

REPORTS

DATE:

Holland and Associates

4918 King Richards Row Midland, Texas 79707 915-520-2098

RISK ASSESSED SITE CLOSURE

SNYDER OIL CORPORATION MALJAMAR NORTH UNIT LEA COUNTY, NEW MEXICO

March 16, 1996



Copies of 'Snyder Oil Corporation's Risk Assessed Pit Closure' have been sent to the following:

Wayne Price - NMOCD District I Supervisor, Hobbs, N. M.
Roger Anderson - New Mexico Environmental Bureau Chief, Santa Fe, N. M.
Eric Nelson - New Mexico State Land Office, Hobbs, N. M.
John Nussbaumer - Snyder Oil Corporation, Evans, Co.
Sam Simpson - Snyder Oil Corporation, Denver, Co.
Andy Grubb - Snyder Oil Corporation, Ft. Worth, Tx.
Peter Lorenzen - Snyder Oil Corporation, Ft. Worth, Tx.

RECEIVED MAR 2 8 1996

Environmental Bureau Oil Conservation Division

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1.0 INTRODUCTION

In the process of conducting a site assessment for the plugging and abandonment of three wells and associated tank battery at the North Maljamar Unit, Snyder Oil Corporation discovered an abandoned pit, once used for disposal of oilfield (hydrocarbon) material. Remedial actions were undertaken at the site in December of 1995. This report, herein, discusses the results of the remedial actions that were completed as part of the final closure for release at the site.

1.1 Site Location and Physical Setting

The North Maljamar Unit is situated on property owned by the State of New Mexico and is located approximately 4 miles east of Maljamar, just off and south of Hwy 82. The property location is within the North 1/2 of the Northwest 1/4 of Section 31, Township 16S, Range 33E of Lea County, New Mexico. G.P.S. location is N 32° 52.945', W 103° 42.414'.

Groundwater at and around the site is located at an average depth of 196 feet below ground surface according to information received from Mr. Johnny Hernandez, New Mexico State Engineer. (Reference Attachment I)

The soil survey from the Agriculture Soil Conservation Service indicates the surface soils at the site are classified as Kimbrough and Kimbrough-Lea Series. These soils are defined by the U. S. Department of Agriculture Soil Conservation Service as 'very shallow to shallow, loamy sediment layer over indurated caliche. These soils are about 4 inches to 8 inches thick. (See Appendix A.) Based on the results of a borehole drilled at the site, the site is underlain by a thick cemented sandstone layer from approximately 65 feet to 80 feet deep.

1.2 Background Information

The last production at this site was from the Maljamar North Unit #1 on 5/30/86. According to general knowledge of the location, the pit was dug in the early-1960's. Surface equipment remaining when plugging and clean-up operations commenced consisted of :

3 - 500 bbl welded steel tanks

2 - 30" x 10' separators, (1 out of service)

1 - 4' x 20' heater treater

3 - wellheads and associated flowlines for Maljamar North Unit #1, #2, and #4, respectively.

The site configuration is shown on Figure I. (Site facility map.)

2.0 SITE INVESTIGATION AND REMEDIATION

2.1 Excavation and Source Soils Removal

Remedial actions at the Maljamar site were initiated on 12-19-95. The pit was excavated to a depth of approximately 15 feet and 2,880 yards of contaminated source soils were hauled to CRI, Controlled Recovery, Inc., waste disposal facilities. With source contaminants removed, investigation started for a risk assessed closure plan. A soil sample was obtained by backhoe ten feet below pit bottom. This sample was tested by Cardinal Laboratories in Hobbs, New Mexico. Results indicated a TPH level of 14,134 mg/kg and BTEX levels of:

Benzene - 3.125 mg/kg	Para-Xylene - 1.607 mg/kg
Toluene - 8.127 mg/kg	Meta-Xylene - 3.674 mg/kg
Ethyl Benzene - 5.625 mg/kg	Ortho-Xylene - 2.479 mg/kg
(Reference Appendix B.)	

On January 17, 1996, a hollow stem auger drilling rig operated by Atkins Engineering Associates was moved to the site for the purpose of determining the vertical and horizontal extent of the contamination. A field laboratory, operated by Environmental Spill Control was brought in to conduct on-site TPH (418.1) and BTEX (8020) tests, Due to extreme high wind conditions, the BTEX samples could not be run in the field. Split spoon samples were taken at regular intervals. See the boring log, (Attachment II), for soil descriptions. Table 1 summarizes samples and corresponding TPH analysis results. At critical depth, samples were split and taken to Cardinal Labs in Hobbs and Maxim Labs in Midland, Texas for comparison confirmation of data. Copies of all laboratory data, including the final results for determination of vertical extent of contamination, are contained in Appendix B.

The first borehole was drilled in the bottom of the pit to a depth of 89.5 feet below ground surface. Sampling of the soil began at a depth of 20 feet and proceeded at regular intervals until a thick layer of cemented sandstone was encountered at about 65 feet. The drilling rig experienced mechanical problems and operations shut down for repairs. Resumption of operations proved the cemented sandstone to be approximately 15 feet thick and an apparent barrier to migration of the contaminants. Final samples were taken at 84.5 feet and 89.5 feet. Maxim Labs reported TPH and BTEX at levels below detection limits. Cardinal Labs reported TPH at 93 mg/kg and 116 mg/kg with BTEX levels close to detection limits. Cardinal Lab results are not considered as reliable as Maxim Labs since the original report showed the sample type to be water instead of soil, which they corrected, and TPH levels are slightly higher at the greater depth.



 TABLE 1

 SAMPLING DATA FROM PIT BOREHOLE #1

Depth (ft) from G. L.	TPH (mg/kg) Lab Data	TPH (ppm) Field Lab Data	PID (ppm)	BENZENE	BTEX
5' to 10'	21,700				
14.5'	15,700				
25' (w/ backhoe)	14,134			3.125	24.63
29'		12,085			
35'		11,510	556		
45'		10,750	405		
60'		7,520	242		
65'	vanisinan nanzen n	4,770	273		
80'		780			
84.5' **	93	45		0.082	BDL
85'		36			
84.5'	BDL			BDL	BDL
89.5' **	116			0.175	BDL

** Cardinal Labs seems to have quality control problems which may have affected results. On the analysis report, the sample medium had to be corrected from water to soil. **BDL - Below Detection Limits**

It should be noted that the borehole was plugged back through the cemented sandstone with Bentonite to 41 feet from surface.

To determine the horizontal extent of contamination, three additional boreholes were drilled in a triangulated pattern and samples taken to 15 feet, which corresponds to the depth of the pit. Environmental Spill Control ran TPH analysis in their field lab. Results demonstrated TPH levels of 25 ppm or less in all samples. See Figure II for borehole locations.



LOCATION	DEPTH (ft) from G.L.	TPH (ppm) Field Lab Data	TPH (mg/kg) Lab Data
Battery / Tank site	surface		5,580
Battery / Tank site	5'	3,910	
Battery / Tank site	10'	184	
Battery / Tank site	15'	28	
South Horizontal Extent / S-7	15'	23	
North East Horizontal Extent / S-8	15'	18	
North West Horizontal Extent / S-9	15'	25	
North Pit Wall - Composite	approx 10'	10,610	
West Pit Wall - Composite	approx 10'	14,460	
East Pit Wall - Composite	approx 10'	14,340	
South Pit Wall - Composite	approx 10'		11,485
Rock from Pit Wall	approx 10'		12,710
Stock Piled Soil - Composite	1' to 15'	2,600	
Stock Piled Soil - Composite	1' to 15'	2,850	

 TABLE 2

 SAMPLING DATA FROM CORING AT ALTERNATE SITES

2.2 Sampling Techniques

Samples were obtained using a split spoon sampler. The sampler was decontaminated between sample points using a nonphosphate detergent and distilled water. Each sample was clearly marked with indelible ink. Samples taken to an off-site laboratory were maintained at approximately 40 degrees Fahrenheit and transported to the laboratory utilizing appropriate chain of custody control.

3.0 RISK ANALYSIS

3.1 Site Condition, Status and Land Use

Site Status

The wells associated with the site have been properly plugged and abandoned. Stock tanks and associated equipment have been removed. The following criteria apply to the present site.

A. <u>The release has been abated</u>. The source materials (tank bottoms and heavily contaminated soils) have been removed. Approximately 2,880 yards of contaminated material were hauled to CRI's reclamation and waste disposal facility located 37 miles west of Hobbs, New Mexico.

B. <u>Public health and safety is neither impacted nor threatened</u>. As will be discussed in the exposure assessment section, there are no exposure pathways that the public could come into contact with the remaining hydrocarbons at the site.

C. <u>Contaminants are not discharged to surface waters or ground water</u>. There is no discharge of dissolved-phase contaminants or phase-separated hydrocarbons to surface waters or ground water which was demonstrated to be 196 feet below ground surface.

D. <u>The migration of the contaminant plume has ceased</u>. The removal of the source material, the presence of the underlying layer of cemented sandstone, and the provision of the clay cap will inhibit any infiltration of surface water, thus effectively preventing further vertical plume migration.

3.2 Chemicals of Concern

In the Risk-Based Corrective Action for Leaking Storage Tank Sites developed by the Texas Natural Resource Conservation Commission, (TNRCC document # RG 36) clean-up levels for total petroleum hydrocarbons were not established due to the lack of toxicity values for TPH. Where no indicator compounds, i.e. benzene, as is the case here, do not exceed health-based levels, then the determination of the acceptable level of TPH will be based upon other factors. Those factors as defined by the TNRCC and their applicability to this site are discussed below:

A. <u>No mobile product should be left in the soils.</u> All mobile product and source material was removed from the pit.

B. <u>The hydrocarbons should not generate vapors which exceed 25% of the LEL</u>. With removal of the source and placement of a clay cap, there will be no vapors to the atmosphere.

C. <u>The TPH contaminants should not harm vegetation, especially where the vegetation is a food</u> source to animals. The pit closure will be consist of fifteen feet of clean fill covered by a one and one-half foot to two foot clay cap and one foot of top soil. Vegetation will not be in contact with any remaining impacted soil.

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D. <u>TPH should not exceed 0.5 mg/L in impacted water supply wells or water intakes unless it can be demonstrated that the compounds contributing to the TPH concentration have been specifically evaluated with another analytical method.</u> There is no impact on the water supply.

E. <u>The TPH concentration should not create any odor nuisance</u>. Fifteen feet of backfill and a clay cap closure will prevent any odor nuisance.

F. <u>Site monitoring should indicate that TPH values are stable or declining</u>. The source of contamination, 2,880 yards of material in the upper portions of the pit have been removed. TPH levels at depth will naturally attenuate. As sampling results presented in Table 1 indicate, TPH values are decreasing with depth. TPH values less than the detectable limit were found at 84.5 feet from ground surface, suggesting the hydrocarbons have stabilized and declined with depth.

NOTE: BENZENE and BTEX levels as shown by sample results are not in significant quantities to be of a health concern.

3.3 Risk Assessment

Physical Setting

Direct human exposure to any remaining contamination will be virtually impossible. The contaminated source materials were removed to a depth of fifteen feet. Clean fill material will be placed in the pit to replace the impacted soils and clay cap (at 80 PCF) 1 1/2 to 2 feet thick will cover any remaining impacted soils. A one foot thick layer of top soil will be placed over the clay cap and the area revegetated. The area, centered with the backfilled pit, will be mounded to allow drainage away from the former pit location.

Water use in the area is agricultural in nature. The nearest water well in the area is approximately one mile away. The climate in the area is arid, with precipitation of fourteen inches per year average. Depth to ground water is 196 feet below ground surface as documented by the State Engineers Office.

Land use is for grazing. The area adjacent to the affected site is owned by the State of New Mexico and currently leased to Mr. Darr Angell. In all probability, future utilization of the land will continue to be for grazing.

Potentially Exposed Populations

The property is at least three miles from any residence and twenty miles from any municipality of significant size. Ground water in the area is at a depth of 196 feet, which is more than 100 feet below any remaining contaminated soil. There is a fifteen foot, cemented sandstone layer between the remaining impacted soil and the ground water. The top of this cemented sandstone layer is at a depth of 65 feet and provides a barrier to vertical migration.

Exposure Pathway Analysis

In order to have a complete exposure pathway, there must be a contaminant source area, an environmental transport media, an exposure point, and a route of exposure.

<u>Contamination Source</u>. The contamination source soils have been removed. Remaining impacted soils have been segregated from the surface by a clay cap and from the ground water by a cemented sandstone layer. Remaining hydrocarbons will naturally attenuate without impacting ground water or surface water in the area.

<u>Environmental Transport Media</u>. The only transport media is infiltration of surface water which has been eliminated by the clay cap.

<u>Exposure Point Concentration</u>. There will be no exposure point concentration as there will be no possibility of exposure by humans to the remaining impacted soil. The ground water, surface water and air are not affected by the impacted soil.

<u>Toxicity Assessment.</u> This is not necessary as there will be no exposure. Toxicity levels for TPH have not been established and BTEX are not present in sufficient quantities to be of concern.

<u>Risk Characterization</u>. Exposure pathways have been eliminated or shown not to be completed; therefore, risk is considered minimal.

<u>Uncertainty</u>. The assumptions made related to current and future land use were based on the present ownership and use of the land. Should the land use change, which is very unlikely given the remoteness of the location, there would be slight possibility of disturbance of the clay cap due to the building of a structure.

4.0 PROPOSAL

All source material was removed from the pit area to a depth of fifteen feet below ground surface. Approximately 2,880 yards of petroleum impacted soils were removed and hauled to CRI's facility. A soil boring was drilled to a depth of 89.5 feet to determine the vertical extent of contamination. At a depth of 65 feet, a fifteen foot layer of cemented sandstone was encountered. This cemented sandstone acted as a barrier, preventing further vertical contamination. Five feet below the cemented sandstone, a soil sample was collected and the results indicated TPH and BTEX at or below detectable levels. To determine the horizontal extent of contamination, three boreholes were drilled and sampled at a depth of fifteen feet. The TPH concentrations from these samples were 23 ppm, 18 ppm, and 25 ppm as detailed on Table 2 and Figure II.

Based on application of the TNRCC Risk Based Action Plan criteria, Snyder Oil Corporation believes that the overall risk is low. Reasons are as follows:

- a) No detectable BTEX or TPH at depth
- b) Source material excavated and removed to disposal
- c) Installation of clay cap preventing further migration through infiltration of surface water
- d) Depth to ground water is 196 feet from surface
- e) A cemented sandstone barrier below impacted soils and over 100 feet above ground water
- f) Demonstrated natural attenuation of remaining hydrocarbons

Snyder Oil is proposing to scrape the surface to a final areal dimension of approximately 150 feet by 160 feet as defined by the coring for horizontal extent. The soil at the battery location will be mixed and diluted to remediate on site. The pit will be backfilled with clean soil and a two foot thick clay cap will be mounded over the center of the pit, sloping to the outer edges of the identified remedial area to allow drainage away from the affected site. For clay specifications, see Appendix C. One foot of topsoil will be placed over the clay cap and revegetated. Once the above backfill, capping, and revegetation activities are completed, Snyder Oil Corporation considers the site to be effectively remediated in accordance with New Mexico Oil Conservation Division guidelines for risk assessed closure. Reference the attached <u>Pit Remediation and Closure Report</u>, Attachment III.

5.0 CLOSURE

All source material was removed from the pit area to a depth of fifteen feet below ground surface. Approximately 2,880 yards of petroleum impacted soils were removed and hauled to CRI's facility. A soil boring was drilled to a depth of 89.5 feet to determine the vertical extent of contamination. At a depth of 65 feet, a fifteen foot layer of cemented sandstone was encountered. This cemented sandstone acted as a barrier, preventing further vertical contamination. Five feet below the cemented sandstone, a soil sample was collected and the results indicated TPH and BTEX at or below detectable levels. To determine the horizontal extent of contamination, three boreholes were drilled and sampled at a depth of fifteen feet. The TPH concentrations from these samples were 23 ppm, 18 ppm, and 25 ppm as detailed on Table 2 and Figure II. The coring identified an area of containment 148 feet by 157 feet.

Reference Attachment V, NMOCD Remedial Action Plan Approval Letter.

Based on application of the TNRCC Risk Based Action Plan, the following criteria are met: a) No detectable BTEX or TPH at depth

- b) Source material excavated and removed to disposal
- c) Installation of clay cap preventing further migration through infiltration of surface water
- d) Depth to ground water is 196 feet from surface
- e) A cemented sandstone barrier below impacted soils and over 100 feet above ground water
- f) Demonstrated natural attenuation of remaining hydrocarbons

The pit area is backfilled with clean soil and a clay cap covered with topsoil placed over the surface to a final areal dimension of 150 feet by 160 feet. The clay cap is two foot thick over the center of the pit, with minimal thickness of eighteen inches at the outer edges of the identified remedial area. Mr. Wayne Price of the New Mexico Oil Conservation Division witnessed and approved the clay cap before the topsoil was overlaid. For clay specifications, see Appendix C.

The topsoil, one foot of dark sandy loam, is mounded over the center of the former pit to allow drainage away from the affected site. The soil at the battery location has been mixed and diluted with clean soil to remediate on site. See Figure III, Pit Closure Diagram.

Mr. Eric Nelson of the New Mexico State Land office has requested revegetation of the area be delayed until May, 1996 so optimal results will be achieved from the reseeding. Per Mr. Nelson's recommendation, a combination of native grasses, Blue Grama, Sand Drop Seed, and Side Oats Grama, will be broadcast in excess of five pounds per acre. In preparation, the former battery and closure area will be "scratched" and watered. Snyder Oil Corporation will revegetate the closure and battery site in early May and considers the site to be effectively remediated in accordance with New Mexico Oil Conservation Division guidelines for risk assessed closure. Reference the attached <u>Pit Remediation and Closure Report</u>, Attachment III.



DATE	WATER Level		DATE		ATER Evel n s		DATE	WATER Level	MS	DATE	WATER Level MS
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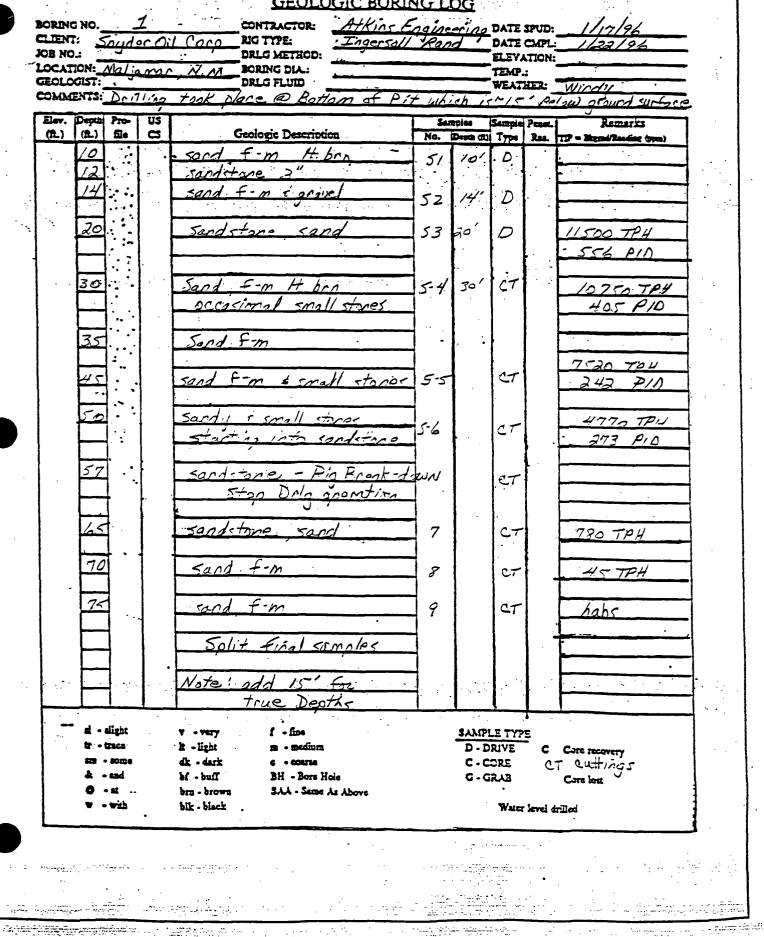
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ATTACHMENT II

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District I P.O. Box 1980, Hobbs, NM istrict II P.O. Drawer DD, Artesis, NM 88211 District III 1000 Rio Brazos Rd, Azzee, NM 87410 State of New Mexico Energy, Minerals and Natural Resources Department

> OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, New Mexico 87504-2088

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

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

operator: Snyder Oil Corporation Telephone: 817-338-4043 2500 Ft. Worth, TX 76/02 Main Address: 777Samar North UNIT Facility Or: Man Well Name Location: Unit or gtr/gtr sec N/2 NW 14 sec 31 T/65 R 33E County LEA, N.M. Pit Type: Separator ___ Dehydrator ___ Other Hudrocarbon - Production Land Type: BLM___, State ___, Fee ___, Other___ length 40', width 40', depth 14.5'Pit Location: Pit dimensions: (Attach diagram) Reference: wellhead , other <u>Bafferu</u> Footage from reference: 275'Direction from reference: /80° Degrees / East North of West South Depth To Ground Water: Less than 50 feet (20 points) 50 feet to 99 feet (Vertical distance from @ 196' (10 points) Greater than 100 feet (0 Points) contaminants to seasonal high water elevation of ground water) Wellhead Protection Area: Yes (20 points) (0 points) L (Less than 200 feet from a private No domestic water source, or; less than 1000 feet from all other water sources) (20 points) Distance To Surface Water: Less than 200 feet (Horizontal distance to perennial 200 feet to 1000 feet (10 points) lakes, ponds, rivers, streams, creeks, Greater than 1000 feet (0 points) irrigation canals and ditches) RANKING SCORE (TOTAL POINTS):

		5 Date Completed: <u>3-15-96</u>
Remediation Method: (Check all appropriate	Excavation _/	Approx. cubic yards _2,880
sections)	Landfarmed	Insitu Bioremediation
	Other <u>Risk As</u>	sessed Closure
	<u>Clay Cap</u>	b
Remediation Location (ie. landfarmed onsite,	a: Onsite Offs	ite CRI, Controlled Recovery; Inter
name and location of offsite facility)		37 miles West of Hobbs, NM.
General Description	Of Remedial Action:	Contaminated source materials
removed, Vertica	Extent at or above	e, 89.5 feet from ground level.
Coring for hori	contal extent ide	ntified an area of containment
150' X 160'. 7	he pit was backf	illed with clean soil, capped with
clay 2' thick ove	er center of pit a	verlaid with I'sf dark sandy loam.
		area and sloped to allow drainage reded with s ib/Ac native grasses. Yes Depth
Ground Water Encoun	tered: : No i/	Yes Depth
Ground Water Encoun		Yes Depth
Ground Water Encoun		
	Sample location <u>Sample</u>	See Attached Report
Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample	Sample location <u>Sample</u>	
Final Pit: Closure Sampling: (if multiple samples, attach sample results	Sample location <u>Sample location</u>	See Attached Report
Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample	Sample location <u>Sample location</u> <u>Table 1., Table2</u> Sample depth	See Attached Report Appeddix B, and Figure II
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Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample	Sample location 	See Attached Report Appeddix B, and Figure II Sample time BQL, m) <u>B,D.L.</u>
Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample	Sample location <u>Table i., Table2,</u> Sample depth Sample date Sample Results Benzene(ppm) Total BTEX(ppr Field headspace	See Attached Report Appeddix B, and Figure II Sample time BQL, m) <u>B,D.L.</u>
Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths)	Sample location <u>Table 1., Table2.</u> Sample depth Sample date Sample Results Benzene(ppm) Total BTEX(ppm Field headspace TPH B, D, L.	See Attached Report Appeddix B, and Figure II Sample time BDL, n) <u>B.D.L.</u> ce(ppm)
Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths) Ground Water Sample	Sample location <u>Toble 1., Table2.</u> Sample depth Sample date Sample Results Benzene(ppm) Total BTEX(ppr Field headspace TPH Yes NO IAT THE INFORMATION 2	See Attached Report Appeddix B, and Figure II Sample time BDL, m) <u>B.D.L.</u> Se(ppm) Below Detection Limits
Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths) Ground Water Sample I HEREBY CERTIFY TH OF MY KNOWLEDGE AND	Sample location <u>Table 1., Table2.</u> Sample depth Sample date Sample Results Benzene(ppm) Total BTEX(ppm Field headspace TPH B, D, L. Sample Section 10 Description 10 Sample Sample Results Sample Results Benzene(ppm) Sample Results Benzene(ppm) Total BTEX(ppm Field headspace TPH NO Description 10 Description 10	See Attached Report Appeddix B, and Figure II Sample time BDL, m) <u>B.D.L</u> , ce(ppm) Below Detection Limits (If yes, attach sample results)

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+ Submit S copies to Ag	propriate District Office	State of Ne	w Mexico	<i>.</i>
DISTRICT I	bs, NM \$8241-1980		ral Resources Department	Form C-117 A
DISTRICT II	03, MAR 40241-1940		·	Revised 4-1-91
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	Pipeline Break Oil or Spi	ш 🗆 🕤		
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DESTRUCTIO	ON OF SEDIMENT	QILBY: 🛛 Burnin	rg 🗌 Pit Disposal 🗍	Use on Roads or firewalls 🔲 Other
	Location of Destruction			

	Justification of Destruction	ion		
CERTIFICAT	ION : (APPLICATION	MAY BE MADE BY EITHER OF TH	IE FOLLOWING)	/
I hereby	certify that the infomation	above is true and complete to the best	of my knowledge and belief.	DA GA
	Owner Shull	der Oil Co.	Transporter UR	llen outruction
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	By 200 Jurin	e pren en	Address P-U-	Malle 1 8
	Title		Signature Dil	Marty
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OTL CONSEE	VATION DIVISION	N.		
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STATE OF NEW MEXICO ENERGY, MINERALE AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION HOEBS DISTRICT OFFICE

Feb. 27, 1996

POST OFFICE 20X 1980 HOBBS. NEW MEXICO 88241-1981 (503) 393-6161

John Nussbaumer, R.E.H.S. Snyder Oil Corporation (SOCO) 3939 SOCO Parkway Evans, Colorado 80620

ATTACHMENT V

NMOCD Remediation Action Plan Approval Letter

Re: Proposal For Risk Assessed Site Closure Snyder Oil Corp.-Maljamar North Unit N/2 Nw/4 Sec 31-T3155-R33 e.

Dear Mr. Nussbaumer,

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the Proposal For Risk Assessed Site Closure for the above referenced facility submitted on your behalf by Suzanne Holland.

The proposed plan and actions as of this date are hereby approved with the following conditions.

- 1. Please advise this office when completion of the clay cap is installed for our visual inspection and final closure activities are complete.
- 2. Please submit a final closure report. At a minimum it should contain a completed "Pit Remediation And Closure Report" form (attached). Please send one copy to the NHOCD Santa Fe Environmental Bureau, attention Mr. Roger Anderson.

Please be advised that NMCCD approval does not relieve (SOCO) of liability should remaining contaminates pose a future threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (SOCO) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please contact this office at 305-393-6161.

Sincersly yours,

Varpe Price

Wayne Price-Environmental Engineer

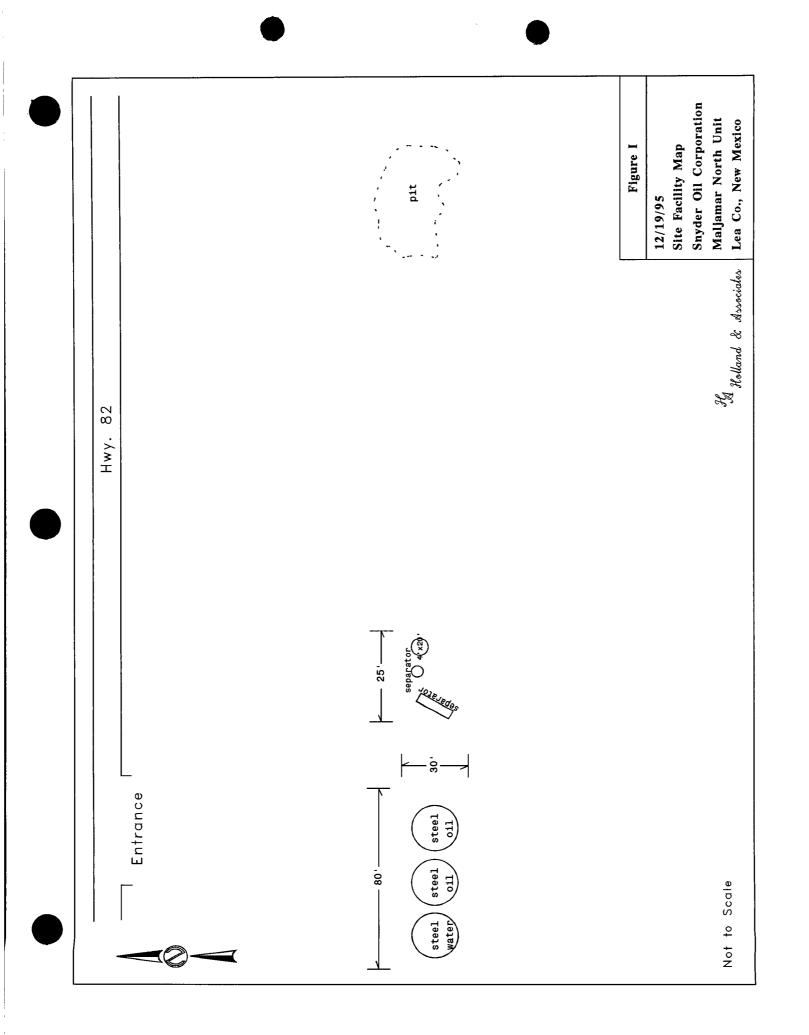


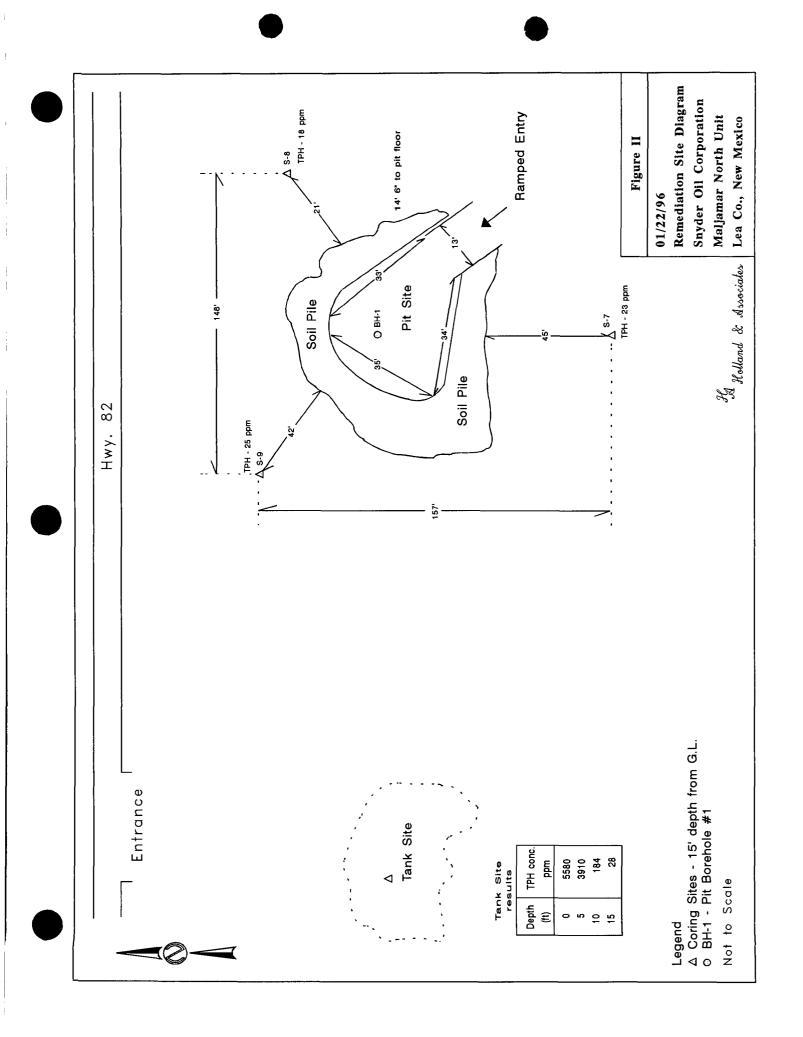
CC: Jerry Sexton-NMCCD District I Supervisor Gary Wink-Field Rep. II Roger Anderson-Environmental Bureau Chief Suzanne Holland-Consultant NM State Land Office-Hobbs

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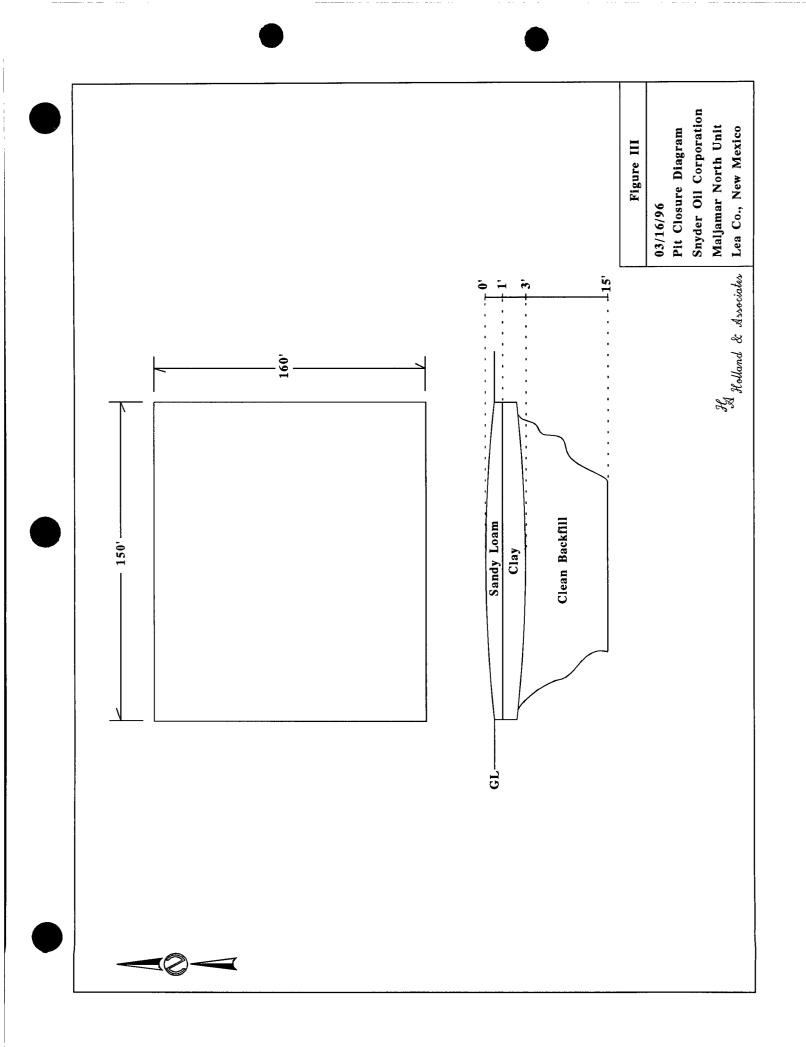
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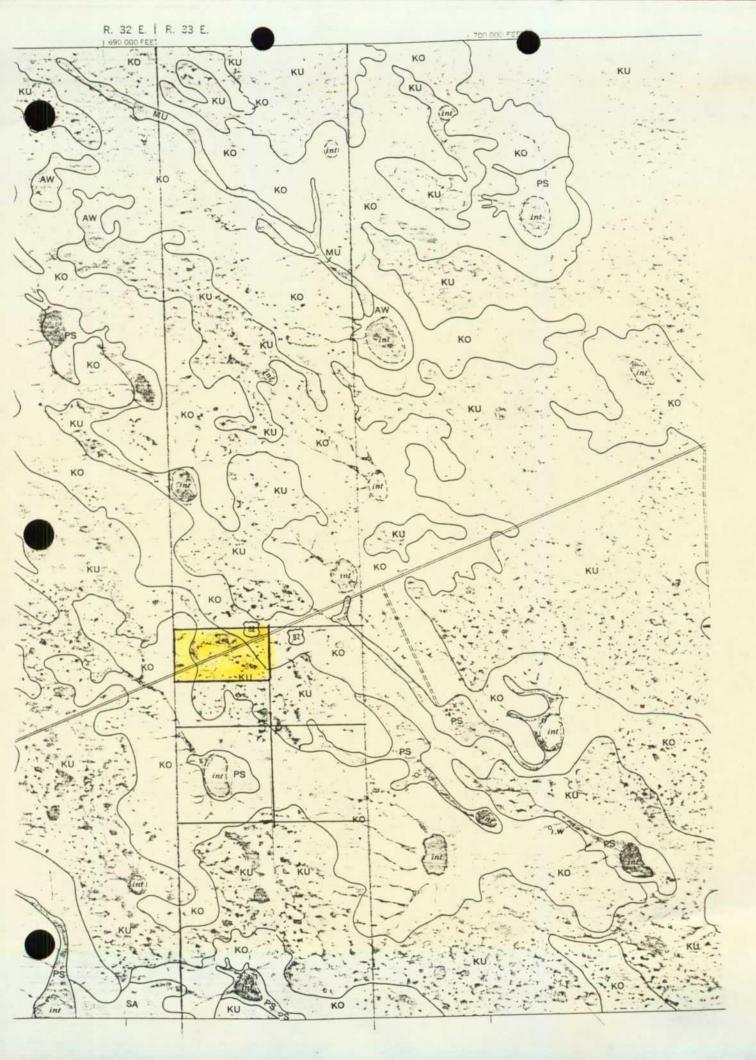
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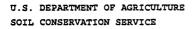
APPENDIX

A

U. S. Department of Agriculture Soil Conservation Survey







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CHEMICAL PROPERTIES OF THE SOILS nontech

Map symbol and soil name	Depth	Clay	Cation	Soil reaction	Calcium carbonate		Salinity	Sodium adsorption
1		1	capacity	1			1	ratio
 	In	 Pct	 meq/100g	 pH	 Pct	Pct		
נט:		1	1	1	1		1	
Kimbrough	0-6	15-20		7.4-8.4			0-2	
Ì	6-10							
			ļ	l	1			1
Lea	0-10	18-27	1	6.6-7.3				
	10-26	18-35		7.9-8.4			0-2	1
1	26-30							
		1	ł				1	1
KO :	1				l	l	I	1
Kimbrough	0-6	15-20		7.4-8.4			0-2	
	6-10							!
	1	1	1	1	ł	1	1	1







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CHEMICAL PROPERTIES OF THE SOILS

Endnote -- CHEMICAL PROPERTIES OF THE SOILS

This report shows estimates of some characteristics and features that affect soil behavior. These estimates are given for the major layers of each soil in the survey area. The estimates are based on field observations and on test data for these and similar soils.

CLAY as a soil separate consists of mineral soil particles that are less than 0.002 millimeter in diameter. In this report, the estimated clay content of each major soil layer is given as a percentage, by weight, of the soil material that is less than 2 millimeters in diameter. The amount and kind of clay greatly affect the fertility and physical condition of the soil. They determine the ability of the soil to adsorb cations and to retain moisture. They influence shrink-swell potential, permeability, and plasticity, the ease of soil dispersion, and other soil properties. The amount and kind of clay in a soil also affect tillage and earthmoving operations.

CATION EXCHANGE CAPACITY (CEC) is the total amount of cations held in a soil in such a way that they can be removed only by exchanging with another cation in the natural soil solution. CEC is a measure of the ability of a soil to retain cations, some of which are plant nutrients. Soils with low CEC hold few cations and may require more frequent applications of fertilizers than soils with high CEC. Soils with high CEC have the potential to retain cations, thus reducing the possibility of pollution of ground water.

SOIL REACTION is a measure of acidity or alkalinity and is expressed as a range in pH es. The range in pH of each major horizon is based on many field tests. For many soils, have been verified by laboratory analyses. Soil reaction is important in selecting crops and other plants, in evaluating soil amendments for fertility and stabilization, and in determining the risk of corrosion.

CALCIUM CARBONATE is the percentage by weight of calcium carbonate in the fine-earth material, less than 2 millimeters in size.

GYPSUM is the percentage by weight of hydrated calcium sulfates 20 millimeters or smaller in size, in the soil.

SALINITY is a measure of soluble salts in the soil at saturation. It is expressed as the electrical conductivity of the saturation extract, in millimhos per centimeter at 25 degrees C. Estimates are based on field and laboratory measurements at representative sites of nonirrigated soils.

The salinity of irrigated soils is affected by the quality of the irrigation water and by the frequency of water application. Hence, the salinity of soils in individual fields can differ greatly from the value given in the report. Salinity affects the suitability of a soil for crop production, the stability of soil if used as construction material, and the potential of the soil to corrode metal and concrete.

SODIUM ADSORPTION RATIO (SAR) expresses the relative activity of sodium ions in exchange reactions in the soil. SAR is a measure of the amount of sodium relative to calcium and magnesium in the water extract from saturated soil paste.



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PHYSICAL PROPERTIES OF SOILS nontech

(Entries under "Erosion factors--T" apply to the entire profile. Entries under "Wind erodibility group" and "Wind erodability index" apply only to the surface layer)

1		1			1	1	l	Erosion	factors	Wind	Wind
Map symbol	Depth	Clay	Moist	Permea-	Available	Shrink-	Organic	l		erodi-	erodi-
and soil name		ļ	bulk	bility	water	swell	matter	1	ł	bility	bility
		I	density		capacity	potential		K :	Kf T	group	index
	In	Pct	 g/cc	In/hr	 In/in	 	Pct	_ 	ł		
KU :						 -	l				1
Kimbrough	0-6	15-20	1.35-1.45	0.60-2.00	0.12-0.14	Low	1.0-2.0	0.20	0.37 1	5	
	6-10	1	1		1					l	
•						1					1
Lea		•	•	0.60-2.00	•	•	,	· ·		6	
		•	•	0.60-2.00	0.17-0.19	Moderate		0.37	0.37	1	1
	26-30					1					1
KO :	1			l					l	1	1
	1	I	I	1	1	I		1	I	1	1
Kimbrough	0-6	15-2	0 1.35-1.45	0.60-2.00	0.12-0.14	Low	1.0-2.0	0.20	0.37 1	5	
	6-10				ļ					1	1
	1	1	1	1	1	1		1 1	1	1	1

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PAGE 2 OF 4 02/20/96

PHYSICAL PROPERTIES OF SOILS

Endnote -- PHYSICAL PROPERTIES OF SOILS

This report shows estimates of some characteristics and features that affect soil behavior. These estimates are given for the major layers of each soil in the survey area. The estimates are based on field observations and on test data for these and similar soils.

CLAY as a soil separate consists of mineral soil particles that are less than 0.002 millimeter in diameter. In this report, the estimated clay content of each major soil layer is given as a percentage, by weight, of the soil material that is less than 2 millimeters in diameter. The amount and kind of clay greatly affect the fertility and physical condition of the soil. They determine the ability of the soil to adsorb cations and to retain moisture. They influence shrink-swell potential, permeability, plasticity, the ease of soil dispersion, and other soil properties. The amount and kind of clay in a soil also affect tillage and earthmoving operations.

MOIST BULK DENSITY is the weight of soil (ovendry) per unit volume. Volume is measured when the soil is at field moisture capacity, the moisture content at 1/3 bar moisture tension. Weight is determined after drying the soil at 105 degrees C. In this report, the estimated moist bulk density of each major soil horizon is expressed in grams per cubic centimeter of soil material that is less than 2 millimeters in diameter. Bulk density data are used to compute shrink-swell potential, available water capacity, total pore space, and other soil properties. The moist bulk density of a soil indicates the pore space available for water and roots. A bulk density of more than 1.6 can restrict water storage and root penetration. Moist bulk density is influenced by texture, kind of clay, content of organic matter, and soil structure.

CABILITY refers to the ability of a soil to transmit water or air. The estimates indicate the of downward movement of water when the soil is saturated. They are based on soil characteristics observed in the field, particularly structure, porosity, and texture. Permeability is considered in the design of soil drainage systems, septic tank absorption fields, and construction where the rate of water movement under saturated conditions affects behavior.

AVAILABLE WATER CAPACITY refers to the quantity of water that the soil is capable of storing for use by plants. The capacity for water storage is given in inches of water per inch of soil for each major soil layer. The capacity varies, depending on soil properties that affect the retention of water and the depth of the root zone. The most important properties are the content of organic matter, soil texture, bulk density, and soil structure. Available water capacity is an important factor in the choice of plants or crops to be grown and in the design and management of irrigation systems. Available water capacity is not an estimate of the quantity of water actually available to plants at any given time.

SHRINK-SWELL POTENTIAL is the potential for volume change in a soil with a loss or gain of moisture. Volume change occurs mainly because of the interaction of clay minerals with water and varies with the amount and type of clay minerals in the soil. The size of the load on the soil and the magnitude of the change in soil moisture content influence the amount of swelling of soils in place. Laboratory measurements of swelling of undisturbed clods were made for many soils. For others, swelling was estimated on the basis of the kind and amount of clay minerals in the soil and on measurements of similar soils. If the shrink-swell potential is rated moderate to very high, shrinking and swelling can cause damage to buildings, roads, and other structures. Special design is often needed. Shrink-swell potential classes are based on the change in length of an unconfined clod as moisture content is increased from air-dry to field capacity. The change is based on the soil fraction less than 2 millimeters in diameter. The classes are "Low," a change of less than 3 percent; "Moderate," 3 to 6 percent; and "High," more than 6 percent. "Very high," greater than 9 percent, is sometimes used.

PAGE 3 OF 4 02/20/96

PHYSICAL PROPERTIES OF SOILS

Endnote -- PHYSICAL PROPERTIES OF SOILS--Continued

ORGANIC MATTER is the plant and animal residue in the soil at various stages of decomposition. In report J, the estimated content of organic matter is expressed as a percentage, by weight, of the soil material that is less than 2 millimeters in diameter. The content of organic matter in a soil can be maintained or increased by returning crop residue to the soil. Organic matter affects the available water capacity, infiltration rate, and tilth. It is a source of nitrogen and other nutrients for crops.

EROSION FACTOR K indicates the susceptibility of the whole soil (including rocks and rock fragments) to sheet and rill erosion by water. Factor K is one of six factors used in the Universal Soil Loss Equation (USLE) to predict the average annual rate of soil loss by sheet and rill erosion in tons per acre per year. The estimates are based primarily on percentage of silt, sand, and organic matter (up to 4 percent) and on soil structure and permeability. Values of K range from 0.05 to 0.69. The higher the value, the more susceptible the soil is to sheet and rill erosion by water.

EROSION FACTOR Kf is like EROSION FACTOR K but it is for the fine-earth fraction of the soil. Rocks and rock fragments are not considered.

EROSION FACTOR T is an estimate of the maximum average annual rate of soil erosion by wind or water that can occur without affecting crop productivity over a sustained period. The rate is in tons per acre per year.

WIND ERODIBILITY GROUPS are made up of soils that have similar properties affecting their resistance to wind erosion in cultivated areas. The groups indicate the susceptibility of soil to wind erosion. Soils are grouped ding to the following distinctions:

1. Coarse sands, sands, fine sands, and very fine sands. These soils are generally not suitable for crops. They are extremely erodible, and vegetation is difficult to establish.

2. Loamy coarse sands, loamy sands, loamy fine sands, loamy very fine sands, and sapric soil material. These soils are very highly erodible. Crops can be grown if intensive measures to control wind erosion are used.

3. Coarse sandy loams, sandy loams, fine sandy loams, and very fine sandy loams. These soils are highly erodible. Crops can be grown if intensive measures to control wind erosion are used.

4L. Calcareous loams, silt loams, clay loams, and silty clay loams. These soils are erodible. Crops can be grown if intensive measures to control wind erosion are used.

4. Clays, silty clays, noncalcareous clay loams, and silty clay loams that are more than 35 percent clay. These soils are moderately erodible. Crops can be grown if measures to control wind erosion are used.



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PHYSICAL PROPERTIES OF SOILS

Endnote -- PHYSICAL PROPERTIES OF SOILS--Continued

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5. Noncalcareous loams and silt loams that are less than 20 percent clay and sandy clay loams, sandy clays, and hemic soil material. These soils are slightly erodible. Crops can be grown if measures to control wind erosion are used.

6. Noncalcareous loams and silt loams that are more than 20 percent clay and noncalcareous clay loams that are less than 35 percent clay. These soils are very slightly erodible. Crops can be grown if ordinary measures to control wind erosion are used.

7. Silts, noncalcareous silty clay loams that are less than 35 percent clay, and fibric soil material. These soils are very slightly erodible. Crops can be grown if ordinary measures to control wind erosion are used.

 Soils that are not subject to wind erosion because of coarse fragments on the surface or because of surface wetness.

The WIND ERODIBILITY INDEX is used in the wind erosion equation (WEQ). The index number indicates the int of soil lost in tons per acre per year. The range of wind erodibility index numbers is 0 to 300.

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SOIL FEATURES nontech

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l	Bed	rock	Cement	ed pan	Subsi	dence	l	Risk of a	corrosion
		I			I		Potential		
Map symbol		1 1					frost action	Uncoated	1
and soil name	Depth	Hardness	Depth	Kind	Initial	Total		steel	Concrete
	In	 	 In		 In	In	 		_
KU :			1		1 I		1	1	
Kimbrough	>60		4-20	Thick			1	High	Low
Lea	>60	 	20-40	Thick	 		Low	 High 	Low
KO :					1		1		1
Kimbrough	>60		4-20	Thick			1	High 	Low





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SOIL FEATURES

Endnote -- SOIL FEATURES

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This report gives estimates of various soil features. The estimates are used in land use planning that involves engineering considerations.

Depth to bedrock is given if bedrock is within a depth of 5 feet. The depth is based on many soil borings and on observations during soil mapping. The rock is either "Soft" or "Hard". If the rock is "Soft" or fractured, excavations can be made with trenching machines, backhoes, or small rippers. If the rock is "Hard" or massive, blasting or special equipment generally is needed for excavation.

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Cemented pans are cemented or indurated subsurface layers within a depth of 5 feet. Such pans cause difficulty in excavation. Pans are classified as "Thin" or "Thick". A "Thin" pan is less than 3 inches thick if continuously indurated or less than 18 inches thick if discontinuous or fractured. Excavations can be made by trenching machines, backhoes, or small rippers. A "Thick" pan is more than 3 inches thick if continuously indurated or more than 18 inches thick if discontinuous or fractured. Such a pan is so thick or massive that blasting or special equipment is needed in excavation.

Subsidence is the settlement of organic soils or of saturated mineral soils of very low density. Subsidence results from either desiccation and shrinkage or oxidation of organic material, or both, following drainage. Subsidence takes place gradually, usually over a period of several years. This report shows the expected initial subsidence, which usually is a result of drainage, and total subsidence, which usually is a result of oxidation. Not shown in the report is subsidence caused by an imposed surface load or by the withdrawal of ground water throughout an extensive area as a result of lowering the water table.

Extential frost action is the likelihood of upward or lateral expansion of the soil caused by the formation of segregated ice lenses (frost heave) and the subsequent collapse of the soil and loss of strength on thawing. Frost action occurs when moisture moves into the freezing zone of the soil. Temperature, texture, density, permeability, content of organic matter, and depth to the water table are the most important factors considered in evaluating the potential for frost action. It is assumed that the soil is not insulated by vegetation or snow and is not artificially drained. Silty and highly structured clayey soils that have a high water table in winter are the most susceptible to frost action. Well drained, very gravelly, or very sandy soils are the least susceptible. Frost heave and low soil strength during thawing cause damage mainly to pavements and other rigid structures.

Risk of corrosion pertains to potential soil-induced electrochemical or chemical action that dissolves or weakens uncoated steel or concrete. The rate of corrosion of uncoated steel is related to such factors as soil moisture, particle-size distribution, acidity, and electrical conductivity of the soil. The rate of corrosion of concrete is based mainly on the sulfate and sodium content, texture, moisture content, and acidity of the soil. Special site examination and design may be needed if the combination of factors creates a severe corrosion environment. The steel installations that intersect soil boundaries or soil layers is more susceptible to corrosion than steel in installations that are entirely within one kind of soil or within one soil layer. For uncoated steel, the risk of corrosion, expressed as "Low", "Moderate", or "High", is based on soil drainage class, total acidity, electrical resistivity near field capacity, and electrical conductivity of the saturation extract.

For concrete, the risk of corrosion is also expressed as "Low", "Moderate", or "High". It is based on soil texture, acidity, and amount of sulfates in the saturation extract.

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CONSTRUCTION MATERIALS nontech

(The information in this report indicates the dominant soil condition but does not eliminate the need for onsite investigation)

Map symbol and soil name	Roadfill	Sand	Gravel	Topsoil
				l
	1			
U :			ł	I
Kimbrough	Poor:	Improbable:	Improbable:	Poor:
	cemented pan	excess fines	excess fines	cemented pan,
	1			small stones
	1	I	I	l
Lea	Poor:	Improbable:	[Improbable:	Fair:
	cemented pan	excess fines	excess fines	cemented pan,
	, í	I	ł	too clayey,
	1	ł	1	thin layer
		I	I	
KO :	ļ		1	}
Kimbrough	Poor:	[Improbable:	Improbable:	Poor:
	cemented pan	excess fines	excess fines	cemented pan,
	1	1	1	small stones
	1	1	1	1

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CONSTRUCTION MATERIALS

Endnote -- CONSTRUCTION MATERIALS

This report gives information about the soils as a source of roadfill, sand, gravel, and topsoil. The soils are rated "Good", "Fair", or "Poor" as a source of roadfill and topsoil. They are rated as a "Probable" or "Improbable" source of sand and gravel. The ratings are based on soil properties and site features that affect the removal of the soil and its use as construction material. Normal compaction, minor processing, and other standard construction practices are assumed. Each soil is evaluated to a depth of 5 or 6 feet.

Roadfill is soil material that is excavated in one place and used in road embankments in another place. In this report, the soils are rated as a source of roadfill for low embankments, generally less than 6 feet high and less exacting in design than higher embankments. The ratings are for the soil material below the surface layer to a depth of 5 or 6 feet. It is assumed that soil layers will be mixed during excavating and spreading. Many soils have layers of contrasting suitability within their profile. The report entitled Engineering Index Properties is also available and it provides detailed information about each soil layer. This information can help determine the suitability of each layer for use as roadfill. The performance of soil after it is stabilized with lime or cement is not considered in the ratings.

The ratings are based on soil properties, site features, and observed performance of the soils. The thickness of suitable material is a major consideration. The ease of excavation is affected by large stones, a high water table, and slope. How well the soil performs in place after it has been compacted and drained is determined by its strength (as inferred from the engineering classification of the soil) and shrink-swell potential.

's rated "Good" contain significant amounts of sand or gravel or both. They have at least 5 feet of suitable rial, a low shrink-swell potential, few cobbles and stones, and slopes of 15 percent or less. Depth to the er table is more than 3 feet

Soils rated "Fair" are more than 35 percent silt- and clay-sized particles and have a plasticity of less than 10. They have a moderate shrink-swell potential, slopes of 15 to 25 percent, or many stones. Depth to the water table is 1 to 3 feet.

Soils rated "Poor" have a plasticity index of more than 10, a high shrink-swell potential, many stones, or slopes of more than 25 percent. They are wet, and the depth to the water table is less than 1 foot. These soils may have layers of suitable material, but the material is less than 3 feet thick.

Sand and gravel are natural aggregates suitable for commercial use with a minimum of processing. Sand and gravel are used in many kinds of construction. Specifications for each use vary widely. In this report only the probability of finding material in suitable quantity is evaluated. The suitability of the material for specific purposes is not evaluated, nor are factors that affect excavation of the material. The properties used to evaluate the soil as a source of sand or gravel are gradation of grain sizes (as indicated by the engineering classification of the soil), the thickness of suitable material, and the content of rock fragments. Kinds of rock, acidity, and stratification are given in the soil series descriptions. Gradation of grain sizes is given in the Engineering Index Properties report.

A soil rated as a "Probable" source has a layer of clean sand and gravel or a layer of sand or gravel that contains up to 12 percent silty fines. This material must be at least 3 feet thick and less than 50 percent, by weight, large stones. All other soils are rated as an "Improbable" source. Coarse fragments of soft bedrock, such as shale and siltstone, are not considered to be sand and gravel.



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CONSTRUCTION MATERIALS

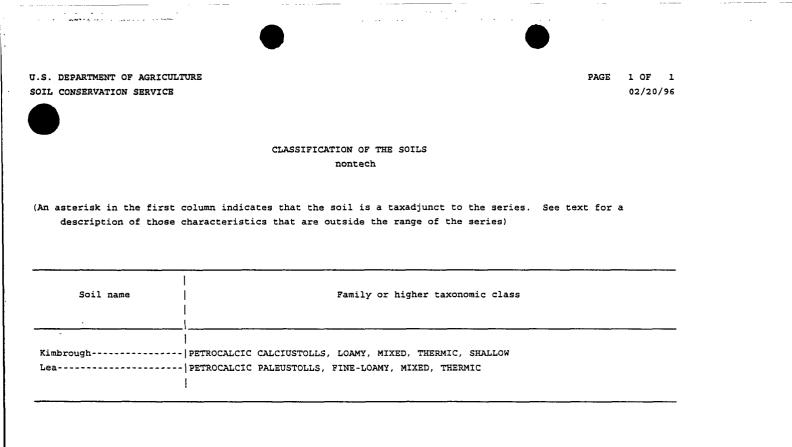
Endnote -- CONSTRUCTION MATERIALS--Continued

Topsoil is used to cover an area so that vegetation can be established and maintained. The upper 40 inches of a soil is evaluated for use as topsoil. Also evaluated is the reclamation potential of the borrow area. Plant growth is affected by toxic material and by such properties as soil reaction, available water capacity, and fertility. The ease of excavating, loading, and spreading is affected by rock fragments, slope, a water table, soil texture, and thickness of suitable material. Reclamation of the borrow area is affected by slope, a water table, rock fragments, bedrock, and toxic material.

Soils rate "Good" have friable loamy material to a depth of at least 40 inches. They are free of stones and cobbles, have little or no gravel, and have slopes of less than 8 percent. They are low in content of soluble salts, are naturally fertile or respond well to fertilizer, and are not so wet that excavation is difficult.

Soils rated "Fair" are sandy soils, loamy soils that have a relatively high content of clay, soils that have only 20 to 40 inches of suitable material, soils that have an appreciable amount of gravel, stones, or soluble salts, or soils that have slopes of 8 to 15 percent. The soils are not so wet that excavation is difficult.

Soils rate "Poor" are very sandy or clayey, have less than 20 inches of suitable material, have a large amount of gravel, stones, or soluble salts, have slopes of more than 15 percent, or have a seasonal water table at or near the surface. The surface layer of most soils is generally preferred for topsoil because of it organic matter content. Organic matter greatly increases the absorption and retention of moisture and nutrients for plant growth.



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.S. DEPARTMENT OF AGRICUI OIL CONSERVATION SERVICE	TURE	PAGE 1 OF 1 02/20/96
	SOIL MAP LEGEND nontech	
Map ymbol	Soil name	

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U.S. DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE

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ENGINEERING INDEX PROPERTIES

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			Classif	ication	Frag	nents	Pe	rcentag	e passi	ng		
Map symbol	Depth	USDA texture	1		. <u></u>		,	sieve n	umber		Liquid	Plas-
and soil name		1	1	1	>10	3-10	I				limit	ticity
		1	Unified	AASHTO	inches	inches	4	10	40	200	1 1	index
/	In	۲ <u></u>	1	\ 	Pct	Pct	! 1	\	.; 		Pct	
ו גע:				1	 	l ł		1		1	+ 	
Kimbrough	0-6	Gravelly loam	CL-ML	A-4	0	5-10	65-85	60-80	55-70	150-60	20-25	5-10
Ì	6-10	Indurated	1	1	0	0	0	0	0	0		NP
Lea	0-10	i Loam	CL	 A-6	 0	0	 100	 100	 80-95	 60-70	25-35	10-15
	10-26	Loam, clay	CL	A-6	0	0	100	100	80-95	55-75	25-40	10-20
		loam, sandy	1	1	1	1	1	1	1	1	1	
		clay loam	1	1	!	I	1	1	1	1	1	1
	26-30	Indurated	1	1	[0	٥	0	0	[0	0	l ,	NP
		1	1	1	1		I	1	1	1	1	I
KO:		1	1	1	l I	1	1	1	1	1	1	
Kimbrough	0-6	Gravelly loam	CL-ML	A-4	0	5-10	65-85	60-80	55-70	50-60	20-25	5-10
	6-10	Indurated	1	1	0	0	0	0	0	0		NP
	1	1	1		1	1		1	1	1	1	1

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U.S. DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE

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PAGE 2 OF 2 02/20/96

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ENGINEERING INDEX PROPERTIES

Endnote -- ENGINEERING INDEX PROPERTIES

This report gives estimates of the engineering classification and of the range of index properties for the major layers of each soil in the survey area. Most soils have layers of contrasting properties within the upper 5 or 6 feet.

DEPTH to the upper and lower boundaries of each layer is indicated. The range in depth and information on other properties of each layer are given in the published Soil Survey for each soil series under "Soil Series and Their Morphology."

TEXTURE is given in the standard terms used by the U.S. Department of Agriculture. These terms are defined according to percentages of sand, silt, and clay in the fraction of the soil that is less than 2 millimeters in diameter. "Loam," for example, is soil that is 7 to 27 percent clay, 28 to 50 percent silt, and less than 52 percent sand. If the content of particles coarser than sand is as much as about 15 percent, an appropriate modifier is added, for example, "gravelly." Textural terms are defined in the Soil Survey Glossary.

Classification of the soils is determined according to the Unified soil classification system and the system adopted by the American Association of State Highway and Transportation Officials.

The UNIFIED system classifies soils according to properties that affect their use as construction material. Soils are classified according to grain-size distribution of the fraction less than 3 inches in diameter and according to plasticity index, liquid limit, and organic matter content. Sandy and gravelly soils are identified as GW, GP, GM, GC, SW, SP, SM, and SC; silty and clayey soils as ML, CL, OL, MH, CH, and OH; and highly organic soils as PT. Soils biting engineering properties of two groups can have a dual classification, for example, CL-ML.

The AASHTO system classifies soils according to those properties that affect roadway construction and maintenance. In this system, the fraction of a mineral soil that is less than 3 inches in diameter is classified in one of seven groups from A-1 through A-7 on the basis of grain-size distribution, liquid limit, and plasticity index. Soils in group A-1 are coarse grained and low in content of fines (silt and clay). At the other extreme, soils in group A-7 are fine grained. Highly organic soils are classified in group A-8 on the basis of visual inspection. If laboratory data are available, the A-1, A-2, and A-7 groups are further classified as A-1-a, A-1-b, A-2-4, A-2-5, A-2-6, A-2-7, A-7-5, or A-7-6. As an additional refinement, the suitability of a soil as subgrade material can be indicated by a group index number. Group index numbers range from 0 for the best subgrade material to 20 or higher for the poorest.

Rock FRAGMENTS larger than 3 inches in diameter are indicated as a percentage of the total soil on a dry-weight basis. The percentages are estimates determined mainly by converting volume percentage in the field to weight percentage.

Percentage of soil particles passing designated sieves (PERCENTAGE PASSING SIEVE NUMBER--) is the percentage of the soil fraction less than 3 inches in diameter based on an ovendry weight. The sieves, numbers 4, 10, 40, and 200 (USA Standard Series), have openings of 4.76, 2.00, 0.420, and 0.074 millimeters, respectively. Estimates are based on laboratory tests of soils sampled in the survey area and in nearby areas and on estimates made in the field.

LIQUID LIMIT and PLASTICITY INDEX (Atterberg limits) indicate the plasticity characteristics of a soil. The estimates are based on test data from the survey area or from nearby areas and on field examination. The estimates of grain-size distribution, liquid limit, and plasticity index are generally rounded to the nearest 5 percent. Thus, if the ranges of gradation and Atterberg limits extend a marginal amount (1 or 2 percentage points) across classification boundaries, the classification in the marginal zone is omitted in this report.



NONTECHNICAL SOILS DESCRIPTION REPORT

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Symbol	Soil name and description
Kg	Kimbrough gravelly loam, 0 to 3 percent slopes
_	<pre>Soil depth - shallow; Soil drainage - well drained; Surface layer - gravelly loam 6 inches thick; Permeability - moderate; AWC - very low; Effective rooting depth is 6 to 20 inches; Water erosion hazard - slight; Soil blowing hazard - severe; Capability subclass 6e (IRR) 7s (NIRR); T-1; WEG-5; I-56; limitation: depth to indurated caliche.</pre>
ĸu	Kimbrough-Lea complex
	KIMBROUGH: Soil depth - shallow; Soil drainage - well drained; Surface layer - gravelly loam 6 inches thick; Indurated caliche is at a depth of 6 inches; Permeability - moderate; AWC - very low; Effective rooting depth - 4 to 20 inches; Water erosion hazard - moderate; Soil blowing hazard - moderate; Capability subclass 7s (IRR) (UA) 7s (NIRR); T-5; WEG-5; I-56; Limitations: depth to indurated caliche and gravel content. LEA: Soil depth - moderately deep; Soil drainage - well drained; Surface layer - loam 4 inches thick; Substratum - loam 22 inches thick; Indurated caliche is at a depth of 26 inches; Permeability - moderate; AWC - low; Effective rooting depth is 20 to 40 inches; Water erosion hazard - moderate; Soil blowing hazard - severe; Capability subclass 4e (IRR) (UA) 6e (NIRR); T-2; WEG-6; I-48; Limitations: depth to indurated caliche, and high lime content above the indurated caliche.
KO	Kimbrough gravelly loam, 0 to 3 percent slopes

APPENDIX B

Lab Reports of Soil Sample Analysis

01/30/1996 17:44 9156860

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1703 West Industrial P.O. Box 2150 * Midland, Texas 79701 * 915/683-3349 FAX 915/686-0492

Client Susan Holland Snyder Oil Co. 4918 King Richard's Midland, TX 79707 Client No. 4100200 Report No. M6-01-082 Report Date 01/30/96 16:42

Project NLJM Pit V.E.

Phone: 915/520-2098 Fax: 915/697-9926

Date Sampled 01/22/96

Semple Type <u>Soil</u>

P.O. #_____

<u>Lab No.</u> M6-01-082-01

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ample Identification

Date Received 01/23/96

Transported by Susan Holland

Sample Identification MLJM Pit V.E. 84.5

Sampled By Client

Dur letters and reports are for the exclusive use of the client to whom they are addressed and shall not be reproduced except in full without the approval of the testing laboratory. The use of our name must receive our prior written approval.

MAXIN

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Reviewed By

ALLAN B. JOHNSTON

MAXIN

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Order # M6-01-082 01/30/96 14:09 Client: Snyder Oil Co.

TEST RESULTS BY SAMPLE

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Page 2 of 3

Sample: 01A MLJM Pit V.E. 84.6' Collected: 01/22/96 16:00

Category: S

...

Detection Date <u>Result Units</u> Limit Started Analyst 4.67 01/29/96 SLS <u>Test Name</u> Method TOT.PET. HYDROCARBONS SOIL EPA 418.1 < 4.67 mg/kg

Order # M6-01-082 01/31/96 10:33 Client: Snyder Oil Co.

TEST RESULTS BY SAMPLE

Sample Description: MLJM Pit V.E. 84.6'Lab No: 01ATest Description: BTEX - SOIL SAMPLEMethod: SW-846, 8020 Test Code: BTEX_SCollected: 01/22/96 16:00Category: S

Date Extracted 01/29/96 Date Started <u>01/29/96</u> Detection Limit <u>0.02</u> <u>M17</u> Analyst Units <u>mg/kg</u> Method <u>SW-846, 8020</u> <u>Resul ts</u> Compound BENZENE < 0.02 TOLUENE < 0.02 ETHYLBENZENE < 0.02 XYLENE < 0.02

Page 3 of 3



MAXIN

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PHONE (915) 673-7001 . 2111 BEECHWOOD . ABILENE, TX 79603

PHONE (505) 393-2328 . 101 E. MARLAND . HOBES, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TPH/BTEX ANALYSIS REPORT

r Oil Company ain St. Ste.2500 rth, Texas 76102

Project Name: Maljamar Pit Location: Sampled by: Analyzed by: Sample Type: Lovington-Artesia Hwy ST MI SOIL

160 172.**4** 107.7

00

1/22/96 1/24/96 - Time: 09:00 Intact Date: Date: Sample Condition: Units: mg/kg

Date: Lab #: 01/26/96 H2384

**** 21-72 8/80X7 7171-NEWS-

Samı #	p Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA- XYLZNE	META- Xylene	ORTHO- XYLENE
1	Botton of Pit 84' 6"	93	0.082	<0.001	0.044	<0.001	0.019	0.068
2	Bottom of Pit 89' 6"	116	0.175	<0.001	<0.001	<0.001	<0.001	0.007

00	Recovery	
ōċ	Spike	
	ruracy	
Air	Blank	

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.508 .534	0.502	0.564	0.514	0.514	0.503
95% .001	95% <0.001	107% <0.001	98% <0.001	0.514 0.523 98% <0.001	972 <0.001

Methods - GAS CHROMOTOGRAPHY; INFRARED SPECTROSCOPY - EPA SW-846; 8020, 418.1, 3510, 3540 or 3550

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VVI Mitch Irvin

31-96 Date

PLEASE NOTE: Liability and Damages. Cardinat's liability and client's exclusive remedy for any claim arising, whether based in contract or ton, shall be limited to the amount paid by client for analyses. All clasms, including those for negligence and any other cause whateover shall be deemed waived unless made in writing and received by Cardinat within hinry (30) days and any other completion of the applicable service. In no event shall Cardinal be fields for incidental or consequential damages, including, without limitation, business intemptions, loss of use, or loss of profils incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whather such claim is based upon any of the above-stated reasons or otherwise.

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ENVIRONMENTAL SPILL CONTROL, INC.

1203 West Dunnam P.O. Box 5890 Hobbs, NM 88241 (505) 392-6167 (800) 390-6167

SOIL ANALYSIS REPORT

TTTTT

DATE: 01/29/96 CLIENT: Snyder Oil Corporation SUPERVISOR: A. HODGE S. THOMAS

الله الحادية والمسترينية . مالية المحادية المستروف المار المور

> FACILITY: North Maljamar Unit Test Method: EPA 418.1 Matrix: Soil

> > LOCATION

	TPH		DEPTH
SAMPLE NO. 1:	12,085	PPM	14'-29'
SAMPLE NO. 2:	11,510	PPM	20'-35'
SAMPLE NO. 3:	10,750	PPM	30'-45'
SAMPLE NO. 4:	7,520	PPM	45'-60'
SAMPLE NO. 5:	4,770	PPM	50'-65'
SAMPLE NO. 6:	2,600	PPM	
SAMPLE NO. 7:	2,850	PPM	
SAMPLE NO. 8:		PPM	
SAMPLE NO. 9:		PPM	
SAMPLE NO. 10		PPM	
SAMPLE NO. 11	:	PPM	
SAMPLE NO. 12	:	PPM	
SAMPLE NO. 13	:	PPM	

15' depth from bottom of pit
5 point composite from stack pile
5 point composite ''

COMMENTS: These samples were taken with split spoon from boring in bottom of pit. Sample six and seven were from stock pile material on-site.

ENVIRONMENTAL SPILL CONTROL, INC.

1203 West Dunnam P.O. Box 5890 Hobbs, NM 88241 (505) 392-6167 (800) 390-6167

SOIL ANALYSIS REPORT

DATE: 01/29/96 CLIENT: Snyder Oil Corporation SUPERVISOR: A. HODGE S. THOMAS FACILITY: North Maljamar Unit Test Method: EPA 418.1 Matrix: Soil

H	DEPTH	LOCATION
0 PPM	65"	Center of pit
5 PPM	70'	Center of pit
5 PPM	70'	Center of pit
4,460 PPM	Composite	West Wall
),610 PPM	Composite	North Wall
4,340 PPM	Composite	East Wall
3 PPM	15'	Outside surface / South side
8 PPM	15'	North East side
5 PPM	15'	North West side
,910 PPM	5'	West side
84 PPM	10'	Tank battery pad removed
28 PPM	15'	Tank battery pad removed
	0 PPM 0 PPM 9 PPM 9,460 PPM 9,610 PPM 9,340 PPM 3 PPM 5 PPM 910 PPM 84 PPM	0 PPM 65" PPM 70' 0 PPM 70' 0 PPM 70' 0 PPM 70' 0 PPM Composite 0,610 PPM Composite 0,610 PPM Composite 3 PPM 15' 3 PPM 15' 5 PPM 15' 910 PPM 5' 84 PPM 10'



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYSIS REPORT TPH/BTEX

	Address: City, State: Project Name:	Snyder Oil Company 4918 King Richards Row Midland, Texas 79707 MLJM Pit Lackhoc			Date: Lab # :	01/17/96 H2376	
•	Location: Sampled by: Analyzed by: Sample Type:	MI	Sample Cond	Date:	1/16/96 1/16/96 Intact		12:30 15:59

Units: mg/kg

Sam #	p Field Code		TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA- XYLENE	META- XYLENE	ORTHO- XYLENE
1	Malj. San	'كة 1	14,134	3.125	8.127	5.625	1.607	3.674	2.479
2	Malj. Bla	ck q'	12,710	2.492	7.278	5.084	1.579	3.567	2.455
3	Malj. Wal	19'	11,485	1.936	3.459	2.840	1.797	0.414	2.820

QC Recovery QC Spike	478 475	0.435	0.416 0.481		0.421 0.481	0.432	0.436
Accuracy Air Blank	100.9%	88%	86%	97 <0.001	87%	89 <0.001	91%

Methods - GAS CHROMOTOGRAPHY; INFRARED SPECTROSCOPY - EPA SW-846; 8020, 418.1, 3510, 3540 or 3550

Mitch Irvin

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidianes, atfiliates or successors arising out of or related to the outcommance of services hereunder by Cardinal, recardless of whether such claim is based upon any of the above-failed to access on any other outcomes or otherwise. service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidie affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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1703 West Industrial P.O. Box 2150 * Midland, Texas 79701 * 915/683-3349 FAX 915/686-0492

Client Suzanne Holland Snyder Oil Co. 4918 King Richard's Midland, TX 79707

Project Pit Floor and Tank Site

Client No. 4100200 Report No. M6-01-021 Report Date 01/11/96 12:46

Phone: 915/520-2098 Fax:

Date Sampled _____

Sample Type Soil

P.Q. # _____

Lab No. M6-01-021-01 M6-01-021-02

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Sampled By Client

Transported by Mark Holland

Date Received 01/05/96

Sample Identification Pit Floor 2 - 20' Tank Site

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Reviewed By

MAXIM

ALLAN B. JOHNSTON

Order # M6-01-021 01/11/96 12:46 Client: Snyder Oil Co.	TEST RES	ULTS BY SAMPLE	Page 2 of 2
Sample: 01A Pit Floor 2 - 20'	Collec	ted:	Category: S
<u>Test Name</u> TOT.PET. HYDROCARBONS SOIL	<u>Method</u> EPA 418.1	<u>Result</u> <u>Units</u> 15700 mg/kg	<u>Detection</u> <u>Date</u> <u>Limit Started Analyst</u> 52.4 01/10/96 SLS
Sample: 02A Tank Site	Collec	sted:	Category: S
<u>Test Name</u> TOT.PET. HYDROCARBONS SOIL	Method EPA 418.1	<u>Result</u> <u>Units</u> 5580 mg/kg	<u>Detection</u> <u>Date</u> <u>Limit Started Analyst</u> 40.2 01/10/96 SLS

MAXIN

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Client Suzanne Holland Snyder Oil Co. 4918 King Richard's Midland, TX 79707 Client No. Report No. M6-01-009 Report Date 01/03/96 16:13

Project Maljamar Pit #1

Phone: 915/520-2098 Fax:

Transported by Suzanne Holland

Sampled By Client

Date Sampled 01/02/96

Sample Type Soil

P.O. # _____

<u>Lab No.</u> M6-01-009-01 <u>Sample Identification</u> Maljamar Pit #1

Date Received 01/03/96

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on

Reviewed By

MAXIM

ALLAN B. JOHNSTON

Order # M6-01-009 Page 2 of 2 01/03/96 16:13 TEST RESULTS BY SAMPLE Client: Snyder Oil Co. Sample: 01A Maljamar Pit #1 Collected: 01/02/96 Category: S Detection Date Test Name Method Result Units Limit Started Analyst TOT.PET. HYDROCARBONS SOIL EPA 418.1 21700 mg/kg 37.4 01/03/96 SLS

MAXIM

APPENDIX C

Sundown Clay Specifications

PETTIGREW and ASSOCIATES

1110 H. GRIMES

DEARA P. HICKS PE WILLIAM M. HICKS, M. P.E. ICHARD H. PUTTIGREW, P.E. P.

September 19, 1995

John West Engineering 412 N. Dal Paso Hobbs, New Mexico 88240 ATTN: Phil Ross

RE: Sundown Pit

Dear Phil:

Enclosed please find the results for the permeability tests that you requested for Sundown Pit. This material was delivered to our lab on August 23, 1995. The average permeability values are as follows:

Taiti	z	Fina	Ē	Hydraulic Conductivity
Moisture	Dry Density	Molsture	Dry Density	
(%)	(PCF)	(%)	(PCF)	(cm/sec)
25.2	80.4	37.8	82.2	1.8E-05
25.2	85.7	37.5	81.9	2.0E-05
25.2	91.0	33.9	87.0	3.3E-07

The 85% sample compressed during testing and the 90 and 95% samples swelled during the testing. This will influence the Hydraulic Conductivity results. Also enclosed please find the Moisture Density Determination results (ASTM D 698), the Plasticity Index results. Sieve Analysis and Soil Classification.

We appreciate the opportunity to be of service to you on this project. Please call if you have any questions.

Sincerely,

PETTIGREW and ASSOCIATES, P.A.

Elect Robinett, E.T.

enclosures: as stated



PETTIGREW and ASSOCIATES

110 N. GRIMES HOBBS NM 88240 ARLSBAD NM . MEZAR VIE NM 28102 500 393-9827 (375) 201421

LABORATORY TEST REMURI

WILLIAM M. HICKS, III, P.B. RICHARD & PETITORHW,

TO: John West Engincering 412 N. Dal Paso Hobbs, New Mexico 88240

· • 1. TEST METHOD: AASHTO T-27

TYPE OF TEST: SIEVE ANALYSIS

PROJECT. Suadown Pit

DATE OF TEST: August 25, 1995

TYPE OF MATERIAL: Red Clay

LOCATION:

YEST NO:

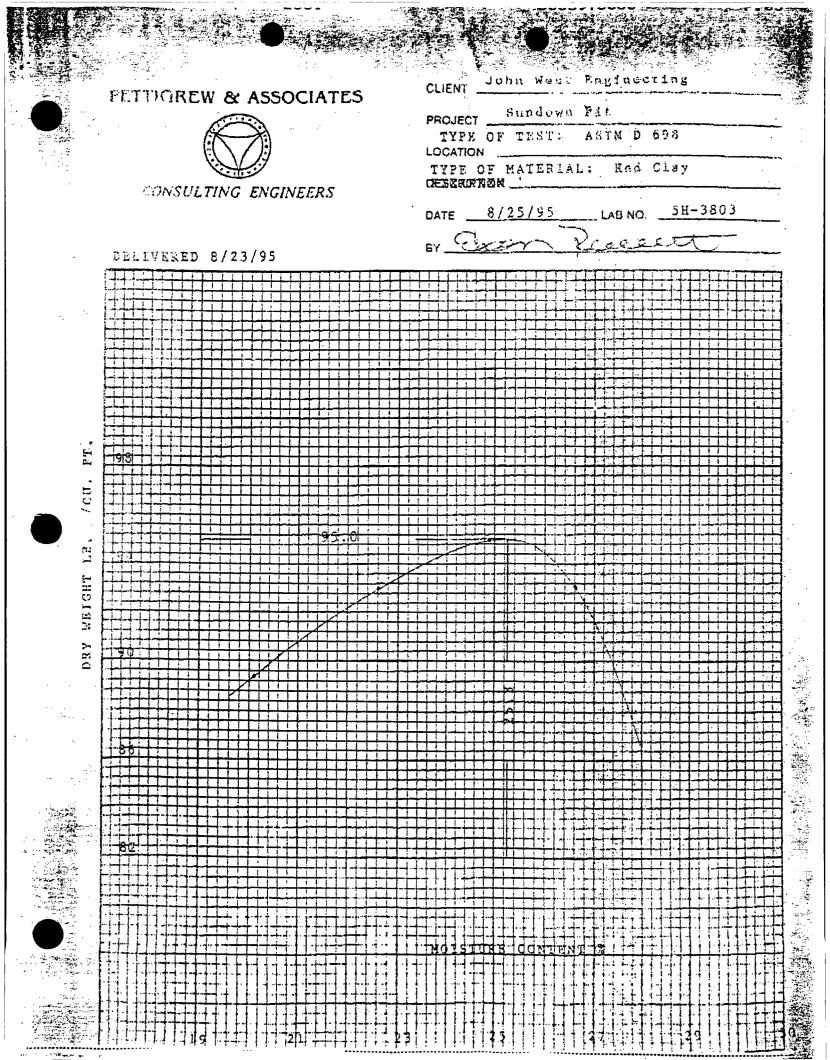
#4 100 #10 99 #40 58	
#40	in it
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#200	
LL 48	
PL 23	
P1	

Classified as CL Moisture Density Determination: ASTM D698=95.0 @ 253 Delivered 8/23/95 John West Engineering LAR NO. 211-3803 3804

COPIES TO

Hour West Engineering

PETTIGREW ING ASSOCIATES



902 Flexible Wall Permeability

Boring Number: Sample Number Depti Project Date: Day tample (Initial) Manth: 244.00 244.00 244.00 Moisture Content. (%): 244.00 244.00 244.00 Wet Unit Weight, (pcf): Wat Unit Weight, (g/cc): Wet Mass, Wer (gms): Volume, Va (cm3): Area. (om2): Diameter, O(cm): engin, L(cm): etta Lenglh Correction Ha. Time: 10.00 10.00 11.00 10.00 10.00 10.00 Petigrew Min 30.00 23,00 49.00 12.00 10.00 , 00 Diff. Phese (PSI) 0.00 0,00 0.00 0.00 0,00 0.00 Standariper. Parel Number: Qeli Number. Checked by: Tasted by: fest setup date: Head Bot Î area (a) (ri): (Juo æ) 26.04 6,80 6.20 5.80 7.40 8,50 50'2 Head ŝ 419.79 721.60 10.149 107.26 7.257 1.718 41.36 25.20 18,50 15.70 13.90 14.40 15.10 13.20 1.14 Head Total (cm) 0.076 \$1.8 0 12.46 10.86 8,00 9,49 5.37 6.86 Elapsed lime (sec) 860.00 1260,00 780.00 660.00 760.00 Area, Afomic Sample (fina Initial Wet unit Weight (poll: Wei Mass, Willing Volume. V(cm)12 ength, L(cm): Contining Pressure: Wat Unit Weight (grint) Diamoter, D(cm); C == ((a ln)*(a out)*[1)/((/ Value of C: (1) (1) Volume of Solids, Vinc National Specific draw Gradien Percent Seturation (N void Ratio, and Pore Volume, V(cc) Maisture content (54) 87.0 0,93 1.07 0,68 1.23 cegree Temp. 23.50 1,35E-01 23.50 2.44E-01 23.50 23.50 23,50 1.54E-01 1.37E-01 1.705-01 新始始

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(cm/sec)

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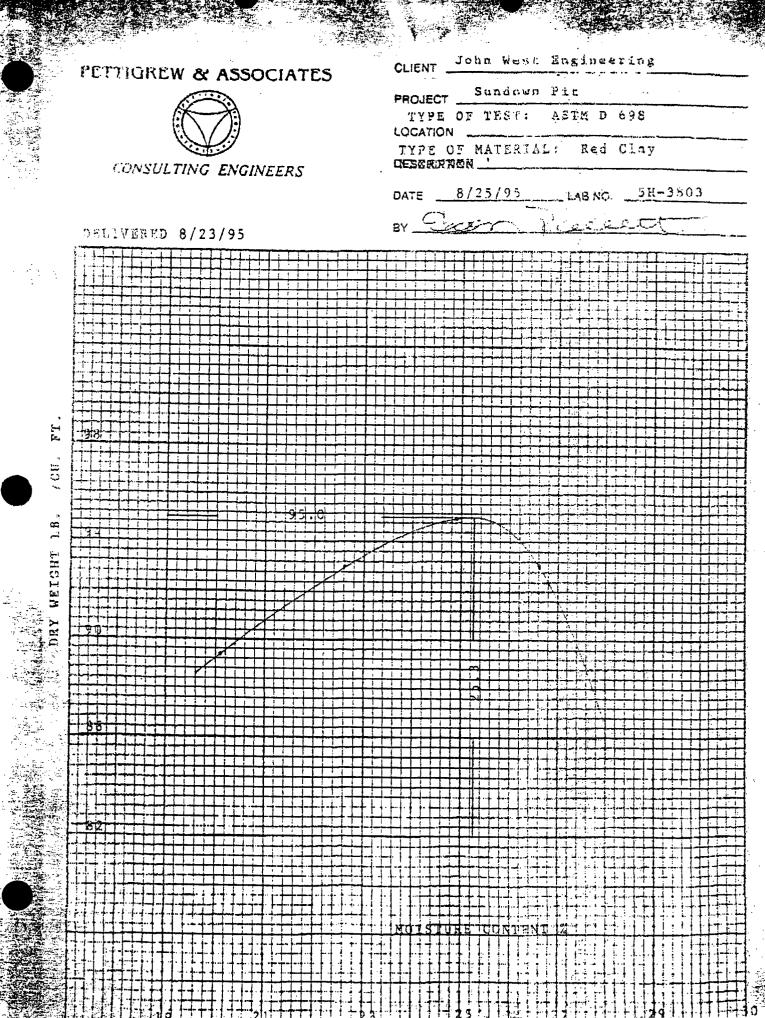
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Ring Park

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8929977293 1:505772

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APPENDIX D

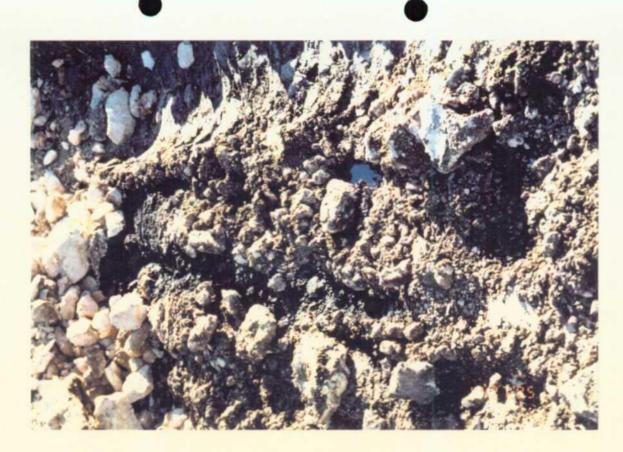
Photographs of Site



Orig. pit location



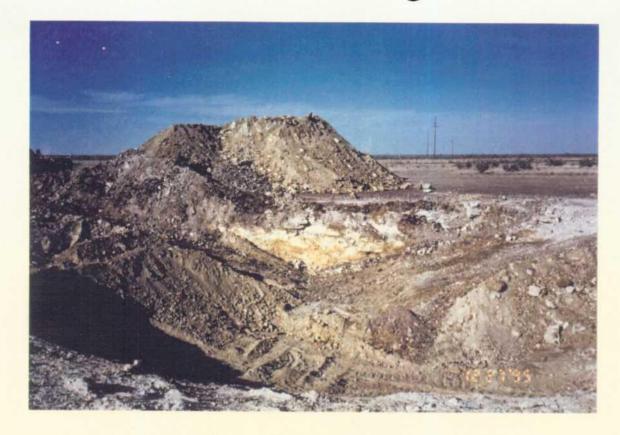
Pre-excavation



Excavation of source

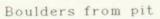


Excavation of source



Excavation of source







Pit site



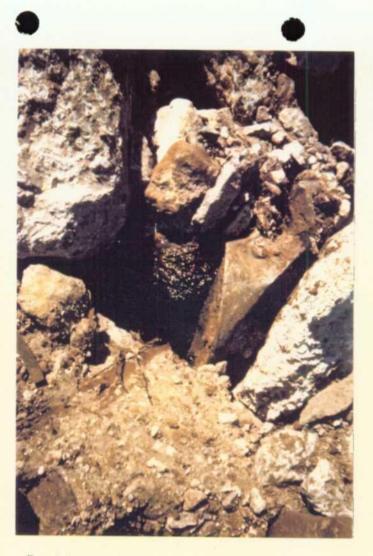
Pit excavation 8'-12'



Pit excavation 8'-12'



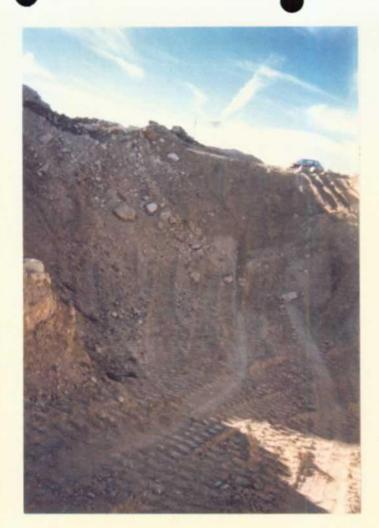
Pit excavation 8'-12'



Boulders will need separate disposal



Pit @ 14'6''



Pit @ 14'6''



Pre-closure pit site



HC contam. @ battery site



Excavation of Pad



Soil - TPH 5580 ppm

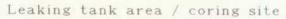


Site of leaking tank.



Pad - TPH 3910 ppm







Backfill with clean soil.





Clay cap in progress.



Clay cap completed.



Top soil completed, ready for seeding.



Battery site remediated.



Line vent belonging to GPM.