EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

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

PUBCO FEDERAL GAS COM #1
Meter/Line ID - 73945

SITE DETAILS

Legals - Twn: 30 **Rng:** 11 **Sec:** 14 **Unit:** M
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: AMOCO PRODUCTION COMPANY **Pit Closure Date: 05/04/94**

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: 73945 Location: PUBCO FEDERAL GAS COM #1

Operator #: 0203 Operator Name: AMOCO P/L District: KUTZ

Coordinates: Letter: M Section 14 Township: 30 Range: 11

Or Latitude _____ Longitude _____

Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____

Site Visit Date: 3.22.94 Run: 02 21

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside Vulnerable Zone ☒
Outside ☐

Land Type:
BLM ☒
State ☐
Fee ☐
Indian _____

Depth to Groundwater
Less Than 50 Feet (20 points) ☐
50 Ft to 99 Ft (10 points) ☐
Greater Than 100 Ft (0 points) ☒

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? ☐ YES (20 points) ☒ NO (0 points)

Horizontal Distance to Surface Water Body
Less Than 200 Ft (20 points) ☐
200 Ft to 1000 Ft (10 points) ☐
Greater Than 1000 Ft (0 points) ☒
Name of Surface Water Body _____
(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

TOTAL HAZARD RANKING SCORE: 0 **POINTS**

REMARKS

Remarks : THREE PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY.

ORIGINAL PIT LOCATION

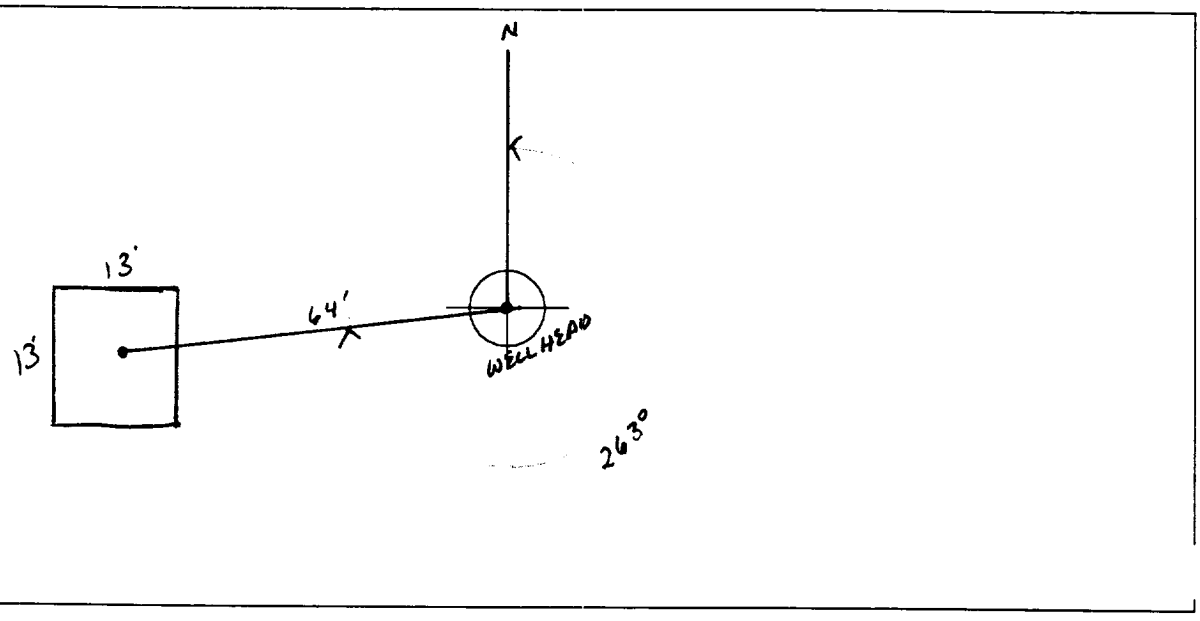
ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 263° Footage to Wellhead 64'

b) Degrees from North _____ Footage to Dogleg _____

Dogleg Name _____

c) Length : 13' Width : 13' Depth : 2'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 11:05 A.M.

DUMPTRUCK - BOBTAIL

Completed By:

Robert Thompson
Signature

3-22-94
Date

RT

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73945 Location: Pubco Federal Gas Com #1

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: ___ Section ___ Township: ___ Range: ___

Or Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: ___ Line Drip: ___ Other: _____

Site Assessment Date: _____ Area: 02 Run: 21

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 Hampton Arroyo

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

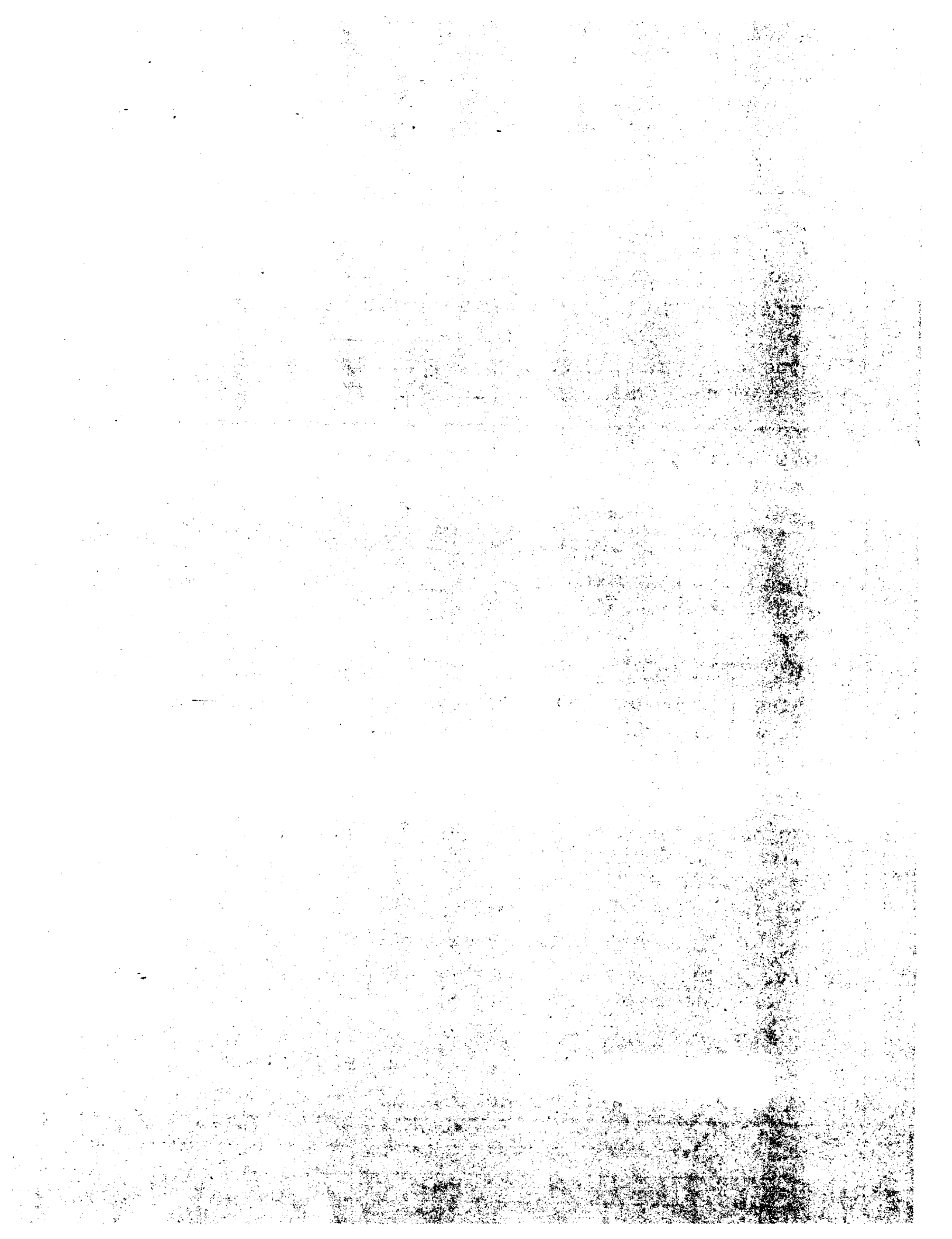
Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 40 **POINTS**

REMARKS

Remarks :



PHASE I
EXCAVATION

FIELD P REMEDIATION/CLOSURE)RM

GENERAL

Meter: 73945 Location: Pubco Federal Gas Com #1

Coordinates: Letter: M Section 14 Township: 30 Range: 11

Or Latitude _____ Longitude _____

Date Started : 5/4/94 Area: 02 Run: 71

FIELD OBSERVATIONS

Sample Number(s): 945069 SP16 _____ _____ _____

Sample Depth: 9 Feet

Final PID Reading 301 ppm PID Reading Depth 9 Feet

	Yes	No
Groundwater Encountered	☐ (1)	☒ (2)

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 30
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

Envirotech	☐ (1)	☒ (3) Tierra
Other Facility	☐ (2)	Name: _____

Pit Closure Date: 5/4/94 Pit Closed By: BEI

REMARKS

Remarks : started remediating pit, hit sand rock at 9' took VC sample reading was 301 ppm at 79° closed pit. Floor & Walls still black

Signature of Specialist: James L Pearce

(SP3191) 04/07/94

40

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	SP16	945069
MTR CODE | SITE NAME:	73945	N/A
SAMPLE DATE | TIME (Hrs):	5/4/94	1200
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5/5/94	5/5/94
DATE OF BTEX EXT. | ANAL.:	5/9/14	5/13/94
TYPE | DESCRIPTION:	VC	Grey Coarse Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	18	MG/KG	100			
TOLUENE	270	MG/KG	100			
ETHYL BENZENE	37	MG/KG	100			
TOTAL XYLENES	540	MG/KG	100			
TOTAL BTEX	865	MG/KG				
TPH (418.1) JWL 5/14/94	~~10829~~ 10,800	MG/KG			JWL 5/14/94 ~~2.32~~ 2.50	~~28~~ 28
HEADSPACE PID	301	PPM				
PERCENT SOLIDS	84.1	%				

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

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

Narrative:

ATI results attached. Surrogate recovery not obtainable due to sample dilution (1:100).

DF = Dilution Factor Used

Approved By: John Labrie Date: 7/14/94

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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                     *
**********************************************************
*
 94/05/05  14:13
*
*  Sample identification
 945069
*
*  Initial mass of sample, g
 0.500
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 10829.600
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.330
*
*
*
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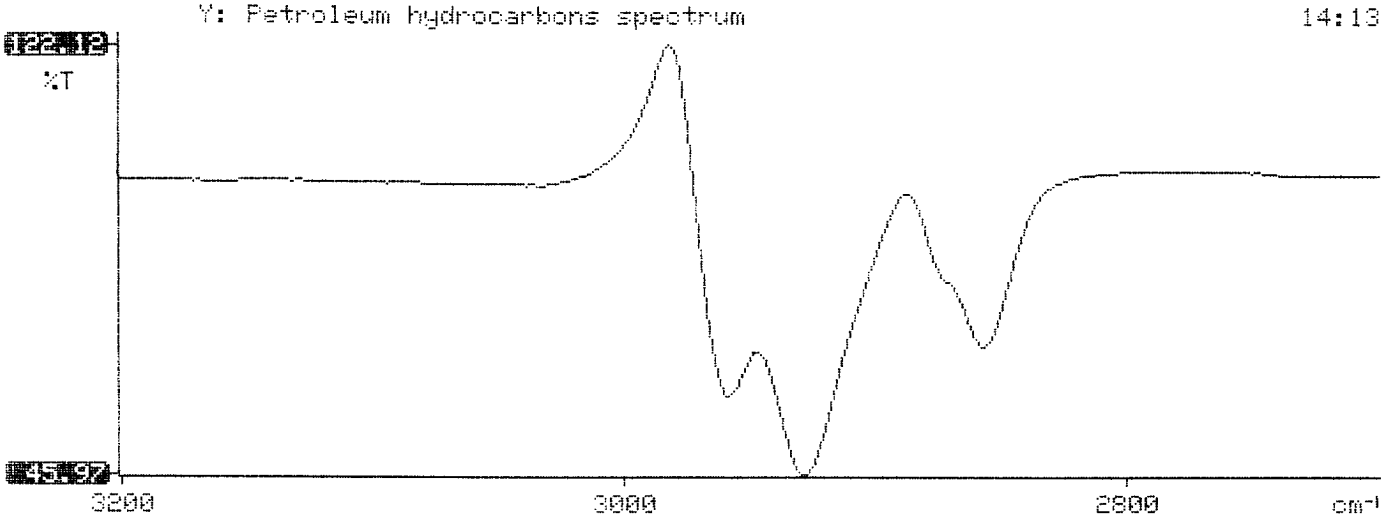

Analytical **Technologies,** Inc.

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

ATI I.D. **405331**

May 19, 1994

El Paso Natural Gas Company
770 W. Navajo
Farmington, NM 87401

Project Name/Number: PIT PROJECT 24324

Attention: John Lambdin

On **05/06/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous** and **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.

Upon arrival, it was noted that sample 945055 contained headspace. The client was notified and the sample was analyzed "as is."

The laboratory was instructed to correct the sampling data for sample 945075 to 05/04/94.

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

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.: 405331

PROJECT # : 24324

PROJECT NAME : PIT PROJECT

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
20	945069	NON-AQ	05/04/94	05/09/94	05/13/94	100
21	945070	NON-AQ	05/04/94	05/09/94	05/13/94	1
22	945071	NON-AQ	05/04/94	05/09/94	05/13/94	50

PARAMETER	UNITS	20	21	22
BENZENE	MG/KG	18	<0.025	17
TOLUENE	MG/KG	270	<0.025	280
ETHYLBENZENE	MG/KG	37	0.11	35
TOTAL XYLENES	MG/KG	540	1.0	370
SURROGATE:				
BROMOFLUOROBENZENE (%)		NA*	74	113

*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG PITS
Project Number 14509 Phase 6000 77
Project Location Pubco Federal Gas Com #1 73945

Elevation
Borehole Location QM - S14 - T30 - R11
GWL Depth
Logged By CM CHANCE
Drilled By ~~K Padilla~~ F. Rivera
Date/Time Started 10/24/95 - 1505
Date/Time Completed 10/24/95 - 1610

Well Logged By CM Chance
Personnel On-Site K Padilla, 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 BZ	BH	S HS	Drilling Conditions & Blow Counts
0				Backfill to 9'						
5										
10										hard drlng
15	1	15-16	12	Lt gry/BLK mottled sandy CLAY, vf sand, v. stiff, non plastic			0	27	16/28	1520
				TDB 16'						
20										
25										
30										
35										
40										

Comments: CM(164(15-16') sent to lab BTEX TPH. 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:	CMC164	947695
MTR CODE | SITE NAME:	73945	Pubco Fed. Gas Com. #1
SAMPLE DATE | TIME (Hrs):	10-24-95	1520
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	10/25/95	
DATE OF BTEX EXT. | ANAL.:	10/25/95	10/25/95
TYPE | DESCRIPTION:	VG	Light grey Sand & Clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
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	MG/KG			1.98	28
HEADSPACE PID	28	PPM				
PERCENT SOLIDS	90.9	%				

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

The Surrogate Recovery was at 98% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: J.J. Date: 10-26-95

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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                     *
**********************************************************
*
 95/10/25  14:27
*
*  Sample identification
 947695
*
*  Initial mass of sample, g
 1.980
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 -12.055
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.009
*
*
*
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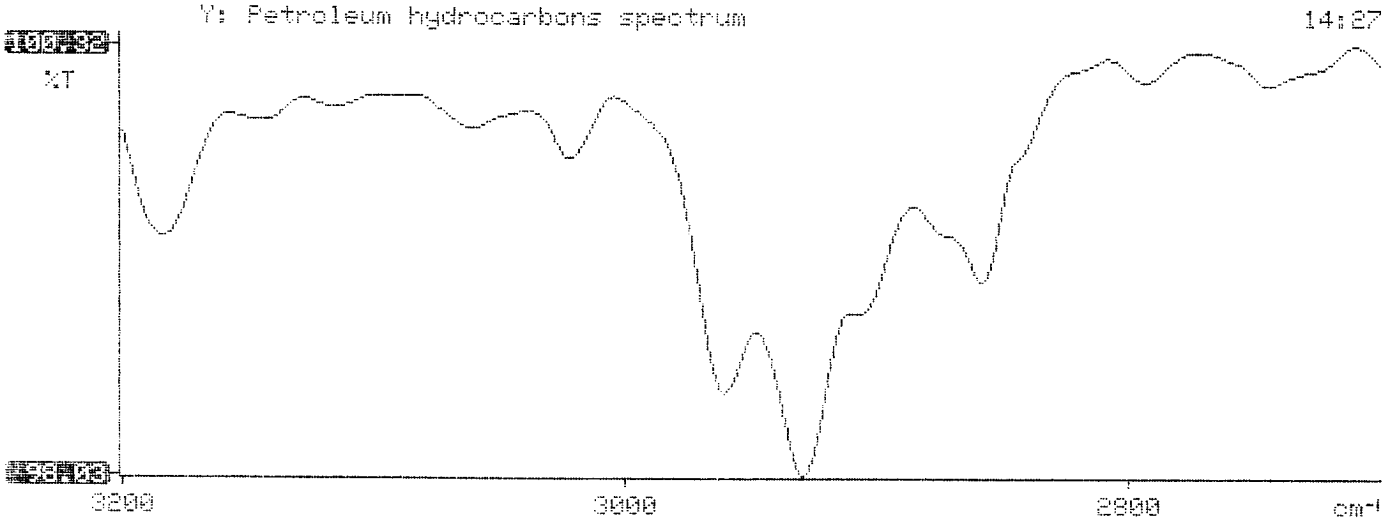

BTEX SOIL SAMPLE WORKSHEET

File	: 947695	**Date Printed**	: 10/26/95		
Soil Mass (g)	: 5.01	**Multiplier (L/g)**	: 0.00100		
Extraction vol. (mL)	: 10	**CAL FACTOR (Analytical):**	200		
Shot Volume (uL)	: 50	**CAL FACTOR (Report):**	0.19960		
		DILUTION FACTOR:	**1**	**Det. Limit**	
Benzene (ug/L)	: 0.19	**Benzene (mg/Kg):**	**0.038**	0.499	
Toluene (ug/L)	: 1.19	**Toluene (mg/Kg):**	**0.238**	0.499	
Ethylbenzene (ug/L)	: 0.16	**Ethylbenzene (mg/Kg):**	**0.032**	0.499	
p & m-xylene (ug/L)	: 0.82	p & m-xylene (mg/Kg):	0.164	0.998	
o-xylene (ug/L)	: 0.20	o-xylene (mg/Kg):	0.040	0.499	
		Total xylenes (mg/Kg):	**0.204**	1.497	
		Total BTEX (mg/Kg):	**0.511**		

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\102595-0.014
Method : C:\LABQUEST\METHODS\0-101895.MET
Sample ID : 947695,5.01G,50U
Acquired : Oct 25, 1995 20:28:36
Printed : Oct 25, 1995 20:58:57
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.447	99958	0.1907
a,a,a-TFT	10.707	8344981	85.3010
TOLUENE	13.087	600844	1.1869
ETHYLBENZENE	17.373	69326	0.1582
M,P-XYLENES	17.743	416369	0.8152
O-XYLENE	18.910	85052	0.1996
BFB	19.913	53200036	98.0760