3R - 149

GENERAL CORRESPONDENCE

YEAR(S):

2003 - 1993

NMOCD INSPECTION REPORT

SITE: El Paso Natural Gas (EPNG) Aztec Yard

INSPECTED BY: Bill Olson and Ed Martin

INSPECTION DATE: January 27, 2003, 3:00 pm – 3:30 pm

COMPANY REPS. David Bays and Ronald Sipe, EPNG

ALLEGATIONS:
"Any mercury that was spilled in the field trucks during the recalibration process (of meters) was rinsed out at the shop into a sump pit that drained directly in the Hampton Arroyo."

"...because there is an old mercury-containing pit in the direct path of drainage into the arroyo, this site clearly poses a potential health hazard..." (EarthJustice Legal Defense Fund 1/6/03 Petition to EPA)."

INSPECTION FINDINGS:
The site is a former EPNG yard which has been sold and is currently operated by Sunland Construction. OCD personnel inspected this site on June 4, 2002 after it was taken over by Sunland Construction. There are no current pits at the site. The site is located on the north side of Aztec in 36° 49′ 49.27″ North, 107° 58′ 53.64″ West. An arroyo runs along the south side of the facility. No flowing water was in the arroyo at the time of inspection. The area identified in the petitioner's photograph is a pipe leading from the facility into the adjacent arroyo. There are 4 pipes that drain into the arroyo. Three of the pipes are storm drains for the parking lot. One pipe has evidence past discharge. Old dried, weathered, oil-related residue materials are on the walls of the bottom half of the pipe. According to EPNG, service trucks were cleaned at the site and the wash water from the shop floor was drained into unlined sumps. EPNG stated that no mercury was washed from trucks in this process. EPNG stated that they did have a mercury staging area for wastes generated as part of the EPNG mercury meter cleanup project that was overseen by NMED. The staging area was located in the northeast corner of the yard away from the sumps. EPNG stated that all mercury wastes were contained in above-ground lined vessels and that mercury-related wastes were recycled or disposed of at an approved offsite facility. EPNG stated that there has not been dumping of mercury at this facility.

The OCD received a complaint in 1993 concerning pits at this site (see OCD case file #3R0149). The complainant had knowledge of two unlined pits that were covered over at the site. OCD investigations revealed that the site had one active unlined sump for a shop floor drain and that a previously closed former unlined sump for a floor drain was located under the slab of the welding shop. Both of these sumps were remediated and closed by EPNG as required by OCD. The OCD issued final closure approval of the remedial actions on October 5, 1995.

RECOMMENDATIONS
Request that EPNG give OCD a written response to the allegations in the Earthjustice petition to EPA and submit a work plan to investigate potential contamination at the one discharge pipe.

El Paso Aztec Yard. Currently Sunland Construction. View of yard looking North from South side of arroyo.

El Paso Aztec Yard. Currently Sunland Construction.

El Paso Aztec Yard. Currently Sunland Construction.

El Paso Aztec Yard. Currently Sunland Construction.

El Paso Aztec Yard. Currently Sunland Construction.

El Paso Aztec Yard. Currently Sunland Construction.

El Paso Aztec Yard. Currently Sunland Construction.

El Paso Aztec Yard. Currently Sunland Construction. View looking East along arroyo.

El Paso Aztec Yard. Currently Sunland Construction. View of drain line showing oily residue.

El Paso Aztec Yard. Currently Sunland Construction. View of drain line showing oily residue.

EARTHJUSTICE
LEGAL DEFENSE FUND

Earthjustice Environmental Law Clinic
at the University of Denver

EPNG { ALTON JAMES, RICKY CROSBY, SANDRA MILLER

January 6, 2003

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Gregg A. Cooke, Administrator
Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

By Fax: (214) 665-6648

Re: Citizen's Petition for Preliminary Site Assessment under Section 9605(d) of the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9601 et seq.

Dear Mr. Cooke:

On behalf of Ms. Tweeti Blancett, pursuant to 42 U.S.C. §9605(d) and 40 C.F.R. §300.420(b)(5) we hereby request that the Environmental Protection Agency (EPA) conduct preliminary assessments of four (4) locations in northern New Mexico to determine the hazards to public health and the environment associated with a threatened release of hazardous substances, pollutants, and contaminants.

Ms. Blancett's ranch is located near Aztec, New Mexico, and her family has lived in northern New Mexico for five generations. Recently, Ms. Blancett was presented with information about various locations in the area where hazardous substances and other contaminants were buried by former owners and operators of oil and gas production and refining facilities. Each of these locations is in the direct path of surface or groundwater drainage into the San Juan River basin. The threatened release of hazardous substances and other contaminants poses an imminent and substantial danger to human health and the environment. Because Ms. Blancett and her family are part of this community, their health and well being is also at risk.

The specific locations, the nature of activities which reportedly occurred at the sites, and the probable effects of a release are described below.

I. Sunland Yard, Hampton Arroyo, Aztec, New Mexico

Contact information:
Sean Renfro
Rocky Mountain Division Manager
Sunland Construction, Inc.
816 NE Aztec Boulevard
Aztec, NM 87410
(505) 334 4350

-Photograph attached as Exhibit A-

This site is located next to the Hampton Arroyo, which drains into the Animas River. It is near the McCoy Elementary School. The site was formerly owned by El Paso Natural Gas and was recently sold to Sunland Construction.

When El Paso was the owner and operator of the site, it was used as a shop for oil field service trucks. At that time, mercury was used in well meters. Field workers periodically recalibrated these meters by adding new mercury. Any mercury that was spilled in the field trucks during the recalibration process was rinsed out at the shop into a sump pit that drained directly into the Hampton Arroyo. This was done for many years. The sump pit was later cemented over without any reclamation.

The Hampton Arroyo flows year round and because this specific stretch of the Arroyo is close to the McCoy Elementary School, it is a favorite place for children to play in the water. Because mercury was routinely washed into the Arroyo here where children play, and because there is an old mercury-containing pit in the direct path of drainage into the Arroyo, this site clearly poses a potential health hazard to the local population.

II. Farmington Yard, Farmington, New Mexico

Contact information:
Richard Farley
Burlington Resources, Inc.
3401 E 30th Street
Farmington, NM 87402
(505) 326-9700

-Photograph attached as Exhibit B-

This is another yard which was formerly owned by El Paso Natural Gas. The site has since been sold to Burlington Resources. It is located on the Animas River which contributes to Farmington's water supply.

When El Paso owned the yard, oil distillants, lead paint, mercury, and asbestos were dumped there and remain to this day. The potential migration of these hazardous substances and other pollutants threatens to contaminate the water supply of Farmington, thus posing an imminent danger to its citizens.

III. Old Blanco Refinery, Bloomfield, New Mexico
East US 64, 1 mile from US 64 and NM 44

-Photograph attached as Exhibit C-

The Blanco Refinery was formerly owned by El Paso Natural Gas. It is very close to the Bloomfield Irrigation Ditch – Bloomfield's water source. The Blanco Refinery was torn down by El Paso and the land was sold to Burlington Resources and was recently resold to Duke Energy.

While El Paso was operating the refinery, they took contaminants from the plant, put them in 55 gallon drums, dug a trench, put the barrels in the trench, poked holes in the barrels, and covered up the mess with soil.

The punctured barrels, located so near the irrigation ditch, pose an obvious threat to Bloomfield's water supply.

This site was added to the CERCLIS database on October 1, 1986, and was archived on December 1, 1988, with a status of no further remedial action planned (NFRAP). However, Ms. Blancett believes that the dumping occurred after the EPA's 1988 site inspection and the site should be reinvestigated.

IV. Ballard Plant, Kutz Wash, just off the San Juan River, on Highway 550 45 miles South of Bloomfield, NM

-Photograph attached as Exhibit D-

This plant was owned and operated by El Paso Natural Gas. While it is no longer operating, during its operating years, El Paso buried mercury-filled meters and barrels of oil field waste near the Kutz Wash which is part of the San Juan River watershed.

The existence of this buried waste threatens the water supply of the surrounding area.

Notification of State and local authorities

Ms. Blancett has discussed the existence of these sites with a number of elected representatives and government personnel in the State of New Mexico. She has also discussed the sites with Joel Dougherty an enforcement officer in the Hazardous Waste Division at the EPA, Region VI. A copy of this letter is being sent to Mr. Dougherty. This letter is also being copied to the appropriate individuals at the New Mexico

Environment Department as well as to the potentially responsible parties to the disposal. The company representatives were previously notified by Ms. Blancett, but she received no reply from them.

Because Ms. Blancett's family has been a part of the northern New Mexico community for many generations, she is deeply concerned about the environment and the health and safety of the people there.

Please do not hesitate to request any necessary follow-up information and please provide a written response to this Petition. In the event that a preliminary assessment is deemed inappropriate, under 42 U.S.C. §9605(d), 40 C.F.R. 300.420(b)(5)(iii), and the Administrative Procedures Act (APA) 5 U.S.C. §555(e), please notify me and provide the reason for such determination. Thank you for your time and attention to this matter.

Sincerely,

Jay Tutchton
Earthjustice

Attachments: Exhibits A - D

cc: Myron O. Knudson, P.E.
Division Director, Superfund Division
EPA, Region VI

Joel Dougherty
Compliance Assurance and Enforcement
Hazardous Waste Division
EPA, Region VI

Marcy Leavitt, Bureau Chief
Ground Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2250
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

James P. Bearzi, General Manager
Hazardous Waste Bureau
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

James H. Davis, Ph.D., Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2050
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

Sean Renfro
Rocky Mountain Division Manager
Sunland Construction, Inc.
816 NE Aztec Boulevard
Aztec, NM 87410

Richard Farley
Burlington Resources
Box 4289
3401 E. 30th Street
Farmington, NM 87402

Bruce Myerson
El Paso Natural Gas Co.
614 Reilly
Farmington, NM 87410

Ms. Tweeti Blancett
103 West Aztec Boulevard
Aztec, NM 87410

Exhibit A

Exhibit B

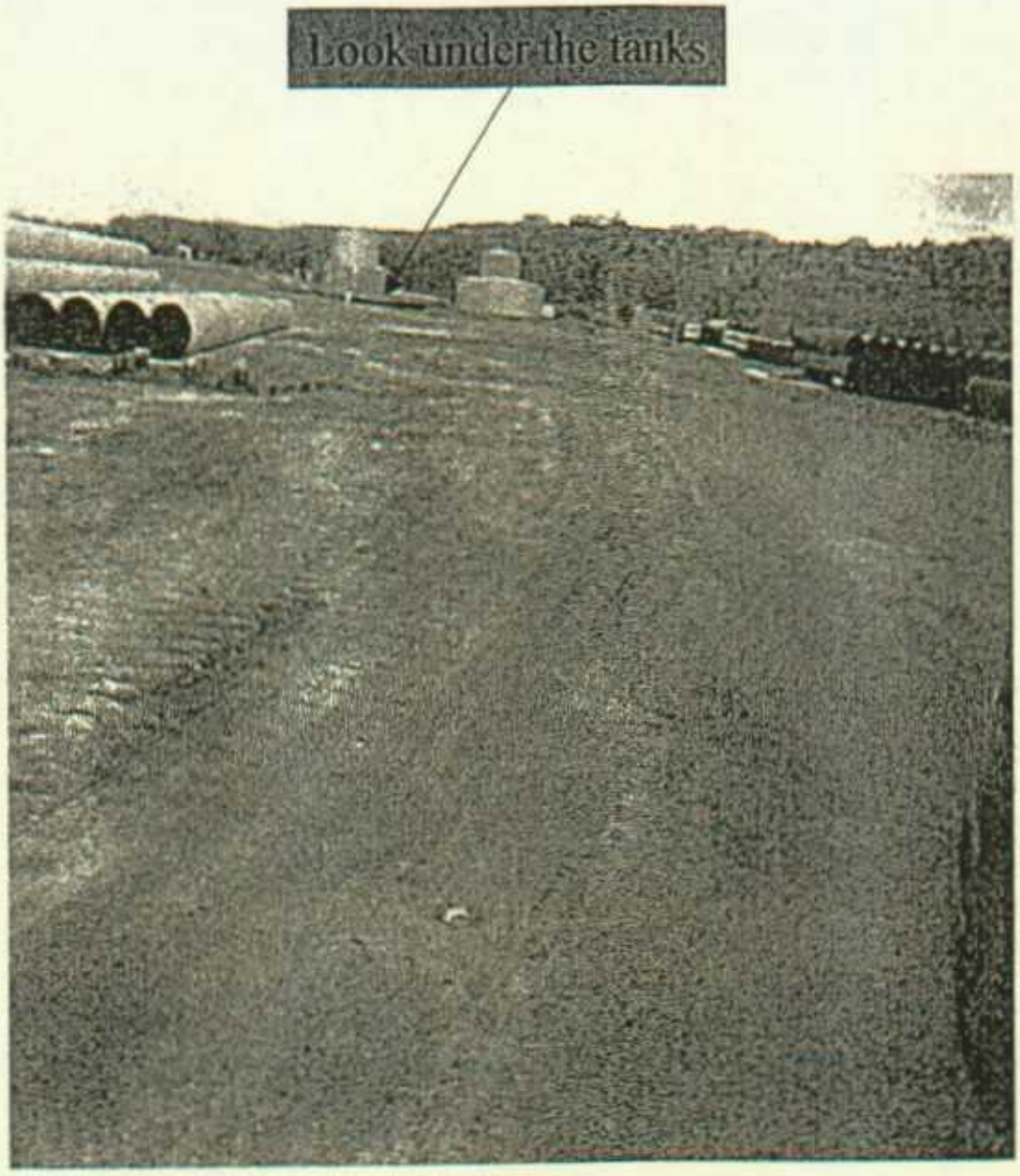


Exhibit C

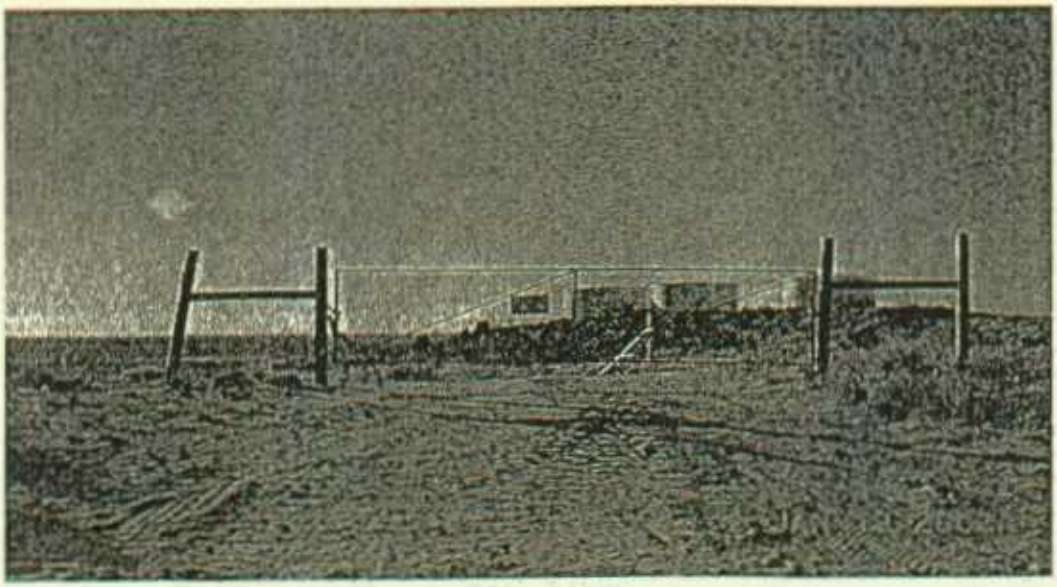


Exhibit D

El Paso
Natural Gas Company

RECEIVED
SEP 2 0 1995
Environmental Bureau
Oil Conservation Division

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

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

September 7, 1995

Subject: **Closure Report for the Aztec Pipeline District Sump Investigation**

Mr. Olson,

El Paso Natural Gas Company has completed the excavation of the subject sump. EPNG request that no further remediation or monitoring activities be required for this location.

As you may recall there were two sumps associated with the garage operation, one historical sump (covered in 1974) and the "north" sump located just north of the garage (sketch provided under Tab A). Each sump received floor drain effluent from washing down the floor with fresh water.

The sump excavation produced a dark, concentrated contamination for a depth of approximately 6 feet in the core of each sump. The excavation continued, following the visual contamination (gray color) vertically and horizontally until the boundary of the excavation matched the color of the clean, surrounding soil. Approximately 375 cubic yards of soil were removed and placed on plastic. Groundwater was never encountered during the excavation.

The excavation was continually monitored with a photo-ionization detector. A five point composite sample was analyzed for TPH which yielded a result of 103 ppm. The excavation was terminated and the appropriate samples were collected and analyzed. The results of the analyses are provided under Tab B.

In addition to the analyses listed in the closure plan, EPNG submits recent soil gas/groundwater analyses from several locations down gradient of the garage/sump. All but one location registered "non-detect" for BTEX. Data provided under Tab C.

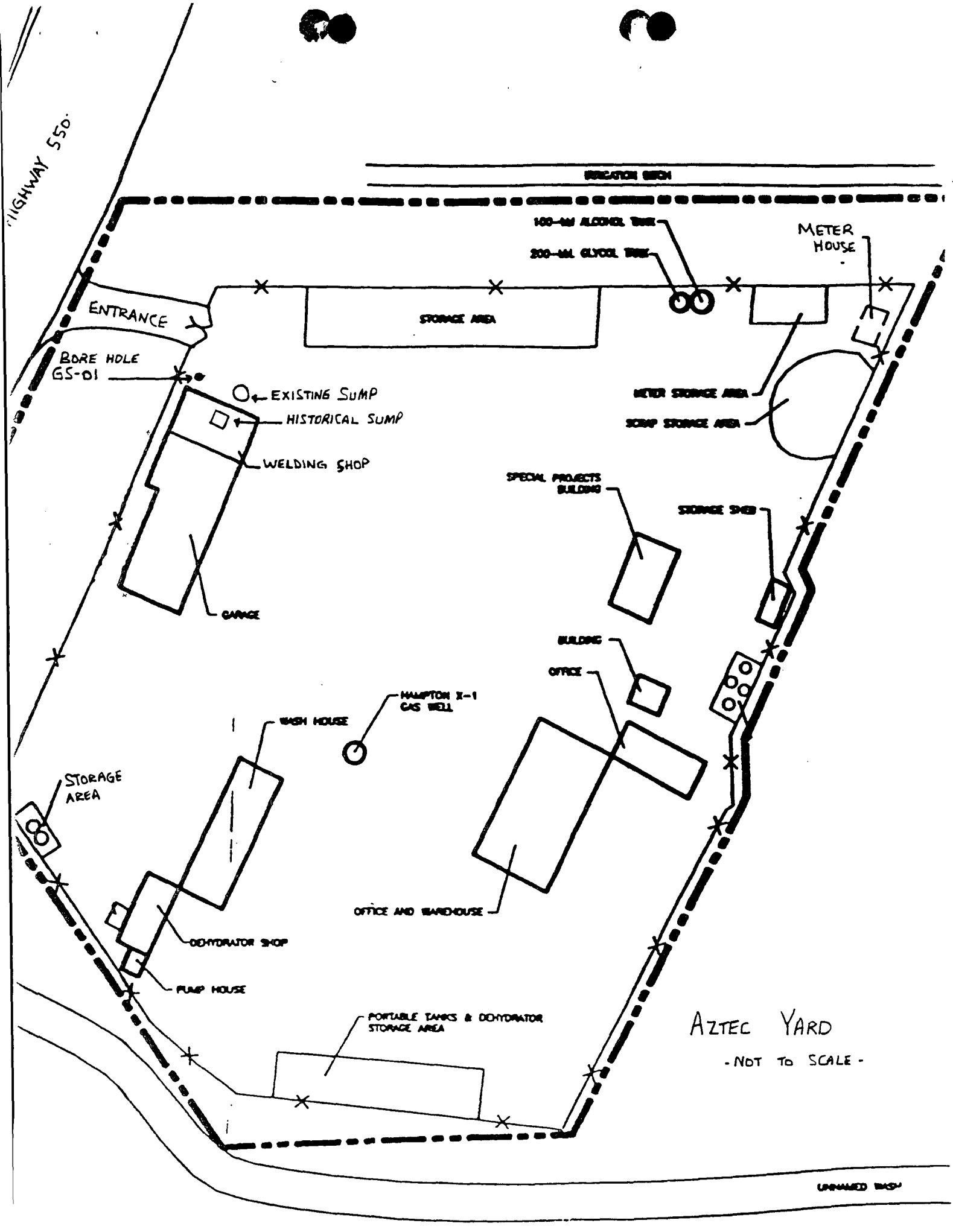
Based on the analyses provided, EPNG requests that no further remediation or monitoring be required for the Aztec District yard. If you have questions or concerns, please call at 505-599-2175.

Thank you,

P. S. Marquez

Patrick Marquez
Compliance Engineer

xc: attachments
Denny Foust - NMOCD Aztec
David Hall - EPNG
Charlie Brown - EPNG
John Lambdin -EPNG
Nancy Prince - EPNG
Sandra Miller/David Bays/File 8013 Environmental


HIGHWAY 550
IRRIGATION DITCH
100-BBL ALCOHOL TANK
200-BBL GLYCOL TANK
METER HOUSE
ENTRANCE
STORAGE AREA
BORE HOLE GS-01
EXISTING SUMP
HISTORICAL SUMP
WELDING SHOP
METER STORAGE AREA
SCRAP STORAGE AREA
SPECIAL PROJECTS BUILDING
STORAGE SHED
GARAGE
BUILDING
OFFICE
HAMPTON X-1 GAS WELL
WASH HOUSE
STORAGE AREA
OFFICE AND WAREHOUSE
DEHYDRATOR SHOP
PUMP HOUSE
PORTABLE TANKS & DEHYDRATOR STORAGE AREA
AZTEC YARD
- NOT TO SCALE -
UNNAMED WASH

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT

SAMPLE IDENTIFICATION

EPNG LAB ID #:	950798
DATE SAMPLE:	20-Jul-95
TIME SAMPLE (Hrs):	1350
SAMPLED BY:	Richard Benson
LOCATION:	Aztec P/L
SAMPLE POINT:	Sump Excavation
SAMPLE TYPE:	5 - Point Composite

REMARKS: 20' x 20' x 12' Excavation

RESULTS

PARAMETER	RESULT	UNITS	DF	Q	M(g)	V(ml)
TPH (418.1)	103	MG/KG	1	None	2.00	28
PERCENT SOLIDS	95	%	N/A	None	5.0	N/A

-- TPH is by EPA Method 418.1 --

arrative:
All QA/QC was found to be acceptable.

F = Dilution Factor, Q = Data Qualifier, M(g) = Sample Mass, V (ml) = Extraction volume

pproved By: John Fabela

Date: 7/21/95

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

****

[illegible]/07/20 14:53

Sample Identification
[illegible]0798

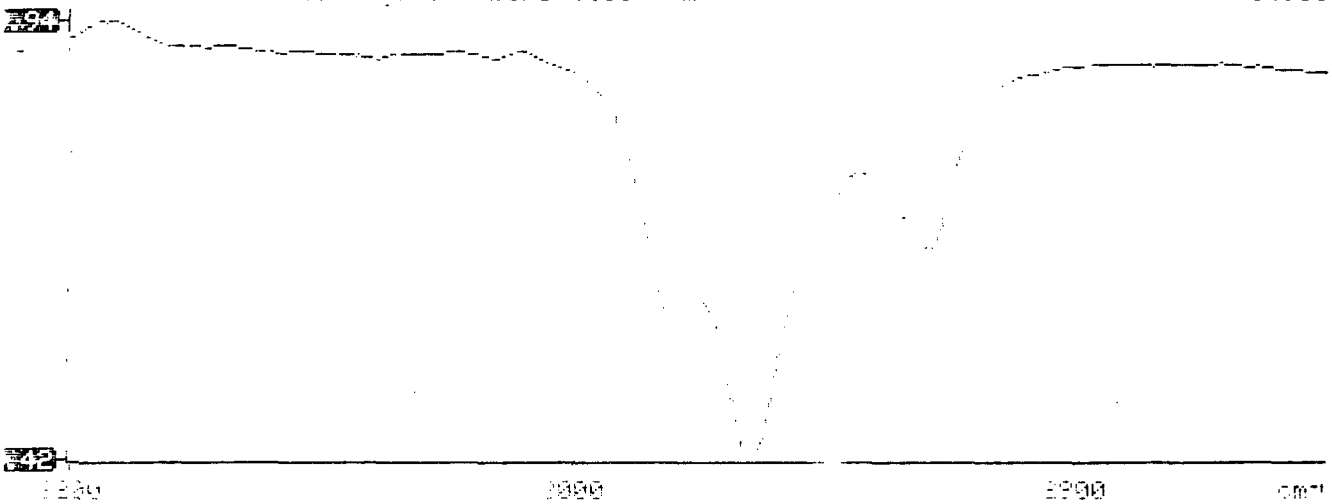
Initial mass of sample, g
[illegible]00

Volume of sample after extraction, ml
[illegible].000

Petroleum hydrocarbons, ppm
[illegible]

Net absorbance of hydrocarbons (2930 cm-1)
[illegible]

: Petroleum hydrocarbons spectrum 14:53



% solids → 94.8%

light brown sand

QUALITY CONTROL REPORT

TPH Modified 418.1 by Infrared

1 Aztec Sump Invest.
9 Pit Samples
2 O - 21 LD

Date of Analysis: July 20, 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 M3G9618	HORIBA	100	99	99	X	

Narrative: Acceptable.

LABORATORY DUPLICATES:

SAMPLE NUMBER	TYPE	SAMPLE RESULT (S)MG/KG	DUPLICATE RESULT (D)MG/KG	RPD	ACCEPTABLE RANGE + / - 35% YES	NO
947033	2nd Extract	112	81	32.49	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
947033	3220	112	4091	124	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 # 31026	ENVIRONMENTA RESOURCE ASS.	1340	1660	804 - 1680	X	
ERA TPH STANDARD #2 w/dil LOT # 31026	ENVIRONMENTA RESOURCE ASS.	2590	3220	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.

Extracted: 07/20/95

Approved By: Dolores Fowler

Date: 21-Jul-95

Analytical Technologies, Inc.

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

ATI I.D. **507389**

July 26, 1995

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

Project Name/Number: AZTEC SUMP INVESTIGATION

Attention: John Lambdin

On **07/21/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** sample(s). The sample(s) were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA Method 8015 Modified analyses were added on 7/21/95 for sample 950798 per Kim Kirby.

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

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:gsm

Enclosure

Analytical Technologies, Inc.

CLIENT	: EL PASO NATURAL GAS CO.	DATE RECEIVED	: 07/21/95
PROJECT #	: (NONE)		
PROJECT NAME	: AZTEC SUMP INVESTIGATION	REPORT DATE	: 07/28/95

ATI ID: 507389

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	950798	NON-AQ	07/20/95

---TOTALS---

MATRIX	#SAMPLES
NON-AQ	1

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507389

PROJECT # : (NONE)

PROJECT NAME : AZTEC SUMP INVESTIGATION

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL FACT
01	950798	NON-AQ	07/20/95	07/21/95	07/23/95	1

PARAMETER	UNITS	01
FUEL HYDROCARBONS	MG/KG	<5
HYDROCARBON RANGE		-
HYDROCARBONS QUANTITATED USING		-
SURROGATE:		
O-TERPHENYL (%)		103

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: EPA 8015 MODIFIED	ATI I.D.	: 507389
BLANK I.D.	: 072195	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/23/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	DILUTION FACTOR	: 1

PARAMETER	UNITS	
FUEL HYDROCARBONS	MG/KG	<5
HYDROCARBON RANGE		-
HYDROCARBONS QUANTITATED USING		-
SURROGATE:		
O-TERPHENYL (%)		128

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: EPA 8015 MODIFIED		
MSMSD #	: 50738610	ATI I.D.	: 507389
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/23/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 50738610	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
FUEL HYDROCARBONS	<5	100	100	100	110	110	10

7/31/95

$$\text{Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507389

PROJECT # : (NONE)

PROJECT NAME : AZTEC SUMP INVESTIGATION

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTO
01	950798	NON-AQ	07/20/95	07/21/95	07/22/95	1

PARAMETER	UNITS	01
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025
METHYL-t-BUTYL ETHER	MG/KG	<0.12
SURROGATE:		
BROMOFLUOROBENZENE (%)		98

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: BTEX, MTBE (EPA 8020)	ATI I.D.	: 507389
BLANK I.D.	: 072195	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/21/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	DILUTION FACTOR	: 1

PARAMETER	UNITS	
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025
METHYL-t-BUTYL ETHER	MG/KG	<0.12
SURROGATE:		
BROMOFLUOROBENZENE (%)		112

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: BTEX, MTBE (EPA 8020)		
MSMSD #	: 50738604	ATI I.D.	: 507389
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/23/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 50738604	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
BENZENE	<0.025	1.0	1.1	110	1.1	110	0
TOLUENE	<0.025	1.0	1.2	120	1.2	120	0
ETHYLBENZENE	<0.025	1.0	1.1	110	1.1	110	
TOTAL XYLENES	<0.025	3.0	3.4	113	3.4	113	0
METHYL-t-BUTYL ETHER	<0.12	2.0	1.9	95	2.2	110	15

7/31/95

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

August 10, 1995

FINAL REPORT

Aztec P/L
Sump Excavation Soil Pile Results
Lab Sample # 950804
Sampled July 21, 1995
Sampled by Richard Benson

Report Distribution:

Patrick Marquez
Results Log Book

Invoice to Accounts Payable. Charge: 108-53827-24-0001-0015-51-7210

Analytical **Technologies,** Inc.

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

ATI I.D. **508401**

September 1, 1995

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

Project Name/Number: AZTEC P/L 53827 Demo Soil Pile

Attention: John Lambdin

On **08/17/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** sample(s). The sample(s) were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

All analyses were performed by Analytical Technologies, Inc., 225 Commerce Drive, Fort Collins, CO.

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

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

Analytical Technologies, Inc.

CLIENT	: EL PASO NATURAL GAS	DATE RECEIVED	: 08/17/95
PROJECT #	: 53827		
PROJECT NAME	: AZTEC P/L	REPORT DATE	: 09/01/95

ATI ID: 508401

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	950857 Demo Soil Pile	NON-AQ	08/16/95

---TOTALS---

MATRIX	#SAMPLES
NON-AQ	1

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

Analytical Technologies, Inc.

TCLP VOLATILE ORGANICS

Modified Method 8240

Aztec P/L Demo Soil Pile

Sample ID: 950857

Lab Name: Analytical Technologies, Inc.
Client Name: ATI-NM
Client Project ID: Aztec P/L -- 508401
Lab Sample ID: 95-08-169-01

Date Collected: 08/16/95
Date Extracted: 08/22/95
Date Analyzed: 08/24/95

Sample Matrix: TCLP Leachate
Sample Volume: 0.5 mL

EPA HW Number	Analyte	CAS Number	Result (mg/L)	Detection Limit (mg/L)
D043	Vinyl chloride	75-01-4	ND	0.1
D029	1,1-Dichloroethylene	75-35-4	ND	0.1
D022	Chloroform	67-66-3	ND	0.1
D028	1,2-Dichloroethane	107-06-2	ND	0.1
D035	Methyl ethyl ketone	78-93-3	ND	0.1
D019	Carbon tetrachloride	56-23-5	ND	0.1
D040	Trichloroethylene	79-01-6	ND	0.1
D018	Benzene	71-43-2	ND	0.1
D039	Tetrachloroethylene	127-18-4	ND	0.1
D021	Chlorobenzene	108-90-7	ND	0.1

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
Dibromofluoromethane	98	86 - 118
Toluene-d8	103	88 - 110
Bromofluorobenzene	99	86 - 115

ND = Not Detected

Analytical Technologies, Inc.

TCLP SEMIVOLATILE ORGANICS
Method 8270

Aztec P/L
Demo
Soil File

Sample ID: 950857

Lab Name: Analytical Technologies, Inc.
Client Name: ATI - NM
Client Project: Aztec P/L -- 508401
Lab Sample ID.: 95-08-169-01

Date Collected: 08-16-95
Date Extracted: 08-22-95
Date Analyzed: 08-25-95

Sample Matrix: TCLP Leachate
Cleanup: None

Sample Volume: 100 mL
Final Volume: 1 mL

EPA HW Number	Analyte	CAS Number	Result (mg/L)	Detection Limit (mg/L)
D023	o-Cresol	95-48-7	ND	0.1
D024	m-Cresol	108-39-4	ND	0.1
D025	p-Cresol	106-44-5	ND	0.1
D026	Total o,m,p-Cresol		ND	0.1
D027	1,4-Dichlorobenzene	106-46-7	ND	0.1
D030	2,4-Dinitrotoluene	121-14-2	ND	0.1
D032	Hexachlorobenzene	118-74-1	ND	0.1
D033	Hexachlorobutadiene	87-68-3	ND	0.1
D034	Hexachloroethane	67-72-1	ND	0.1
D036	Nitrobenzene	98-95-3	ND	0.1
D037	Pentachlorophenol	87-86-5	ND	0.5
D038	Pyridine	110-86-1	ND	0.1
D041	2,4,5-Trichlorophenol	95-95-4	ND	0.5
D042	2,4,6-Trichlorophenol	88-06-2	ND	0.1

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
2-Fluorophenol	23	21-110
Phenol-d5	34	10-110
Nitrobenzene-d5	60	35-114
2-Fluorobiphenyl	50	43-116
2,4,6-Tribromophenol	40	10-123
Terphenyl-d14	66	33-141

ND = Not detected

Analytical Technologies, Inc.

Aztec P/L
Demo
50.1 Pile

TCLP SEMIVOLATILE ORGANICS MATRIX SPIKE

Method 8270

Sample ID: **950857**

Lab Name: Analytical Technologies, Inc.
Client Name: ATI - NM
Client Project: Aztec P/L -- 508401
Lab Sample ID.: 95-08-169-01

Date Collected: 08-16-95
Date Extracted: 08-22-95
Date Analyzed: 08-25-95

Sample Matrix: TCLP Leachate
Cleanup: None

Sample Volume: 100 mL
Final Volume: 1 mL

Analyte	Spike Added (mg/L)	Sample Concentration (mg/L)	MS Concentration (mg/L)	MS % Rec	QC Limit Recovery
Pyridine	0.50	ND	0.144	29	D - 104
1,4-Dichlorobenzene	0.50	ND	0.199	40	D - 99
2-Methylphenol	1.00	ND	0.571	57	D - 134
3 and 4-Methylphenol	2.00	ND	1.08	54	D - 112
Hexachloroethane	0.50	ND	0.197	39	D - 110
Nitrobenzene	0.50	ND	0.271	54	10 - 121
Hexachlorobutadiene	0.50	ND	0.172	34	D - 98
2,4,6-Trichlorophenol	1.00	ND	0.370	37	D - 106
2,4,5-Trichlorophenol	1.00	ND	0.530	53	D - 114
2,4-Dinitrotoluene	0.50	ND	0.258	52	D - 117
Hexachlorobenzene	0.50	ND	0.272	54	1 - 112
Pentachlorophenol	1.00	ND	0.618	62	D - 123

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
2-Fluorophenol	35	21-110
Phenol-d5	46	10-110
Nitrobenzene-d5	60	35-114
2-Fluorobiphenyl	53	43-116
2,4,6-Tribromophenol	45	10-123
Terphenyl-d14	69	33-141

ND = Not detected

Analytical Technologies, Inc.

TCLP VOLATILE ORGANICS
Modified Method 8240

Sample ID
TCLP Reagent Blank

Lab Name: Analytical Technologies, Inc.
Client Name: ATI-NM
Client Project ID: Aztec P/L -- 508401
Lab Sample ID: TCLPRB1 08/22/95

Date Collected: N/A
Date Extracted: 08/22/95
Date Analyzed: 08/24/95

Sample Matrix: TCLP Leachate
Sample Volume: 0.5 mL

EPA HW Number	Analyte	CAS Number	Result (mg/L)	Detection Limit (mg/L)
D043	Vinyl chloride	75-01-4	ND	0.1
D029	1,1-Dichloroethylene	75-35-4	ND	0.1
D022	Chloroform	67-66-3	ND	0.1
D028	1,2-Dichloroethane	107-06-2	ND	0.1
D035	Methyl ethyl ketone	78-93-3	ND	0.1
D019	Carbon tetrachloride	56-23-5	ND	0.1
D040	Trichloroethylene	79-01-6	ND	0.1
D018	Benzene	71-43-2	ND	0.1
D039	Tetrachloroethylene	127-18-4	ND	0.1
D021	Chlorobenzene	108-90-7	ND	0.1

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
Dibromofluoromethane	91	86 - 118
Toluene-d8	102	88 - 110
Bromofluorobenzene	98	86 - 115

ND = Not Detected

9-7-95

Analytical Technologies, Inc.

TCLP VOLATILE ORGANICS
Modified Method 8240

Sample ID: **Reagent Blank**

Lab Name: Analytical Technologies, Inc.
Client Name: ATI-NM
Client Project ID: Aztec P/L -- 508401
Lab Sample ID: WRB1 08/24/95

Date Collected: N/A
Date Extracted: N/A
Date Analyzed: 08/24/95

Sample Matrix: Water
Sample Volume: 5 mL

EPA HW Number	Analyte	CAS Number	Result (mg/L)	Detection Limit (mg/L)
D043	Vinyl chloride	75-01-4	ND	0.01
D029	1,1-Dichloroethylene	75-35-4	ND	0.01
D022	Chloroform	67-66-3	ND	0.01
D028	1,2-Dichloroethane	107-06-2	ND	0.01
D035	Methyl ethyl ketone	78-93-3	ND	0.01
D019	Carbon tetrachloride	56-23-5	ND	0.01
D040	Trichloroethylene	79-01-6	ND	0.01
D018	Benzene	71-43-2	ND	0.01
D039	Tetrachloroethylene	127-18-4	ND	0.01
D021	Chlorobenzene	108-90-7	ND	0.01

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
Dibromofluoromethane	89	86 - 118
Toluene-d8	102	88 - 110
Bromofluorobenzene	99	86 - 115

ND = Not Detected

8-29-95

Analytical **Technologies,** Inc.

TCLP VOLATILE MATRIX SPIKE RECOVERY

Modified Method 8240

Sample ID

In House

Lab Name: Analytical Technologies, Inc.
Client Name: ATI-NM
Client Project ID: Aztec P/L -- 508401
Lab Sample ID: 95-08-126-03

Date Collected: 08/15/95
Date Extracted: 08/22/95
Date Analyzed: 08/24/95

Sample Matrix: TCLP Leachate
Sample Volume: 0.5 mL

Analyte	Spike Added (mg/L)	Sample Concentration (mg/L)	MS Concentration (mg/L)	MS % Rec	QC Limit Recovery
Vinyl chloride	0.500	ND	0.330	66	49 - 132
1,1-Dichloroethylene	0.500	ND	0.466	93	65 - 126
Chloroform	0.500	ND	0.484	97	68 - 123
1,2-Dichloroethane	0.500	ND	0.497	99	61 - 122
Methyl ethyl ketone	0.500	ND	0.544	109	26 - 156
Carbon tetrachloride	0.500	ND	0.459	92	80 - 113
Trichloroethylene	0.500	ND	0.477	95	81 - 108
Benzene	0.500	ND	0.493	99	60 - 129
Tetrachloroethylene	0.500	ND	0.469	94	75 - 116
Chlorobenzene	0.500	ND	0.488	98	81 - 107

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
Dibromofluoromethane	103	86 - 118
Toluene-d8	102	88 - 110
Bromofluorobenzene	99	86 - 115

ND = Not Detected

JP 9-7-95

Analytical Technologies, Inc.

TCLP SEMIVOLATILE ORGANICS

Method 8270

Sample ID

TCLP Blank

Lab Name: Analytical Technologies, Inc.
Client Name: ATI - NM
Client Project: Aztec P/L -- 508401
Lab Sample ID.: RB1 08-22-95

Date Collected: N/A
Date Extracted: 08-22-95
Date Analyzed: 08-25-95

Sample Matrix: TCLP Leachate
Cleanup: None

Sample Volume: 100 mL
Final Volume: 1 mL

EPA HW Number	Analyte	CAS Number	Result (mg/L)	Detection Limit (mg/L)
D023	o-Cresol	95-48-7	ND	0.1
D024	m-Cresol	108-39-4	ND	0.1
D025	p-Cresol	106-44-5	ND	0.1
D026	Total o,m,p-Cresol		ND	0.1
D027	1,4-Dichlorobenzene	106-46-7	ND	0.1
D030	2,4-Dinitrotoluene	121-14-2	ND	0.1
D032	Hexachlorobenzene	118-74-1	ND	0.1
D033	Hexachlorobutadiene	87-68-3	ND	0.1
D034	Hexachloroethane	67-72-1	ND	0.1
D036	Nitrobenzene	98-95-3	ND	0.1
D037	Pentachlorophenol	87-86-5	ND	0.5
D038	Pyridine	110-86-1	ND	0.1
D041	2,4,5-Trichlorophenol	95-95-4	ND	0.5
D042	2,4,6-Trichlorophenol	88-06-2	ND	0.1

SURROGATE RECOVERIES

Analyte	% Recovery	% Rec Limits
2-Fluorophenol	76	21-110
Phenol-d5	87	10-110
Nitrobenzene-d5	85	35-114
2-Fluorobiphenyl	70	43-116
2,4,6-Tribromophenol	79	10-123
Terphenyl-d14	96	33-141

ND = Not detected

9-7-95

Analytical**Technologies**, Inc., Albuquerque, NM
San Diego • Phoenix • Seattle • Pensacola • Ft. Collins • Portland • Albuquerque

CHAIN OF CUSTODY

DATE: 8/16/95 PAGE 1 OF 1

ATI LAB I.D. 508401

PLEASE FILL THIS FORM IN COMPLETELY. SHADED AREAS ARE FOR LAB USE ONLY.

PROJECT MANAGER: JOHN LAMBDIN

COMPANY: EL PASO NATURAL GAS COMPANY
ADDRESS: P.O. BOX 4990
FARMINGTON, NM 87499
PHONE: 505-599-2144
FAX: 505-599-2261

BILL TO: SAME
COMPANY: AS
ADDRESS: ABOVE

SAMPLE ID	DATE	TIME	MATRIX	LAB ID
950857	8/16/95	1000	soil	-01

ANALYSIS REQUEST

Petroleum Hydrocarbons (418.1)	(MOD 8015) Gas/Diesel	Diesel/Gasoline/BTXE/MTBE (MOD 8015/8020)	BTXE/MTBE (8020)			Chlorinated Hydrocarbons (601/8010)	Aromatic Hydrocarbons (602/8020)	SDWA Volatiles (502.1/503.1), 502.2 Reg. & Unreg.			Pesticides/PCB (608/8080)	Herbicides (615/8150)	Base/Neutral/Acid Compounds GC/MS (625/8270)	Volatile Organics GC/MS (624/8240)	Polynuclear Aromatics (610/8310)	TCLP - 8240/8270	SDWA Primary Standards - Arizona	SDWA Secondary Standards - Arizona	SDWA Primary Standards - Federal	SDWA Secondary Standards - Federal		The 13 Priority Pollutant Metals	RCRA Metals by Total Digestion	RCRA Metals by TCLP (1311)
																X								

PROJECT INFORMATION

PROJ. NO.: 53827
PROJ. NAME: AZTEC P/L
P.O. NO.:
SHIPPED VIA: AIR/BOVIO

SAMPLE RECEIPT

NO. CONTAINERS	1
CUSTODY SEALS	Y / (N) / NA
RECEIVED INTACT	Y
RECEIVED COLD	Y 37°F

PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS

(RUSH) ☐ 24hr ☐ 48hr ☐ 72hr ☐ 1 WEEK (NORMAL) ☐ 2 WEEK

Comments: Charge to:
108-53827-24-0001-0015-51-7210

SAMPLED & RELINQUISHED BY: 1.
Signature: Richard Benson Time: 1000
Printed Name: RICHARD BENSON Date: 8/16/95
Company: EL PASO NATURAL GAS CO Phone: 599-2140

RELINQUISHED BY: 2.
Signature: Time:
Printed Name: Date:
Company:

RELINQUISHED BY:
Signature: Time:
Printed Name: Date:
Company:

RECEIVED BY: 1.
Signature: Time:
Printed Name: Date:
Company:

RECEIVED BY: 2.
Signature: Time:
Printed Name: Date:
Company:

RECEIVED BY:(LAB)
Signature: Time:
Printed Name: Date: 8/17
Analytical Technologies, Inc.

ATI Labs: San Diego (619) 458-9141 • Phoenix (602) 496-4400 • Seattle (206) 228-8335 • Pensacola (904) 474-1001 • Portland (503) 684-0447 • Albuquerque (505) 344-3777 DISTRIBUTION: White, Canary - ATI • Pink - ORIGINATOR

Analytical**Technologies,**Inc. Albuquerque, NM

Chain of Custody 95-08-169

DATE 8/17 PAGE 1 OF 1

Kim McNeill

NETWORK PROJECT MANAGER: ~~LETITIA KRAKOWSKI~~

COMPANY: **Analytical Technologies, Inc.**

ADDRESS: 2709-D Pan American Freeway, NE
Albuquerque, NM 87107

CLIENT PROJECT MANAGER:
Kim McNeill

ANALYSIS REQUEST

SAMPLE ID	DATE	TIME	MATRIX	LAB ID	TOX	TCC	ORGANIC LEAD	SULFIDE	SURFACTANTS (MBAS)	632/632 MOD	619/619 MOD	610/8310	8240/8270 - TCLP	8240 (TCLP 1311) ZHE	Diesel/Gasoline/BTXE/MTBE/ (MOD 8015/8020)	Volatile Organics GC/MS (624/8240)	NACE	ASBESTOS	BOD	TOTAL COLIFORM	FECAL COLIFORM	GROSS ALPHA/BETA	RADIUM 226/228	AIR - O2, CO2, METHANE	AIR - Diesel/Gasoline/BTXE/ (MOD 8015/8020)	NUMBER OF CONTAINERS
508401-01	8/16	1000	NAQ	01									X													1

PROJECT INFORMATION	
PROJECT NUMBER:	508401
PROJECT NAME:	Aztec P/L
QC LEVEL:	STD. IV
QC REQUIRED:	MS MSD BLANK
TAT:	STANDARD RUSH!

SAMPLE RECEIPT	
TOTAL NUMBER OF CONTAINERS	1
CHAIN OF CUSTODY SEALS	--
INTACT?	Y
RECEIVED GOOD COND./COLD	Y
LAB NUMBER	

DUE DATE: 8/29

RUSH SURCHARGE: _____

CLIENT DISCOUNT: 15 %

Iwo# KM670

SAMPLES SENT TO:

SAN DIEGO	
FT. COLLINS	X
RENTON	
PENSACOLA	
PORTLAND	
PHOENIX	
FIBERQUANT	

RELINQUISHED BY: 1.
Signature: Andrew Parker Time: 1730
Printed Name: Andrew Parker Date: 8/17
Analytical Technologies, Inc. Albuquerque
Signature: Time:
Printed Name: Date:
Company: Fedex

RECEIVED BY: (LAB) 1.
Signature: Time:
Printed Name: Date:
Company:

RELINQUISHED BY:
Signature: Time:
Printed Name: Date:
Company: Fedex

RECEIVED BY: (LAB) 2.
Signature: Time: 900
Printed Name: D. Hull Date: 8/18/95
Company: ATI CO

Analytical Technologies, Inc.

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

ATI I.D. **507405**

August 7, 1995

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

Project Name/Number: AZTEC P/L

Attention: John Lambdin

On **07/26/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** sample(s). The sample(s) were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA method 8020 and 8015 analyses were performed by Analytical Technologies, Inc., Albuquerque, NM.

All other analyses were performed by Analytical Technologies, Inc., 225 Commerce Drive, Fort Collins, CO.

Sample was diluted for EPA method 8020 due to the presence of late eluting hydrocarbons.

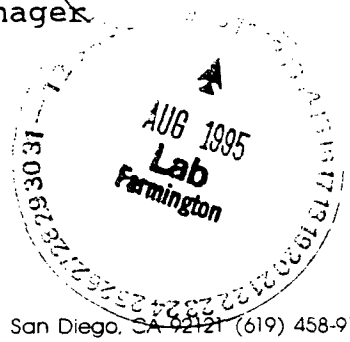
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



Corporate Offices: 5550 Morehouse Drive San Diego, CA 92121 (619) 458-9141

Analytical Technologies, Inc.

CLIENT	: EL PASO NATURAL GAS CO.	DATE RECEIVED	: 07/26/95
PROJECT #	: (NONE)		
PROJECT NAME	: AZTEC P/L	REPORT DATE	: 08/07/95

ATI ID: 507405

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	950804	NON-AQ	07/21/95

---TOTALS---

MATRIX	#SAMPLES
NON-AQ	1

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

TCLP METALS

Analytical Technologies, Inc.

Sample ID

950804

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Date Collected: 07/21/95

Client Project ID: Aztec P/L -- 507405

Prep Date: 07/28,31/95

Lab Sample ID: 95-07-189-01

Date Analyzed: 07/31/95

Sample Matrix: TCLP Leachate

EPA HW Number	CAS Number	Analyte	Modified Method	Concentration mg/L	Detection Limit (mg/L)
D004	7440-38-2	Arsenic	6010	ND	0.1
D005	7440-39-3	Barium	6010	2	1
D006	7440-43-9	Cadmium	6010	ND	0.05
D007	7440-47-3	Chromium	6010	ND	0.1
D008	7439-92-1	Lead	6010	ND	0.03
D009	7439-97-6	Mercury	7470	ND	0.002
D010	7782-49-2	Selenium	6010	ND	0.05
D011	7440-22-4	Silver	6010	ND	0.1

ND= Not Detected

Analytical Technologies, Inc.

Sample ID

TCLP Blank

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Date Collected: N/A

Client Project ID: Aztec P/L -- 507405

Prep Date: 07/28,31/95

Lab Sample ID: RB 95-07-189

Date Analyzed: 07/31/95

Sample Matrix: TCLP Leachate

EPA HW Number	CAS Number	Analyte	Modified Method	Concentration mg/L	Detection Limit (mg/L)
D004	7440-38-2	Arsenic	6010	ND	0.1
D005	7440-39-3	Barium	6010	ND	1
D006	7440-43-9	Cadmium	6010	ND	0.05
D007	7440-47-3	Chromium	6010	ND	0.1
D008	7439-92-1	Lead	6010	ND	0.03
D009	7439-97-6	Mercury	7470	ND	0.002
D010	7782-49-2	Selenium	6010	ND	0.05
D011	7440-22-4	Silver	6010	ND	0.1

ND= Not Detected

TCLP METALS
MATRIX SPIKE

Analytical Technologies, Inc.

Sample ID

950804

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Lab Sample ID: 95-07-189-01

Prep Date: 07/28/95

Sample Matrix: TCLP Leachate

Date Analyzed: 07/31/95

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Arsenic	20	< 0.1	21	105	
Barium	20	2	21	95	
Cadmium	0.50	< 0.05	0.45	90	
Chromium	2.0	< 0.1	1.9	95	
Lead	5.0	< 0.03	5.1	102	
Selenium	20	< 0.05	22	110	
Silver	2.0	< 0.1	2.3	115	

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120 %)	Relative % Difference (limits 0-20%)	Flags
Arsenic	21	105	0	
Barium	21	95	0	
Cadmium	0.45	90	0	
Chromium	1.8	90	5	
Lead	5.0	100	2	
Selenium	22	110	0	
Silver	2.3	115	0	

8/10/95

TCLP METALS
MATRIX SPIKE

Analytical Technologies, Inc.

Sample ID

In House

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Lab Sample ID: 95-07-165-01

Prep Date: 07/31/95

Sample Matrix: TCLP Leachate

Date Analyzed: 07/31/95

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Mercury	0.020	< 0.002	0.020	100	

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120 %)	Relative % Difference (limits 0-20%)	Flags
Mercury	0.019	95	5	

8/1/95

Analytical Technologies, Inc.

IGNITABILITY
Method 1010

Lab Name: Analytical Technologies, Inc.

Client Name: ATI-NM

Client Project ID: Aztec P/L--507405

Lab Workorder Number: 95-07-189

Date Collected: 07/21/95

Date Analyzed: 07/31/95

Sample Matrix: Soil

Sample ID	Lab Sample ID	Ignitable At (deg C)	Non-ignitable Below (deg C)
950804	95-07-189-01		96.5

AnalyticalTechnologies,Inc. Albuquerque, NM

Kim McNeill

Chain of Custody

DATE 7/26 PAGE 1 OF 1

NETWORK PROJECT MANAGER: LETITIA KRAKOWSKI

COMPANY: Analytical Technologies, Inc.
ADDRESS: 2709-D Pan American Freeway, NE
Albuquerque, NM 87107

CLIENT PROJECT MANAGER: Kim McNeill

ANALYSIS REQUEST

SAMPLE ID	DATE	TIME	MATRIX	LAB ID	TOX	TOC	ORGANIC LEAD	SULFIDE	SURFACTANTS (MBAS)	632/632 MOD	619/619 MOD	610/8310	RCRA metals - TCLP	Ignitability	8240 (TCLP 1311) ZHE	Diesel/Gasoline/BTXE/MTBE/ (MOD 8015/8020)	Volatile Organics GC/MS (624/8240)	NACE	ASBESTOS	BOD	TOTAL COLIFORM	FECAL COLIFORM	GROSS ALPHA/BETA	RADIUM 226/228	AIR - O_2, CO_2, METHANE	AIR/Diesel/Gasoline/BTXE/ (MOD 8015/8020)	NUMBER OF CONTAINERS
507405-01	7/21	1415	NAQ	01									X	X													1

PROJECT INFORMATION

PROJECT NUMBER: 507405
PROJECT NAME: Aztec P/L
QC LEVEL: (STD.) IV
QC REQUIRED: MS MSD BLANK
TAT: (STANDARD) RUSH!

DUE DATE: ~~8/9~~ AP7/26 7/31
RUSH SURCHARGE: 100%
CLIENT DISCOUNT: 15 %

IWO# KM690

SAMPLE RECEIPT

TOTAL NUMBER OF CONTAINERS	1
CHAIN OF CUSTODY SEALS	Y
INTACT?	Y
RECEIVED GOOD COND./COLD	Y
LAB NUMBER	73-07-184

SAMPLES SENT TO: SAN DIEGO; FT. COLLINS X; RENTON; PENSACOLA; PORTLAND; PHOENIX; FIBERQUANT

RELINQUISHED BY: 1.
Signature: Andrew Parker Time: 1645
Printed Name: Andrew Parker Date: 7/26
Analytical Technologies, Inc.
Albuquerque

RECEIVED BY: (LAB) 1.
Signature: Time:
Printed Name: Date:
Company: Fed Ex

RELINQUISHED BY: 2.
Signature: Time:
Printed Name: Date:
Company: Fed Ex

RECEIVED BY: (LAB) 2.
Signature: [signature] Time: 9:00
Printed Name: L. Holall Date: 7-27
Company: ATI

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507405

PROJECT # : (NONE)

PROJECT NAME : AZTEC P/L

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	950804	NON-AQ	07/21/95	07/26/95	07/27/95	5

PARAMETER	UNITS	01
BENZENE	MG/KG	<0.13
TOLUENE	MG/KG	<0.13
ETHYLBENZENE	MG/KG	<0.13
TOTAL XYLENES	MG/KG	0.20
METHYL-t-BUTYL ETHER	MG/KG	<0.60

SURROGATE:

BROMOFLUOROBENZENE (%) 82

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: BTEX, MTBE (EPA 8020)	ATI I.D.	: 507405
BLANK I.D.	: 072695	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/26/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/26/95
PROJECT NAME	: AZTEC P/L	DILUTION FACTOR	: 1

PARAMETER	UNITS	
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025
METHYL-t-BUTYL ETHER	MG/KG	<0.12
SURROGATE:		
BROMOFLUOROBENZENE (%)		109

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: BTEX, MTBE (EPA 8020)		
MSMSD #	: 50740210	ATI I.D.	: 507405
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/26/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/27/95
PROJECT NAME	: AZTEC P/L	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 50740210	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
BENZENE	<0.025	1.0	1.0	100	1.0	100	0
TOLUENE	<0.025	1.0	1.1	110	1.1	110	0
ETHYLBENZENE	<0.025	1.0	1.1	110	1.1	110	0
TOTAL XYLENES	<0.025	3.0	3.3	110	3.2	107	3
METHYL-t-BUTYL ETHER	<0.12	2.0	1.6	80	1.6	80	0

7/27/95

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507405

PROJECT # : (NONE)

PROJECT NAME : AZTEC P/L

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	950804	NON-AQ	07/21/95	07/27/95	07/28/95	10

PARAMETER	UNITS	01
FUEL HYDROCARBONS	MG/KG	1900
HYDROCARBON RANGE		C10-C34
HYDROCARBONS QUANTITATED USING		DIESEL
SURROGATE:		
O-TERPHENYL (%)		101

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: EPA 8015 MODIFIED	ATI I.D.	: 507405
BLANK I.D.	: 072795	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/27/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/27/95
PROJECT NAME	: AZTEC P/L	DILUTION FACTOR	: 1

PARAMETER	UNITS	
FUEL HYDROCARBONS	MG/KG	<5
HYDROCARBON RANGE		-
HYDROCARBONS QUANTITATED USING		-
SURROGATE:		
O-TERPHENYL (%)		106

8/1/95

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: EPA 8015 MODIFIED		
MSMSD #	: 072795	ATI I.D.	: 507405
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/27/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/27/95
PROJECT NAME	: AZTEC P/L	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 072795	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
FUEL HYDROCARBONS	<5	100	100	100	100	100	0

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

Analytical Technologies, Inc., Albuquerque, NM

San Diego • Phoenix • Seattle • Pensacola • Ft. Collins • Portland • Albuquerque

CHAIN OF CUSTODY

DATE: 7/25/95 PAGE 1 OF 1

ATI LAB I.D. 507405

PLEASE FILL THIS FORM IN COMPLETELY. SHADED AREAS ARE FOR LAB USE ONLY.

PROJECT MANAGER: JOAN LAMBDIN

COMPANY: EL PASO NATURAL

ADDRESS: P.O. BOX 4990
170 W NAVAJO ST

PHONE: FARMINGTON, NM 87499

FAX:

BILL TO: SAME AS ABOVE

COMPANY:

ADDRESS:

ANALYSIS REQUEST

SAMPLE ID	DATE	TIME	MATRIX	LAB ID	Petroleum Hydrocarbons (418.1)	(MOD 8015) Gas/Diesel	Diesel/Gasoline/BTXE/MTBE (MOD 8015/8020)	BTXE/MTBE (8020)			Chlorinated Hydrocarbons (601/8010)	Aromatic Hydrocarbons (602/8020)	SDWA Volatiles (502.1/503.1), 502.2 Reg. & Unreg.		Pesticides/PCB (608/8080)	Herbicides (615/8150)	Base/Neutral/Acid Compounds GC/MS (625/8270)	Volatile Organics GC/MS (624/8240)	Polynuclear Aromatics (610/8310)		Ignitability	SDWA Primary Standards - Arizona	SDWA Secondary Standards - Arizona	SDWA Primary Standards - Federal	SDWA Secondary Standards - Federal			The 13 Priority Pollutant Metals	RCRA Metals by Total Digestion	RCRA Metals by TCLP (1311)
950804-	7/21/95	1415	SOIL	-01			X														X								X

PROJECT INFORMATION

PROJ. NO.:

PROJ. NAME: AZTEC P/L

P.O. NO.:

SHIPPED VIA:

SAMPLE RECEIPT

NO. CONTAINERS	2
CUSTODY SEALS	(Y) N / NA
RECEIVED INTACT	Y
RECEIVED COLD	-1.3°C

PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS

(RUSH) ☐ 24hr ☐ 48hr ☒ 72hr ☐ 1 WEEK (NORMAL) ☐ 2 WEEK

Comments: Charge:
108-53827-24-0001-0015-50-7210

SAMPLED & RELINQUISHED BY: 1.

Signature: Richard Benson Time: 1500

Printed Name: RICHARD BENSON Date: 7/25/95

Company: EPNG Phone: 505-599-2140

RELINQUISHED BY: 2.

Signature: Rhea Bays Time: 15:10

Printed Name: Rhea Bays Date: 7/25/95

Company: El Paso Natural Gas

RELINQUISHED BY:

Signature: Time:

Printed Name: Date:

Company:

RECEIVED BY: 1.

Signature: Time:

Printed Name: Date:

Company:

RECEIVED BY: 2.

Signature: Time:

Printed Name: Date:

Company:

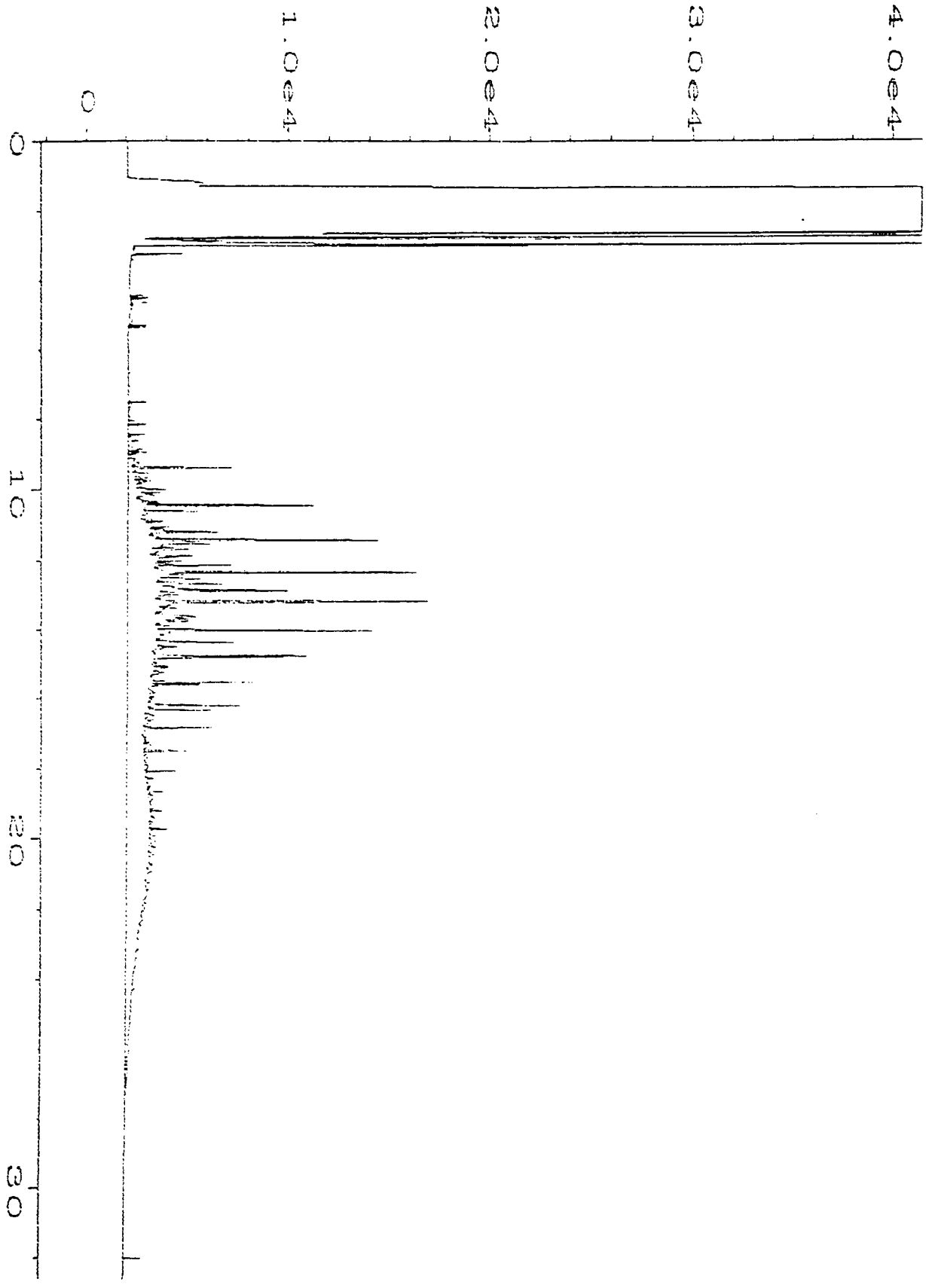
RECEIVED BY: (LAB)

Signature: Time: 7:3

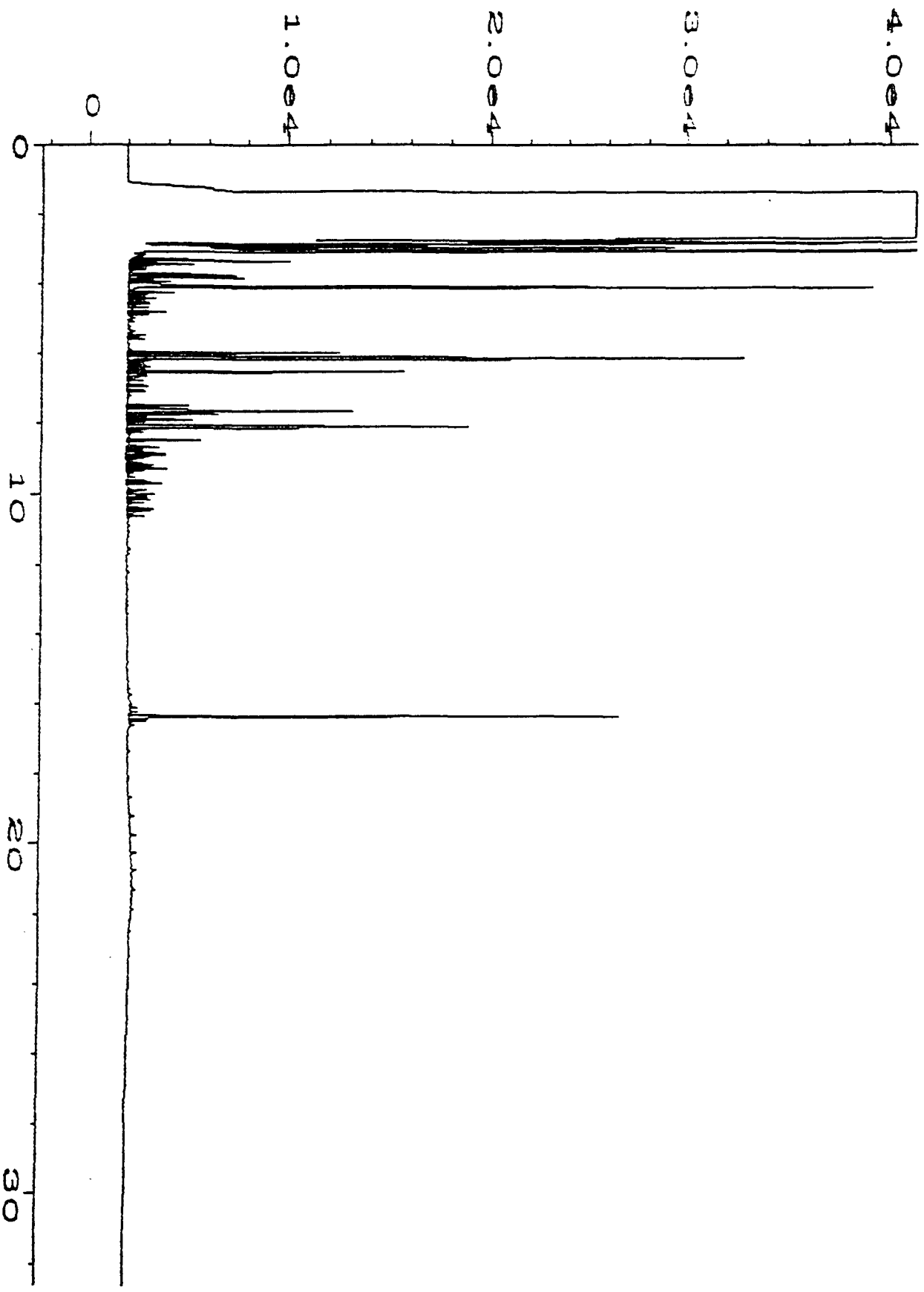
Printed Name: Date:

Analytical Technologies, Inc

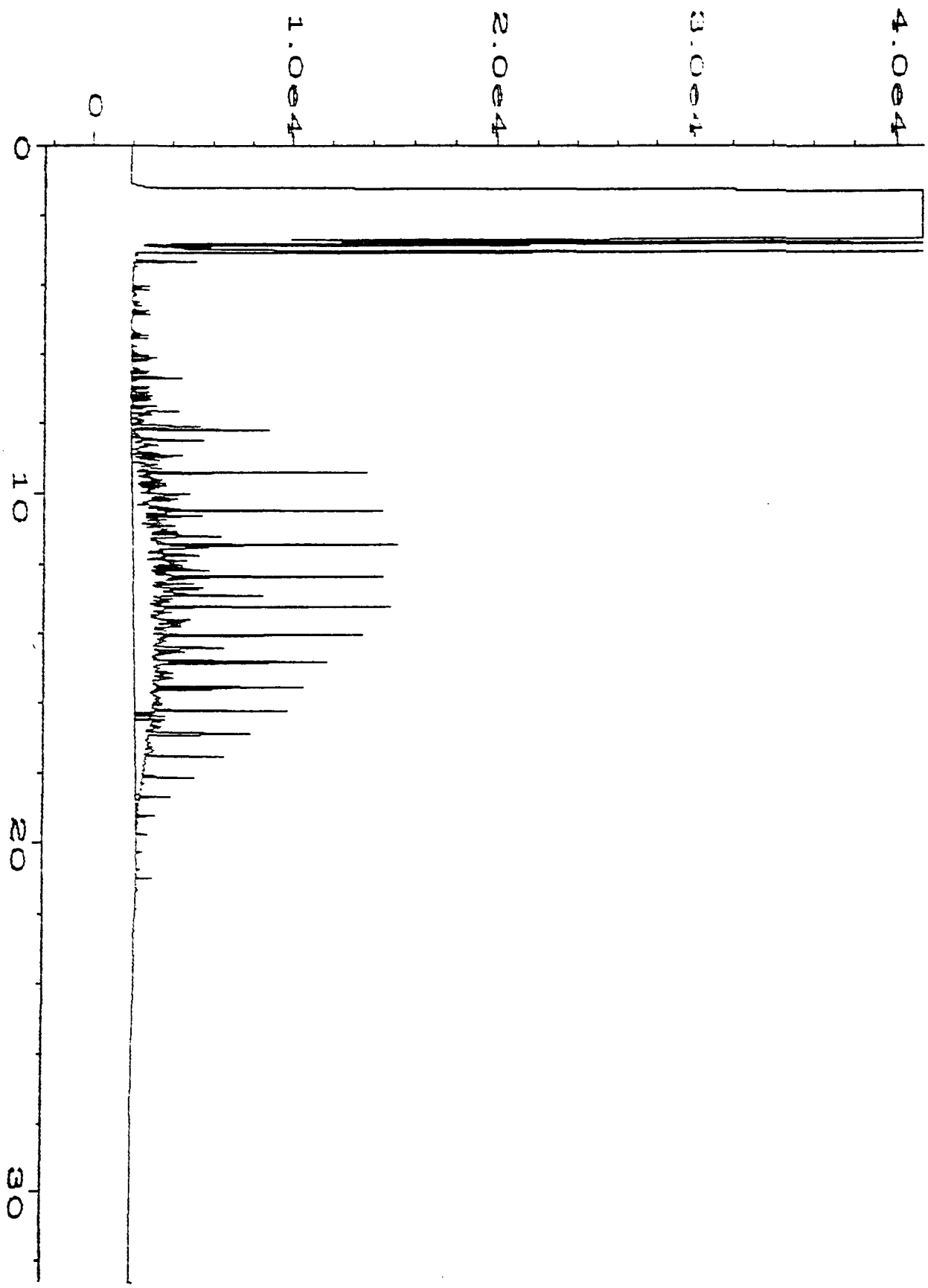
ATI Labs: San Diego (619) 458-9141 • Phoenix (602) 496-4400 • Seattle (206) 228-8335 • Pensacola (904) 474-1001 • Portland (503) 684-0447 • Albuquerque (505) 344-3777 DISTRIBUTION: White, Canary - ATI • Pink - ORIGINATO



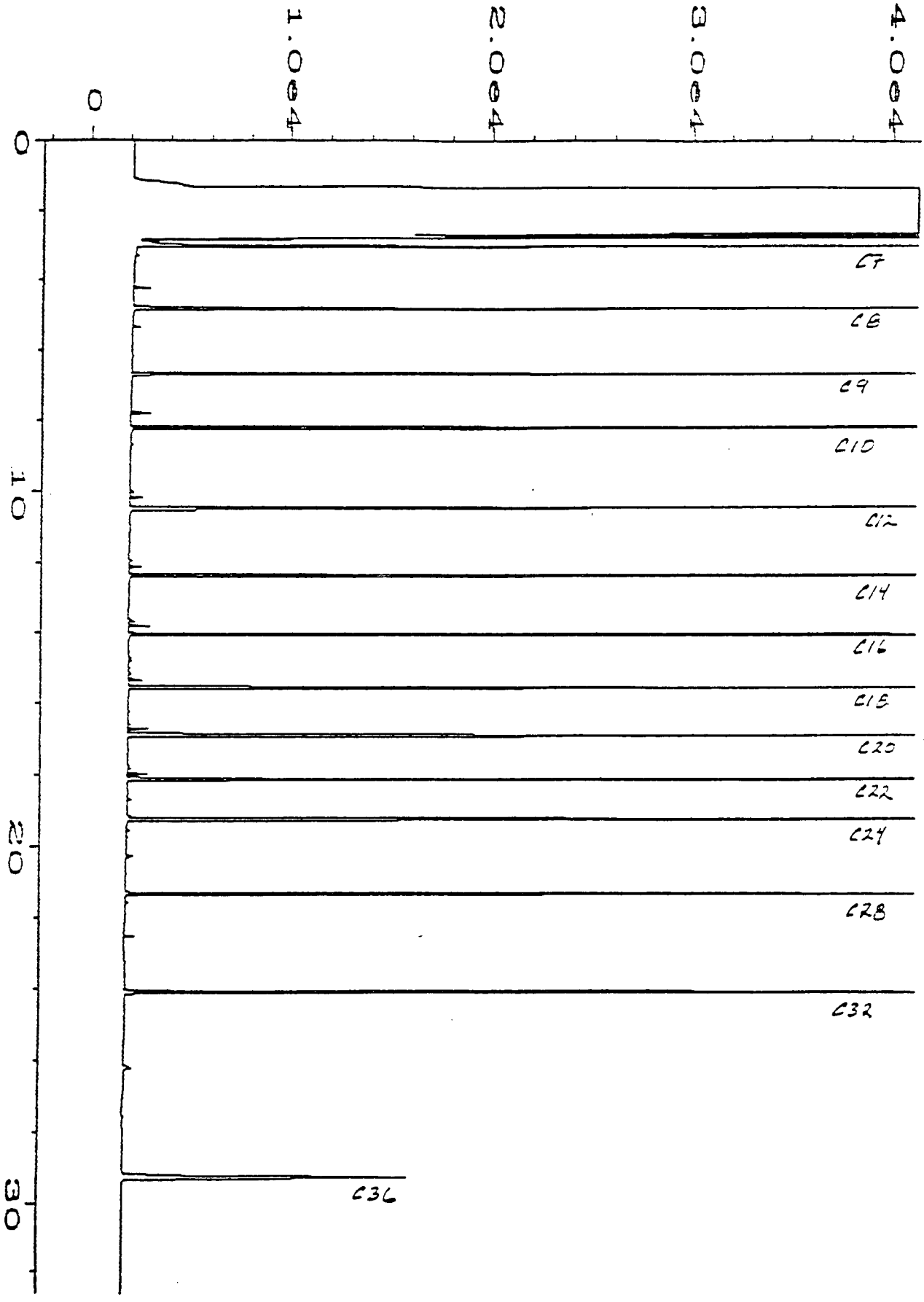
Data File Name : C:\HPCHEM\1\DATA\28JUL95\005F0301.D
Operator : CF & JE & KM
Instrument : GC#1 5890
Sample Name : 507405-01*10
Run Time Bar Code:
Acquired on : 28 Jul 95 01:13 PM
Page Number : 1
Vial Number : 5
Injection Number : 1
Sequence Line : 3
Instrument Method: SDF1219.MTH



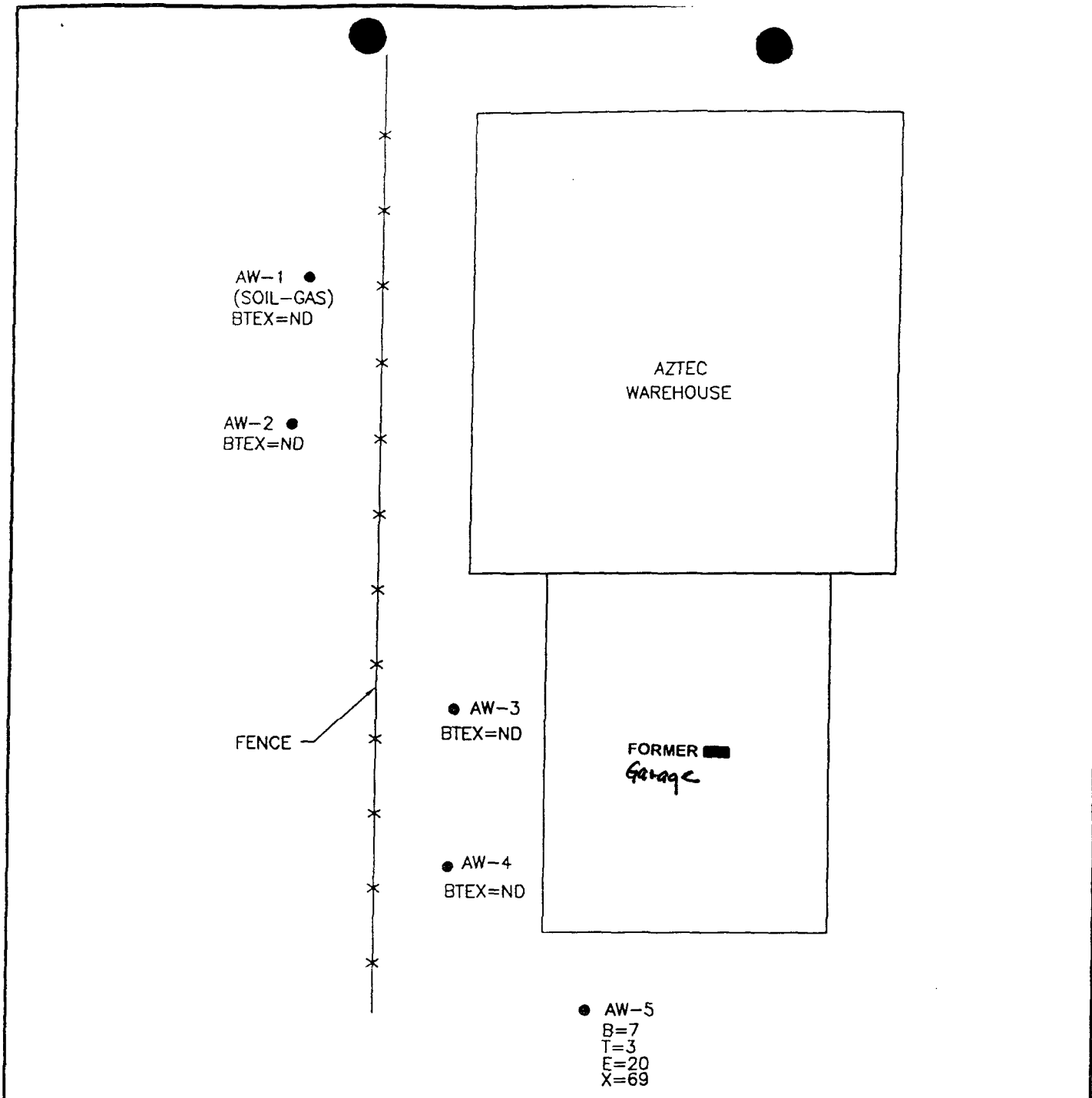
Data File Name : C:\HPCHEM\1\DATA\14JUL95\004F0201.D
Operator : CF & JE & KM
Instrument : GC 5890
Sample Name : GAS GC3-57-23
Page Number : 1
Seal Number : 4
Injection Number : 1



Data File Name : C:\HPCHEM\1\DATA\14JUL95\003F0101.D
Operator : CF & JE & KM
Instrument : GC 5890
Sample Name : DSL GC3-56-13
Page Number : 1
Vial Number : 3
Injection Number : 1



Data File Name : C:\HPCHEM\1\DATA\11APR95\006F0301.D
Operator : CF [redacted]JE & KM [redacted]ge Number : 1
Instrument : GC#1 5890 Vial Number : 6



LEGEND

B	BENZENE (ug/L)
T	TOLUENE (ug/L)
E	ETHYL BENZENE (ug/L)
X	XYLENE (ug/L)
ug/L	MICROGRAMS PER LITER
● AW-1	APPROXIMATE PROBEHOLE LOCATION AND NUMBER

*NOTE: Results are of groundwater samples only except as stated

NOT TO SCALE

N

PHILIP ENVIRONMENTAL

TITLE:
EPNG RECON Pits
Aztec Warehouse

SCALE	none	DATE
DWN:	JEN	4/13/95
DES:	JEN	4/13/95
CHKD:	SP	4/6/95
APPD:	SP	4/6/95

PROJECT NO: 13947
EPNG
SAN JUAN COUNTY, NM

Figure 15

REV: 0

COL. 13947P-001

BURLINGTON
ENVIRONMENTAL

RECON SAMPLE ANALYSIS
DATA SUMMARY TABLE
Project: 13947

Sample I.D.	Probe Hole Number	Depth (feet)	Benzene (ug/L)	Toluene (ug/L)	Ethyl benzene (ug/L)	m+p-Xylene (ug/L)	o-Xylene (ug/L)	Comments
GC1-4-9-D	PH-04	9	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	QC - Duplicate
Blank-37	N/A	N/A	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	QC - System Blank
QCRT-12	N/A	N/A	N/A	N/A	N/A	N/A	N/A	QC -Retention Times
Blank-01	N/A	N/A	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	QC - System Blank
STD-0317	N/A	N/A	229	253	226	241	231	Calibration Standard
Blank-02	N/A	N/A	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	QC - System Blank
Blank-03	N/A	N/A	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	QC - Probe Rod Blank
AW-1-42	PH-01	42	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Soil-gas
AW-2-45	PH-02	45	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Groundwater
AW-2-35	PH-02	35	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Soil-gas
AW-3-45	PH-03	45	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Groundwater
AW-3-35	PH-03	35	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Soil-gas
AW-4-45	PH-04	45	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Groundwater
AW-4-35	PH-04	35	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	Soil-gas
AW-5-48	PH-05	48	7	3	20	57	12	Groundwater
AW-5-36	PH-05	36	41	12	62	197	35	Soil-gas
AW-5-35-D	PH-05	36	47	15	77	232	48	QC - Duplicate
Blank-04	N/A	N/A	ND(1)	ND(1)	ND(1)	ND(1)	ND(1)	QC - System Blank
QCRT-01	N/A	N/A	N/A	N/A	N/A	N/A	N/A	QC -Retention Times

D = duplicate analysis
QC = quality control
ug/L = micrograms of compound detected per liter of headspace vapor analyzed
ND = not detected at the lower quantifiable limit indicated in parenthesis
N/A = not applicable
* = possible interference

QA Review: Gary W. Wood

Review Date: March 31, 1995

RECORD OF SUBSURFACE EXPLORATION

Borehole # AW-3
Well # N/A
Page 1 of 1

Philip Environmental Services Corporation
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name: EPNG RECON - Aztec Warehouse
Project Number: 13947 Phase: 77
Project Location: Aztec Warehouse - Aztec, New Mexico

Elevation:
Borehole Location: Probe Hole 3
GWL Depth: 36.0' appx.
Logged By: S. Pope
Drilled By: T. Tobin
Date/Time Started: 3/17/95 - 1030
Date/Time Completed: 3/17/95 - 1215

Well Logged By: S. Pope
Personnel On-Site: T. Tobin, G. Wood
Contractors On-Site: N/A
Client Personnel On-Site: Kevin Sedlak

Drilling Method: RECON Van
Air Monitoring Method: PID

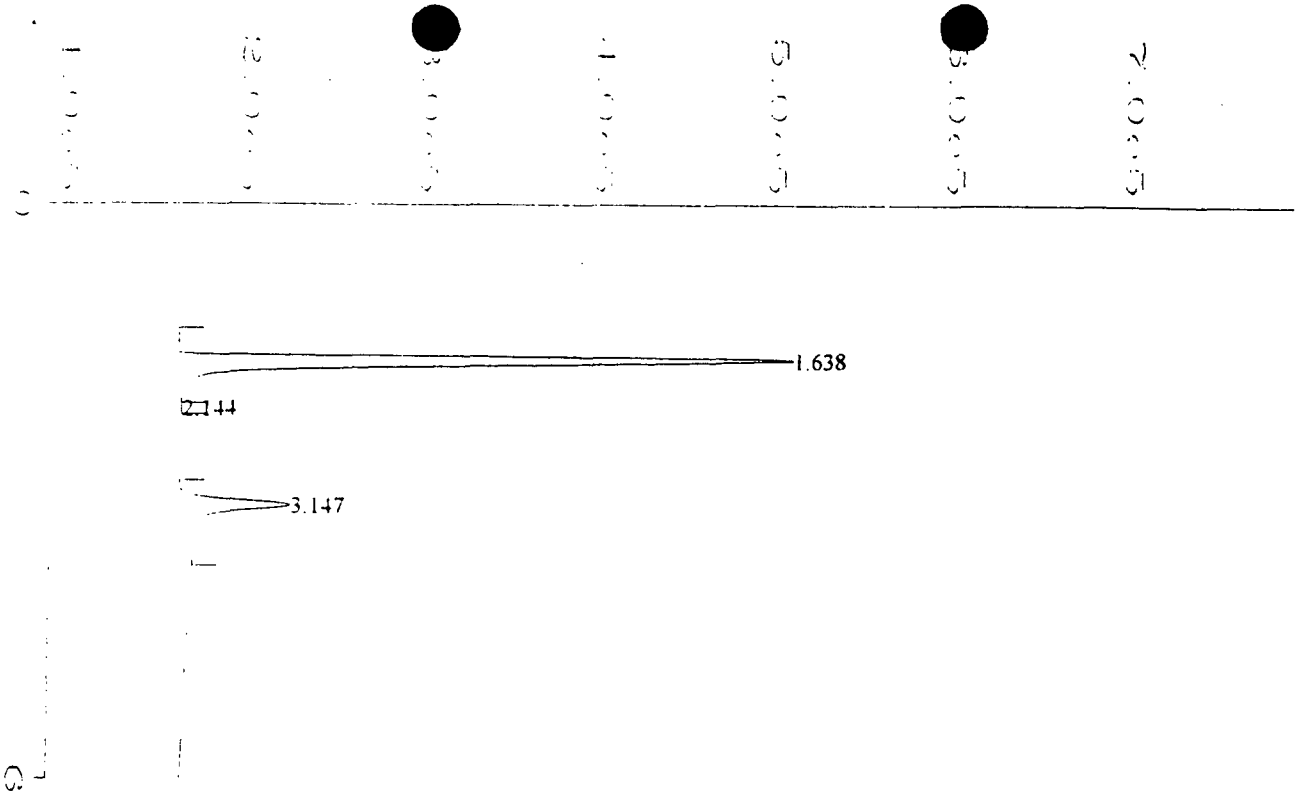
Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: NDU BZ	BH	S	Drilling Conditions & Blow Counts
0										
1	1	1.5	10	Brown sand trace silt, fine-medium			0	0	0	
2	2	1.5	6	grained, loose, moist			0	0	0	
3		3								
	3	3	12	SAA			0	0	0	
4		4.5								
5	4	4.5	18	SAA trace clay			0	0	0	
6		6								
	5	6	18	Brown sand, medium-coarse grained,			0	0	0	
7		7.5		loose, moist						
8	6	7.5	18	SAA			0	0	0	
9		9								
	7	9	18	SAA			0	0	0	
10		10.5								
11	8	10.5	18	SAA			0	0	0	
12		12								
	9	12	18	SAA			0	0	0	
13		13.5								
14	10	13.5	24	SAA			0	0	0	
15		15.5								
				No additional soil samples collected below 15.5 feet						
45				TOB 45.0'					*	

Head Space

Depth		Reading, PPM
0 -	1.5	0.5
1.5 -	3.0	0.5
3.0 -	4.5	0.5
4.5 -	6.0	0.5
6 -	7.5	0.5
7.5 -	9.0	0.5
9 -	10.5	0.5
10.5 -	12.0	0.5
13 -	13.5	0.5
* 13.5 -	15.5	0.5

Comments: Pushed rod from 15.5 feet to 45 feet to collect soil gas (36 feet) on groundwater (45 feet).
* *Sample collected by Kevin Sedlak for laboratory analysis.*

Geologist Signature



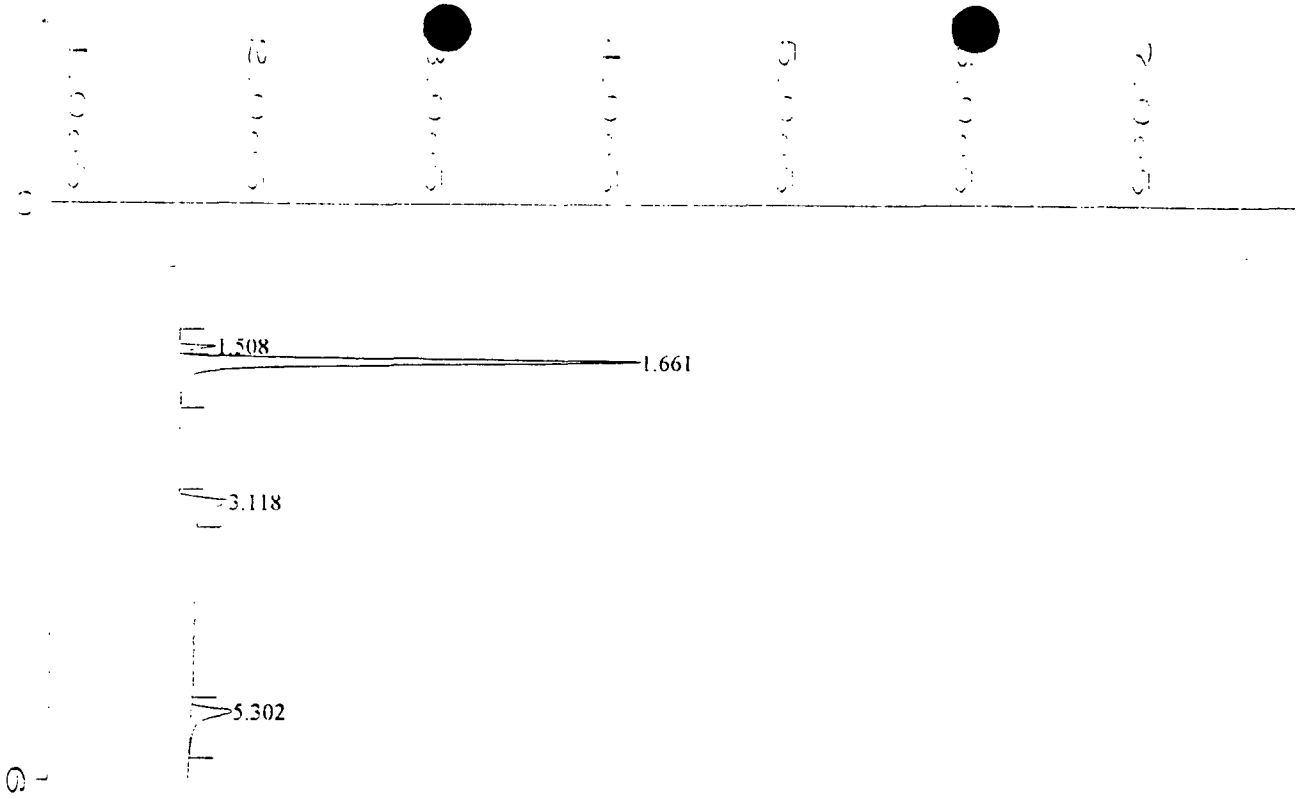
External Standard Report

a File Name	: C:\HPCHEM\1\DATA\NV-F0386.D		
perator	: GWW	Page Number	: 1
nstrument	: HP5890GC	Vial Number	:
ample Name	: AW-1-42	Injection Number	:
un Time Bar Code:		Sequence Line	:
cquired on	: 17 Mar 95 09:17 AM	Instrument Method	: 8020.MTH
eport Created on	: 17 Mar 95 09:23 AM	Analysis Method	: 8020.MTH
ast Recalib on	: 17 Mar 95 08:35 AM	Sample Amount	: 0
ultiplier	: 0.2	ISTD Amount	:
ample Info	: PH-01 SOIL-GAS AT 42 FEET BGS		

ig. 1 in C:\HPCHEM\1\DATA\NV-F0386.D

et Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.638	2113648	BV	0.094	1-R	930.030	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.638	0.1%



External Standard Report

a File Name : C:\HPCHEM\1\DATA\NV-F0387.D
erator : GWW
nstrument : HP5890GC
ample Name : AW-2-45
un Time Bar Code:
cquired on : 17 Mar 95 10:07 AM
eport Created on: 17 Mar 95 10:15 AM
ast Recalib on : 17 Mar 95 08:35 AM
ultiplier : 0.2

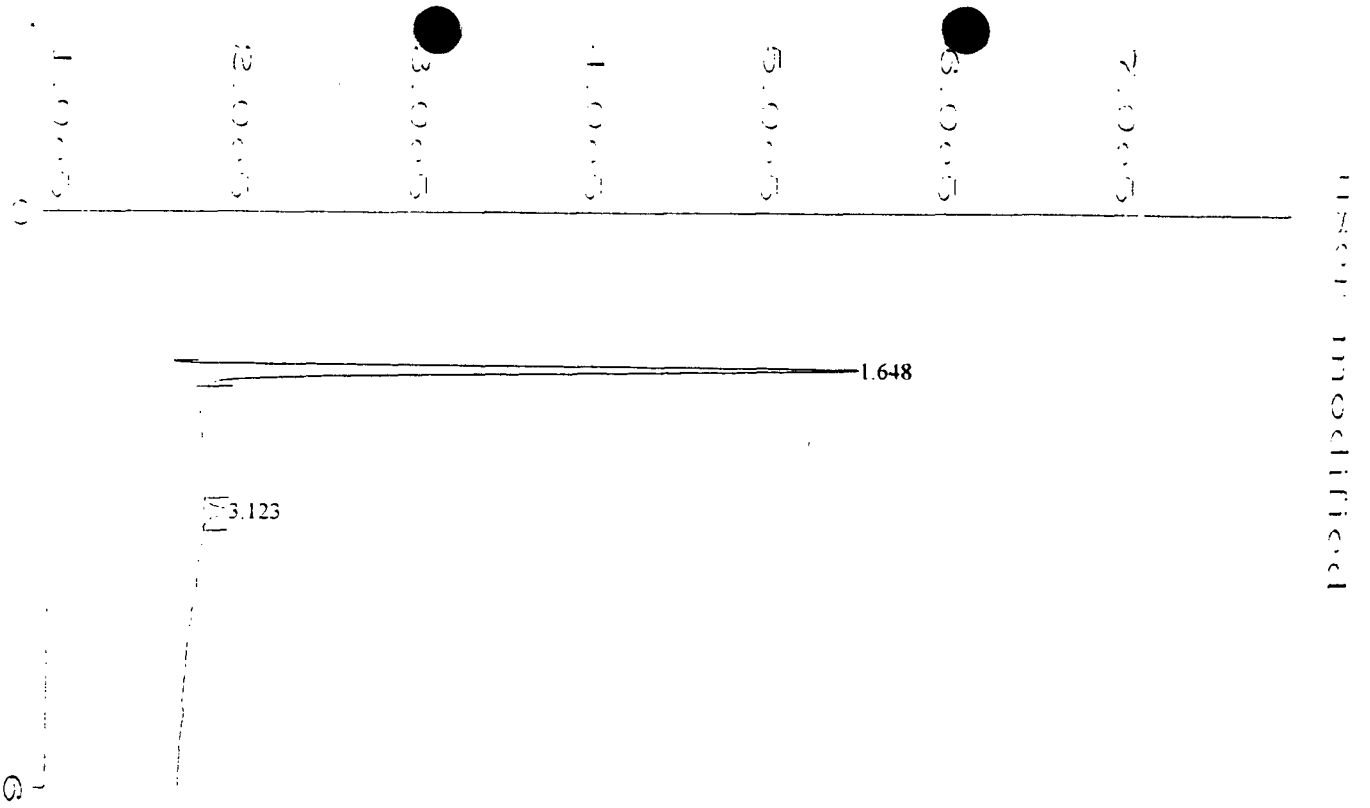
Page Number : 1
Vial Number :
Injection Number :
Sequence Line :
Instrument Method: 8020.MTH
Analysis Method : 8020.MTH
Sample Amount : 0
ISTD Amount :

g. 1 in C:\HPCHEM\1\DATA\NV-F0387.D

et Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.661	1197410	VB	0.068	1-R	526.875	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.661	1.5%

t all calibrated peaks were found



External Standard Report

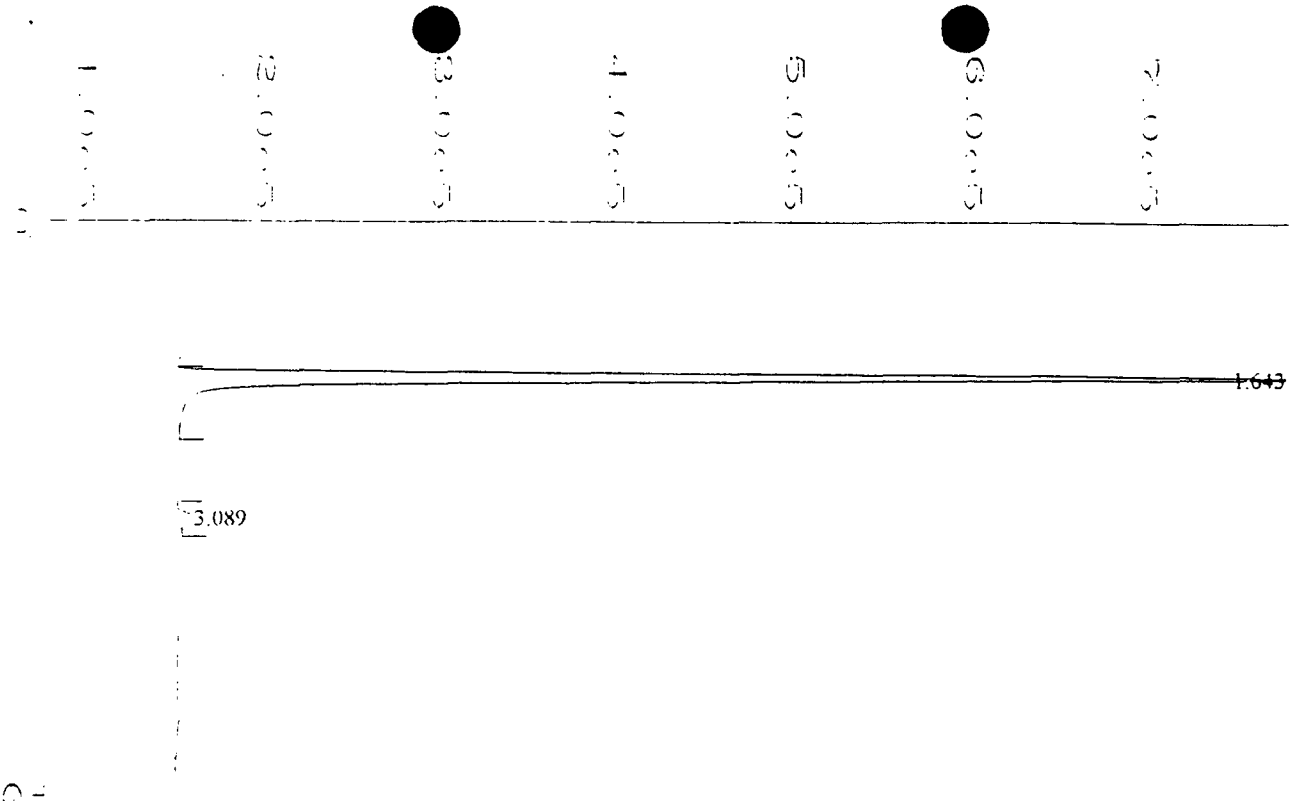
Data File Name	: C:\HPCHEM\1\DATA\NV-F0388.D		
Operator	: GWW	Page Number	: 1
Instrument	: HP5890GC	Vial Number	:
Sample Name	: AW-2-35	Injection Number	:
Run Time Bar Code:		Sequence Line	:
Acquired on	: 17 Mar 95 10:17 AM	Instrument Method	: 8020.MTH
Report Created on	: 17 Mar 95 10:34 AM	Analysis Method	: 8020.MTH
Last Recalib on	: 17 Mar 95 08:35 AM	Sample Amount	: 0
Multiplier	: 0.2	ISTD Amount	:

Dg. 1 in C:\HPCHEM\1\DATA\NV-F0388.D

Ret Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.648	2035761	PBA	0.084	1-R	895.759	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.648	0.7%

t all calibrated peaks were found



External Standard Report

a File Name : C:\HPCHEM\1\DATA\NV-F0390.D
perator : GWW
nstrument : HP5890GC
ample Name : AW-3-35
un Time Bar Code:
cquired on : 17 Mar 95 12:48 PM
eport Created on: 17 Mar 95 01:10 PM
ast Recalib on : 17 MAR 95 08:35 AM
ultiplier : 0.2

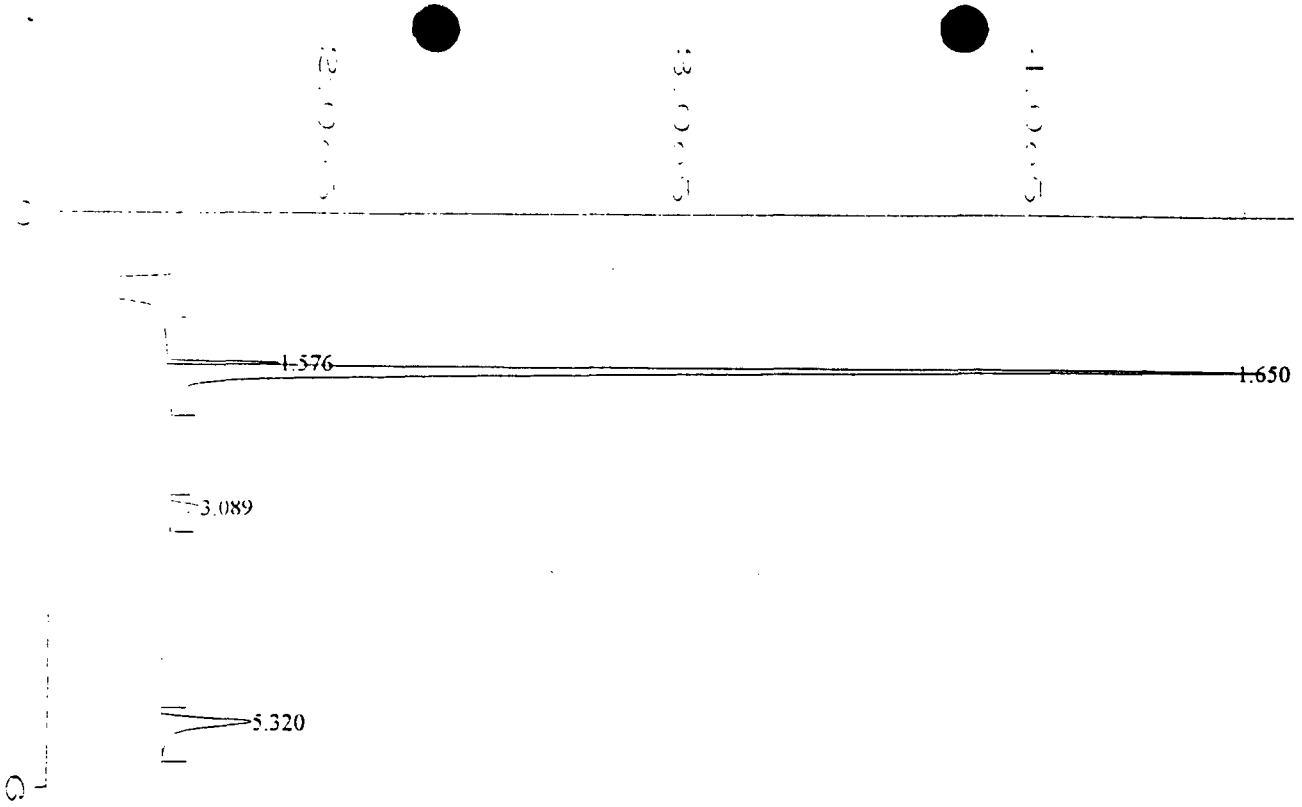
Page Number : 1
Vial Number :
Injection Number :
Sequence Line :
Instrument Method: 8020.MTH
Analysis Method : 8020.MTH
Sample Amount : 0
ISTD Amount :

ig. 1 in C:\HPCHEM\1\DATA\NV-F0390.D

et Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.643	3435095	PB	0.081	1-R	1511.482	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time eference Peak	Expected RT	Actual RT	Difference
2	1.637	1.643	0.4%

t all calibrated peaks were found



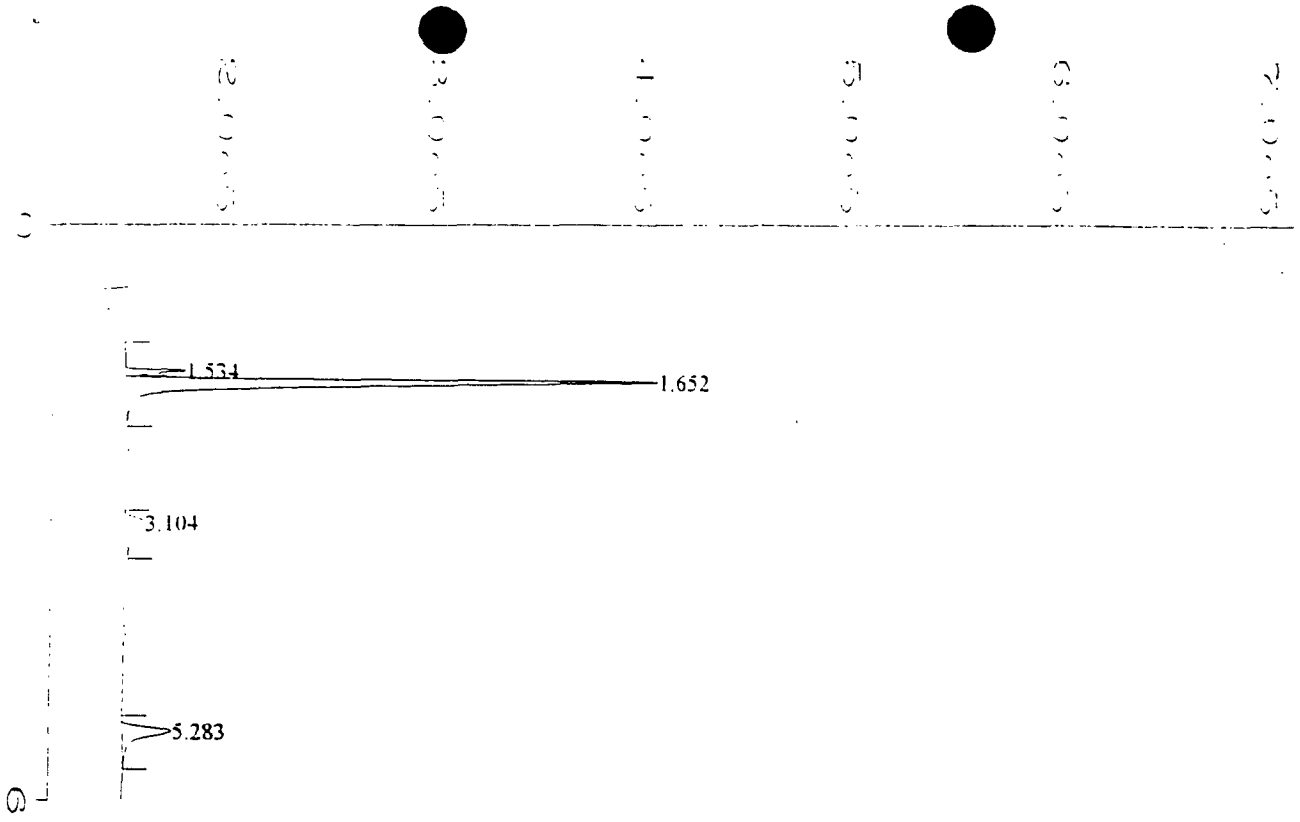
External Standard Report

Data File Name	: C:\HPCHEM\1\DATA\NV-F0391.D		
Operator	: GWW	Page Number	: 1
Instrument	: HP5890GC	Vial Number	:
Sample Name	: AW-3-~~3~~ 35 GW	Injection Number	:
Run Time Bar Code:		Sequence Line	:
Acquired on	: 17 Mar 95 01:03 PM	Instrument Method	: 8020.MTH
Report Created on	: 17 Mar 95 01:09 PM	Analysis Method	: 8020.MTH
Last Recalib on	: 17 MAR 95 08:35 AM	Sample Amount	: 0
Multiplier	: 0.2	ISTD Amount	:
Sample Info	: PH-03 GROUNDWATER AT ~~3~~ 35 FEET BGS		

Fig. 1 in C:\HPCHEM\1\DATA\NV-F0391.D

Ret Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.650	1395562	VB	0.066	1-R	614.063	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
1	1.637	1.650	0.8%



External Standard Report

a File Name : C:\HPCHEM\1\DATA\NV-F0392.D
perator : GWW
nstrument : HP5890GC
ample Name : AW-4-45
un Time Bar Code:
cquired on : 17 Mar 95 01:14 PM
eport Created on: 17 Mar 95 01:23 PM
ast Recalib on : 17 MAR 95 08:35 AM
ultiplier : 0.2

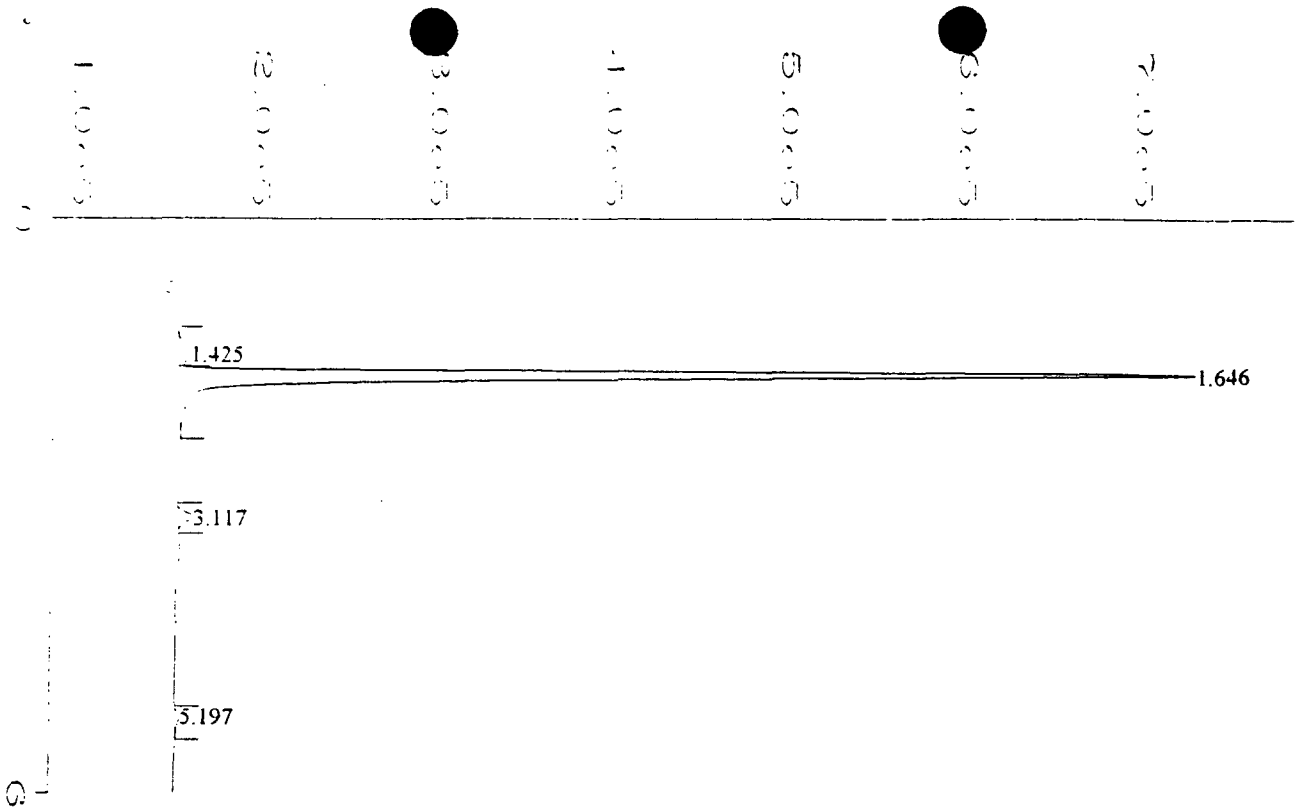
Page Number : 1
Vial Number :
Injection Number :
Sequence Line :
Instrument Method: 8020.MTH
Analysis Method : 8020.MTH
Sample Amount : 0
ISTD Amount :

ig. 1 in C:\HPCHEM\1\DATA\NV-F0392.D

et Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.652	1147345	VB	0.066	1-R	504.845	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.652	0.9%

t all calibrated peaks were found



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External Standard Report

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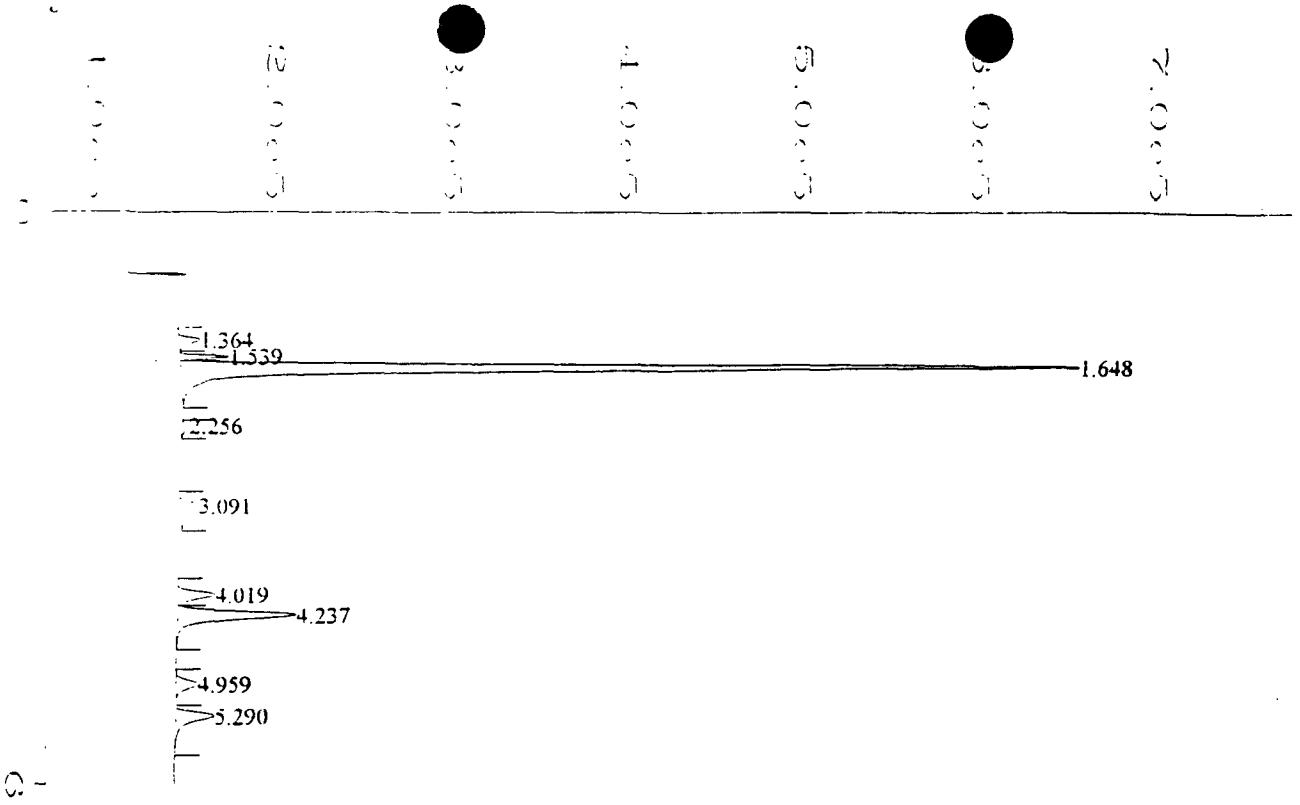
Data File Name	: C:\HPCHEM\1\DATA\NV-F0393.D		
Operator	: GWW	Page Number	: 1
Instrument	: HP5890GC	Vial Number	:
Sample Name	: AW-4-35	Injection Number	:
Run Time Bar Code:		Sequence Line	:
Acquired on	: 17 Mar 95 01:24 PM	Instrument Method	: 8020.MTH
Report Created on	: 17 Mar 95 01:31 PM	Analysis Method	: 8020.MTH
Last Recalib on	: 17 MAR 95 08:35 AM	Sample Amount	: 0
Multiplier	: 0.2	ISTD Amount	:

Fig. 1 in C:\HPCHEM\1\DATA\NV-F0393.D

Ret Time	Area	Type	Width	Ref#	ug/L	Name
1.339	* not found *			1		Benzene
1.646	3042489	VB	0.078	1-R	1338.731	a,a,a-TFT
2.268	* not found *			1		Toluene
4.102	* not found *			1		Ethyl benzene
4.323	* not found *			1		m+p-Xylene
5.081	* not found *			1		o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.646	0.5%

Not all calibrated peaks were found



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External Standard Report

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a File Name	: C:\HPCHEM\1\DATA\NV-F0396.D		
erator	: GWW	Page Number	: 1
nstrument	: HP5890GC	Vial Number	:
ample Name	: AW-5-[redacted] 48 GW	Injection Number	:
un Time Bar Code:		Sequence Line	:
cquired on	: 17 Mar 95 03:06 PM	Instrument Method	: 8020.MTH
eport Created on	: 17 Mar 95 03:14 PM	Analysis Method	: 8020.MTH
ast Recalib on	: 17 MAR 95 08:35 AM	Sample Amount	: 0
ultiplier	: 0.2	ISTD Amount	:

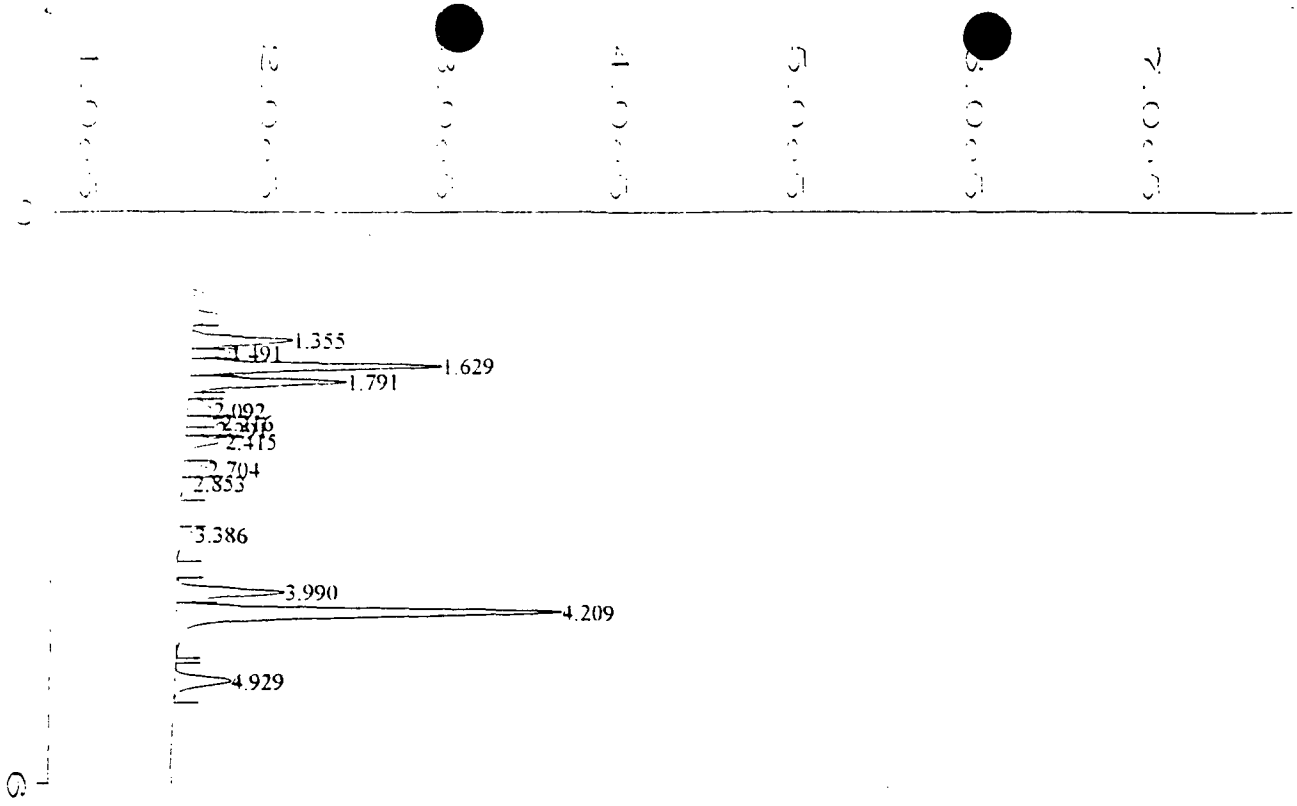
PH-05 GROUNDWATER AT 48 FEET BGS

ig. 1 in C:\HPCHEM\1\DATA\NV-F0396.D

et Time	Area	Type	Width	Ref#	ug/L	Name
1.364	51776	BV	0.066	1	7.222	Benzene
1.648	2264828	VV	0.066	1-R	996.551	a,a,a-TFT
2.256	17983	BV	0.072	1	2.823	Toluene
4.019	118119	BV	0.085	1	20.161	Ethyl benzene
4.237	409672	VB	0.093	1	56.984	m+p-Xylene
4.959	74172	BB	0.096	1	12.402	o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.648	0.7%

==========



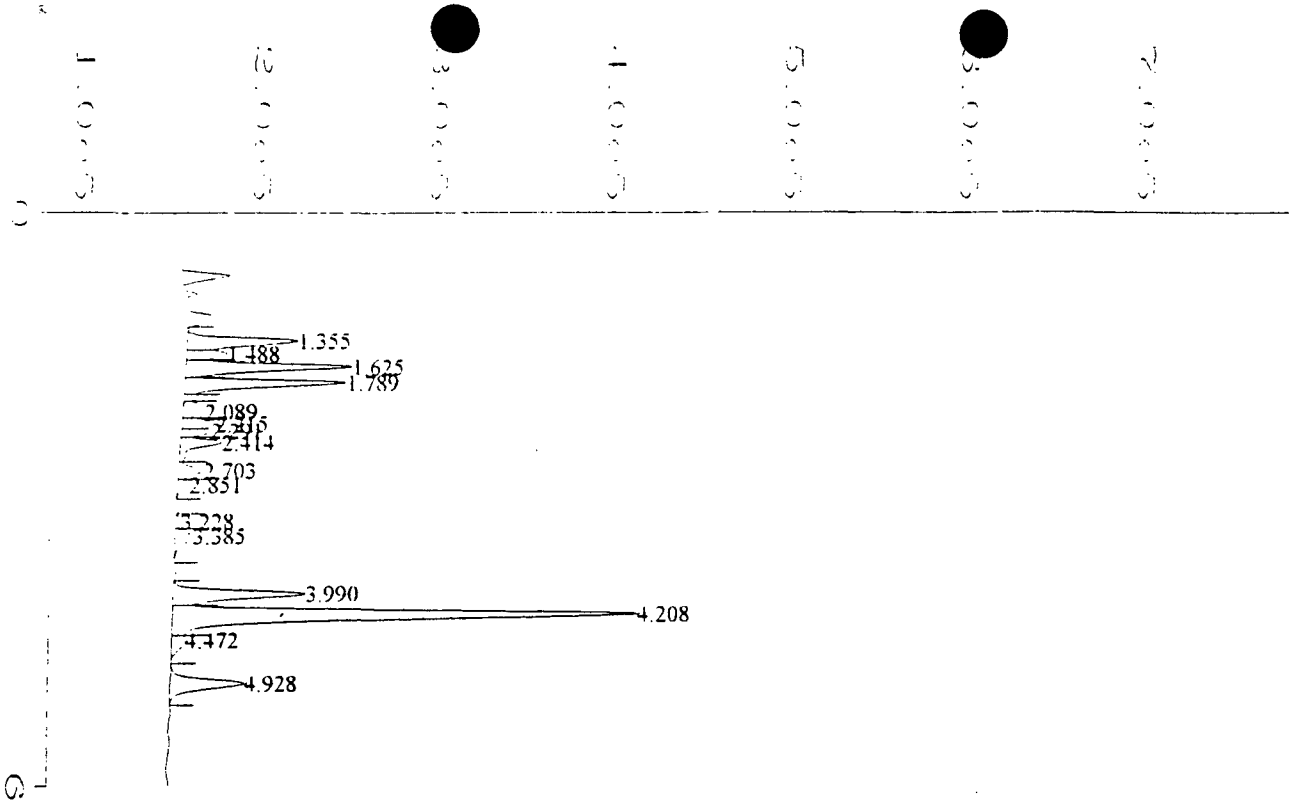
External Standard Report

Data File Name	: C:\HPCHEM\1\DATA\NV-F0397.D		
Operator	: GWW	Page Number	: 1
Instrument	: HP5890GC	Vial Number	:
Sample Name	: AW-5-36 GW	Injection Number	:
Run Time Bar Code:		Sequence Line	:
Acquired on	: 17 Mar 95 03:17 PM	Instrument Method	: 8020.MTH
Report Created on	: 17 Mar 95 03:24 PM	Analysis Method	: 8020.MTH
Last Recalib on	: 17 MAR 95 08:35 AM	Sample Amount	: 0
Multiplier	: 0.2	ISTD Amount	:
Sample Info	: PH-05 SOIL-GAS AT 35 FEET BGS		

Fig. 1 in C:\HPCHEM\1\DATA\NV-F0397.D

Ret Time	Area	Type	Width	Ref#	ug/L	Name
1.355	293042	BV	0.083	1	40.878	Benzene
1.629	742124	VV	0.080	1-R	326.543	a,a,a-TFT
2.291	76458	VV	0.070	1	12.003	Toluene
3.990	365771	VV	0.091	1	62.432	Ethyl benzene
4.209	1413799	VB	0.098	1	196.655	m+p-Xylene
4.929	210029	BV	0.101	1	35.117	o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.629	-0.5%



External Standard Report

a File Name	: C:\HPCHEM\1\DATA\NV-F0399.D		
erator	: GWW	Page Number	: 1
nstrument	: HP5890GC	Vial Number	:
ample Name	: AW-5-36-D	Injection Number	:
un Time Bar Code:		Sequence Line	:
cquired on	: 17 Mar 95 03:30 PM	Instrument Method	: 8020.MTH
eport Created on	: 17 Mar 95 03:36 PM	Analysis Method	: 8020.MTH
ast Recalib on	: 17 MAR 95 08:35 AM	Sample Amount	: 0
ultiplier	: 0.2	ISTD Amount	:
ample Info	: QC - DUPLICATE		

ig. 1 in C:\HPCHEM\1\DATA\NV-F0399.D

et Time	Area	Type	Width	Ref#	ug/L	Name
1.355	337157	BV	0.087	1	47.031	Benzene
1.625	501511	VV	0.082	1-R	220.671	a,a,a-TFT
2.215	97472	VV	0.076	1	15.302	Toluene
3.990	449209	VV	0.092	1	76.674	Ethyl benzene
4.208	1668522	VV	0.097	1	232.087	m+p-Xylene
4.928	284938	PV	0.104	1	47.642	o-Xylene

Time Reference Peak	Expected RT	Actual RT	Difference
2	1.637	1.625	-0.7%

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

RECEIVED
SEP 2 0 1995
Environmental Bureau
Oil Conservation Division

August 10, 1995

Phillip C. Nobis
Tierra Environmental Co.
909 West Apache
Farmington, NM 87401

Re: Aztec Pipeline District Sump Investigation - El Paso Natural Gas Company (EPNG)

Mr. Nobis,

EPNG's Aztec Pipeline District has removed approximately 375 cubic yards of non-exempt soil from beneath the District Office Garage according to NMOCD's directive. Details are as follows:

- Aztec Pipeline District - 816 Azted Blvd NE, City of Aztec
- Certificate of Waste Status for non-exempt waste is attached
- Analysis for the soil is attached for your review
- Philip Environmental will deliver the soil to your facility upon NMOCD approval
- EPNG's NMOCD approved Closure Plan is attached

Philip Environmental has heavy equipment standing by to complete this project, therefor any efforts to expedite the approval would be appreciated.

Should you require further information, please do not hesitate to call at 5992175.

Thank you,

P. S. Marquez

Patrick Marquez
Compliance Engineer

cc: w/attachments

Denny Foust - Aztec NMOCD
Bill Olson - NMOCD
Charlie Brown - EPNG
Sandra Miller/David Bays/File: 5216 Environmental

TIERRA
ENVIRONMENTAL CORPORATION

CORPORATE OFFICE
P. O. Drawer 15250
Farmington, NM 87401
(505) 325-0924

CERTIFICATE OF WASTE STATUS
NON-EXEMPT RCRA WASTE

Originating
Site: (Include Name, Section, Township, Range, 1/4, etc.)
El Paso Natural Gas Co. - Aztec Pipeline District
located at 816 Aztec Blvd NE, City of Aztec
"Sump Investigation"

Source: The sump received floor drain effluent from the garage. Effluent was primarily generated from the common practice of washing down the floor with a fresh water source.

I Patrick Marquez representative
for El Paso Natural Gas Company

do hereby certify that the waste described above is non-exempt, according to the Resource Conservation and Recovery Act (RCRA), but has been identified as non-hazardous by characteristic analysis or by product identification.

The appropriate documentation is hereto attached.

Check appropriate line(s)

_____ MSDS Information
_____ RCRA TCLP Analysis
__X__ RCRA Metals
__Ign__ Corrosivity, Ignitability, Reactivity
_____ Letter from Out of State Regulatory Agency
_____ I further certify that there has been no change in the processes employed or chemicals stored / used at the facility generating the waste since _____.

Signature Patricia S. Lira

Title Compliance Engineer

Date August 10, 1995

File 8013 - Garage (Icz Fld)

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

DRUG FREE

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

August 22, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-156

Ms. Anu Pundari
Sr. Compliance Engineer
El Paso Natural Gas Company
P.O. Box 4990
Farmington, New Mexico 87499

RE: EPNG AZTEC YARD
SAN JUAN COUNTY, NEW MEXICO

Dear Mr. Hall:

The New Mexico Oil Conservation Division (OCD) has reviewed El Paso Natural Gas Company's (EPNG) July 12, 1994 "EPNG AZTEC YARD SUMP CLOSURE". This document contains EPNG's work plan for closure of the existing sump north of the welding shop which was taken out of service in 1990.

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

1. The report containing the results of the closure and a work plan for determining any potential impacts from the old sump under the slab of the welding shop will be submitted to the OCD by November 4, 1994.

Please be advised that OCD approval does not relieve EPNG of liability should the closure activities fail to adequately remediate contaminants related to EPNG's activities. 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 contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Aztec Office

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

July 12, 1994

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

Subject : EPNG Aztec Yard Sump Closure

Dear Mr. Olson:

Attached is the closure plan for the existing sump north of the welding shop which was taken out of service in 1990. A work plan for determining any potential ground water impacts from the old sump located under the slab of the welding shop which was closed in 1974 will be sent with the north sump closure report.

El Paso Natural Gas Company respectfully requests approval of the attached closure plan. If you need additional information, please contact me at (505) 599-2176.

Anu Pundari
Sr. Compliance Engineer

cc: Mr. David Hall (EPNG)
Ms. Nancy Prince (EPNG)
Ms. Sandra Miller (EPNG)
Mr. Denny Foust (NMOCD)

NORTH SUMP CLOSURE PLAN

1. The assessment to determine the lateral and vertical extent of contamination will be performed according to NMOCD's Unlined Surface Impoundment Closure Guidelines.

2. Upon removal of the culvert, any visually contaminated soil will be excavated to a maximum depth and horizontal extent practicable.

3. The soil will be stockpiled onsite and covered with plastic.

4. Composite soil samples will be obtained from the side walls and bottom of the excavation prior to backfilling. Soil samples will be analyzed for benzene, toluene, xylene, ethylbenzene by EPA Method 8020 , and Total Petroleum Hydrocarbons by 418.1

5. The representative sample of the stockpiled soil will be analyzed for benzene, toluene, xylene, ethylbenzene by EPA Method 8020 , and Total Petroleum Hydrocarbons by 418.1, RCRA TCLP analysis, RCRA metals, and ignitability. The soil will not be tested for corrosivity and reactivity since there is no reason to believe that corrosive or reactive waste was disposed in the sump.

6. Upon approval for disposal of " non-exempt" soil from NMOCD and Tierra Environmental, the contaminated soil will be transported to Tierra Environmental's landfarm facility. Tierra Environmental will be responsible for spreading, disking and analyzing the soil at the landfarm according to NMOCD requirements.

7. The excavated soil will be replaced with clean backfill and machine compacted.

8. The backfilled area will be repaved with asphalt.

9. A report containing the results of the closure will be submitted to NMOCD after completion of the closure activities. The closure report will detail any additional investigation if required. In addition, a work plan for determining any potential ground water impacts from the old sump located under the slab of the welding shop which was closed in 1974 will be sent.

10. The local NMOCD will be notified of excavation activities at least 48 hours prior to commencement such that NMOCD has the opportunity to witness the operation and/or split samples.

FAX . . . FAX . . . FAX . . . FAX . . . FAX . . . FAX . . . FAX . . . FAX . . . FAX . . .

FROM: Analytical **Technologies**, Inc.

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

____ Mitch Rubenstein
__X__ Kim McNeill
____ Dianne Cutler
____ Peggy Norton
____

Number of pages being sent: 20 (including this page)

TO:

Name : John Lambdin

Company : EPNG

Phone # :

FAX # : 599 2261

COMMENTS:

Aztec P/L Report ATI ID 57405

→ 375 Cubic Yds Soil ←

NOTE:
If any of these FAX copies are illegible or you do not receive the same number of pages as stated above, please contact us immediately.

ATI I.D. 507405

August 7, 1995

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

Project Name/Number: AZTEC P/L

Attention: John Lambdin

On 07/26/95, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze non-aqueous sample(s). The sample(s) were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA method 8020 and 8015 analyses were performed by Analytical Technologies, Inc., Albuquerque, NM.

All other analyses were performed by Analytical Technologies, Inc., 225 Commerce Drive, Fort Collins, CO.

Sample was diluted for EPA method 8020 due to the presence of late eluting hydrocarbons.

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

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

CLIENT	: EL PASO NATURAL GAS CO.	DATE RECEIVED	: 07/26/95
PROJECT #	: (NONE)		
PROJECT NAME	: AZTEC P/L	REPORT DATE	: 08/07/95

ATI ID: 507405

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	950804	NON-AQ	07/21/95

---TOTALS---

MATRIX	#SAMPLES
NON-AQ	1

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

TCLP METALS

Sample ID

950804

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Date Collected: 07/21/95

Client Project ID: Aztec P/L -- 507405

Prep Date: 07/28,31/95

Lab Sample ID: 95-07-189-01

Date Analyzed: 07/31/95

Sample Matrix: TCLP Leachate

EPA HW Number	CAS Number	Analyte	Modified Method	Concentration mg/L	Detection Limit (mg/L)
D004	7440-38-2	Arsenic	6010	ND	0.1
D005	7440-39-3	Barium	6010	2	1
D006	7440-43-9	Cadmium	6010	ND	0.05
D007	7440-47-3	Chromium	6010	ND	0.1
D008	7439-92-1	Lead	6010	ND	0.03
D009	7439-97-6	Mercury	7470	ND	0.002
D010	7782-49-2	Selenium	6010	ND	0.05
D011	7440-22-4	Silver	6010	ND	0.1

ND= Not Detected

TCLP METALS

Sample ID

TCLP Blank

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Client Project ID: Aztec P/L -- 507405

Lab Sample ID: RB 95-07-189

Sample Matrix: TCLP Leachate

Date Collected: N/A

Prep Date: 07/28,31/95

Date Analyzed: 07/31/95

EPA HW Number	CAS Number	Analyte	Modified Method	Concentration mg/L	Detection Limit (mg/L)
D004	7440-38-2	Arsenic	6010	ND	0.1
D005	7440-39-3	Barium	6010	ND	1
D006	7440-43-9	Cadmium	6010	ND	0.05
D007	7440-47-3	Chromium	6010	ND	0.1
D008	7439-92-1	Lead	6010	ND	0.03
D009	7439-97-6	Mercury	7470	ND	0.002
D010	7782-49-2	Selenium	6010	ND	0.05
D011	7440-22-4	Silver	6010	ND	0.1

ND= Not Detected

TCLP METALS
MATRIX SPIKE

Sample ID
950804

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Lab Sample ID: 95-07-189-01

Prep Date: 07/28/95

Sample Matrix: TCLP Leachate

Date Analyzed: 07/31/95

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Arsenic	20	< 0.1	21	105	
Barium	20	2	21	95	
Cadmium	0.50	< 0.05	0.45	90	
Chromium	2.0	< 0.1	1.9	95	
Lead	5.0	< 0.03	5.1	102	
Selenium	20	< 0.05	22	110	
Silver	2.0	< 0.1	2.3	115	

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120 %)	Relative % Difference (limits 0-20%)	Flags
Arsenic	21	105	0	
Barium	21	95	0	
Cadmium	0.45	90	0	
Chromium	1.8	90	5	
Lead	5.0	100	2	
Selenium	22	110	0	
Silver	2.3	115	0	

TCLP METALS
MATRIX SPIKE

Sample ID
In House

Lab Name: Analytical Technologies, Inc.

Client Name: ATI - NM

Lab Sample ID: 95-07-165-01

Prep Date: 07/31/95

Sample Matrix: TCLP Leachate

Date Analyzed: 07/31/95

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Mercury	0.020	< 0.002	0.020	100	

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120 %)	Relative % Difference (limits 0-20%)	Flags
Mercury	0.019	95	5	

IGNITABILITY
Method 1010

Lab Name: Analytical Technologies, Inc.

Client Name: ATI-NM

Client Project ID: Aztec P/L--507405

Lab Workorder Number: 95-07-189

Date Collected: 07/21/95

Date Analyzed: 07/31/95

Sample Matrix: Soil

Sample ID	Lab Sample ID	Ignitable At (deg C)	Non-ignitable Below (deg C)
950804	95-07-189-01		96.5

>204. F

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507405
PROJECT # : (NONE)
PROJECT NAME : AZTEC P/L

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	950804	NON-AQ	07/21/95	07/26/95	07/27/95	5

PARAMETER	UNITS	01
BENZENE	MG/KG	<0.13
TOLUENE	MG/KG	<0.13
ETHYLBENZENE	MG/KG	<0.13
TOTAL XYLENES	MG/KG	0.20
METHYL-t-BUTYL ETHER	MG/KG	<0.60
SURROGATE:		
BROMOFLUOROBENZENE (%)		82

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: BTEX, MTBE (EPA 8020)	ATI I.D.	: 507405
BLANK I.D.	: 072695	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/26/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/26/95
PROJECT NAME	: AZTEC P/L	DILUTION FACTOR	: 1

PARAMETER	UNITS	
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025
METHYL-t-BUTYL ETHER	MG/KG	<0.12
SURROGATE:		
BROMOFLUOROBENZENE (%)		109

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: BTEX, MTBE (EPA 8020)		
MSMSD #	: 50740210	ATI I.D.	: 507405
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/26/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/27/95
PROJECT NAME	: AZTEC P/L	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 50740210	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
BENZENE	<0.025	1.0	1.0	100	1.0	100	0
TOLUENE	<0.025	1.0	1.1	110	1.1	110	0
ETHYLBENZENE	<0.025	1.0	1.1	110	1.1	110	0
TOTAL XYLENES	<0.025	3.0	3.3	110	3.2	107	3
METHYL-t-BUTYL ETHER	<0.12	2.0	1.6	80	1.6	80	0

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507405

PROJECT # : (NONE)

PROJECT NAME : AZTEC P/L

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	950804	NON-AQ	07/21/95	07/27/95	07/28/95	10

PARAMETER	UNITS	01
FUEL HYDROCARBONS	MG/KG	1900
HYDROCARBON RANGE		C10-C34
HYDROCARBONS QUANTITATED USING		DIESEL
SURROGATE:		
O-TERPHENYL (%)		101

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: EPA 8015 MODIFIED	ATI I.D.	: 507405
BLANK I.D.	: 072795	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/27/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/27/95
PROJECT NAME	: AZTEC P/L	DILUTION FACTOR	: 1

PARAMETER	UNITS	
FUEL HYDROCARBONS	MG/KG	<5
HYDROCARBON RANGE		-
HYDROCARBONS QUANTITATED USING		-
SURROGATE:		
O-TERPHENYL (%)		106

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: EPA 8015 MODIFIED		
MSMSD #	: 072795	ATI I.D.	: 507405
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/27/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/27/95
PROJECT NAME	: AZTEC P/L	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 072795	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
FUEL HYDROCARBONS	<5	100	100	100	100	100	0

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

El Paso Natural Gas Company

MEMORANDUM

To: Patrick Marquez

From: John Lambdin

Date: July 31, 1995

Place: Field Services Laboratory

Subject: Aztec P/L Sump Excavation Analytical Results

On July 20, 1995 the Field Services Laboratory collected one (1) soil sample from the referenced excavation/remediation project site. The sample was assigned Field Services laboratory number 950798.

The sample was tested for TPH by EPA 418.1 and Modified 8015 as well at BTEX by EPA Method 8020. Enclosed you will find copies of all analytical results.

Please let me know, if you have any questions.

Pit

cc;

Results Log Book
File

Attachments

El Paso Natural Gas Company

CHAIN OF CUSTODY RECORD

Project No.	Project Name	Samplers: (Signature)	Date	Receiving Temp (°F)
	AZTEC Sump Inv	[signature]	7-20-95	

Lab ID	Date	Time	Matrix	Sample Number	Total No. of Containers	Chain of Custody Seals	Intact?	Composite or Grab	See Attached	TPH	BTEX		Remarks
	7-20-95	1350	Soil	952 /018	1					X	X		5 pts Composite 20'x20'x12' deep Garage Sump

Requested Analysis

Contract Laboratory

Relinquished by: (Signature)	Date/Time	Received by: (Signature)	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Relinquished by: (Signature)	Date/Time	Received by: (Signature)	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Relinquished by: (Signature)	Date/Time	Received for Laboratory by: (Signature)	Date/Time	Remarks:	
Results & Invoices to::		Charge Code		Date Results Reported / by: (Signature)	

WHITE-Testing Laboratory **YELLOW**-EPNG Lab **PINK**-Field Sampler

san juan repro Form

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT

SAMPLE IDENTIFICATION

EPNG LAB ID #:	950798
DATE SAMPLE:	20-Jul-95
TIME SAMPLE (Hrs):	1350
SAMPLED BY:	Richard Benson
LOCATION:	Aztec P/L
SAMPLE POINT:	Sump Excavation
SAMPLE TYPE:	5 - Point Composite

REMARKS: 20' x 20' x 12' Excavation

RESULTS

PARAMETER	RESULT	UNITS	DF	Q	M(g)	V(ml)
TPH (418.1)	103	MG/KG	1	None	2.00	28
PERCENT SOLIDS	95	%	N/A	None	5.0	N/A

-- TPH is by EPA Method 418.1 --

Narrative:
All QA/QC was found to be acceptable.

DF = Dilution Factor, Q = Data Qualifier, M(g) = Sample Mass, V (ml) = Extraction volume

Approved By: John Fabela

Date: 7/21/95

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

****

95/07/20 14:53

Sample identification
950798

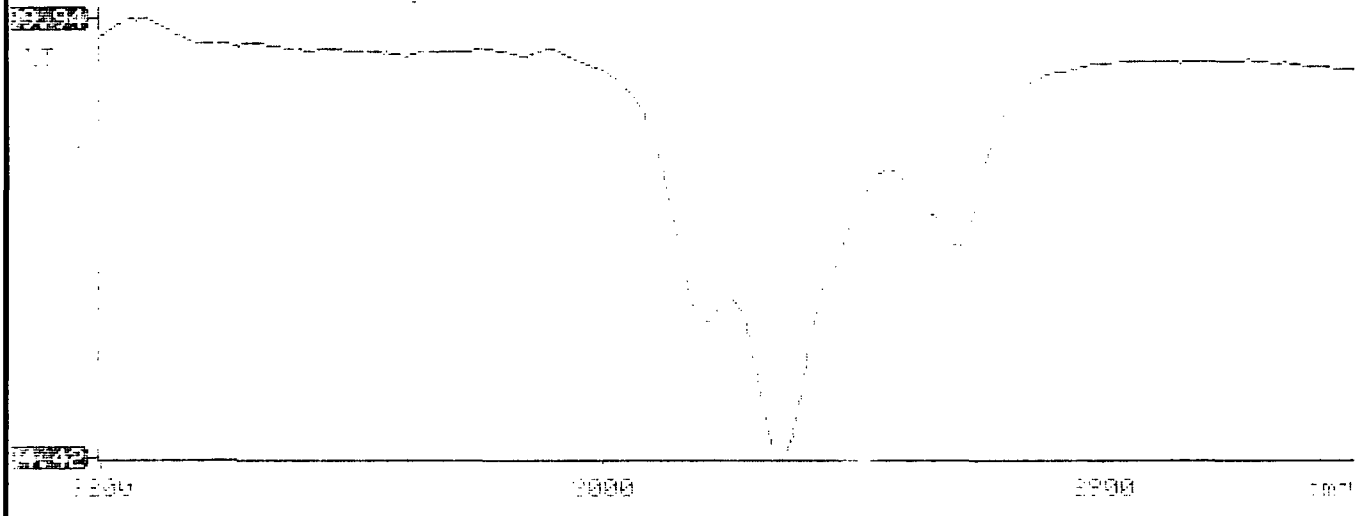
Initial mass of sample, g
1.000

Volume of sample after extraction, ml
30.000

Petroleum hydrocarbons, ppm
[illegible]

Net absorbance of hydrocarbons (2930 cm-1)
[illegible]

1: Petroleum hydrocarbons spectrum 14:53



% solids → 94.8%

light brown sand

QUALITY CONTROL REPORT

T[illegible]y Modified 418.1 by Infrared

1 Aztec Sump Invest.
9 Pit Samples
2 0 - 21 LD

Date of Analysis: July 20, 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	99	99	X	

Narrative: Acceptable.

LABORATORY DUPLICATES:

SAMPLE NUMBER	TYPE	SAMPLE RESULT (S)MG/KG	DUPLICATE RESULT (D)MG/KG	RPD	ACCEPTABLE RANGE + / - 35% YES	NO
947033	2nd Extract	112	81	32.49	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
947033	3220	112	4091	124	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	ENVIRONMENTA RESOURCE ASS.	1340	1660	804 - 1680	X	
ERA TPH STANDARD #2 w... LOT = 91026	ENVIRONMENTA RESOURCE ASS.	2590	3220	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.

Extracted: 07/20/95

Approved By: [signature]

Date: 21-Jul-95

Analytical Technologies, Inc.

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

ATI I.D. **507389**

July 26, 1995

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

Project Name/Number: AZTEC SUMP INVESTIGATION

Attention: John Lambdin

On **07/21/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** sample(s). The sample(s) were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA Method 8015 Modified analyses were added on 7/21/95 for sample 950798 per Kim Kirby.

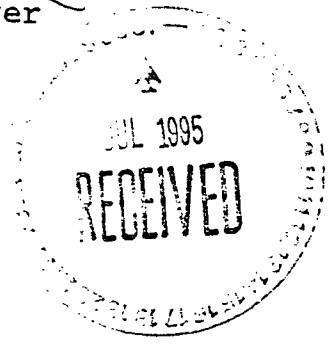
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:gsm

Enclosure



Analytical Technologies, Inc.

CLIENT	: EL PASO NATURAL GAS CO.	DATE RECEIVED	: 07/21/95
PROJECT #	: (NONE)		
PROJECT NAME	: AZTEC SUMP INVESTIGATION	REPORT DATE	: 07/28/95

ATI ID: 507389

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	950798	NON-AQ	07/20/95

---TOTALS---

MATRIX	#SAMPLES
NON-AQ	1

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507389

PROJECT # : (NONE)

PROJECT NAME : AZTEC SUMP INVESTIGATION

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL FACT
01	950798	NON-AQ	07/20/95	07/21/95	07/23/95	1

PARAMETER	UNITS	01
FUEL HYDROCARBONS	MG/KG	<5
HYDROCARBON RANGE		-
HYDROCARBONS QUANTITATED USING		-
SURROGATE:		
O-TERPHENYL (%)		103

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: EPA 8015 MODIFIED	ATI I.D.	: 507389
BLANK I.D.	: 072195	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/23/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	DILUTION FACTOR	: 1

PARAMETER	UNITS	
FUEL HYDROCARBONS	MG/KG	<5
HYDROCARBON RANGE		-
HYDROCARBONS QUANTITATED USING		-
SURROGATE:		
O-TERPHENYL (%)		128

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: EPA 8015 MODIFIED		
MSMSD #	: 50738610	ATI I.D.	: 507389
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/23/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 50738610	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
FUEL HYDROCARBONS	<5	100	100	100	110	110	10

7/31/95

$$\text{Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507389

PROJECT # : (NONE)

PROJECT NAME : AZTEC SUMP INVESTIGATION

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTO
01	950798	NON-AQ	07/20/95	07/21/95	07/22/95	1

PARAMETER	UNITS	01
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025
METHYL-t-BUTYL ETHER	MG/KG	<0.12
SURROGATE:		
BROMOFLUOROBENZENE (%)		98

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

REAGENT BLANK

TEST	: BTEX, MTBE (EPA 8020)	ATI I.D.	: 507389
BLANK I.D.	: 072195	MATRIX	: NON-AQ
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/21/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	DILUTION FACTOR	: 1

PARAMETER	UNITS	
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025
METHYL-t-BUTYL ETHER	MG/KG	<0.12
SURROGATE:		
BROMOFLUOROBENZENE (%)		112

7/21/95

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: BTEX, MTBE (EPA 8020)		
MSMSD #	: 50738604	ATI I.D.	: 507389
CLIENT	: EL PASO NATURAL GAS CO.	DATE EXTRACTED	: 07/21/95
PROJECT #	: (NONE)	DATE ANALYZED	: 07/23/95
PROJECT NAME	: AZTEC SUMP INVESTIGATION	SAMPLE MATRIX	: NON-AQ
REF. I.D.	: 50738604	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
BENZENE	<0.025	1.0	1.1	110	1.1	110	0
TOLUENE	<0.025	1.0	1.2	120	1.2	120	0
ETHYLBENZENE	<0.025	1.0	1.1	110	1.1	110	
TOTAL XYLENES	<0.025	3.0	3.4	113	3.4	113	0
METHYL-t-BUTYL ETHER	<0.12	2.0	1.9	95	2.2	110	15

7/31/95

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

March 21, 1995

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

Subject: Request Extension for Submitting Closure Results and Work Plan for Determining Potential Impacts from Aztec Yard Sump.

Dear Mr. Olson,

EPNG is currently experiencing delays in the demolition of the Aztec Pipeline District Yard Garage. EPNG will submit the closure results and corresponding work plan upon completion. The demolition and excavation should be complete no later than August 15, 1995.

Should you have questions or concerns, please do not hesitate to call at 505 599 2175.

Thank you,

P. S. Marquez

Patrick Marquez

cc: w/o attachment

Charlie Brown (EPNG)
Denny Foust (NMOCD)
David Hall (EPNG)
Sandra Miller (EPNG)
Nancy Prince (EPNG)
Lynn Knight (EPNG)

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

October 17, 1995

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

Subject: Request Extension for Submitting Closure Results and Work Plan for Determining Potential Impacts from Aztec Yard Sump.

Dear Mr. Olson,

EPNG request that submission of the work plan for determining any potential impacts from the Aztec Yard sump be extended from November 4, 1994 to April 1st, 1995.

Your letter to Anu Pundari, dated August 22, 1994 instructed our office to submit a report detailing the results of the " north" sump closure and the potential impacts from the sump as a condition of approval for closure.

Our office has been informed that the Aztec Yard Garage will be demolished sometime in early 1995. We would like to incorporate the "north sump" closure with the garage demolition. Any analytical results regarding the "old sump" (covered in 1974) beneath the garage will be communicated to you along with the "north sump" closure results. This should allow us to make a more informative determination of any potential impacts from the sump operations.

El Paso Natural Gas respectfully request an extension from November 1, 1994 to April 1, 1995 for the subject document. Should you have further questions, please do not hesitate to call at 505 599 2175.

Thank you,

P. J. Marquez

Patrick Marquez
Compliance Engineer

cc:

Charlie Brown (EPNG)
Denny Foust (NMOCD)
David Hall (EPNG)
Sandra Miller (EPNG)
Nancy Prince (EPNG)

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

October 17, 1995

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

Subject: Request Extension for Submitting Closure Results and Work Plan for Determining Potential Impacts from Aztec Yard Sump.

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Our office has been informed that the Aztec Yard Garage will be demolished sometime in early 1995. We would like to incorporate the "north sump" closure with the garage demolition. Any analytical results regarding the "old sump" (covered in 1974) beneath the garage will be communicated to you along with the "north sump" closure results. This should allow us to make a more informative determination of any potential impacts from the sump operations.

El Paso Natural Gas respectfully request an extension from November 1, 1994 to April 1, 1995 for the subject document. Should you have further questions, please do not hesitate to call at 505 599 2175.

Thank you,

P. J. Marquez

Patrick Marquez
Compliance Engineer

cc:

Charlie Brown (EPNG)
Denny Foust (NMOCD)
David Hall (EPNG)
Sandra Miller (EPNG)
Nancy Prince (EPNG)

12/16/94 10:00 am
Verbally approval
Will Olson

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

July 12, 1994

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

Subject : EPNG Aztec Yard Sump Closure

Dear Mr. Olson:

Attached is the closure plan for the existing sump north of the welding shop which was taken out of service in 1990. A work plan for determining any potential ground water impacts from the old sump located under the slab of the welding shop which was closed in 1974 will be sent with the north sump closure report.

El Paso Natural Gas Company respectfully requests approval of the attached closure plan. If you need additional information, please contact me at (505) 599-2176.

Anu Pundari
Sr. Compliance Engineer

cc: Mr. David Hall (EPNG)
Ms. Nancy Prince (EPNG)
Ms. Sandra Miller (EPNG)
Mr. Denny Foust (NMOCD)

NORTH SUMP CLOSURE PLAN

1. The assessment to determine the lateral and vertical extent of contamination will be performed according to NMOCD's Unlined Surface Impoundment Closure Guidelines.

2. Upon removal of the culvert, any visually contaminated soil will be excavated to a maximum depth and horizontal extent practicable.

3. The soil will be stockpiled onsite and covered with plastic.

4. Composite soil samples will be obtained from the side walls and bottom of the excavation prior to backfilling. Soil samples will be analyzed for benzene, toluene, xylene, ethylbenzene by EPA Method 8020 , and Total Petroleum Hydrocarbons by 418.1

5. The representative sample of the stockpiled soil will be analyzed for benzene, toluene, xylene, ethylbenzene by EPA Method 8020 , and Total Petroleum Hydrocarbons by 418.1, RCRA TCLP analysis, RCRA metals, and ignitability. The soil will not be tested for corrosivity and reactivity since there is no reason to believe that corrosive or reactive waste was disposed in the sump.

6. Upon approval for disposal of " non-exempt" soil from NMOCD and Tierra Environmental, the contaminated soil will be transported to Tierra Environmental's landfarm facility. Tierra Environmental will be responsible for spreading, disking and analyzing the soil at the landfarm according to NMOCD requirements.

7. The excavated soil will be replaced with clean backfill and machine compacted.

8. The backfilled area will be repaved with asphalt.

9. A report containing the results of the closure will be submitted to NMOCD after completion of the closure activities. The closure report will detail any additional investigation if required. In addition, a work plan for determining any potential ground water impacts from the old sump located under the slab of the welding shop which was closed in 1974 will be sent.

10. The local NMOCD will be notified of excavation activities at least 48 hours prior to commencement such that NMOCD has the opportunity to witness the operation and/or split samples.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

January 7, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-891

Mr. W. David Hall
Field Services Compliance Engineering Manager
El Paso Natural Gas Company
P.O. Box 1492
El Paso, Texas 79978

RE: EPNG AZTEC YARD
SAN JUAN COUNTY, NEW MEXICO

Dear Mr. Hall:

The New Mexico Oil Conservation Division (OCD) has reviewed El Paso Natural Gas Company's (EPNG) December 3, 1993 correspondence. This document provided information requested by OCD regarding past storage of service shop wash water in two separate sumps at the EPNG Aztec Yard.

Based on a review of the above referenced document, the OCD requests that EPNG submit a closure plan for the existing sump north of the welding shop which was taken out of service in 1990. In addition, the OCD requests that EPNG submit a work plan for determining any potential ground water impacts from the old sump located under the slab of the welding shop which was closed in 1974.

The OCD thanks you for your cooperation in this matter. If you have any questions, please contact Bill Olson of my staff at (505) 827-5885.

Sincerely,

Roger C. Anderson
Bureau Chief

xc: OCD Aztec Office

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

December 3, 1993

Mr. Roger C. Anderson
New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Re: EPNG Aztec Yard
San Juan County, NM

Dear Mr. Anderson:

This letter is in response to your request for information dated November 2, 1993 regarding pits at El Paso Natural Gas Company's Aztec Yard. EPNG has conducted a site visit and researched our environmental and construction records. Based on the description in your letter, EPNG provides the following information:

- There is an existing inground sump located immediately north of the garage building. The sump appears to be constructed of 48" corrugated pipe. It extends approximately 4" above grade and has a steel cover. A 4" clay tile drain connects the sump to floor drains in the former garage. The depth of the sump is approximately 9'. The sump currently has 1'-2' of silt in it. The sump has not been used for approximately 3 years. Construction drawings indicate that this sump was installed in 1974.

- There is a sump identified through construction drawings, located underneath the existing welding shop portion of the garage building. The sump was connected to floor drains in the garage area. Records indicate the welding shop was added onto the north end of the garage in 1974. The old sump was filled in (per drawing notes) and covered with the concrete slab that now serves as the floor of the welding shop. We have been unable to find any specifics regarding closure of the sump. The existing sump described above was installed to replace the one that was covered during construction.

- To the best of our knowledge, both of the sumps were used to collect floor drain effluent from the garage. The effluent was primarily generated from the common practice of washing down the floor with a fresh water source. The sumps were not intended to serve as disposal receptacles for motor oil, antifreeze, or any other vehicle related fluids. The facility ceased to function as a garage and the sumps were no longer used after July 1990.

- Through research of our environmental records, we have found limited analytical information pertaining to the subsurface near the sumps. Data was obtained as part of another project that was done in May 1991. A borehole (identified as GS-01) was drilled to a depth of 20' on the north side of the welding shop at the west corner. The soil samples collected were analyzed for BTEX and halogenated hydrocarbons. Sample results showed no detectable amounts for any constituent.

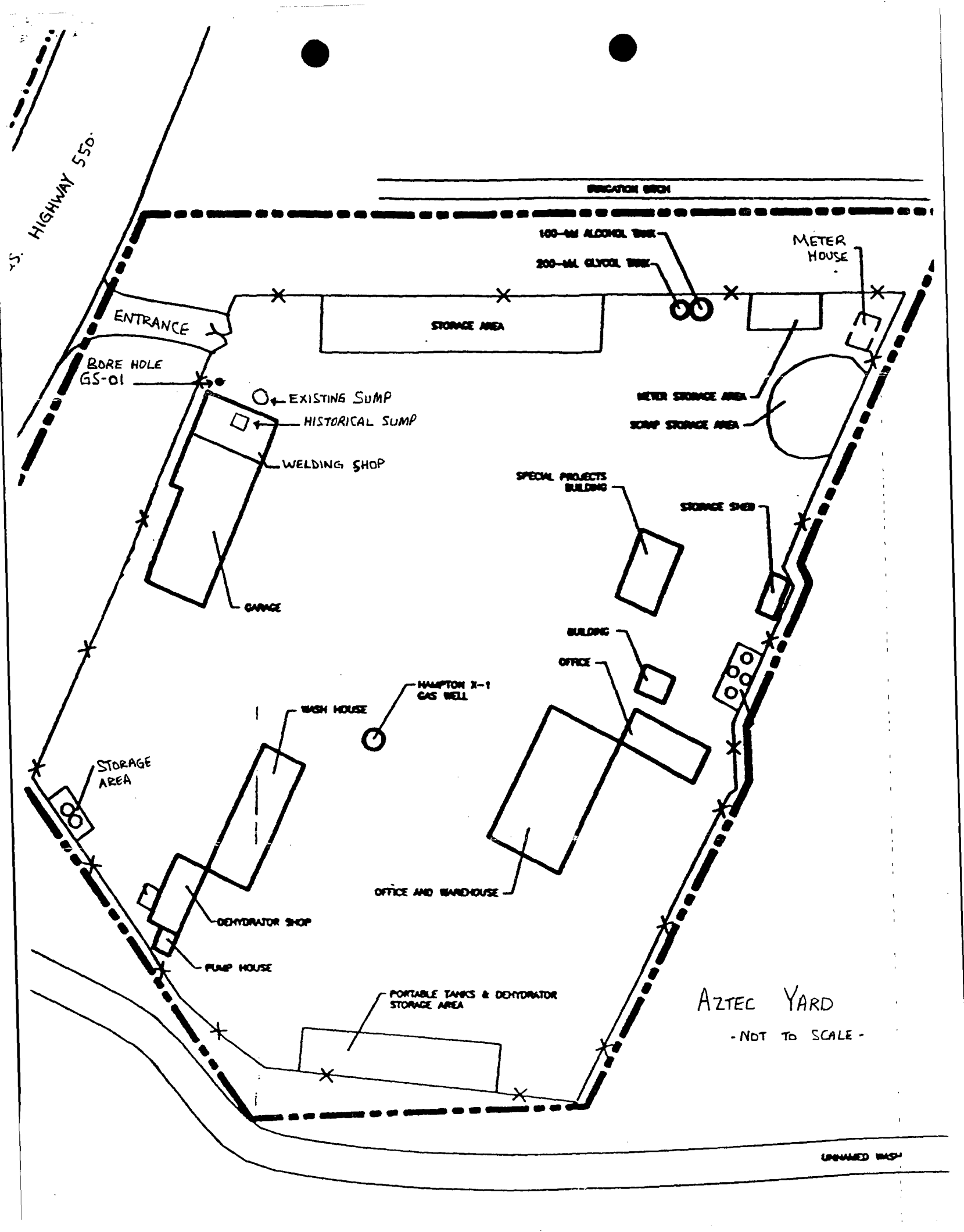
I have enclosed a sketch of the Aztec Yard facilityfor your information. If you have any questions, please give me a call at 915/541-3531.

Sincerely,

W. David Hall

W. David Hall, P.E.
Manager, Field Services Compliance Engineering

xc: Mr. H.A. Shaffer, EPNG
Mr. C.D. Brown, EPNG
Mr. Frank Chavez, Aztec NMOCD



AZTEC YARD

- NOT TO SCALE -

bc: R.J. Kasulaitis
G.J. Odegard
S.D. Miller
J.B. Ward
A.N. Pundari/K.A. Sinclair/File

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

November 2, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-403

Mr. W. David Hall
Field Services Compliance Engineering Manager
El Paso Natural Gas Company
P.O. Box 1492
El Paso, Texas 79978

RE: EPNG AZTEC YARD
SAN JUAN COUNTY, NEW MEXICO

Dear Mr. Hall:

The New Mexico Oil Conservation Division has recently received a written anonymous complaint from a concerned citizen regarding past disposal practices at the El Paso Natural Gas Company (EPNG) Aztec Yard. This citizen stated that they had knowledge of two unlined pits which were covered over at the EPNG Aztec yard. The pits were purportedly used for the disposal of oily wastes and antifreeze. The complainant stated that one pit was located under the old welding shop at the northeast corner of the existing shop and that one pit was located under the welding shop.

The OCD has no record regarding the use or closure of these pits. Therefore, the OCD requires EPNG to supply OCD with all information regarding the existence, locations, use and closure of these purported pits by December 10, 1993.

If you have any questions regarding this matter, please contact me at (505) 827-5812.

Sincerely,

Roger C. Anderson
Bureau Chief

RCA/WO

xc: OCD Aztec Office