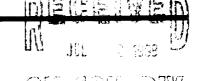
Dennet PASOFFEED SERVICES DEPUTY ORROBUSTHOOD PIT CLOSURE

DEC 2 1 1998

Five of Diamonds #2 Meter/Line ID - 93267



SITE DETAILS

Rng: 13
NMOCD Hazard Ranking: 40

Sec: 10

Unit: K

Land Type: 2 - Federal

Operator: DUGAN PRODUCTION CORP

Pit Closure Date: 01/30/95

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 thε 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: 93267 Location: Five of Diamond S #2 Operator #: 1862 Operator Name: Dvga. P/L District: KUTZ Coordinates: Letter: K Section 10 Townsh p: 20 Range: 13 Or Latitude Longitude Pit Type: Dehydrator Location Drip: \(\sum \) Line Drip: Other: Site Assessment Date: \(\sum \) 1/2/95 Area: \(\sum \) Run: \(\sum \) |
|-----------------|---|
| ENT | NMOCD Zone: (From NMOCD Maps) Inside Outside 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 |
| SITE ASSESSMENT | 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 (3) (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 |
| SKS | Remarks: Realine Book: Inside Vulnerable Zone Topo: Inside |
| REMARKS | lpit. Close Meter TD |
| RE | DIGAHAUL |

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

| GENERAL | Meter: 93267 Location: Five of Diamond 5 + 2 Coordinates: Letter: K Section 10 Township: 30 Range: 13 Or Latitude Longitude — — — — — — — — — — — — — — — — — — — |
|---------------------|--|
| FIFT D OBSERVATIONS | Sample Number(s): KN 397 KN 398 KP 399 Sample Depth: 4' Feet Final PID Reading M36 062 PID Reading Depth 4' Feet Yes No Groundwater Encountered Approximate Depth Feet |
| TOTION | , |
| 5 | Remarks: NO Line markers. Started Remediating to 12' Hit sand stane At 4' sampled closed Pit. Signature of Specialist: Lelly Public (SP3181) 03/16 |



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

| 397 | 7466/D |
|------|--------------------------------|
| | |
| | N/A |
| | 1350 |
| | N/A |
| 2/95 | 2/2/95 |
| | 2/1/95 |
| | Dark Gray sand and clay |
| | 3267 30-95 2/95 31/95 |

RESULTS

| | DECULT. | UNITS | | QUALIFIE | RS | |
|----------------|---------|------------|----------|----------|------|-------|
| PARAMETER | RESULT | UNITS | DF | Q | M(g) | V(ml) |
| BENZENE | 41,00 | MG/KG | 0.1.1960 | | 5,01 | 20 |
| TOLUENE | 41.00 | MG/KG | | | | |
| ETHYL BENZENE | 21.00 | MG/KG | | | | - |
| TOTAL XYLENES | 43.00 | MG/KG | | | | |
| TOTAL BTEX | 3.60 kg | 7,/4.MG/KG | | | | |
| TPH (418.1) | 235 | MG/KG | | | 1.95 | 28 |
| HEADSPACE PID | 62 | PPM | | - A | - | |
| PERCENT SOLIDS | 75.0 | % | | | | |

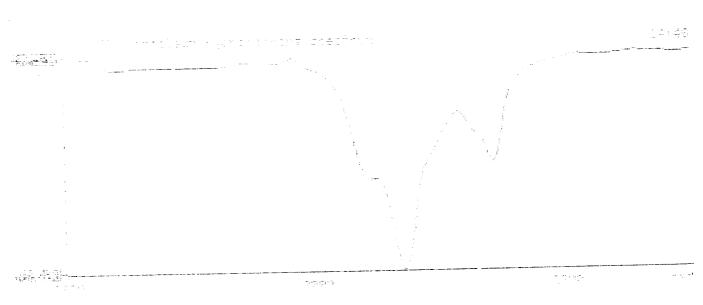
- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

| | - TPH is by EPA Method 418.1 and BIEA IS BY EFA | |
|-------------------------------|---|---------------------------|
| The Surrogate Recovery was at | 84.6 % for this sample | All QA/QC was acceptable. |
| Narrative: | | |

DF = Dilution Factor Used

a comment of their

2-22-95



BTEX SOIL SAMPLE WORKSHEET

| File Soil Mass Extraction vol Shot Volume | s (g) : . (mL) : | 946 | 5.01 20 100 | • | (L/g) ytical) | 2/2/95 : 0.00100 : 200 : 0.19960 | |
|--|---------------------|-----|-------------------|-----------------------------|------------------|---|------------|
| | | | | | | | Det. Limit |
| Benzene | (ug/L) : | | 0.00 | Benzene | (mg/Kg) | : 0.000 | |
| Toluene | (ug/L) : | | 0.00 | Toluene | (mg/Kg) | : 0.000 | |
| Ethylbenzene | (ug/L) : | | 0.00 | Ethylbenzene | | _ | |
| p & m-xylene | (ug/L) | | 5.16 | p & m-xylene | | | |
| o-xylene | (ug/L) | | 0.32 | o-xylene | | | |
| | | | | Total xylenes Total BTEX | • • | | |

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

C:\LABQUEST\CHROM001\946610A File : C:\LABQUEST\METHODS\9001.MET Method

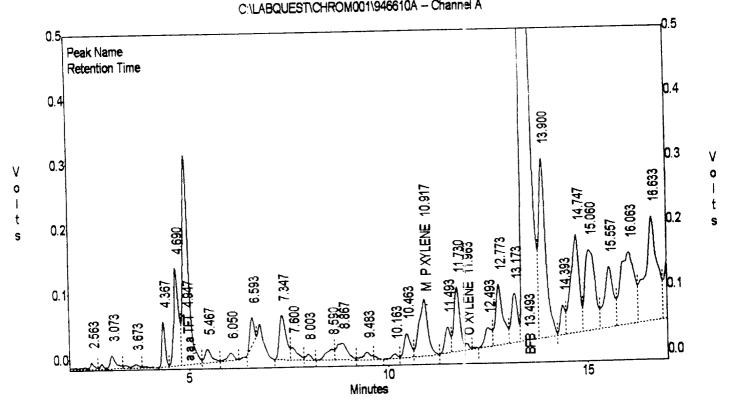
Sample ID : 946610,5.01G/100uL : Feb 01, 1995 19:55:22 Acquired : Feb 01, 1995 20:21:35 Printed

: Tony User

Channel A Results

| COMPONENT | RET TIME | AREA | AVG RF | CONC (ug/L) |
|--|---|--|--|--|
| BENZENE a,a,a TFT TOLUENE ETHYLBENZENE M & P XYLENE O XYLENE BFB | 3.413 4.947 6.780 10.567 10.917 11.963 13.493 | 0 3180071 0 0 1299872 69990 85477536 | 0.00000 32055.68359 0.00000 0.00000 316768.40625 221087.17188 944778.31250 | 0.0000 97.5978 0.0000 0.0000 5.1633 0.3176 89.6372 |
| Totals : | | 90027472 | | 192.7160 |

C:\LABQUEST\CHROM001\946610A -- Channel A



EL PASO NATURAL GAS EPA METHOD 8020 - BTEX SOILS

: C:\LABQUEST\CHROM001\946610A File : C:\LABQUEST\METHODS\9001.MET Method

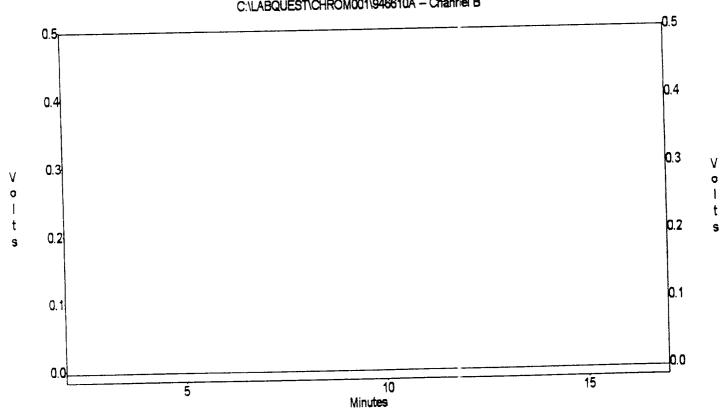
Sample ID 946610,5.01G/100ul. : Feb 01, 1995 19:55:22 Acquired : Feb 01, 1995 20:21:40 Printed

: Tony User

Channel B Results

| COMPONENT | RET TIME | AREA | AVG RF | CONC (ug/L) |
|--|---|----------------------------|--|--|
| BENZENE a,a,a TFT TOLUENE ETHYLBENZENE M & P XYLENE O XYLENE BFB | 3.450 4.950 6.787 10.480 10.833 11.900 13.400 | 0 0 0 0 0 0 | 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 | 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 |
| Totals : | | 0 | | 0.0000 |

C:\LABQUEST\CHROM001\946610A -- Chanriel B



PHASE II

RECORD OF SUBSURFACE EXPLORATION

| PHILIP | ENVIRONMENTAL | |
|---------------|---------------|--|

4000 Monroe Road

Farmington, New Mexico 87401

(606) 326-2262 FAX (606) 326-2388

Elevation

Borehole Location

GWL Depth

Logged By

CM CHANCE

Drilled By

Date/Time Started

Date/Time Completed

| Borehole # | BH-1 | |
|------------|------|--|
| Weil # | | |
| Page | of(| |

Project Name
Project Number
Project Location
Project Location
Project Location
Project Name

EPNG PITS

14509
Phase 6000 77

Five P Diaments # 35 9336

Well Logged By
Personnel On-Site
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 Units: BZ | Monitori PPM BH | ng <u>S</u> HS | Drilling Conditions & Blow Counts |
|-----------------|------------------|--------------------|---------------------------------|--|----------------|-------------------------------|---------------------|-----------------------|----------------------|--------------------------------------|
| | Number | Interval | Type & Recovery (inches) | · · | Symbol | Lithology Change | Units: BZ | PPM BH | SI HS | |
| 3: | 5 | | | | | | | | | |

Comments: (M(|29(10-11') Sent to lat (BTEX, TAH). Bit grouted to surface. Deilled
to 10' to ensure not in backfill. Sample baggel ticed prior to

Contained 20 ties

Geologist Signature

Cong Chang



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

| | Field | ID | | Lab ID | | |
|------------------------------|---------------------|----------------------------|------------------|-------------|--------------|--|
| SAMPLE NUMBER: | C41C129 | 7 | 947 | | | |
| MTR CODE SITE NAME: | 93267 | | Fire of Diamonds | | | |
| SAMPLE DATE TIME (Hrs): | 10/4/95 | | 152 | | | |
| PROJECT: | Phase II Di | | | | | |
| DATE OF TPH EXT. ANAL.: | 10/6/ | 750 | · · · · · · | 1 | | |
| DATE OF BTEX EXT. ANAL.: | 10/5/9 | 5 | 10/5/ | | 0 1 2 | |
| TYPE DESCRIPTION: | 16 | | 1367 | 1944 3 | 4/12 | |
| Field Remarks: | | RESULTS | | | | |
| | | | | | | |
| PARAMETER | RESULT | UNITS | DF | QUALIF Q | IERS M(g) | V(ml |
| BENZENE | < c.5 | MG/KG | | | | |
| TOLUENE | < 05 | MG/KG | | | | |
| ETHYL BENZENE | 4 6.5 | MG/KG | | | <u> </u> | |
| TOTAL XYLENES | < 1.5 | MG/KG | | | | |
| TOTAL BTEX | < 3 | MG/KG | | | | |
| TPH (418.1) | <10 | MG/KG | | ik: | 7.22 | 2.P |
| HEADSPACE PID | 12 | PPM | | | | |
| PERCENT SOLIDS | 94,1 | % | | | | |
| he Surrogate Recovery was at | TPH is by EPA Metho | od 418.1 and BTEX is by EP | All QA/QC | | otable. | |

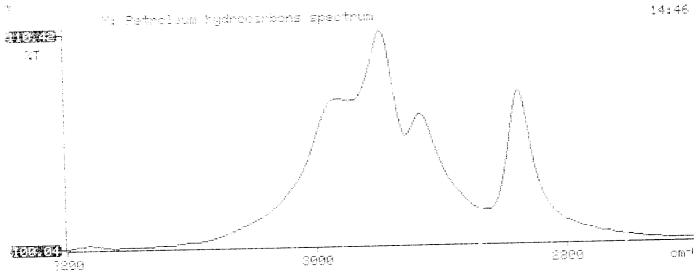
Test Method for

Inst Method for

In Weter and Soil

Report

Reservable Reservabl



BTEX SOIL SAMPLE WORKSHEET

| File | : | 947581 | Date Printed | : | 10/6/95 |
|----------------------|---|--------|------------------|---|---------|
| Soil Mass (g) | : | 5.03 | Multiplier (L/g) | : | 0.00099 |
| Extraction vol. (mL) | : | 10 | DF (Analytical) | : | 200 |
| Shot Volume (uL) | : | 50 | DF (Report) | : | 0.19881 |

| | | | | D | et. Limit |
|--------------|----------|------|------------------------|-------|-----------|
| Benzene | (ug/L) : | 0.12 | Benzene (mg/Kg): | 0.024 | 0.497 |
| Toluene | (ug/L) : | 0.18 | Toluene (mg/Kg): | 0.036 | 0.497 |
| Ethylbenzene | (ug/L) : | 0.00 | Ethylbenzene (mg/Kg): | 0.000 | 0.497 |
| p & m-xylene | (ug/L) : | 0.34 | p & m-xylene (mg/Kg): | 0.068 | 0.994 |
| o-xylene | (ug/L) : | 0.00 | o-xylene (mg/Kg): | 0.000 | 0.497 |
| - injining | (g. –) | | Total xylenes (mg/Kg): | 0.068 | 1.491 |

Total BTEX (mg/Kg): 0.127

EL PASO NATURAL GAS EPA METHOD 8020 - BTEX SOILS

: C:\LABQUEST\CHROM000\100595-0.003 File : C:\LABQUEST\METHODS\0-092095.MET Method

Sample ID : 947581,5.03G,50U : Oct 05, 1995 12:49:49 Acquired : Oct 05, 1995 13:20:16 Printed

User : MARLON

Channel A Results

| COMPONENT | RET TIME | AREA | CONC (ug/L) |
|--------------|----------|----------|-------------|
| | | | |
| BENZENE | 8.143 | 43882 | 0.1173 |
| a,a,a-TFT | 10.490 | 8967587 | 102.5033 |
| TOLUENE | 12.897 | 65936 | 0.1812 |
| ETHYLBENZENE | 17.170 | 0 | 0.0000 |
| M, P-XYLENES | 17.613 | 134920 | 0.3363 |
| O-XYLENE | 18.710 | 0 | 0.0000 |
| BFB | 19.863 | 52253728 | 95.8642 |

