EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEC 2 1 1998

NICKLES #1M
Meter/Line ID - 93907

SITE DETAILS

Legals - Twn: 31 **Rng:** 13 **Sec:** 11 **Unit:** O
NMOCD Hazard Ranking: 20 **Land Type:** 2 - Federal
Operator: P-R-O MANAGEMENT **Pit Closure Date: 04/22/94**

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: 93907 / 93908 Location: NICKLES # 1-M

Operator #: 7272 Operator Name: PRO MANAGEMENT P/L District: KUTZ

Coordinates: Letter: O Section 11 Township: 31 Range: 13

Or Latitude _____ Longitude _____

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

Site Visit Date: 3.31.94 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 LA PLATA RIVER

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

TOTAL HAZARD RANKING SCORE: 20 **POINTS**

REMARKS

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

ORIGINAL PIT LOCATION

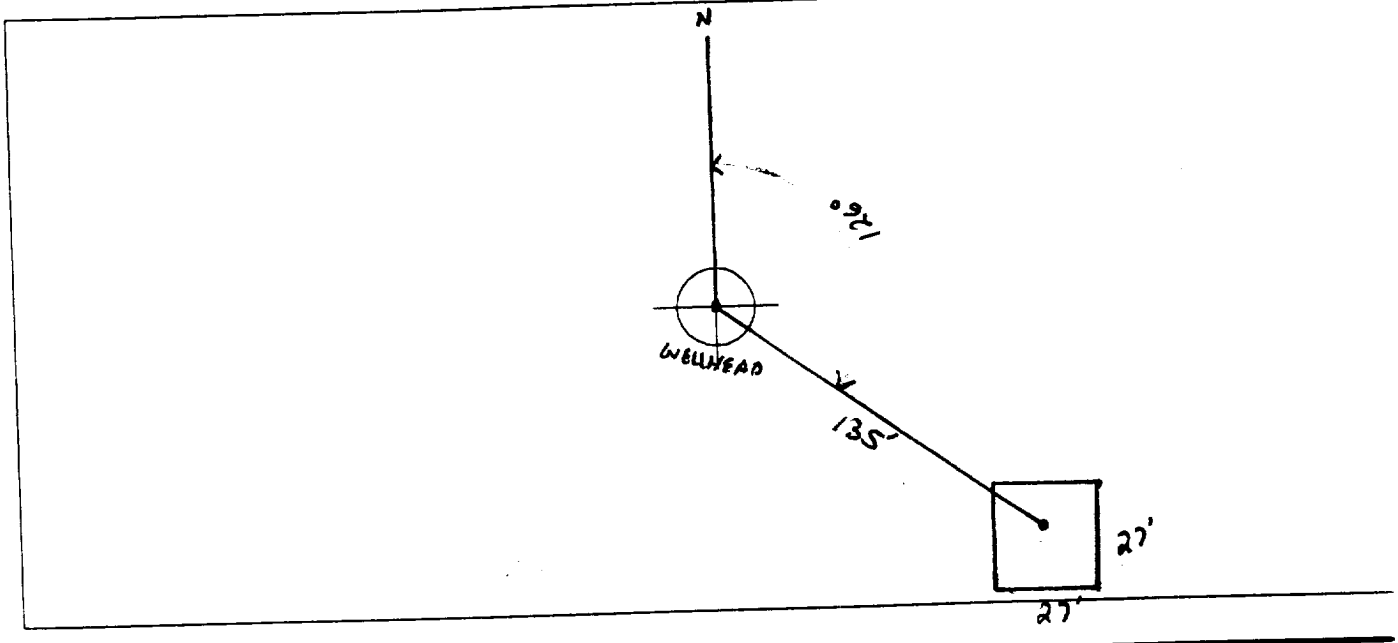
ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 126° Footage to Wellhead 135'

b) Degrees from North _____ Footage to Dogleg _____

Dogleg Name _____

c) Length : 27' Width : 27' Depth : 5'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 11:10 A.M.

END DUMP

Completed By:

Robert Thompson
Signature

3.31.94
Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 93907 / 93908 Location: Nickles # 1-M

Coordinates: Letter: O Section 11 Township: 31 Range: 13

Or Latitude _____ Longitude _____

Date Started : 4-22-94 Area: 02 Run: 21

FIELD OBSERVATIONS

Sample Number(s): 945007 VW28 _____ _____ _____

Sample Depth: 10 Feet

Final PID Reading 296 PID Reading Depth 10 Feet

	Yes	No	
Groundwater Encountered	☐ (1)	☒ (2)	Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 85
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

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

Pit Closure Date: _____ Pit Closed By: BEI

REMARKS

Remarks : No markers on location, Hit Rock at 10' + couldn't dig any further

Signature of Specialist: Vicki Wilson

(SP3191) 04/07/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW28	945007
MTR CODE | SITE NAME:	93907/93908	NICKELS #1-M
SAMPLE DATE | TIME (Hrs):	22-Apr-94	1610
PROJECT:	Phase I Excavation	
DATE OF TPH EXT. | ANAL.:	4/28/94	4/28/94
DATE OF BTEX EXT. | ANAL.:	5/6/94	5/14/94
TYPE | DESCRIPTION:	VC	Brown/Grey Sand/Clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.03	MG/KG				
TOLUENE	8.72	MG/KG				
ETHYL BENZENE	5.18	MG/KG				
TOTAL XYLENES	43.1	MG/KG				
TOTAL BTEX	57.0	MG/KG				
TPH (418.1)	<10	MG/KG			2.04	28.0
HEADSPACE PID	296	PPM				
PERCENT SOLIDS	87.0	%				

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

The Surrogate Recovery was at 78.1 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: John Fowler

Date: original: 9/30/94 re-print: 4/14/98

NARRATIVE

SAMPLE NO.: 945007

SAMPLE WAS ORIGINALLY ANALYZED BY EPNG LAB FOR TPH (4/28/94) AND BTEX (EXT 5/6/94, ANAL 5/4/94) . SAMPLE WAS RE-ANALYZED BY EPNG ON 5/16/94 FOR TPH AND ON 5/19/94 (EXT 5/17/94) FOR BTEX DUE TO THE PRESENCE OF BTEX COMPONENTS WITH NO INDICATION OF TPH COMPONENTS.
SAMPLE WAS ALSO SENT TO ANALYTICAL TECHNOLOGIES (ATI) FOR BTEX ANALYSIS (EXT 5/20/94, ANAL 5/22/94).

ORIGINAL RESULTS ARE WITHIN REQUIRED HOLDING TIMES. SECOND BTEX AND TPH ANALYSES BY EPNG, AS WELL AS THE BTEX ANALYSIS DONE BY ATI ARE BEYOND THE REQUIRED HOLDING TIMES FOR THESE ANALYSES.

[illegible] ***
Test [illegible] for *
[illegible] Grease and Petroleum Hydrocarbons *
in Water and Soil *
*
Perkin-Elmer Model [illegible] *
Analysis Report *
****

[illegible]

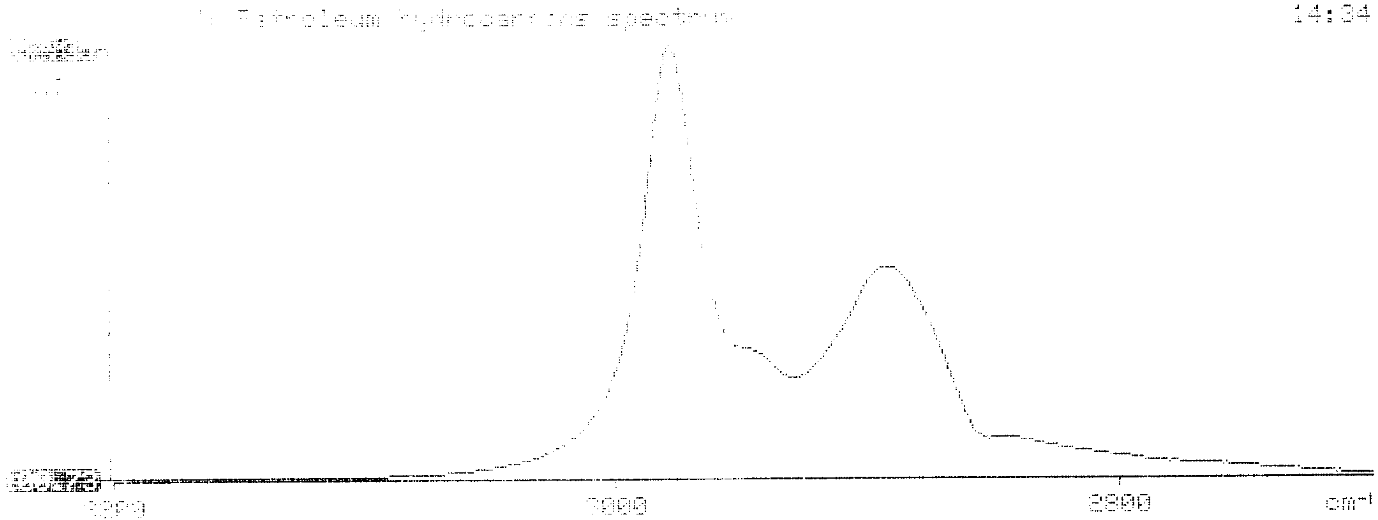
[illegible] Identification
[illegible]

[illegible] mass of sample, g
[illegible]

[illegible] of sample after extraction, ml
[illegible]

[illegible] hydrocarbons, ppm
[illegible]
[illegible] absorbance of hydrocarbons ([illegible] cm-1)
[illegible]

[illegible] Petroleum hydrocarbons spectrum 14:34



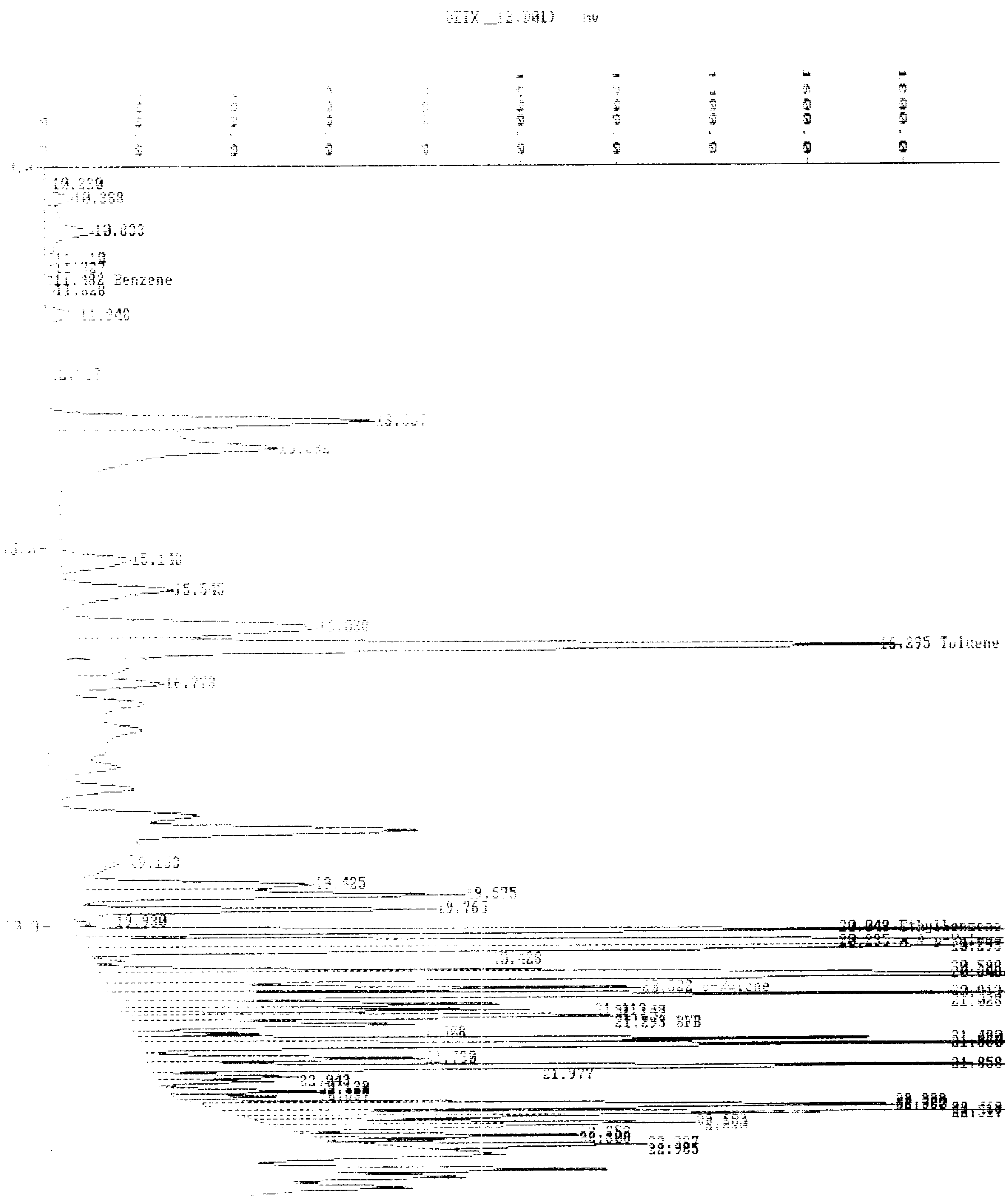
John Lambert[illegible]
Type : Sample

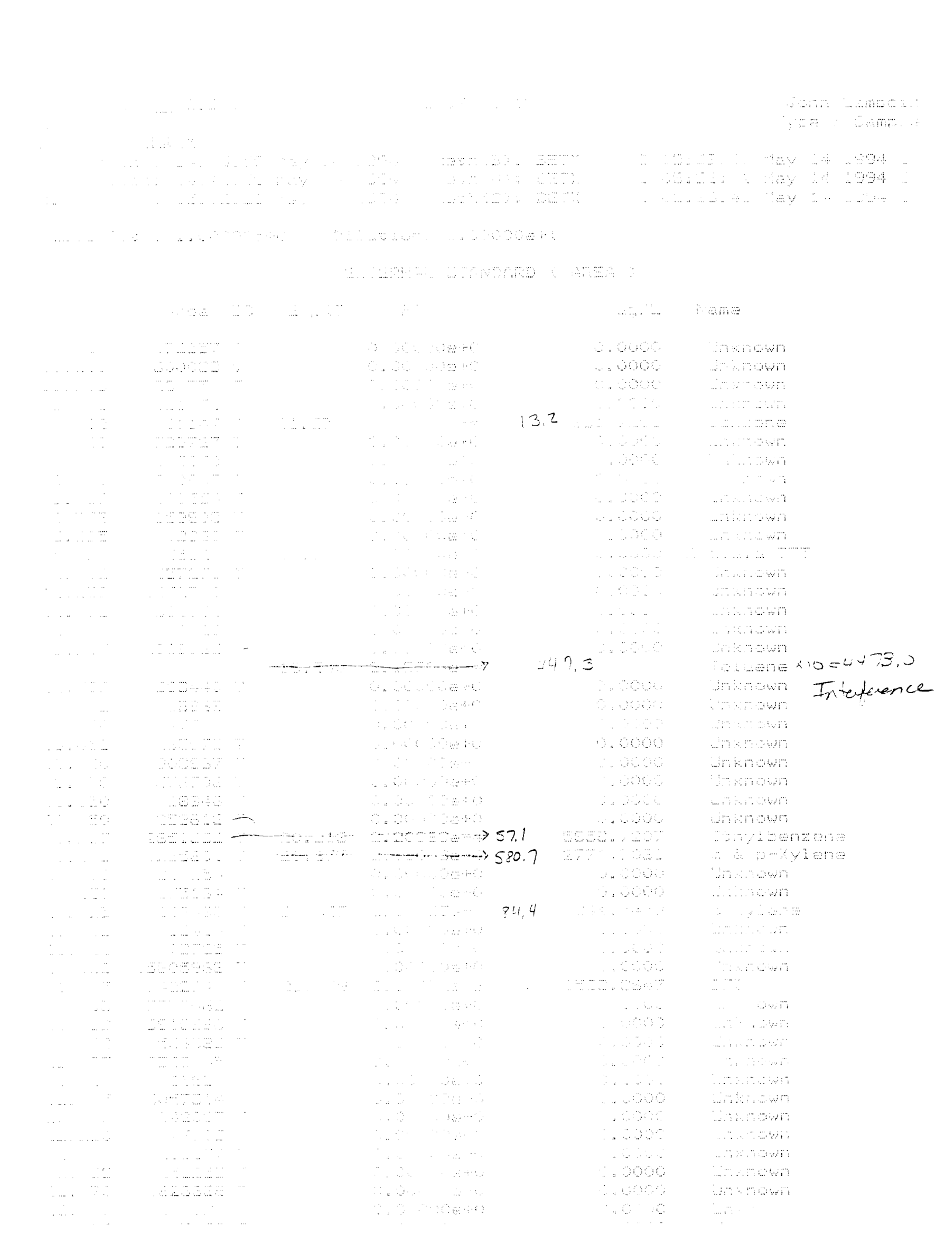
[illegible] May 14 1994 [illegible]
[illegible] May 14 1994 [illegible]
[illegible] May 14 1994 [illegible]

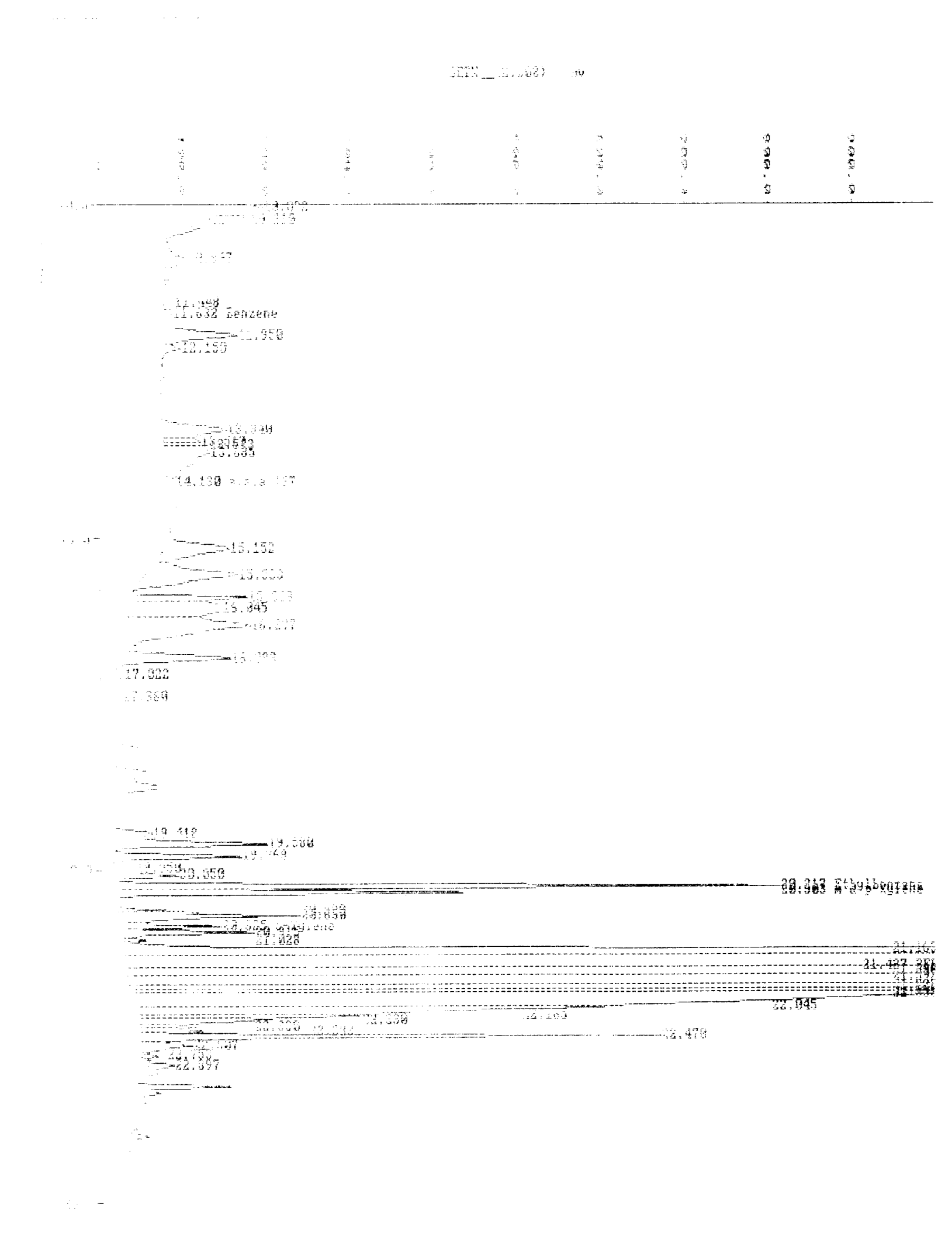
INTERNAL STANDARD [illegible]

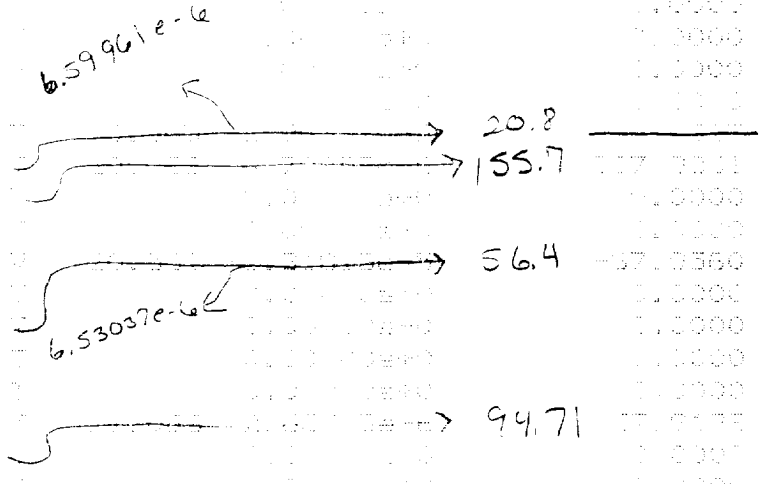
[illegible]	Amount (ug/L)	Name	
[illegible]	.0000	Unknown	
[illegible]	.0100	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	[illegible]	Benzene	ok ✓
[illegible]	[illegible]	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible] → 556.7		a,a,a TFT	
[illegible]	.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible] 13? ?	[illegible]	Toluene	
[illegible]	.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	.0000	Unknown	
[illegible] 51.0	[illegible].5701	Ethylbenzene	
[illegible] 428.8	[illegible]	[illegible]-Xylene	
[illegible]	0.0000	Unknown	
[illegible]	.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	[illegible]	Unknown	
[illegible] → 136.68	[illegible].0947	[illegible]lene	x10 = 1366.8
[illegible]	.0000	Unknown	
[illegible]	.0000	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	.0000	Unknown	
[illegible]	[illegible]	[illegible]	
[illegible]	[illegible]	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	.0000	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	[illegible]	Unknown	
[illegible]	0000	Unknown	
[illegible]	0.0000	Unknown	
[illegible]	[illegible]	Unknown	

[illegible]	[illegible]	[illegible]	[illegible]	unknown
[illegible]	[illegible]	[illegible]	[illegible]	unknown
[illegible]	[illegible]	[illegible]	[illegible]	unknown
[illegible]	[illegible]	[illegible]	[illegible]	unknown
[illegible]	[illegible]	[illegible]	[illegible]	unknown
[illegible]	[illegible]	[illegible]	[illegible]	unknown




13.2
49.3
Interference
57.1
580.7
84.4

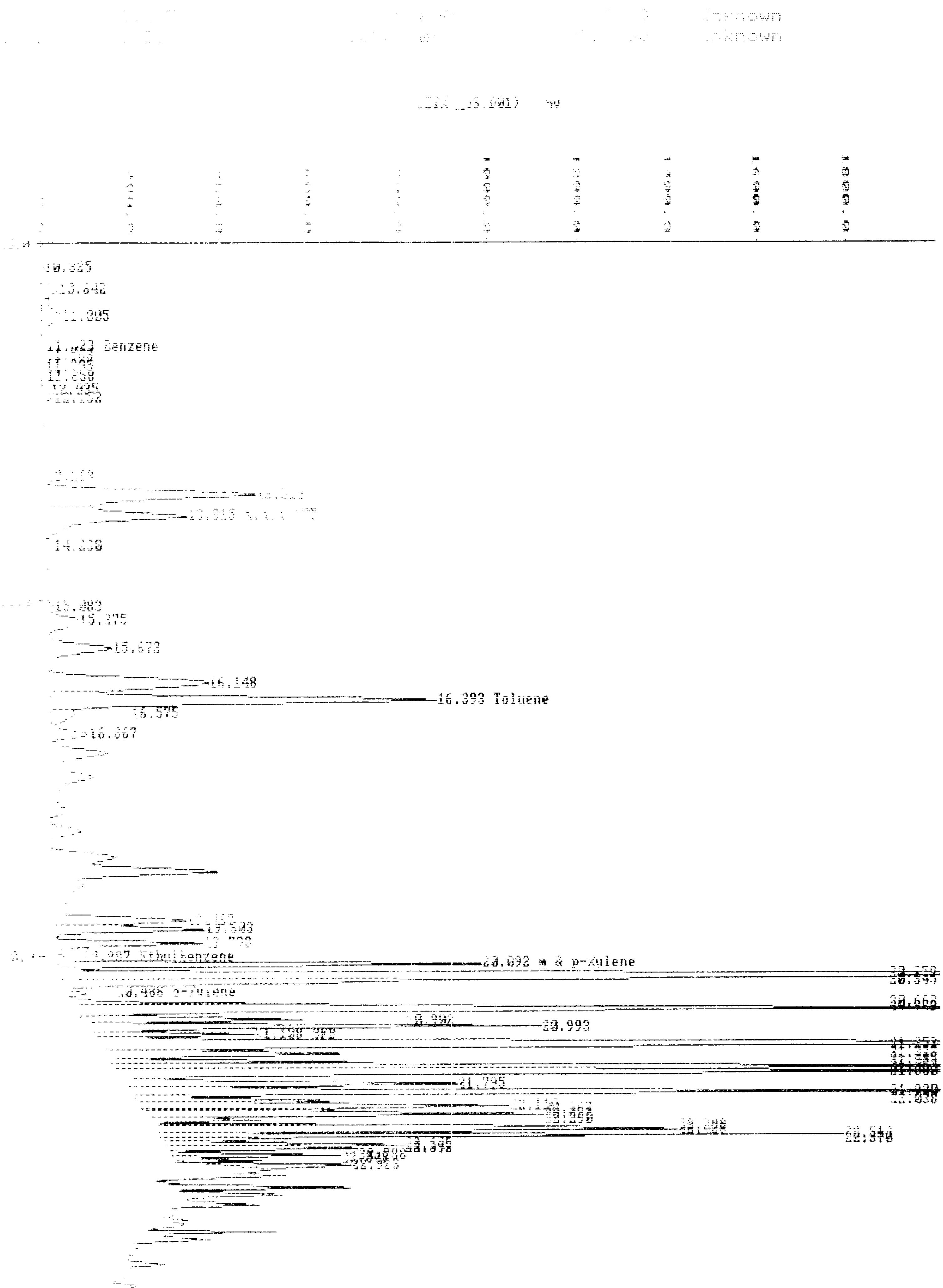

11,632 Benzene
22,045



Toluene x20 = 858.0

m-Xylene x20 = 3114.

o-Xylene x20 = 1128.0



11.423 Benzene
16.393 Toluene
20.092 m & p-Xylene
20.993
21.795

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

[illegible] 13:42

Sample Identification
[illegible]5007

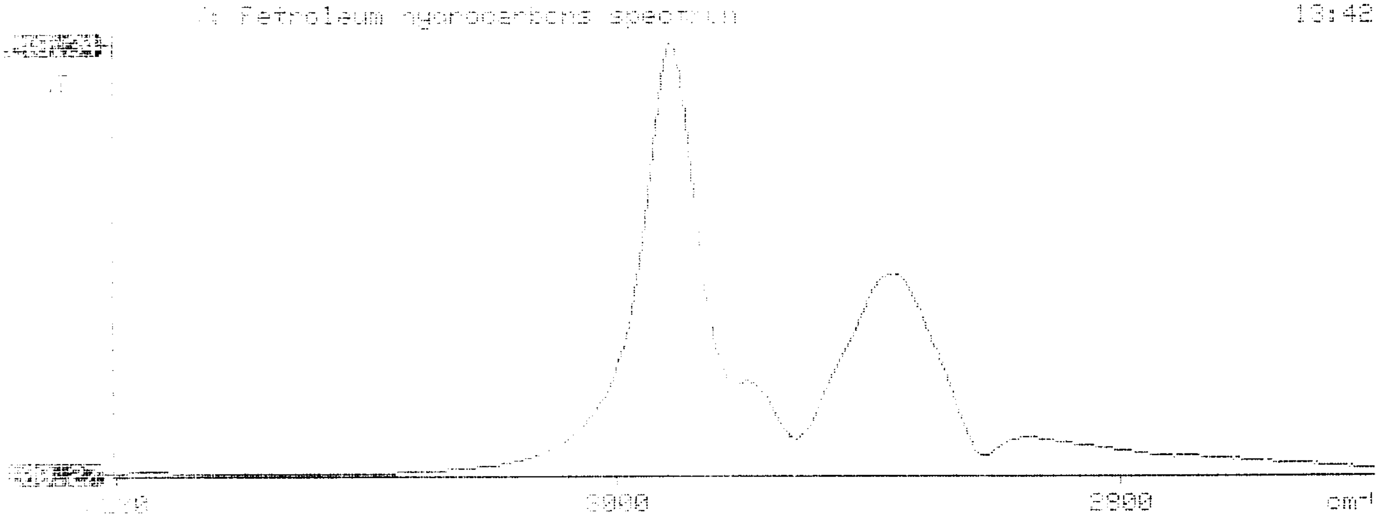
[illegible] mass of sample, g
[illegible]

Volume of sample after extraction, ml
[illegible]

Petroleum hydrocarbons, ppm
[illegible]6.748
Net absorbance of hydrocarbons (2930 cm-1)
[illegible]

ReRun 5/16
<10

[illegible] Petroleum hydrocarbons spectrum 13:42



945007 1/20 Rerun

20

0.545 — ...entane x20 = 10.9

41.26 — ...ene x20 = 825.2

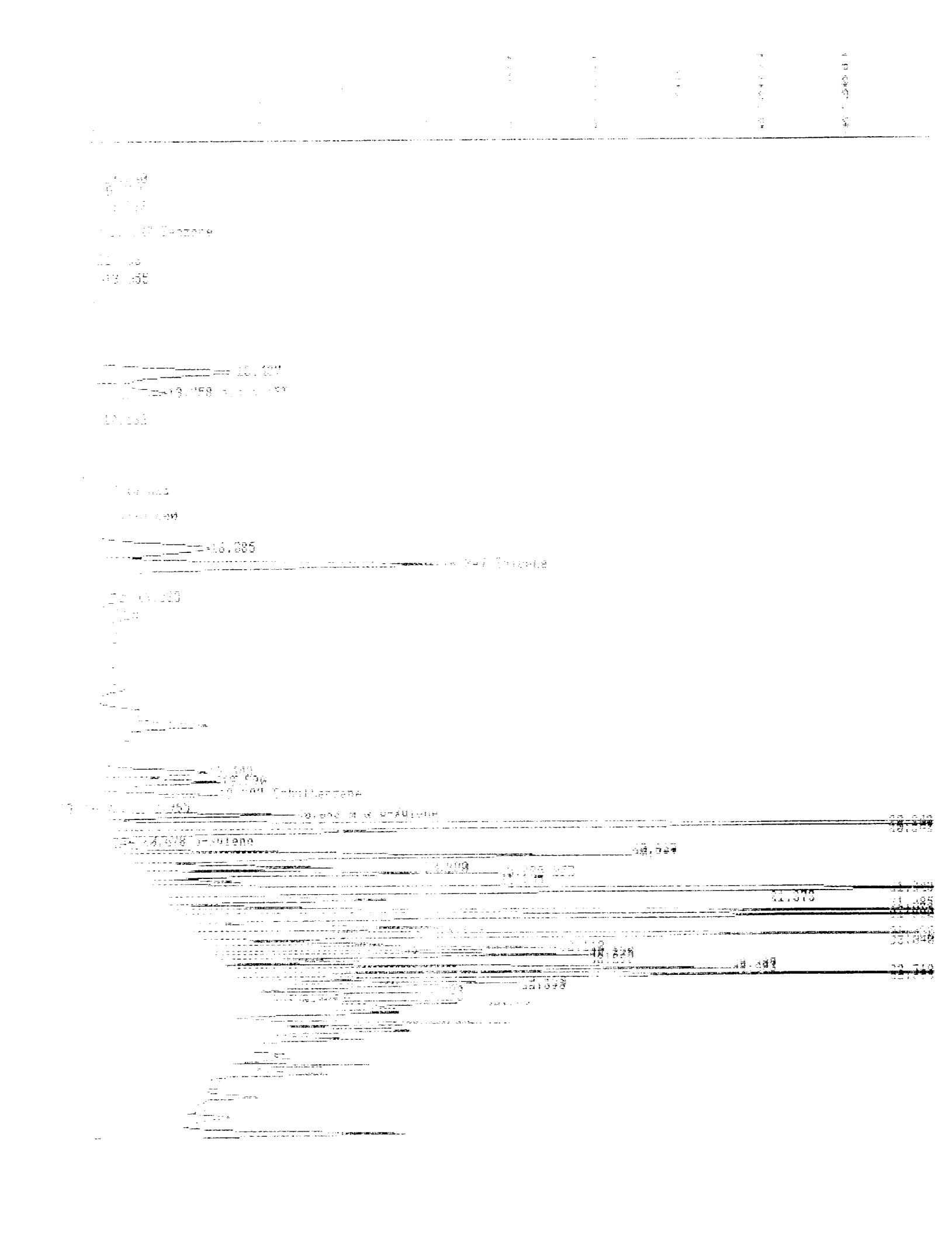
8.27176e-2 → 12.88 — ...ylbenzene x20 = 257.7

3.19972e-6 → 143.6 — ...xylene x20 = 2871.9

8.3324e-6 → 37.36 — ...ene x20 = 747.1

5.43709e-6 → 127.6

Rerun
[signature]
5/20/9



945007 1/20

Analytical Technologies, Inc.

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

ATI I.D. **405378**

June 2, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **05/18/94**, 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.

Client samples 945004 and 945007 were submitted to Analytical Technologies' Albuquerque laboratory past the recommended EPA holding time. NOTED 6/6/94

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

JUN 1994

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405378

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
27	945007	NON-AQ	04/22/94	05/20/94	05/22/94	10

PARAMETER	UNITS	27
BENZENE	MG/KG	<0.25
TOLUENE	MG/KG	0.27
ETHYLBENZENE	MG/KG	1.1
TOTAL XYLENES	MG/KG	9.9

SURROGATE:

TRIFLUOROTOLUENE (%) 97

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 Nickles #1-M 93907
93908

Elevation
Borehole Location T31, R13, S11, Ø
GWL Depth
Logged By Jeff W. Kindley
Drilled By Steve Sneiden
Date/Time Started 09/21/95 1600
Date/Time Completed 09/21/95 1740

Well Logged By Jeff W. Kindley
Personnel On-Site S. Sneiden, J. Johnson, D. Roberts
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	Drilling Conditions & Blow Counts
0				Backfill material to 10'						
5										
10										
15	1	15-17	1.5/2.0	CL, Tan silty clay (20% silt), dry, hard, low plasticity, hydrocarbon odor.					75/61	1622 43 blows per Foot
20	2	20-22	.5/2.0	S.A.A					87/86	1630 56 blows per Foot
25	3	25-27	.6/2.0	S.A.A					95/75	1645 57 blows per Foot
30	4	30-32	.7/2.0	S.A.A					63/82	1655 63 blows per Foot
35	5	35-37	.6/2.0	S.A.A. Boring terminated at 37'					0/7	1710 45 blows per Foot
40										

Comments: BH grouted to surface. Sample collected from 35 to 37 feet (JWK80) and analyzed for BTEX and TPH.

Geologist Signature Jeffrey Kindley

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:	JWK80	947519
MTR CODE | SITE NAME:	93907/93908	Nickels #1-M
SAMPLE DATE | TIME (Hrs):	09-21-95	1710
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL.:	9-22-95	
DATE OF BTEX EXT. ANAL.:	9/22/95	9/25/95
TYPE DESCRIPTION:	VG	Light brown Sand & Sand Stone

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)	73.5	MG/KG			1.99	28
HEADSPACE PID	7	PPM				
PERCENT SOLIDS	87.2	%				

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

The Surrogate Recovery was at 99% for this sample All QA/QC was acceptable.

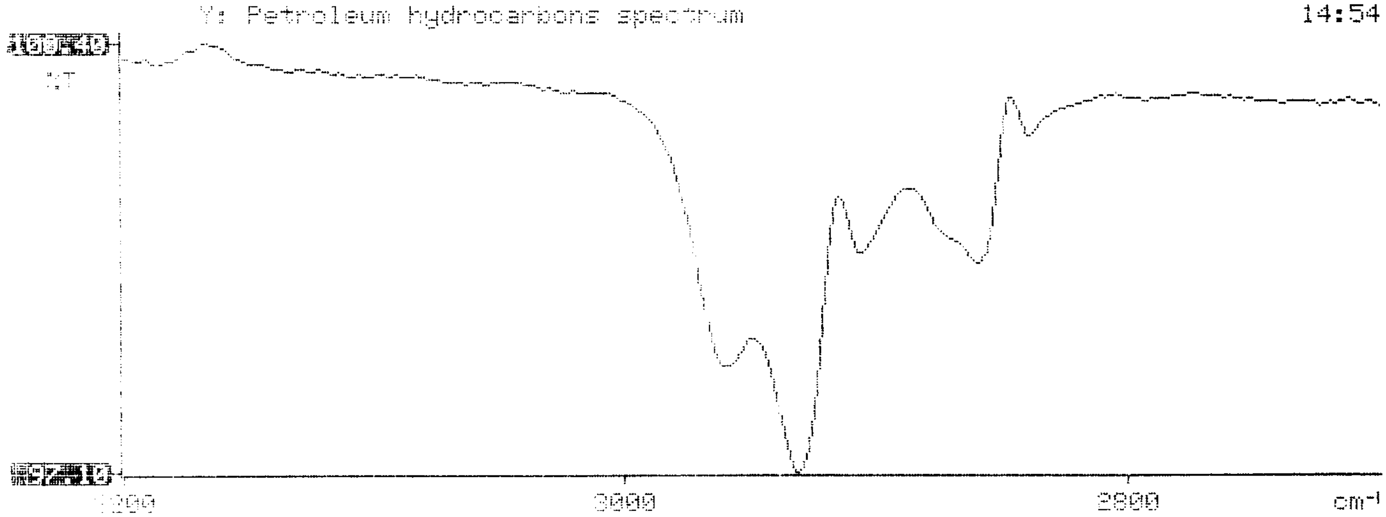
Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-29-95

```
**********************************************************
              Test Method for                             *
   Oil and Grease and Petroleum Hydrocarbons              *
             in Water and Soil                            *
                                                          *
         Perkin-Elmer Model 1600 FT-IR                    *
              Analysis Report                             *
**********************************************************
*
 25/09/22  14:54
*
*  Sample identification
 747519
*
*  Initial mass of sample, g
 1.990
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 22.486
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.013
*
```

Y: Petroleum hydrocarbons spectrum 14:54



BTEX SOIL SAMPLE WORKSHEET

File	947519	**Date Printed**	9/26/95
Soil Mass (g)	4.99	**Multiplier (L/g)**	0.00100
Extraction vol. (mL)	10	**DF (Analytical)**	200
Shot Volume (uL)	50	**DF (Report)**	0.20040

				Det. Limit
Benzene (ug/L)	0.28	**Benzene (mg/Kg):**	**0.056**	0.501
Toluene (ug/L)	0.80	**Toluene (mg/Kg):**	**0.160**	0.501
Ethylbenzene (ug/L)	0.17	**Ethylbenzene (mg/Kg):**	**0.034**	0.501
p & m-xylene (ug/L)	1.01	p & m-xylene (mg/Kg):	0.202	1.002
o-xylene (ug/L)	0.43	o-xylene (mg/Kg):	0.086	0.501
		Total xylenes (mg/Kg):	**0.289**	1.503
		Total BTEX (mg/Kg):	**0.539**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\092595-0.015
Method : C:\LABQUEST\METHODS\9000.MET
Sample ID : 947519,4.99G,50U
Acquired : Sep 25, 1995 20:39:17
Printed : Sep 25, 1995 21:09:41
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.123	104416	0.2791
a,a,a-TFT	10.473	8975803	102.5973
TOLUENE	12.890	291258	0.8003
ETHYLBENZENE	17.237	57178	0.1698
M,P-XYLENES	17.613	404605	1.0085
O-XYLENE	18.783	140243	0.4283
BFB	19.870	53779220	98.6628