District I P O. Box 1980, Hobbs, NM

State of New Mexico
Energy, Minerals and Natural Resources Department

RISK

DEDVOCK
SUBMIT 1 COPY TO
APPROPRIATE
DISTRICT OFFICE
AND 1 COPY TO
SANTA FE OFFICE

District II P.O. Drawer DD, Artesia, NM 88221

District III 1000 Rio Brazos Rd, Aztec, NM 87410

#### OIL CONSERVATION DIVISION

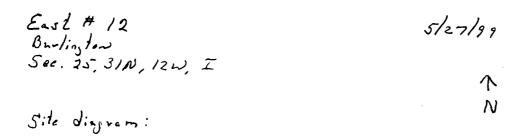
2040 South Pacheco Street Santa Fe, New Mexico 87505

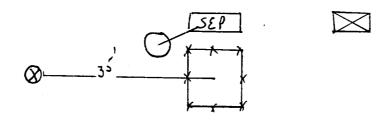
# DECEMBER DIV.

# PIT REMEDIATION AND CLOSURE REPORT

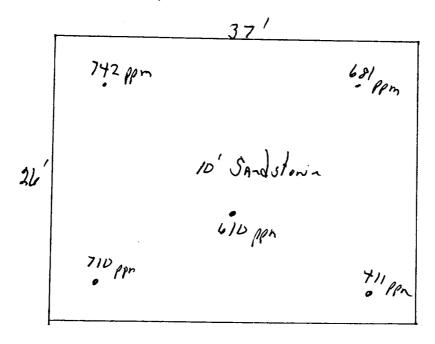
|                                                                                |                                     |                                                   |            | enger. H                                    |               |
|--------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------|------------|---------------------------------------------|---------------|
| Operator:                                                                      | PNM Gas Services ( Burlington       | ) <b>Telephone:</b> 324-3764                      | 1          | Duo D                                       |               |
| Address:                                                                       | 603 W. Elm Street Farmington, NM 87 | 7401                                              |            | The second section of the second section of |               |
| Facility or W                                                                  | ell Name:East #12                   |                                                   |            |                                             |               |
| Location:                                                                      | Unit   Sec                          | 25 T 31N R 12W                                    | County     | San Juan                                    |               |
| Pit Type:                                                                      | Separator 💆 Dehydra                 | ttor Other                                        |            | ·                                           | <del></del> _ |
| Land Type:                                                                     | BLM State                           | Fee Other                                         |            |                                             |               |
| Pit Location:                                                                  | Pit dimensions: length              | 20 ' width 20 '                                   | depth      | 3 '                                         |               |
| (Attach diagrar                                                                | n) Reference: wellhead              | other                                             |            |                                             |               |
|                                                                                | Footage from reference:             | 35'                                               | · <u> </u> |                                             | _             |
|                                                                                | Direction from reference: 90        | Degrees <u>✓</u> East                             | North      |                                             |               |
|                                                                                |                                     | O West                                            | f<br>South |                                             |               |
| Depth to Grou                                                                  | and Water:                          | Less than 50 feet<br>50 feet to 99 feet           |            | (20 points)<br>(10 points)                  |               |
| (Vertical distance from o<br>seasonal high water eleva<br>water                | ontaminants to . stion of ground    | Greater than 100 feet                             |            | ( 0 points)                                 | 10            |
|                                                                                |                                     |                                                   |            |                                             |               |
| Wellhead Prof  (Less than 200 feet from                                        |                                     | Yes<br>No                                         |            | (20 points)                                 | •             |
| domestic water source, or<br>feet from all other water                         | r, less than 1,000                  |                                                   |            | ( 0 points)                                 |               |
| Distance to Su                                                                 | rface Water:                        | Less than 200 feet                                |            | (20 points)                                 |               |
| (Horizontal distance to pe<br>ponds, rivers, streams, co<br>canals and ditches |                                     | 200 feet to 1,000 feet<br>Greater than 1,000 feet |            | (10 points)<br>( 0 points)                  | 0             |
|                                                                                |                                     | RANKING SCORE (TOTAL                              | POINTS):   |                                             | 10            |

| East #12                                                                                      |                                                                            |                                         |                           |  |  |  |  |  |  |
|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------|---------------------------|--|--|--|--|--|--|
| Date Remediation Started:                                                                     | 05/27/1999                                                                 | Date Completed:                         | 05/27/1999                |  |  |  |  |  |  |
| Remediation Method:                                                                           | Excavation X                                                               | Approx. Cubic Yard                      | 356                       |  |  |  |  |  |  |
| (Check all appropriate                                                                        | Landfarmed X                                                               | Amount Landfarmed (cu                   | bic yds) 306              |  |  |  |  |  |  |
| sections)                                                                                     | Other 50 cu yds overburden                                                 |                                         |                           |  |  |  |  |  |  |
| Remediation Location:<br>(i.e., landfarmed onsite, name and<br>location of offsite facility)  | Onsite X                                                                   | Offsite                                 |                           |  |  |  |  |  |  |
| Backfill Material Location:                                                                   | Backfill Material Location:                                                |                                         |                           |  |  |  |  |  |  |
| General Description of Rem                                                                    | nedial Action:                                                             |                                         |                           |  |  |  |  |  |  |
| Excavated contaminated soil to 12". Soil was aerated by d                                     | to a pit size of 37' X 26' X 10' ar<br>lisking/plowing until soil met regu | nd landfarmed soil onsite within a berm | ned area at a depth of 6" |  |  |  |  |  |  |
| 12 :2 : 9011 Was delated by a                                                                 | at 10'. See attached risk analysis                                         | liatory levels.                         |                           |  |  |  |  |  |  |
|                                                                                               | it 10. 555 attached flor analysis                                          | ioim.                                   |                           |  |  |  |  |  |  |
| Ground Water Encountered                                                                      | d: No 📝                                                                    | Yes Dep                                 | oth                       |  |  |  |  |  |  |
| Final Pit Closure<br>Sampling:                                                                | Sample Location 5 pt. co                                                   | mposite - bottom.                       |                           |  |  |  |  |  |  |
| (if multiple samples, attach<br>sample result and diagram of<br>sample locations and depths.) | Sample depth 10'                                                           |                                         | <del></del>               |  |  |  |  |  |  |
| sample locations and depths.)                                                                 | Sample date05/27/1999                                                      | Sample time                             | 1:35:00 PM                |  |  |  |  |  |  |
|                                                                                               | Sample Results                                                             | •                                       |                           |  |  |  |  |  |  |
|                                                                                               | Benzene (ppm) <_                                                           | 0.25                                    |                           |  |  |  |  |  |  |
|                                                                                               | Total BTEX (ppm)                                                           | 62.4 ***                                |                           |  |  |  |  |  |  |
|                                                                                               | Field headspace (ppm)                                                      |                                         |                           |  |  |  |  |  |  |
| •• • • • • • • • • • • • • • • • • • • •                                                      | TPH (ppm) 640.                                                             | 00 Method 801                           | 5B                        |  |  |  |  |  |  |
| Vertical Extent (ft)                                                                          |                                                                            | Risk Analysis form attached Yes         | No                        |  |  |  |  |  |  |
| Ground Water Sample:                                                                          | Yes No                                                                     | (If yes, see attached G Summary Report) | roundwater Site           |  |  |  |  |  |  |
| I HEREBY CERTIFY THAT<br>KNOWLEDGE AND MY B                                                   | THE INFORMATION ABOVE<br>ELIEF                                             | E IS TRUE AND COMPLETE TO TH            | HE BEST OF MY             |  |  |  |  |  |  |
| DATE October 28, 199                                                                          | $\sim$                                                                     | PRINTED NAME <b>Maure</b>               | en Gannon                 |  |  |  |  |  |  |
| SIGNATURE Mau                                                                                 | vees Hann                                                                  | AND TITLE Project                       | t Manager                 |  |  |  |  |  |  |





End of excevation:



LAB: (505) 325-1556

# On Site Technologies, LTD.

**CLIENT:** 

PNM - Public Service Company of NM

**Project:** 

**PNM Pit Remediation** 

Lab Order:

9905100

**CASE NARRATIVE** 

Date: 14-Jun-99

Samples were analyzed using the methods outlined in the following references:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, 3rd Edition

All method blanks, laboratory spikes, and/or matrix spikes met quality assurance objectives.





LAB: (505) 325-1556

## ANALYTICAL REPORT

Date: 14-Jun-99

Client:

OFF: (505) 325-5667

PNM - Public Service Company of NM

Work Order:

9905100

Lab ID:

9905100-04A

Matrix: SOIL

Client Sample Info: East #12

Client Sample ID: 9905271335; Bottom @ 10ft. - ちゅと.

Collection Date: 5/27/99 1:35:00 PM

**Project:** 

**PNM Pit Remediation** 

COC Record: 7601

| Parameter                   | Result  | PQL      | Qual U | nits  | DF  | Date Analyzed |
|-----------------------------|---------|----------|--------|-------|-----|---------------|
| DIESEL RANGE ORGANICS       | SV      | V8015B   |        |       |     | Analyst: DC   |
| T/R Hydrocarbons: C10-C28   | 640     | 25       | п      | ng/Kg | 1   | 6/10/99       |
| ROMATIC VOLATILES BY GC/PID | SW8021B |          |        | • •   | •   | Analyst: DC   |
| Benzene                     | ND      | 250      | u      | g/Kg  | 250 | 6/9/99        |
| Toluene                     | 7600    | 500      | •      | g/Kg  | 250 | 6/9/99        |
| Ethylbenzene                | 6300    | 250      |        | g/Kg  | 250 | 6/9/99        |
| m,p-Xylene                  | 39000   | 500      |        | g/Kg  | 250 | 6/9/99        |
| o-Xylene                    | 9500    | 250      |        | g/Kg  | 250 | 6/9/99        |
|                             | 62400   | )        | ·      | •     |     | 3.3.33        |
|                             | 62.40   | <b>^</b> |        |       |     |               |

Qualifiers:

PQL - Practical Quantitation Limit

ND - Not Detected at Practical Quantitation Limit

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

Surr: - Surrogate

1 of 1



6C

LAB: (505) 325-1556

#### ANALYTICAL REPORT

Date: 14-Jun-99

Client:

OFF: (505) 325-5667

PNM - Public Service Company of NM

Work Order: Lab ID:

Project:

9905100

9905100-05A

Matrix: SOIL

PNM Pit Remediation

Client Sample Info: East #12

Client Sample ID: 9905271340; Walls @ 6ft.

Collection Date: 5/27/99 1:40:00 PM

COC Record: 7601

| Parameter                    | Result | PQL    | Qual Units | DF          | Date Analyzed |
|------------------------------|--------|--------|------------|-------------|---------------|
| DIESEL RANGE ORGANICS        | sv     | V8015B |            | <del></del> | Analyst: DC   |
| T/R Hydrocarbons: C10-C28    | ND     | 25     | mg/Kg      | 1           | 6/10/99       |
| AROMATIC VOLATILES BY GC/PID | SV     | V8021B |            |             | Analyst: DC   |
| Benzene                      | ND     | 1      | μg/Kg      | 1           | 6/9/99        |
| Toluene                      | ND     | 2      | µg/Kg      | 1           | 6/9/99        |
| Ethylbenzene                 | ND     | 1      | μg/Kg      | 1           | 6/9/99        |
| m,p-Xylene                   | ND     | 2      | μg/Kg      | 1           | 6/9/99        |
| o-Xylene                     | ND     | 1      | μg/Kg      | 1           | 6/9/99        |

Qualifiers:

PQL - Practical Quantitation Limit

ND - Not Detected at Practical Quantitation Limit

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

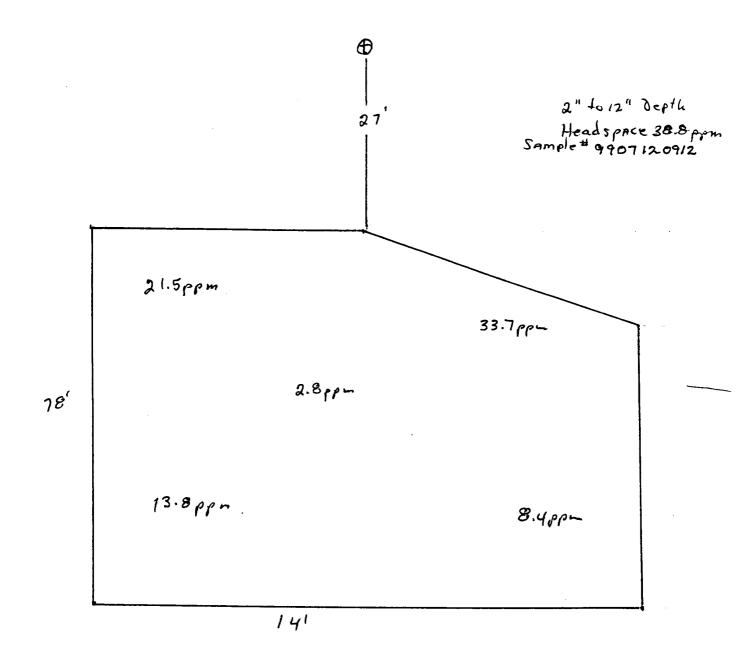
E - Value above quantitation range

Surr: - Surrogate

EAST #12 Sec-25 T-31N R-12W UL-1 Byrlington

Landfarm Drawing

App 306 cuyels



Not to Scale



OFF: (505) 325-5667

**CLIENT:** 

LAB: (505) 325-1556

On Site Technologies, LTD.

PNM - Public Service Company of NM

Project: PNM Pit Remediation Landfarms

**Lab Order:** 9907027

**CASE NARRATIVE** 

Date: 23-Jul-99

Samples were analyzed using the methods outlined in the following references:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, 3rd Edition

All method blanks, laboratory spikes, and/or matrix spikes met quality assurance objectives.

OFF: (505) 325-5667



LAB: (505) 325-1556

Date: 23-Jul-99

#### ANALYTICAL REPORT

\_\_\_\_

Client:

PNM - Public Service Company of NM

Work Order: Lab ID: 9907027

9907027-06A

Matrix: SOIL

Project:

PNM Pit Remediation Landfarms

Client Sample Info: East 12 LF

Client Sample ID: 9907120912; 5pt. Comp

Collection Date: 7/12/99 9:12:00 AM

COC Record: 7484

| Parameter                 | Result  | PQL | Qual Units | DF | Date Analyzed |
|---------------------------|---------|-----|------------|----|---------------|
| DIESEL RANGE ORGANICS     | SW8015B |     |            |    | Analyst: DC   |
| T/R Hydrocarbons: C10-C28 | 310     | 25  | mg/Kg      | 1  | 7/22/99       |

Qualifiers:

PQL - Practical Quantitation Limit

ND - Not Detected at Practical Quantitation Limit

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

Surr: - Surrogate



Well Name:

Well Legals:

Pit Type:

Horizontal Distance to Surface Water:

Groundwater Depth:

East #12

Unit I, Sec 25, T31N, R12W Separator

Greater than 1,000 feet

50 feet to 99 feet

## **RISK ANALYSIS**

PNM requests closure of their former pit on the East #12 well site using a limited risk analysis based on the following conditions:

- Groundwater is estimated to be at a depth of 81 feet based upon the elevation of the site and the elevation of the nearest "listed" or "named" wash. (Reference: Flora Vista, NM series 7.5 minute topographic map.)
- PNM excavated 356 cubic yards of soil from the former pit. Subsurface lateral
  contamination has been remediated (see attached map and analytical results for
  the side wall profiles). Source removal minimizes the possibility of surface water
  contamination.
- Sandstone was encountered at 10 feet below ground surface. Bedrock/sandstone
  provides a barrier between remaining contamination and groundwater. Vertical
  migration through bedrock or sandstone to groundwater is unlikely.
- 4. PNM excavated and performed remediation to the maximum depth and horizontal extent practicable.

PNM believes their former pit on the East #12 well site poses minimal threat to groundwater, human health and the environment based upon our past experience in excavating over 1,000 pits.