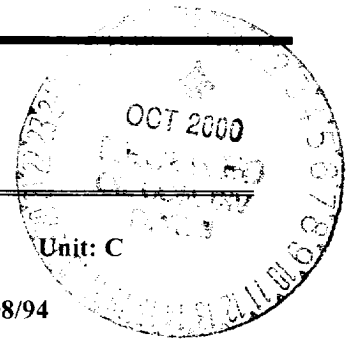


EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Gallegos Canyon Unit Well #202E
Meter/Line ID - 94074



SITE DETAILS

Legals - Twn: 29
NMOCD Hazard Ranking: 20
Operator: Amoco

Rng: 12

Sec: 33
Land Type: Fee
Pit Closure Date: 11/08/94

RATIONALE FOR CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A pit was excavated to five feet, where bedrock was encountered, and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the pit. Approximately 10 cubic yards of material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 511 ppm; laboratory analysis indicated a benzene concentration of 5.2 mg/kg, a total BTEX concentration of 63.6 mg/kg, and a TPH concentration of 2050 mg/kg. This site was re-assessed on August 28, 2000 because the initial assessment incorrectly identified washes as a surface water body.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for almost six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.
- Groundwater was not encountered in the excavation.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Bedrock was encountered in the excavation at five feet below ground surface, making vertical contaminant migration unlikely and further remediation impractical.
- The pit was excavated to the practical extent of the equipment, according to EPNG's pit closure plan.

ATTACHMENT

Field Pit Assessment Form

REVISED
FIELD PIT SITE ASSESSMENT FORM

Meter: 94074 Location: GALLEGOS CANYON UNIT WELL #202E
Operator #: 0203 Operator Name: AMOCO P/L District: ANGEL PEAK
Coordinates: Letter: C Section 33 Township: 29 Range: 12
Or Latitude _____ Longitude _____
Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
Site Assessment Date: 8/29/00 Area: 01 Run: 43

NMOCD Zone: _____ Land Type: _____ BLM ☐ (1)
(From NMOCD State ☐ (2)
Maps) Inside ☒ (1) Fee ☒ (3)
Outside ☐ (2) 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 _____

(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 20 POINTS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body.

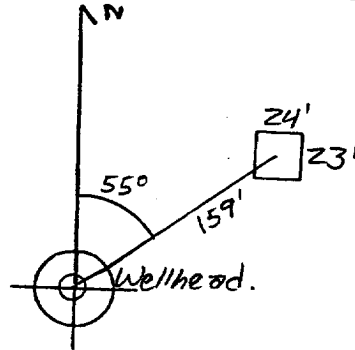
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94-074</u> Location: <u>Gallegos Canyon Unit Well No. 202E</u> Operator #: <u>0203</u> Operator Name: <u>Amoco</u> P/L District: <u>Angel Peak</u> Coordinates: Letter: <u>C</u> Section <u>33</u> Township: <u>29</u> Range: <u>12</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>9/12/94</u> Area: <u>01</u> Run: <u>43</u></p>																
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Land Type:</p> <table border="0"> <tr> <td>Inside</td> <td><input checked="" type="checkbox"/> (1)</td> <td>BLM</td> <td><input type="checkbox"/> (1)</td> </tr> <tr> <td>Outside</td> <td><input type="checkbox"/> (2)</td> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td></td> <td></td> <td>Fee</td> <td><input checked="" type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>XXXXXX</td> </tr> </table> <p>Depth to Groundwater</p> <p>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)</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</p> <p>Less Than 200 Ft (20 points) <input checked="" type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Gallegos Canyon</u> (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input checked="" type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>40</u> POINTS</p>	Inside	<input checked="" type="checkbox"/> (1)	BLM	<input type="checkbox"/> (1)	Outside	<input type="checkbox"/> (2)	State	<input type="checkbox"/> (2)			Fee	<input checked="" type="checkbox"/> (3)			Indian	XXXXXX
Inside	<input checked="" type="checkbox"/> (1)	BLM	<input type="checkbox"/> (1)														
Outside	<input type="checkbox"/> (2)	State	<input type="checkbox"/> (2)														
		Fee	<input checked="" type="checkbox"/> (3)														
		Indian	XXXXXX														
REMARKS	<p>Remarks : <u>Redline Book - Inside Vulnerable Zone Type - Inside</u> <u>Three pits, location drip pit is dry, Will close one pit.</u> <u>DIG a HALL</u></p>																

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 55° Footage from Wellhead 159'
b) Length : 24' Width : 23' Depth : 4'

ORIGINAL PIT LOCATION



REMARKS :

Pictures @ 1419, (1-4, Roll I)
Dump Truck

REMARKS

Completed By:

Samuel Kelly
Signature

9/12/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94074 Location: Gallegos Canyon unit well # 202E
 Coordinates: Letter: C Section 33 Township: 29 Range: 12
 Or Latitude _____ Longitude _____
 Date Started : 11/8/94 Run: 01 43

FIELD OBSERVATIONS

Sample Number(s): KD 365
 Sample Depth: 5' Feet
 Final PID Reading 511 ppm PID Reading Depth 5' Feet
 Yes No
 Groundwater Encountered ☐ ☒ Approximate Depth _____ Feet

CLOSURE

Remediation Method :
 Excavation ☒ Approx. Cubic Yards 10
 Onsite Bioremediation ☐
 Backfill Pit Without Excavation ☐
 Soil Disposition:
 Envirotech ☒ Tierra ☐
 Other Facility ☐ Name: _____
 Pit Closure Date: 11/8/94 Pit Closed By: BEI

REMARKS

Remarks : EXCAVATED pit to 5', - Hit Sandstone, TOOK PID
Sample, closed pit.

Signature of Specialist: [Signature]

CHAIN OF CUSTODY RECORD

PROJECT NUMBER # 24324		PROJECT NAME Pit Closure Project		DATE: 11/18/94		CONTRACT LABORATORY P. O. NUMBER											
SAMPLERS: (Signature)		SAMPLE TYPE		REQUESTED ANALYSIS		REMARKS											
LAB ID	DATE	TIME	MATRIX	FIELD ID	TPH EPA 418.1	BTEX EPA 8020	LAB PID	SEQUENCE #									
946481	11/18/94	1230	Soil	KD-365	1 VC	X	X	331									
RELINQUISHED BY: (Signature)		DATE/TIME 11/18/94 1335		RECEIVED BY: (Signature)		DATE/TIME 11/19/94 1030		RECEIVED BY: (Signature)									
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)									
REQUESTED TURNAROUND TIME:		ROUTINE <input type="checkbox"/> RUSH <input type="checkbox"/>		SAMPLE RECEIPT REMARKS		RESULTS & INVOICES TO:		FIELD SERVICES LABORATORY EL PASO NATURAL GAS COMPANY P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499									
CARRIER CO.		CHARGE CODE		505-599-2144		FAX: 505-599-2261											
BILL NO.:																	



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

SAMPLE NUMBER:

Field ID

Lab ID

MTR CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

SAMPLED BY:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

KD 365	946481
94074	N/A
11-8-94	1230
N/A	
11-10-94	11-10-94
11-12-94	11-14-94
VC	Light Gray Course sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	5.2	MG/KG	20			
TOLUENE	5.2	MG/KG	20			
ETHYL BENZENE	40.5	MG/KG	20			
TOTAL XYLENES	5.9	MG/KG	20			
TOTAL BTEX	63.6	MG/KG				
TPH (418.1)	2040 ²⁰⁵⁰	MG/KG			2.09	28
HEADSPACE PID	511	PPM				
PERCENT SOLIDS	87.4	%				

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

The Surrogate Recovery was at 88 % for this sample All QA/QC was acceptable.
Narrative:

ATI Results attached.

DF = Dilution Factor Used

Approved By:

Date:

12-6-94

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 411348
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	946480	NON-AQ	11/08/94	11/12/94	11/13/94	1
05	946481	NON-AQ	11/08/94	11/12/94	11/14/94	20

PARAMETER	UNITS	04	05
BENZENE	MG/KG	<0.025	5.2
UENE	MG/KG	<0.025	52
ETHYLBENZENE	MG/KG	<0.025	<0.5
TOTAL XYLENES	MG/KG	<0.025	5.9

SURROGATE:

BROMOFLUOROBENZENE (%) 93 88

Analytical**Technologies**, Inc.

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

ATI I.D. 411348

November 17, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 11/11/94, 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
Letitia Krakowski, Ph.D.
Project Manager

MR:jt

Enclosure

