# \*\*\*ELPASO FIELD SERVICES UTPRODUCTION PIT CLOSURE







Legals - Twn: 31 NMOCD Hazard Ranking: 20

**Operator:** P-R-O MANAGEMENT

**Rng:** 13

Sec: 11

Unit: O

Land Type: 2 - Federal

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
- 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
- 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

	43907 Meter: <u>93908</u> Location: <u>NICKLES # 1- M</u>					
	PRO Operator #: 7272 Operator Name: MANAGEMENTP/L District: KUTZ					
GENERAL	Coordinates: Letter: <u>O</u> Section <u>II</u> Township: <u>31</u> Range: <u>13</u>					
ENE	Or Latitude Longitude					
	Pit Type: Dehydrator X Location Drip: Line Drip: Other:					
	Site Visit Date: 3.31.94 Run: 02 21					
	NMOCD Zone: Inside Land Type: BLM (From NMOCD Vulnerable State   State   Fee   Outside   Indian   Indian					
LNI	Depth to Groundwater  Less Than 50 Feet (20 points)  50 Ft to 99 Ft (10 points)  Greater Than 100 Ft (0 points)					
ASSESSMENT	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)					
SITE	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					
RKS	Remarks: Two PITS ON LOCATION. WILL CLOSE ONLY ONE.					
REMARKS						

	ORIGINAL PIT LOCATION
Z	Original Pit: a) Degrees from North <u>126°</u> Footage to Wellhead <u>135′</u> b) Degrees from North Footage to Dogleg  Dogleg Name  c) Length: <u>21′</u> Width: <u>22′</u> Depth: <u>5′</u>
ORIGINAL PIT LOCATION	c) Length: 21 Width . 22 Bopth . 22'
	27
DEWARKS	
	Completed By:  Signature  Signature  Signature

# PHASE I EXCAVATION

# FIL ) PIT REMEDIATION/CLOS RE FORM

GENERAL	Meter: 93908 Location: Mick les 1-11   Nick les 1-11   Range: 13    Coordinates: Letter: D Section II Township: 31   Range: 13    Or Latitude Longitude  Date Started: 4-22-94   Area: 102   Run: 21
FIELD OBSERVATIONS	Sample Number(s): VW28  Sample Depth: 10 Feet  Final PID Reading 296 PID Reading Depth 10 Feet  Yes No  Groundwater Encountered (1) X(2) Approximate Depth Feet
CLOSURE	Remediation Method:  Excavation
	Pit Closure Date: Pit Closed By: BET_
REMARKS	Remarks: No Markers on location, Hit Rock at 10' + couldn't dig any further
	Signature of Specialist: Vale Whon  (SP3191) 04/07/94



# 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				
			DF	0	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 --

Narrative:	78.1	_% for this sample	All UA/UC was acceptable.	
		· · · · · · · · · · · · · · · · · · ·		
DF = Dilution Factor Used			Distinct: 9/30/94	

Approved By: John Fardi

Date: <u>pe-print: 4/14/98</u>

#### NARRATIVE

SAMPLE NO.:

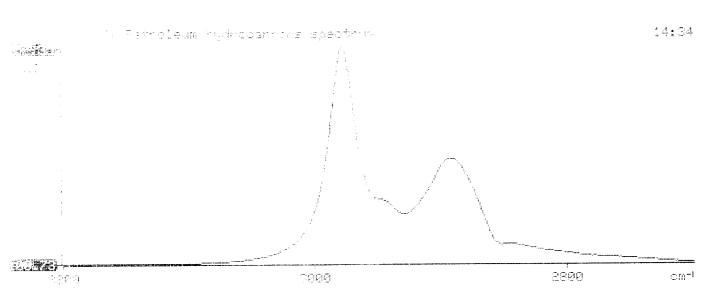
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SAMPLE WAS ORIGINALLY ANALYZED BY EPNG LAB FOR TPH (4/28/94) AND BTEX (EXT 5/6/94, ANAL 5/4/94). SAMPLE WAS RE-ANALYZED BY EPNG ON 5/16/94 FOR TPH AND ON 5/19/94 (EXT 5/17/94) FOR BTEX DUE TO THE PRESENCE OF BTEX COMPONENTS WITH NO INDICATION OF TPH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

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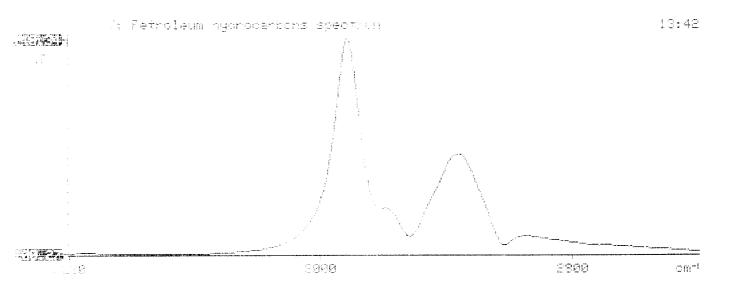
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ATI I.D. 405378

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 81 616/94

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

Letitia Krakowski, Ph.D.

the hakous

Project Manager

MR:jd

Enclosure

H. Mitchell Rubenstein, Ph.D. Laboratory Manager





#### GAS CHROMATCGRAPHY 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:					
mptrillopomorilene (%)			0.7		

TRIFLUOROTOLUENE (%)

97

# PHASE II

#### RECORD OF SUBSURFACE EXPLORATION

#### PHILIP ENVIRONMENTAL

4000 Monroe Road Farmington, New Mexico 87401 (506) 326-2262 FAX (506) 326-2388

Elevation

Borehole Location T31, R 13, £ 11, Ø

GWL Depth

Logged By Jeff W. Kindley

Drilled By Started 09 | 21 95 1600

Date/Time Completed 09 | 21 95 1740

Borehole #	BH-1	
Well #		
Page	of	

 Project Name
 EPNG Pits

 Project Number
 14509
 Phase 6000.77

 Project Location
 NICKIOS
 #I-M 93907

 93 908
 93 908

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

_			Sample		uscs	Depth	A:	- 14		Driffing Conditions
Depth (Feet)	Sample Number	Sample	Type & Recovery	Sample Description Classification System: USCS	Symbol	Lithology Change	Air Monitoring Units: PPM		-	& Blow Counts
(1 001)	1101100		(inches)			(feet)	ВZ	вн	s	
5			(irica es)	BackFill makrial to 10'		need	52			
15	1	15-17	15.0 15.0	CL, Tan silty clay (20 ? silt), dry, hand, low plastreity, hydrocar box wdwr.					75	1622 436 lows Jan Foot
20	2	20-X	·5/2·0	S. A. A.				,	87	1630 56 h Lousgon Foot
25 	3	25-27	2.0	5. A.M					9 <i>5]</i> 75	1645 576 hours for Foot
30				SAA					43/	1655 63 blows for Foot
35	5	36-37	÷ nã	S.AA. Boring terminated at 37'					0/7	1710 45 bour gan Foot

Comments:

BH granted to surface. Sample alberted from 35 to 37 feet (JWK 80)

and analyzed for BTEX and TPH.

Geologist Signature

Hey Kindly



### FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

### SAMPLE IDENTIFICATION

947519 Nickels #1-M 1710
1710
)-
7
2-95
2/95 9/25/95
Light brown Sand & Sand Stom
J

PARAMETER	RESULT	UNITS	QUALIFIERS				
		. 1	DF	Q	M(g)	V(ml)	
BENZENE	< 0.5	MG/KG				Š:	
TOLUENE	< 0.5	MG/KG					
ETHYL BENZENE	< 0.5	MG/KG					
TOTAL XYLENES	< 1.5	MG/KG					
TOTAL BTEX	43	MG/KG					
TPH (418.1)	73,5	MG/KG			1.99	28	
HEADSPACE PID	7	РРМ					
PERCENT SOLIDS	77.2	%					

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 -for this sample All QA/QC was acceptable. The Surrogate Recovery was at Narrative: DF = Dilution Factor Used Date: \_\_\_\_\_9-29-95

Approved By: \_\_\_\_\_

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Test Method for
                                             \frac{1}{4}
    Ul. and Grease and Petroleum bydrocarbons
              in Water and Soil
                                             *
                                             *
         Perkin-Elmer Model 1600 FT-IR
               Analysis Report
25/09/22 14:54
Bancio identification 747819
initial mass of sample, g
{\mathbb K} -Volume of sample after extraction, ml
 Petroleum hydrocarbons, ppm
23.486

Het sesenbance of hydrocarbons (2930 cm-1)
C.013
        Y: Petroleum hydrocarbons spectrum
                                                         14:54
```

3000

2899

 $\circ m^{-1}$ 

1200

#### 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

				U	et. Liiiiit
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 xylenes (mg/Kg): 0.289 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

