

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE
DEPUTY OIL CONSERVATION DIVISION

DEC 21 1998

D.J. SIMMONS E #2A
Meter/Line ID - 89924

RECEIVED
JUL 2 1998

OIL CON. DIV.
DIST. 3

Legals - Twn: 29 Rng: 09
NMOCD Hazard Ranking: 30
Operator: D J SIMMONS, ET AL

SITE DETAILS

Sec: 23 Unit: E
Land Type: 2 - Federal
Pit Closure Date: 02/13/95

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.

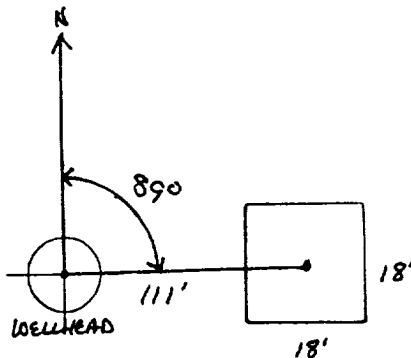
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>89924</u> Location: <u>D.J. SIMMONS E #2A</u> Operator #: _____ Operator Name: <u>D.J. SIMMONS</u> P/L District: <u>BLANCO</u> Coordinates: Letter: <u>E</u> Section <u>23</u> Township: <u>29</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>1-27-95</u> Area: <u>13</u> Run: <u>22</u>	
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)	
	Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____	
	Depth to Groundwater Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)	
	Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)	
	Name of Surface Water Body <u>MEDINA CANYON</u> (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'	
	TOTAL HAZARD RANKING SCORE: <u>30</u> POINTS	
REMARKS	Remarks : <u>REDLINE & TOPO SHOW LOCATION INSIDE U.Z. TWO PITS ON LOCATION. DENY PIT BELONGS TO EPNG. WILL CLOSE PIT. MUST CONTACT OPERATOR TO HAVE THEM ON SITE BEFORE CLOSURE OF THIS PIT!!</u> <u>DIG & HAUL</u>	

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 89° Footage from Wellhead 111'
b) Length : 18' Width : 18' Depth : 3'



REMARKS

Remarks :

PHOTOS - 0909

Completed By:

Signature

1-27-95

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>89924</u> Location: <u>D.J. Simmons E #2A</u></p> <p>Coordinates: Letter: <u>E</u> Section <u>23</u> Township: <u>29</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>2-13-95</u> Run: <u>13</u> <u>22</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>422</u></p> <p>Sample Depth: <u>8'</u> Feet</p> <p>Final PID Reading <u>342</u> PID Reading Depth <u>8'</u> Feet</p> <p>Groundwater Encountered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> Approx. Cubic Yards <u>40</u></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> <input checked="" type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>2-13-95</u> Pit Closed By: <u>B.E.I</u></p>
REMARKS	<p>Remarks : <u>same line markers started Remediating to 12'</u> <u>Hit sand stone At 8' sampled closed pit</u></p>
	<p>Signature of Specialist: <u>Lilly Pachols</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 422	946680
MTR CODE SITE NAME:	89924	N/A
SAMPLE DATE TIME (Hrs):	2-13-95	1010
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	2/17/95	2/17/95
DATE OF BTEX EXT. ANAL.:	2/21/95	2/22/95
TYPE DESCRIPTION:	VC	Gray clay

REMARKS: ~~BTEX~~ / TPH done at ATI

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 1.3	MG/KG	50			
TOLUENE	13	MG/KG	50			
ETHYL BENZENE	74	MG/KG	50			
TOTAL XYLENES	2.8	MG/KG	50			
TOTAL BTEX	91.1	MG/KG				
TPH (418.1)	3900	MG/KG				
HEADSPACE PID	342	PPM				
PERCENT SOLIDS	85.4	%				

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

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

* Surrogate Recovery not obtainable due to sample dilution
ATI Results attached

DF = Dilution Factor Used

Approved By:

Date:

3-20-95



Analytical **Technologies**, Inc.

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



ATI I.D. 502381

February 23, 1995

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 02/17/95, 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.

EPA Method 8020 analyses were added on February 21, 1995 for samples 946659, 946660, 946661, 946662, 946663, 946664, 946666, 946667, 946668, 946669, 946680, 946682 per John Lambdin.

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

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 502381
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
12	946669	NON-AQ	02/10/95	02/21/95	02/22/95	1
23	946680	NON-AQ	02/13/95	02/21/95	02/22/95	50
25	946682	NON-AQ	02/13/95	02/21/95	02/22/95	1
PARAMETER			UNITS	12	23	25
BENZENE			MG/KG	<0.025	<1.3	<0.025
TOLUENE			MG/KG	<0.025	13	<0.025
ETHYLBENZENE			MG/KG	<0.025	74	<0.025
TOTAL XYLENES			MG/KG	<0.025	2.8	<0.025

SURROGATE:

TRIFLUOROTOLUENE (%)	97	NA*	92
----------------------	----	-----	----

*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION



Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 502381
PROJECT #	: 24324	DATE RECEIVED	: 02/17/95
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 02/17/95

PARAMETER	UNITS	21	22	23	24
PETROLEUM HYDROCARBONS, IR	MG/KG	400	42	3900	29000

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

D.J. Simmons E #2A 89934

Elevation

Borehole Location QE-S23-T29-R9

GWL Depth

Logged By CM CHANCE

Drilled By K Padilla

Date/Time Started 8/21/95 - 0820

Date/Time Completed 8/21/95 - 0910

Well Logged By

CM Chance

Personnel On-Site

K Padilla, F. Rivera, 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				Backfill + 08'						
5										
10	1	10-12	8"	DK GRY CLAY, very stiff, low plastic dry			0	5	62 58	0830
15	2	15-17	8"	DK GRY silty CLAY, + r v sand, very stiff, non plastic, dry			3	68	10 1	0833
20				TDB171						
25										
30										
35										
40										

Comments:

CM (83(15-17)) sent to lab (BTEX, TPH). Sample bagged & iced prior to containerization. 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:	CMC 83	947291
MTR CODE SITE NAME:	89924	D.J. Simmons E #2A
SAMPLE DATE TIME (Hrs):	08/22/95	08:38
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL.:	8/22/95	8-22-95
DATE OF BTEX EXT. ANAL.:	8/23/95	8/23/95
TYPE DESCRIPTION:	VG	Environ Sand & Clay

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< .5	MG/KG				
TOLUENE	< .5	MG/KG				
ETHYL BENZENE	< .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	1	PPM				
PERCENT SOLIDS	84.5	%				

-- 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 was acceptable.
Narrative:

DF = Dilution Factor Used

Date:

8/28/95

```

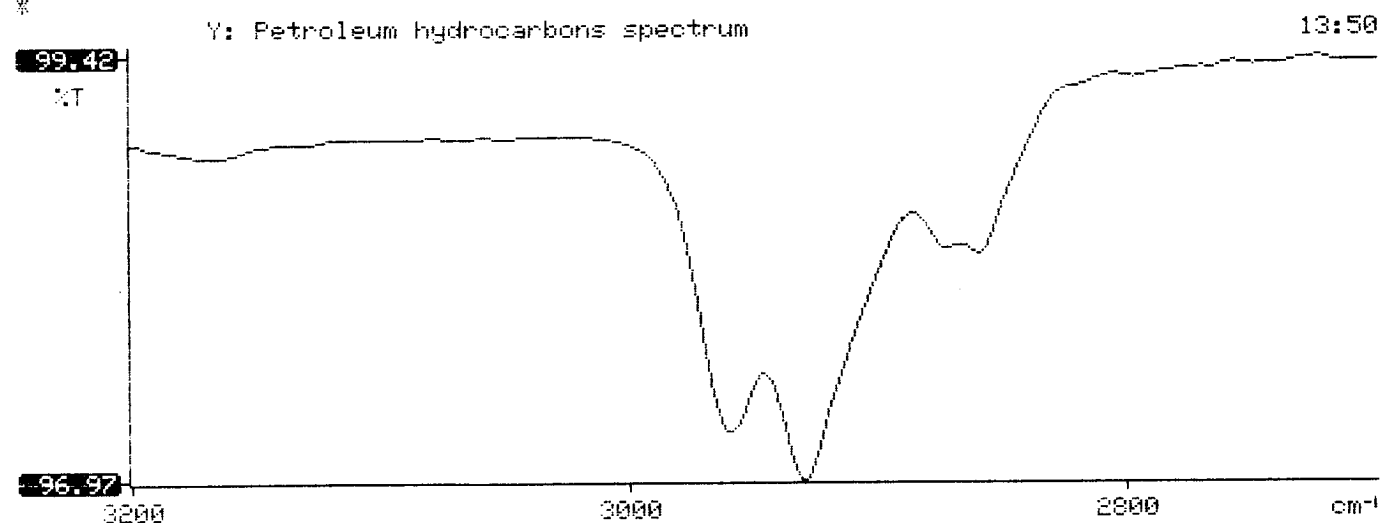
*****
*                               *
*      Test Method for          *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil       *
*                               *
*      Perkin-Elmer Model 1600 FT-IR                    *
*      Analysis Report      *
*****

```

```

* 95/08/22 13:50
*
* Sample identification
* 947291
*
* Initial mass of sample, g
* 2.000
*
* Volume of sample after extraction, ml
* 28.000
*
* Petroleum hydrocarbons, ppm
* -4.480
* Net absorbance of hydrocarbons (2930 cm-1)
* 0.010
*
*
*

```



BTEX SOIL SAMPLE WORKSHEET

File	:	947291	Date Printed	:	8/25/95
Soil Mass (g)	:	4.94	Multiplier (L/g)	:	0.00101
Extraction vol. (mL)	:	20	DF (Analytical)	:	200
Shot Volume (uL)	:	100	DF (Report)	:	0.20243

Det. Limit

Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000	0.506
Toluene (ug/L)	:	0.00	Toluene (mg/Kg):	0.000	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):	0.000	

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082395-1.028
 Method : C:\LABQUEST\METHODS\9001.MET
 Sample ID : 947291,4.94G,100U
 Acquired : Aug 24, 1995 10:06:40
 Printed : Aug 25, 1995 15:36:14
 User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.420	0	0.0000
a,a,a TFT	4.930	5164582	99.3004
TOLUENE	6.760	103453	-0.4611
ETHYLBENZENE	10.520	0	0.0000
M & P XYLENE	10.863	77136	-4.9493
O XYLENE	11.873	0	0.0000
BFB	13.400	80751392	112.1022

C:\LABQUEST\CHROM001\082395-1.028 -- Channel A

