

District I
P.O. Box 1980, Hobbs, NM

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

District III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

2040 South Pacheco Street
Santa Fe, New Mexico 87505

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

*Bedrock
Risk
Analysis*

PIT REMEDIATION AND CLOSURE REPORT

Operator: <u>PNM Gas Services (Williams)</u>		Telephone: <u>324-3764</u>	
Address: <u>603 W. Elm Street Farmington, NM 87401</u>			
Facility or Well Name: <u>Ute Indian A #21 Drip</u>			
Location:	Unit <u>A</u>	Sec <u>34</u>	T <u>32 N</u> R <u>14 W</u> County <u>San Juan</u>
Pit Type:	Separator <input type="checkbox"/>	Dehydrator <input type="checkbox"/>	Other <u>Drip</u>
Land Type:	BLM <input type="checkbox"/>	State <input type="checkbox"/>	Fee <input type="checkbox"/> Other <u>Ute Mountain Reservation</u>
Pit Location:		Pit dimensions: length <u>20</u> ' width <u>20</u> ' depth <u>4</u> '	
(Attach diagram)	Reference: wellhead <input type="checkbox"/>		other <u>Drip riser.</u>
Footage from reference:		<u>15'</u>	
Direction from reference: <u>40</u> Degrees		<input type="checkbox"/> East	North <input type="checkbox"/>
		<input checked="" type="checkbox"/> West	South <input checked="" type="checkbox"/>
Depth to Ground Water:			
<small>(Vertical distance from contaminants to seasonal high water elevation of ground water)</small>		Less than 50 feet	(20 points)
		50 feet to 99 feet	(10 points)
		Greater than 100 feet	(0 points)
			<u>20</u>
Wellhead Protection Area:			
<small>(Less than 200 feet from a private domestic water source, or; less than 1,000 feet from all other water sources)</small>		Yes	(20 points)
		No	(0 points)
			<u>0</u>
Distance to Surface Water:			
<small>(Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)</small>		Less than 200 feet	(20 points)
		200 feet to 1,000 feet	(10 points)
		Greater than 1,000 feet	(0 points)
			<u>0</u>
RANKING SCORE (TOTAL POINTS) :			<u>20</u>

Ute Indian A #21 Drip

Date Remediation Started: 09/15/1999

Date Completed: 09/15/1999

Remediation Method:

Excavation ☒

Approx. Cubic Yard 245

(Check all appropriate sections)

Landfarmed ☒

Amount Landfarmed (cubic yds) 220

Other 25 cu yds overburden.

Remediation Location:

Onsite

Offsite

Tierra Environmental.

(i.e., landfarmed onsite, name and location of offsite facility)

Backfill Material Location:

General Description of Remedial Action:

Excavated contaminated soil to a pit size of 30' X 17' X 13' and transported soil to an offsite commercial landfarm.

*** Sandstone encountered at 13'. See attached risk analysis form.

Ground Water Encountered:

No



Yes



Depth

Final Pit Closure Sampling:

Sample Location

5 pt composite-bottom

(if multiple samples, attach sample result and diagram of sample locations and depths.)

Sample depth

13'

Sample date

09/15/1999

Sample time

10:30:00 AM

Sample Results

Benzene (ppm)

5.3

Total BTEX (ppm)

162.3 ***

Field headspace (ppm)

TPH (ppm)

630.00 ***

Method

8015B

Vertical Extent (ft)

Risk Analysis form attached Yes



No



Ground Water Sample:

Yes



No



(If yes, see attached Groundwater Site Summary Report)

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND MY BELIEF

DATE January 24, 2000

SIGNATURE

Maureen Gannon

PRINTED NAME Maureen Gannon
AND TITLE Project Manager

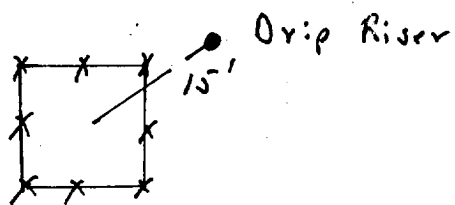
Ute Indian A-21 Orip

9/15/99

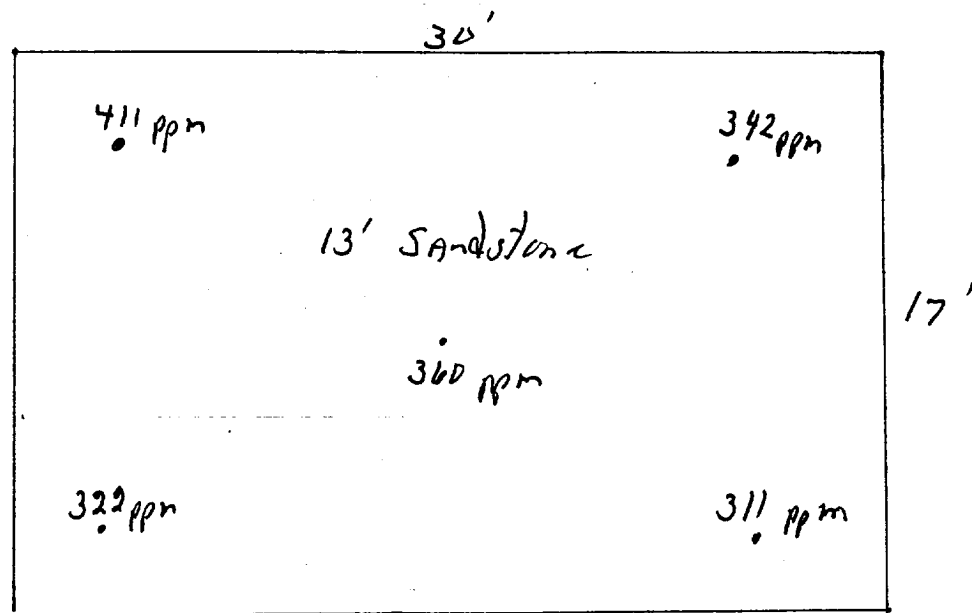
WFS

Sec. 34.32 N, 14 W, A

Site diagram:



End of excavation:



OFF: (505) 325-5667



LAB: (505) 325-1556

On Site Technologies, LTD.

Date: 01-Oct-99

CLIENT: PNM - Public Service Company of NM
Project: P&R & Ute Indian A-21 Pits
Lab Order: 9909055

CASE NARRATIVE

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.



ANALYTICAL REPORT

Date: 01-Oct-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	Ute Indian A-21 Drip
Work Order:	9909055	Client Sample ID:	9909151030 @ 13ft.
Lab ID:	9909055-03A	Matrix:	SOIL
Project:	P&R & Ute Indian A-21 Pits	Collection Date:	09/15/1999 10:30:00 AM
		COC Record:	7758

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		SW8015B		Analyst: DC		
T/R Hydrocarbons: C10-C28	630	25		mg/Kg	1	09/28/1999
AROMATIC VOLATILES BY GC/PID		SW8021B		Analyst: DM		
Benzene	5300	1000		µg/Kg	1000	09/24/1999
Toluene	39000	2000		µg/Kg	1000	09/24/1999
Ethylbenzene	13000	1000		µg/Kg	1000	09/24/1999
m,p-Xylene	84000	2000		µg/Kg	1000	09/24/1999
o-Xylene	21000	1000		µg/Kg	1000	09/24/1999

162300
162.3 ppm

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

Surrogate - Surrogate

1 of 1

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 01-Oct-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	Ute Indian A-21 Drip
Work Order:	9909055	Client Sample ID:	9909151130 @ 7ft. <i>Wells</i>
Lab ID:	9909055-04A	Matrix:	SOIL
Project:	P&R & Ute Indian A-21 Pits	Collection Date:	09/15/1999 11:30:00 AM
		COC Record:	7758

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		SW8015B				Analyst: DC
T/R Hydrocarbons: C10-C28	250	25		mg/Kg	1	09/28/1999
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: DM
Benzene	ND	500		µg/Kg	500	09/24/1999
Toluene	1200	1000		µg/Kg	500	09/24/1999
Ethylbenzene	1200	500		µg/Kg	500	09/24/1999
m,p-Xylene	16000	1000		µg/Kg	500	09/24/1999
o-Xylene	4300	500		µg/Kg	500	09/24/1999

22700
22.7 ppm

Qualifiers:	PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
	ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
	J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
	B - Analyte detected in the associated Method Blank	Surr: - Surrogate

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- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -

Well Name:	Ute Indian A #21 Drip
Well Legals:	Sec 34, T32N, R14W, Unit A
Pit Type:	Drip
Horizontal Distance to Surface Water:	Greater than 1,000 feet
Groundwater Depth:	Less than 50 feet

RISK ANALYSIS

PNM requests closure of their former pit on the Ute Indian A #21 Drip well site using a limited risk analysis based on the following conditions:

1. Groundwater is estimated to be at a depth of 30 feet based upon the elevation of the site and the elevation of the nearest "listed" or "named" wash. (Reference: Purgatory Canyon Peak, NM series 7.5 minute topographic map.)
2. PNM excavated 245 cubic yards of soil from the former pit. Source removal minimizes the possibility of surface water contamination.
3. Sandstone was encountered at 13 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 that their former pit on the Ute Indian A #21 Drip well site poses minimal threat to groundwater, human health and the environment based upon our past experience in excavating over 1,000 pits.