

**EL PASO FIELD SERVICES**  
**PRODUCTION PIT CLOSURE**

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

DJ SIMMONS ET AL #1  
Meter/Line ID - 75507

RECEIVED  
JUL 2 1999

SITE DETAILS

Legals - Twn: 29 Rng: 09  
NMOCD Hazard Ranking: 30  
Operator: DJ SIMMONS.ET AL

Sec: 26 Unit: O  
Land Type: 2 - Federal  
Pit Closure Date: 05/24/94

OIL CON. DIV  
DIST. 5

**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

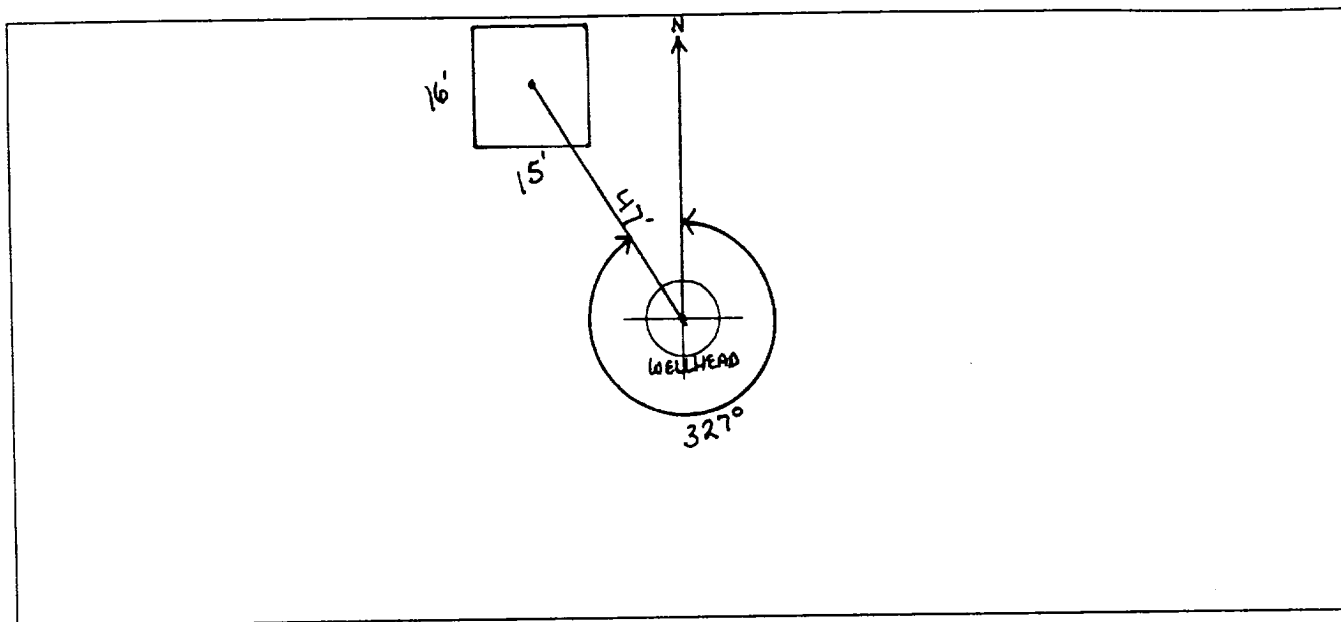
GENERAL	Meter: <u>75507</u> Location: <u>DJ SIMMONS ET AL #1</u> Operator #: <u>8043</u> Operator Name: <u>DJ SIMMONS</u> P/L District: <u>BLANCO</u> Coordinates: Letter: <u>0</u> Section <u>26</u> Township: <u>29</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>5.13.94</u> Area: <u>13</u> Run: <u>22</u>								
SITE ASSESSMENT	<b>NMOCD Zone:</b> (From NMOCD Maps)								
	<b>Land Type:</b> <table border="0"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table>		BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian	_____								
	<b>Depth to Groundwater</b> 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)								
	<b>Wellhead Protection Area :</b> 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)								
	<b>Horizontal Distance to Surface Water Body</b> 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>CAÑON LARGO</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'								
	<b>TOTAL HAZARD RANKING SCORE:</b> <u>30</u> POINTS								
REMARKS	Remarks : <u>TWO PITS ON LOCATION WILL CLOSE ONLY ONE. PIT IS DRY.</u> <u>LOCATION IS IN A LITTLE CANYON JUST NORTH OF LARGO WASH. REDLINE</u> <u>AND TOPD CONFIRMED LOCATION IS INSIDE V.Z.</u>								

DIG & HUNT

## ORIGINAL PIT LOCATION

## ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 327° Footage from Wellhead 47'  
b) Length : 16' Width : 15' Depth : 3'



## REMARKS

Remarks :

TOOK PICTURES AT 2:40 P.M.

END DUMP

Completed By:

Robert Thompson

Signature

5.13.94

Date

# **PHASE I EXCAVATION**

## FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	FIELD OBSERVATIONS	CLOSURE	REMARKS
Meter: <u>75507</u> Location: <u>DJ Simmons ET AL #1</u> Coordinates: Letter: <u>O</u> Section <u>26</u> Township: <u>29</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Date Started : <u>5-24-94</u> Area: <u>13</u> Run: <u>22</u>	Sample Number(s): <u>KD84</u> Sample Depth: <u>12</u> Feet Final PID Reading <u>622 ppm</u> PID Reading Depth <u>12</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet	Remediation Method : Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>50</u> Onsite Bioremediation <input type="checkbox"/> (2) Backfill Pit Without Excavation <input type="checkbox"/> (3) Soil Disposition: Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra Other Facility <input type="checkbox"/> (2) Name: _____ Pit Closure Date: <u>5-24-94</u> Pit Closed By: <u>BEI</u>	Remarks : <u>EXCAVATED pit to 12', TOOK PID sample, closed pit</u>
Signature of Specialist: <u>[Signature]</u>			



30

FIELD SERVICES LABORATORY  
ANALYTICAL REPORT  
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD84	945284
MTR CODE   SITE NAME:	75507	N/A
SAMPLE DATE   TIME (Hrs):	5-24-94	1055
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	5/26/94	5/26/94
DATE OF BTEX EXT.   ANAL.:	5/31/94	6/1/94
TYPE   DESCRIPTION:	VC	Black sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	21.2	MG/KG	50			
TOLUENE	21.2	MG/KG	50			
ETHYL BENZENE	18	MG/KG	50			
TOTAL XYLENES	21	MG/KG	50			
TOTAL BTEX	41	MG/KG				
TPH (418.1)	4620	MG/KG			130	28
HEADSPACE PID	622	PPM				
PERCENT SOLIDS	80.7	%				

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

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

Narrative:

ATT results attached. Surrogate recovery was not obtainable due to sample dilution.

~~outside ATT QC limits due to~~

DF = Dilution Factor Used

Approved By:

Date:

7/14/94

```

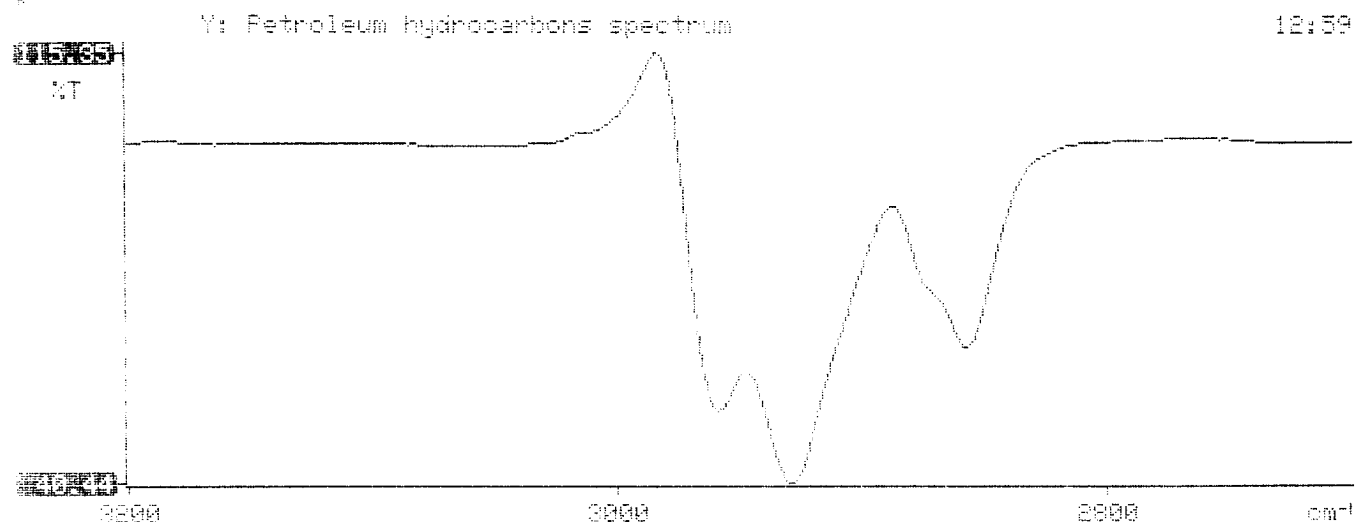
*****
*                                     *
*      Test Method for               *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil             *
*                                     *
*      Perkin-Elmer Model 1400 FT-IR      *
*      Analysis Report                   *
*****

```

```

74/05/26 12:59
*
* Sample identification
945204
*
* Initial mass of sample, g
1.390
*
* Volume of sample after extraction, ml
28.000
*
* Petroleum hydrocarbons, ppm
4623.265
* Net absorbance of hydrocarbons (2930 cm-1)
0.392
*
*
*

```





Analytical **Technologies**, Inc.

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

ATI I.D. **405420**

June 8, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **05/27/94**, 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:jd

Enclosure





Analytical Technologies, Inc.

## GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)  
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405420  
PROJECT # : 24324  
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945283	NON-AQ	05/23/94	05/31/94	06/01/94	1
02	945284	NON-AQ	05/24/94	05/31/94	06/01/94	50
03	945285	NON-AQ	05/24/94	05/31/94	06/01/94	1
PARAMETER			UNITS	01	02	03
BENZENE			MG/KG	<0.025	<1.2	<0.025
TOLUENE			MG/KG	<0.025	<1.2	<0.025
ETHYLBENZENE			MG/KG	0.44	18	<0.025
TOTAL XYLENES			MG/KG	3.9	21	<0.025

### SURROGATE:

BROMOFLUOROBENZENE (%)	136*	NA**	98
------------------------	------	------	----

\*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

\*\*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

# 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 et al 75507

Well Logged By CM Chance

Personnel On-Site K Padilla, F. Rivera, D. Chache

Contractors On-Site \_\_\_\_\_

Client Personnel On-Site \_\_\_\_\_

Elevation \_\_\_\_\_

Borehole Location 20-S26-T29-R9

GWL Depth \_\_\_\_\_

Logged By CM CHANCE

Drilled By K Padilla

Date/Time Started 8/18/95-1055

Date/Time Completed 8/18/95-1200

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 to 12'						
5										
10										
15	1	15-17	6"	Gry silty CLAY, med stiff, low plastic, dry to x-ls seams			0	13	$\frac{100}{585}$	1107 ft
20	2	20-22	10"	<sup>silty</sup> Reddish Br/Gry mottled CLAY, very stiff, non plastic			0	18	$\frac{54}{589}$	1115
25	3	25-27	2'	AA			0	46	$\frac{0}{3}$	1126
30				TDB 27'						
35										
40										

Comments:

CMC 81 (25-27') sent to lab (BTEX, TPH). BH grouted to surface.  
Sample bagged & iced prior to containerization.

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:	CMC81	947287
MTR CODE   SITE NAME:	75507	D.J. Simmons et.al.
SAMPLE DATE   TIME (Hrs):	08-18-95	11:26
PROJECT:	Phase II Drilling	
DATE OF TPH EXT.   ANAL.:	8/2/95	8-21-95
DATE OF BTEX EXT.   ANAL.:	8/23/95	8/23/95
TYPE   DESCRIPTION:	VG	brown 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)	39.2 <sup>8/2/95</sup>	MG/KG			2.03	28
HEADSPACE PID	3	PPM				
PERCENT SOLIDS	90.4	%				

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

The Surrogate Recovery was at 105% for this sample All QA/QC was acceptable.  
Narrative:

DF = Dilution Factor Used

DP

8/28/95

```

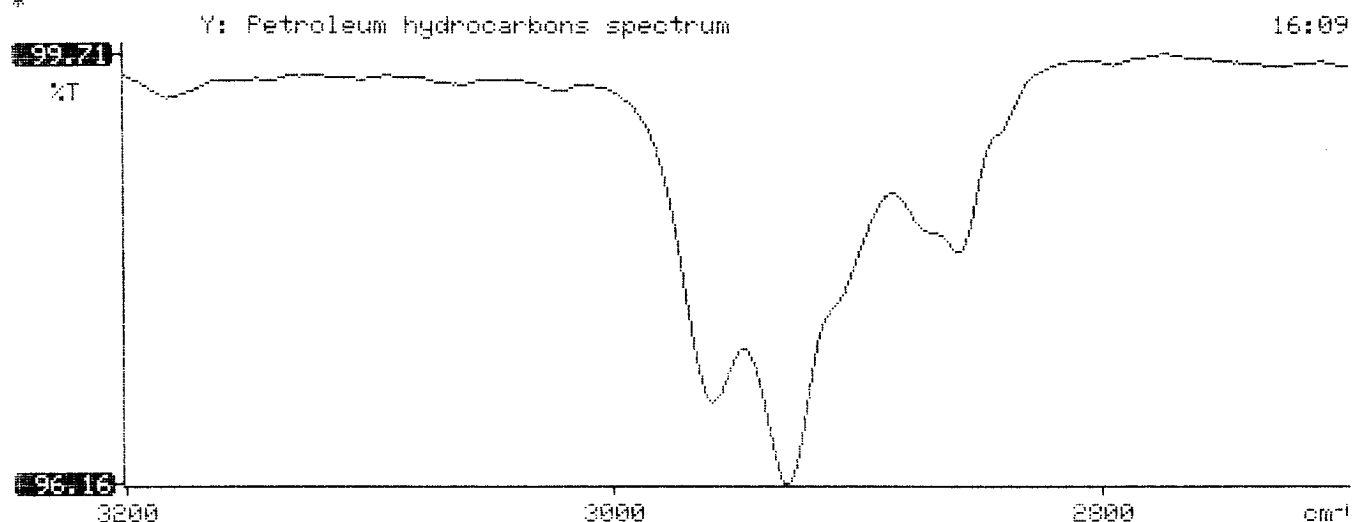
*****
*                               *
*      Test Method for         *
* Oil and Grease and Petroleum Hydrocarbons *
*      in Water and Soil      *
*                               *
*      Perkin-Elmer Model 1600 FT-IR      *
*      Analysis Report          *
*                               *
*****

```

```

* 95/08/21 16:09
*
* Sample identification
* 947267
*
* Initial mass of sample, g
* 2.030
*
* Volume of sample after extraction, ml
* 28.000
*
* Petroleum hydrocarbons, ppm
* 39.154
* Net absorbance of hydrocarbons (2930 cm-1)
* 0.015
*
*
*

```



# BTEX SOIL SAMPLE WORKSHEET

File	:	947287	Date Printed	:	8/25/95
Soil Mass (g)	:	4.98	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	20	DF (Analytical)	:	200
Shot Volume (uL)	:	100	DF (Report)	:	0.20080

				Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000 0.502
Toluene (ug/L)	:	0.00	Toluene (mg/Kg):	0.000 0.502
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000 0.502
p & m-xylene (ug/L)	:	0.00	p & m-xylene (mg/Kg):	0.000 1.004
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000 0.502
			Total xylenes (mg/Kg):	0.000 1.506
			Total BTEX (mg/Kg):	0.000

# EL PASO NATURAL GAS

## EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082395-1.025  
 Method : C:\LABQUEST\METHODS\0001.MET  
 Sample ID : 947287,4.98G,100U  
 Acquired : Aug 24, 1995 06:52:13  
 Printed : Aug 24, 1995 07:18:28  
 User : MARLON

### Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.413	0	0.0000
a,a,a TFT	4.973	5089266	97.0522
TOLUENE	6.800	132505	-0.3806
ETHYLBENZENE	10.523	50862	-0.3798
M & P XYLENE	10.877	130638	-4.7902
O XYLENE	11.883	0	0.0000
BFB	13.403	75633232	104.9970

C:\LABQUEST\CHROM001\082395-1.025 - Channel A

