

3R - 215

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
1995

July 5, 1995

Bill - Pit Closure forms  
for subject pit. Please  
attach to the analysis  
sent to you on July 5<sup>th</sup>  
Thank you.  
P.S.

Mr. Bill Olson  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87504

**Subject: Pit Closure Results from EPNG's Lindrith Pig System Tank Battery**

Dear Mr. Olson,

Enclosed are the results of the pit closure at EPNG's Lindrith Pig System Tank Battery.

The pit area was excavated to practical extent as outlined in EPNG's Pit Closure Plan. A five point composite sample was taken which produced a TPH result of 1,530 mg/kg which fails the soil criteria for this pit location.

This pit will be added to EPNG's list of "Phase II" pits - pits which fail BTEX and/or TPH and will be addressed accordingly.

Should you require further information, please do not hesitate to call at 505-599-2175.

Thank you.

P. S. Marquez  
Patrick Marquez  
Compliance Engineer

cc: w/o enclosure  
Denny Foust (NMOCD)  
David Hall (EPNG)  
Leroy Montoya (EPNG)  
Bob Yungert (EPNG)  
John Lambdin (EPNG)  
Sandra Miller/David Bays/File: 5220 Ojito Field (Regulatory)

## FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>NA</u> Location: <u>Lindbergh Pig Sys Drip-Y1</u></p> <p>Operator #: <u>NA</u> Operator Name: <u>EPN6</u> P/L District: <u>DJITD</u></p> <p>Coordinates: Letter: <u>P</u> Section <u>18</u> Township: <u>24</u> Range: <u>5</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: <u>Pig Sys. Drip</u></p> <p>Site Assessment Date: <u>5/2/95</u> Area: _____ Run: _____</p>
SITE ASSESSMENT	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> <p><b>Land Type:</b> BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Jicarilla Apache</u></p> <p><b>Depth to Groundwater</b> Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area :</b> 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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b> Less Than 200 Ft (20 points) <input checked="" type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Large Canyon</u> (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only) <input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>40</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline Book: Inside</u> <u>Vulnerable Zone Top: Inside</u></p> <p><u>1 pit. Will close. Abundant product in pit. Pit lined &amp; covered w/ "netting"</u></p> <p style="text-align: right;">DIG + HAVL</p>

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	Meter: <u>N/A</u> Location: <u>Lindrieth Pig Sys Drip Y-1</u> Coordinates: Letter: <u>P</u> Section <u>18</u> Township: <u>24</u> Range: <u>5</u> Or Latitude _____ Longitude _____ Date Started : <u>6/19/95</u> Run: _____
<b>FIELD OBSERVATIONS</b>	Sample Number(s): <u>KD 460</u> Sample Depth: <u>13'</u> Feet Final PID Reading <u>550 ppm</u> PID Reading Depth <u>13'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
<b>CLOSURE</b>	Remediation Method: Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>430</u> Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input type="checkbox"/> Soil Disposition: Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>6/21/95</u> Pit Closed By: <u>PEI</u>
<b>REMARKS</b>	Remarks : <u>Removed 430 yds of Contaminated Soil. Removed 100 yds of over Burden. Did not close pit AS per Rick Cosby's instruction. Did not haul in any Backfill.</u>
<b>SIGNATURE</b>	Signature of Specialist: <u>Kenny Damm</u>



**El Paso**  
Natural Gas Company

NEW MEXICO OIL CONSERVATION DIVISION  
RECEIVED

35 JUL 13 AM 8 52

P. O. BOX 4990  
FARMINGTON, NEW MEXICO 87499

July 5, 1995

Mr. Bill Olson  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87504

**Subject: Pit Closure Results from EPNG's Lindrith Pig System Tank Battery**

Dear Mr. Olson,

Enclosed are the results of the pit closure at EPNG's Lindrith Pig System Tank Battery.

The pit area was excavated to practical extent as outlined in EPNG's Pit Closure Plan. A five point composite sample was taken which produced a TPH result of 1,530 mg/kg which fails the soil criteria for this pit location.

This pit will be added to EPNG's list of "Phase II" pits - pits which fail BTEX and/or TPH and will be addressed accordingly.

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Thank you,

*P. S. Marquez*  
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Compliance Engineer

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Sandra Miller/David Bays/File: 5220 Ojito Field (Regulatory)



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD460	946922
MTR CODE   SITE NAME:	None	Lindrith Pig Sys Drip Y-1
SAMPLE DATE   TIME (Hrs):	21-Jun-95	930
SAMPLED BY:	Kenny Dearen, BEI	
DATE OF TPH EXT.   ANAL.:	23-Jun-95	23-Jun-95
DATE OF BTEX EXT.   ANAL.:	27-Jun-95	27-Jun-95
TYPE   DESCRIPTION:	VC	Brown Fine Sand & Clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 1.2	MG/KG	0.4546	N/A	2.20	20
TOLUENE	1.83	MG/KG	0.4546	N/A	2.20	20
ETHYL BENZENE	< 1.2	MG/KG	0.4546	N/A	2.20	20
TOTAL XYLENES	7.46	MG/KG	0.4546	N/A	2.20	20
TOTAL BTEX	9.29	MG/KG	0.4546	N/A	2.20	20
TPH (418.1)	1,530	MG/KG	1	N/A	1.98	28
HEADSPACE PID	550	PPM				
PERCENT SOLIDS	86.9	%				

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

The Surrogate Recovery was at 89.6 for this sample All QA/QC was acceptable.  
Narrative:

DF = Dilution Factor Used

Approved By:

*John Fard*

Date:

*6/28/95*

# EL PASO NATURAL GAS - FIELD SERVICES LAB

QUALITY CONTROL REPORT

EPA METHOD 8020 - BTEX

Samples: 946922, 946925 to 946928 (Phase II Pit Project)

QA/QC for 6/27/95

## LABORATORY DUPLICATES:

SAMPLE NUMBER	TYPE	SAMPLE RESULT (S) (MG/KG)	DUPLICATE RESULT (D) (MG/KG)	RPD	ACCEPTABLE	
					YES	NO
946922					RANGE	
Benzene	2nd Run	<1.5	<1.5	0%	+/- 35 %	X
Toluene	2nd Run	1.83	1.72	6.2	+/- 35 %	X
Ethyl benzene	2nd Run	<1.5	<1.5	0%	+/- 35 %	X
Total Xylenes	2nd Run	7.46	7.52	0.8	+/- 35 %	X

Narrative: Acceptable.

## LABORATORY CALIBRATION CHECKS, LABORATORY CONTROL SAMPLES:

SAMPLE NUMBER	TYPE	KNOWN RESULT (PPB)	FOUND RESULT (PPB)	ZR	ACCEPTABLE	
					YES	NO
ICV 25 PPB std					RANGE	
Benzene	Standard	25.0	20.4	81.6	75 - 125 %	X
Toluene	Standard	25.0	25.8	103.2	75 - 125 %	X
Ethyl benzene	Standard	25.0	24.9	99.6	75 - 125 %	X
Total Xylenes	Standard	75.0	76.2	101.6	75 - 125 %	X
SAMPLE NUMBER	TYPE	KNOWN RESULT (PPB)	FOUND RESULT (PPB)	ZR	ACCEPTABLE	
					YES	NO
LCS 25 PPB					RANGE	
Benzene	Standard	25.0	25.5	102	39 - 150	X
Toluene	Standard	25.0	25.4	102	46 - 148	X
Ethyl benzene	Standard	25.0	24.9	100	32 - 160	X
Total Xylenes	Standard	75.0	76.3	102	Not Given	X

Narrative: Acceptable.

## LABORATORY SPIKES:

SAMPLE NUMBER	SPIKE ADDED (SA) PPB	SAMPLE RESULT (S) (PPB)	SPIKE SAMPLE RESULT (SR) (PPB)	ZR	ACCEPTABLE	
					YES	NO
946922					RANGE	
Benzene	50.0	0	50.3	101	75 - 125 %	X
Toluene	50.0	4.03	43.4	79	75 - 125 %	X
Ethyl benzene	50.0	0	50.5	101	75 - 125 %	X
Total Xylenes	150	16.4	161	96	75 - 125 %	X

Narrative: Acceptable.

## LABORATORY , REAGENT AND TRIP BLANKS:

SAMPLE ID	SOURCE	Component (PPB)	STATUS
Benzene	EPNG Water/MeOH	<5.0	ACCEPTABLE
Toluene	EPNG Water/MeOH	<5.0	ACCEPTABLE
Ethyl benzene	EPNG Water/MeOH	<5.0	ACCEPTABLE
Total Xylenes	EPNG Water/MeOH	<15.0	ACCEPTABLE

Narrative: Acceptable!

Approved By: John Swales

Date: 29-Jun-95

# QUALITY CONTROL REPORT

TPH by Modified 418.1 by Infrared

8 SJR-ponds

4 Pit Samples

13 SJR-landfarm

Date of Analysis: June 27, 1995

## LABORATORY CONTROL SAMPLES: CALIBRATION CHECKS

SAMPLE ID	SOURCE	TRUE VALUE (PPM)	FOUND (MG/KG)	%R	ACCEPTABLE RANGE 75-125 %R YES NO
INITIAL CALIBRATION VERIF. "B" Heavy Oil (Lot M3G9616)	HORIBA	100	95	95	X

Narrative: Acceptable.

## LABORATORY DUPLICATES:

SAMPLE NUMBER	TYPE	SAMPLE RESULT (S)MG/KG	DUPLICATE RESULT (D)MG/KG	RPD	ACCEPTABLE RANGE + / - 35% YES NO
950724	2nd Extract	55	43	24.9	X
946925	2nd Extract	58	53	8.9	X

Narrative : Acceptable.

## LABORATORY SPIKES:

SAMPLE NUMBER	SPIKE ADDED (SA)MG/KG	SAMPLE RESULT (S)MG/KG	SPIKE SAMPLE RESULT (SR)MG/KG	%R	ACCEPTABLE RANGE 75-125 %R YES NO
950724	2730	55	3320	120	X
946925	2760	58	3280	117	X

Narrative: Acceptable.

## REFERENCE SOIL (Laboratory Control Sample):

SAMPLE ID	SOURCE	KNOWN VALUE (MG/KG)	SAMPLE RESULT FOUND (MG/KG)	MFG SPECIFIED RANGE	ACCEPTABLE YES NO
ERA TPH STANDARD #1 LOT # 91026	ENVIRONMENTAL RESOURCE ASS.	1340	1400	804 - 1680	X
ERA TPH STANDARD #2 w/int LOT # 91026	ENVIRONMENTAL RESOURCE ASS.	2590	2770	1550 - 3240	X

Narrative: Acceptable.

## LABORATORY REAGENT BLANK:

SAMPLE ID	SOURCE	TPH LEVEL (MG/KG)	STATUS
Freon Solvent	EPNG Lab	<10.0	ACCEPTABLE
Reagent Blank	EPNG Lab	<10.0	ACCEPTABLE

Narrative: Acceptable.

Approved By:

*John Farrow*

Date: 28-Jun-95

Extracted: 06/27/95





## Page \_\_\_\_\_ of \_\_\_\_\_

White - Testing Laboratory    Canary - EPNG Lab    Pink - Field Sampler



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

April 3, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-242-236**

Mr. Patrick Marquez  
El Paso Natural Gas Company  
P.O. Box 4990  
Farmington, New Mexico 87499

**RE: TANK INSTALLATION/PIT CLOSURE PLAN LINDRITH PIG SYSTEM**

Dear Mr. Marquez:

The New Mexico Oil Conservation Division (OCD) has completed a review of El Paso Natural Gas Company's (EPNG) February 23, 1995 "TANK INSTALLATION AND PIT CLOSURE PLAN AT EPNG'S LINDRITH PIG SYSTEM TANK BATTERY". This document contains EPNG's proposal to close an lined pit used for containment of pipeline pigging wastes and replacing the pit with a double walled tank.

The above referenced work plan is approved with the following conditions:

1. The results of the pit closure will be submitted to the OCD by June 30, 1995.
2. EPNG will notify the OCD at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
3. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec District Office.

Please be advised that OCD approval does not relieve EPNG of liability if their operation results in actual contamination of fresh waters, human health or the environment. In addition, OCD approval does not relieve EPNG of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have any questions, please call me at (505) 827-5885.

Sincerely,

William C. Olson  
Hydrogeologist  
Environmental Bureau

cc: OCD Aztec District Office



OIL CONSERVATION DIVISION  
RECEIVED

'95 MAR 7 AM 8 52

P. O. BOX 4990  
FARMINGTON, NEW MEXICO 87499

Mr. Bill Olson  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87504

February 23, 1995

**Subject: Tank Installation and Pit Closure at EPNG's Lindrith Pig System Tank Battery**

Dear Mr. Olson:

Below are the specifications for the proposed tank installation at EPNG's Lindrith Pig System Tank Battery for your review and approval. The below grade tank will replace the existing lined pit. The single liner which was installed in 1982-83 was not installed with a leak detection system and although there is no reason to believe that the liner is leaking El Paso feels that it would be prudent to install a tank rather than rely on the liner for protection of ground water.

**Pit Closure**

- Lindrith Pig System Tank Battery: Unit Letter P, Section 18, T-24-N & R-5-W.
- Location is within the water vulnerable zone.
- The existing liner will be removed; the pit will be remediated according to EPNG's NMOCD approved pit closure plan and results of closure will be submitted to NMOCD.

**Tank Installation**

- 250 bbl, double walled storage vessel with leak detection.
- Leak detection designed to accommodate a pad lock.
- 12'± diameter x 12'± high.
- Vented cone top will be the only exposed (above ground) portion of the tank.
- Tank to be a minimum 1/4" plate steel bottom and 3/16" plate steel shell.
- Internal and external epoxy coating.
- Inspection of the leak detection system will take place once per month for a period of six months, thereafter quarterly. Any liquids found in the leak detection system will be reported to NMOCD within 24 hours.

El Paso Natural Gas Company respectfully request approval of the tank installation and pit closure. Should you have questions or need further information, please do not hesitate to call at 505 599 2175.

Thank you,

*P. S. Marquez*

Patrick Marquez  
Compliance Engineer

cc:

David Hall (EPNG)  
Leroy Montoya (EPNG)  
Bob Yungert (EPNG)  
John Lambdin (EPNG)  
Sandra Miller/David Bays/File: 5220 Ojito Field (Regulatory)

*Bill - neglected to  
copy Denny Foost on  
copy list - I will forward  
one to him today.*

*Charles*

*Patrick  
Marquez*





