Bernie Gallegos
DEPUTY OIL & GAS INSPECTOR

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEC 21 1998

RECEIVED
JUL 2 1999
OIL CON. DIV.

SAN JUAN 29-5 #88
Meter/Line ID - 90450

SITE DETAILS

Legals - Twn: 29 **Rng:** 05 **Sec:** 34 **Unit:** G
NMOCD Hazard Ranking: 30 **Land Type:** 4 - Fee
Operator: PHILLIPS PETROLEUM COMPAN **Pit Closure Date:** 06/30/94

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: 90450 Location: San Juan 29-5 #88
Operator #: 7035 Operator Name: Phillips P/L District: Bloomfield
Coordinates: Letter: ~~K~~ 6-2-94 KGNJ G Section 34 Township: 29N Range: 5W
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6-2-94 Area: 10 Run: 71

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 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: 30 **POINTS**

REMARKS

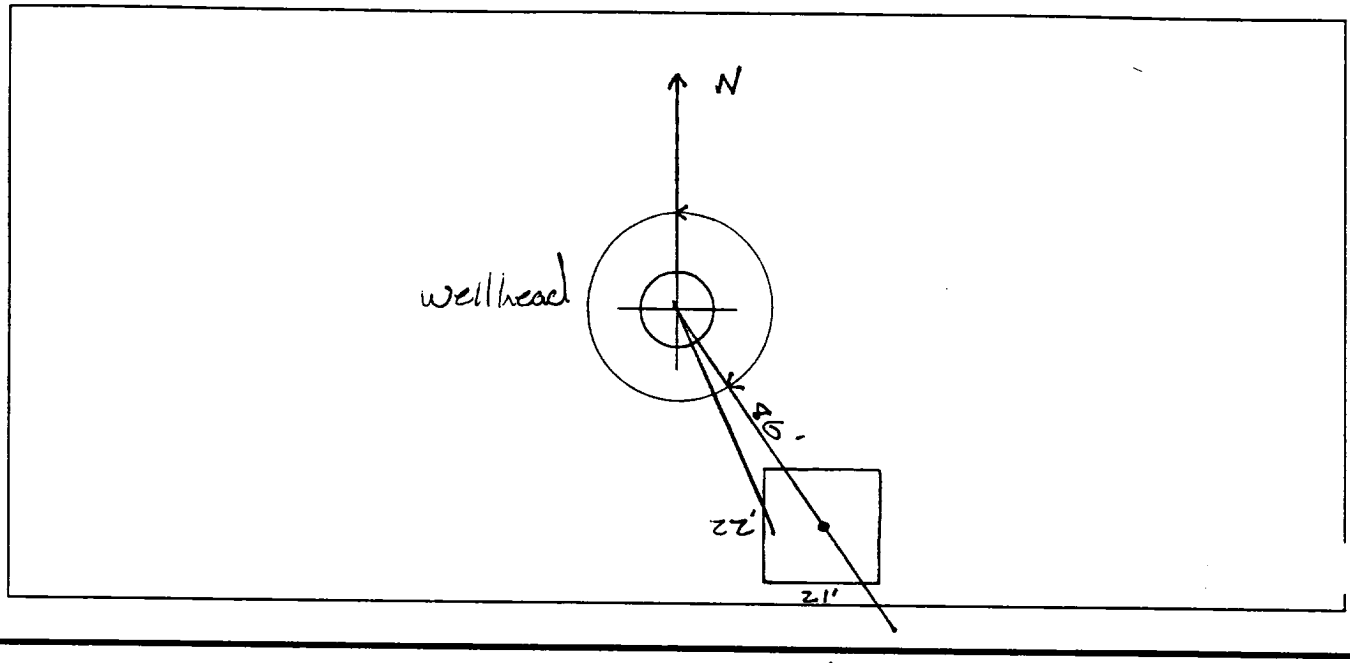
Remarks : Location at head of tributary to Gobernador Canyon
Topo and Redline verify location inside VZ

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 156 Footage from Wellhead 86

b) Length : 22 Width : 21 Depth : 3



REMARKS

Remarks :

Photos - 1236 hrs

End-Dump

Completed By:

Signature

6-2-94

Date

PHASE I EXCAVATION

FIEL PIT REMEDIATION/CLOSUF FORM

GENERAL

Meter: 90450 Location: San Juan 29-5 #88

Coordinates: Letter: G Section 34 Township: 29N Range: 5W

Or Latitude _____ Longitude _____

Date Started : 6-30-94 Area: 10 Run: 71

FIELD OBSERVATIONS

Sample Number(s): KD 124 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 113 ppm PID Reading Depth 12' Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ (1) Approx. Cubic Yards 110

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☐ (3)

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: _____ Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', took PID Sample, Closed pit.

Signature of Specialist: Kenny Deaver

(SP3191) 04/07/9

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 124	945562
MTR CODE | SITE NAME:	90450	N/A
SAMPLE DATE | TIME (Hrs):	6-30-94	1630
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7/7/94	7/7/94
DATE OF BTEX EXT. | ANAL.:	7/8/94	7/10/94
TYPE | DESCRIPTION:	VC	Grey Sand/Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	< 0.055	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	0.49	MG/KG	1			
TOTAL BTEX	0.60	MG/KG				
TPH (418.1)	211	MG/KG			2.01	28
HEADSPACE PID	113	PPM				
PERCENT SOLIDS	87.2	%				

– 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 was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

8/8/94

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

94/07/07 13:40

Sample Identification
945562

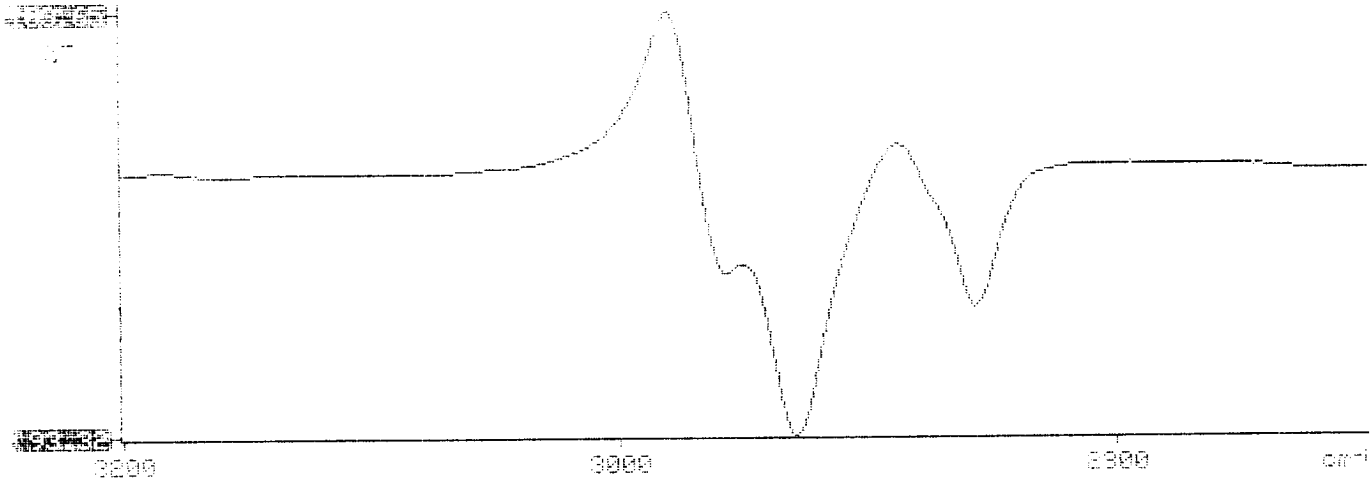
Initial mass of sample, g
2.010

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
711.441

Net absorbance of hydrocarbons (2930 cm-1)
1.025

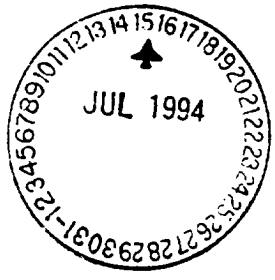
Y: Petroleum hydrocarbons spectrum 13:40



Analytical **Technologies,** Inc.

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

ATI I.D. **407327**



July 14, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/08/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **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.

Due to background interference in the sample the MS/MSD values were evaluted just outside ATI Quality Control (QC) limits.

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.: 407327
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945561	NON-AQ	06/30/94	07/08/94	07/11/94	50
02	945562	NON-AQ	06/30/94	07/08/94	07/10/94	1
03	945563	NON-AQ	06/30/94	07/08/94	07/10/94	20

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	4.5	<0.025	2.4
TOLUENE	MG/KG	200	0.055	180
ETHYLBENZENE	MG/KG	30	<0.025	19
TOTAL XYLENES	MG/KG	320	0.49	270
SURROGATE:				
BROMOFLUOROBENZENE (%)		180*	112	218*

*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 Services Corp.
4000 Monroe Road
Farmington, New Mexico 87401
(606) 326-2262 FAX (606) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase ~~001~~ 6000
Project Location San Juan 29-5, #88, 9045

Elevation
Borehole Location T29N, R5W, S.34, G
GWL Depth
Logged By S.Kelly
Drilled By E. Rivera
Date/Time Started 8/10/95, 0845
Date/Time Completed 8/10/95, 0950

Well Logged By S.Kelly
Personnel On-Site M. Donohue, F. Rivera, J. O'Kei
Contractors On-Site
Client Personnel On-Site

Drilling Method 4¼" 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 5/16 BZ	BH	S	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15										
20	1	18-20	.3'/2.0'	SILT, tan, very dense, dry					0	0920 Not enough sample to take headspace. Collected sample for lab. Drills like rock.
				TOB - 20.0'						
25										
30										
35										
40										

Comments: 18'-20' sample (SEK59) sent to lab (BTEX & TPH.) BH grouted to surface.

Geologist Signature Sarah 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 59	947203
MTR CODE | SITE NAME:	90450	San Juan 29-5, #88
SAMPLE DATE | TIME (Hrs):	08-10-95	09:20
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/14/95	8/14/95
DATE OF BTEX EXT. | ANAL.:	8/18/95	8/18/95
TYPE | DESCRIPTION:	VG	light grey sand & clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	~~40.9~~ RLB 8/14/95 41.0	MG/KG			2.11	28
HEADSPACE PID	n/a	PPM				
PERCENT SOLIDS	96.4	%				

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

The Surrogate Recovery was at 101 for this sample All QA/QC was acceptable.

Narrative: AT | Results attached.

DF = Dilution Factor Used

Approved By: J. L. 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                     *
**********************************************************
*
 95/08/11  13:46
*
*  Sample identification
 947203
*
*  Initial mass of sample, g
 2.110
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 40.981
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.016
*
*
*
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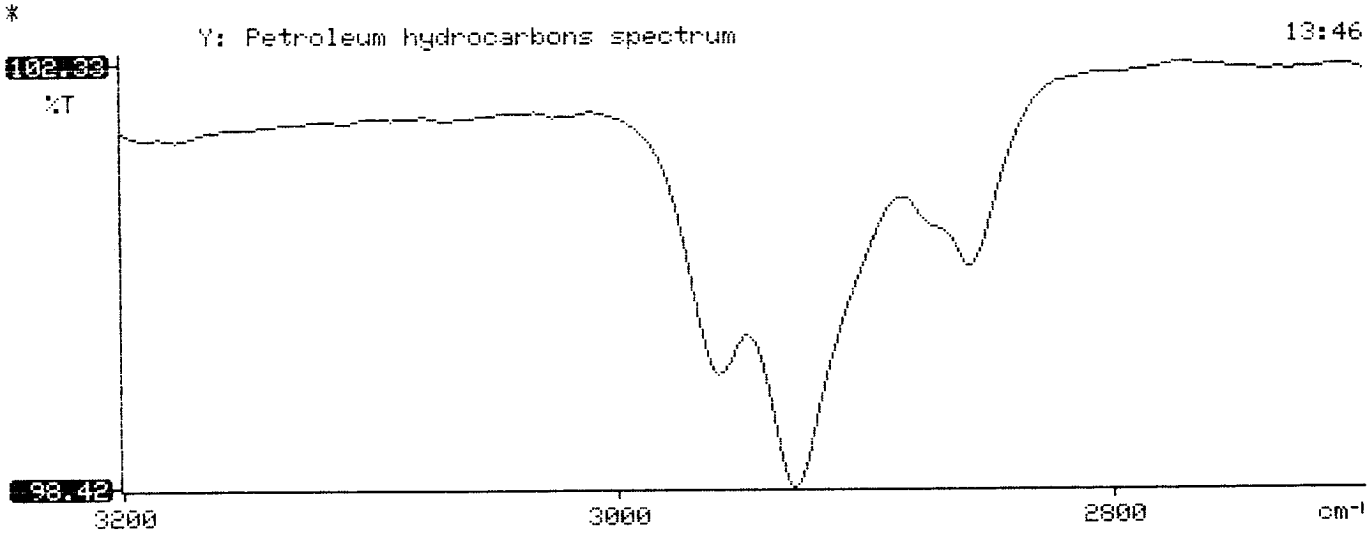

Analytical **Technologies,** Inc.

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

ATI I.D. **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

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.: 508390

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE II & III

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	947201	NON-AQ	08/09/95	08/18/95	08/22/95	1
05	947202	NON-AQ	08/09/95	08/18/95	08/18/95	1
06	947203	NON-AQ	08/10/95	08/18/95	08/18/95	1

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	0.043	<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 (%)		109	88	101