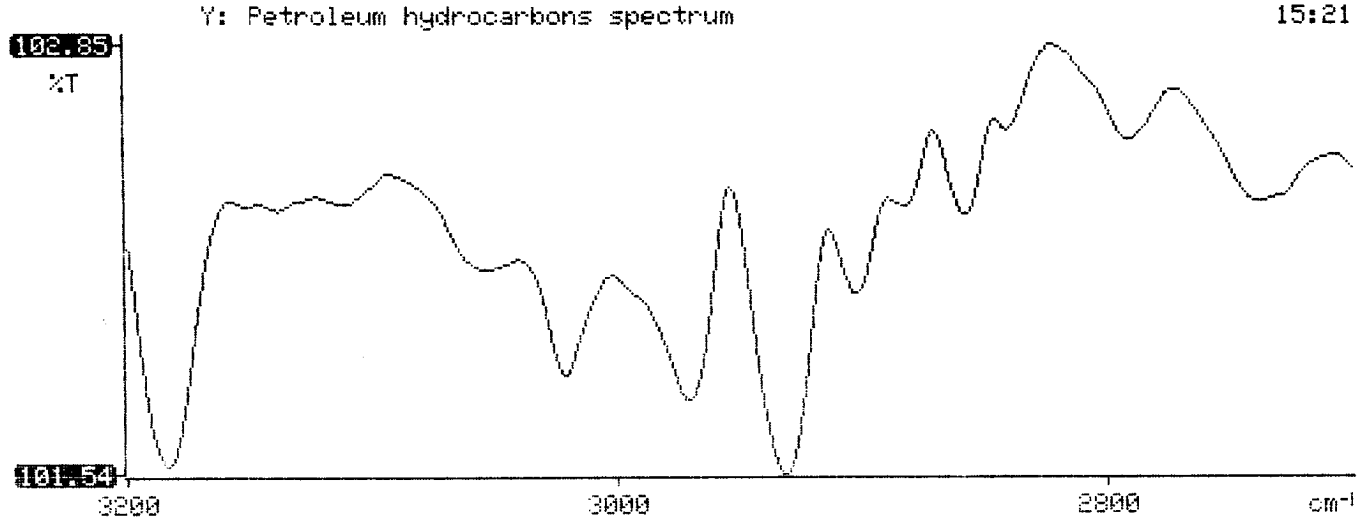

BTEX SOIL SAMPLE WORKSHEET

File :	947736	**Date Printed** :	11/7/95
Soil Mass (g) :	5.03	**Multiplier (L/g)** :	0.00099
Extraction vol. (mL) :	10	**CAL FACTOR (Analytical):**	200
Shot Volume (uL) :	50	**CAL FACTOR (Report):**	0.19881

		DILUTION FACTOR:	**1**	**Det. Limit**
Benzene (ug/L) :	0.00	**Benzene (mg/Kg):**	**0.000**	0.497
Toluene (ug/L) :	1.07	**Toluene (mg/Kg):**	**0.213**	0.497
Ethylbenzene (ug/L) :	0.27	**Ethylbenzene (mg/Kg):**	**0.054**	0.497
p & m-xylene (ug/L) :	5.41	p & m-xylene (mg/Kg):	1.076	0.994
o-xylene (ug/L) :	1.23	o-xylene (mg/Kg):	0.245	0.497
		Total xylenes (mg/Kg):	**1.320**	1.491
		Total BTEX (mg/Kg):	**1.586**	

O NATURAL GAS
ETHOD 8020 - BTEX SOILS

: C:\LABQUEST\CHROM001\110695-1.004
: C:\LABQUEST\METHODS\1-110195.MET
D : 947736,5.03G,50U
: Nov 06, 1995 19:23:25
: Nov 06, 1995 19:49:50
: MARLON

A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	5.573	0	0.0000
a,a,a TFT	7.553	4973659	111.2280
TOLUENE	9.700	356837	1.0748
ETHYLBENZENE	13.833	78372	0.2744
M & P XYLENE	14.210	1880788	5.4053
O XYLENE	15.347	339322	1.2314
BFB	16.930	67854040	111.7647