

3R - 215

**GENERAL
CORRESPONDENCE**

YEAR(S):
1995

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

July 5, 1995

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

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

Dear Mr. Olson,

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

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

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

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

Thank you.

P. S. Marquez
Patrick Marquez
Compliance Engineer

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

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: NA Location: Lindbergh Pig Sys Drip-Y1
 Operator #: NA Operator Name: EPNG P/L District: DJTD
 Coordinates: Letter: P Section 18 Township: 24 Range: 5
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: Pig Sys. Drip
 Site Assessment Date: 5/2/95 Area: _____ Run: _____

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps) Inside (1) Outside (2)

Land Type: BLM (1) State (2) Fee (3) Indian Jicarilla Apache

Depth to Groundwater
 Less Than 50 Feet (20 points) (1)
 50 Ft to 99 Ft (10 points) (2)
 Greater Than 100 Ft (0 points) (3)

Wellhead Protection Area :
 Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction? , or ; Is it less than 200 ft from a private domestic water source? (1) YES (20 points) (2) NO (0 points)

Horizontal Distance to Surface Water Body
 Less Than 200 Ft (20 points) (1)
 200 Ft to 1000 Ft (10 points) (2)
 Greater Than 1000 Ft (0 points) (3)

Name of Surface Water Body Large Canyon
 (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)
 Distance to Nearest Ephemeral Stream (1) < 100' (Navajo Pits Only)
 (2) > 100'

TOTAL HAZARD RANKING SCORE: 40 POINTS

REMARKS

Remarks : Redline Book: Inside Vulnerable Zone Top: Inside
1 pit. Will close. Abundant product in pit. Pit lined & covered w/ "netting"

DIG + HAVL

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>N/A</u> Location: <u>Lindrieth Pig Sys Drip Y-1</u>
	Coordinates: Letter: <u>P</u> Section <u>18</u> Township: <u>24</u> Range: <u>5</u>
	Or Latitude _____ Longitude _____
	Date Started : <u>6/19/95</u> Run: _____

FIELD OBSERVATIONS	Sample Number(s): <u>KD 460</u>
	Sample Depth: <u>13'</u> Feet
	Final PID Reading <u>550 ppm</u> PID Reading Depth <u>13'</u> Feet
	Groundwater Encountered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Approximate Depth _____ Feet

CLOSURE	Remediation Method:
	Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>430</u>
	Onsite Bioremediation <input type="checkbox"/>
	Backfill Pit Without Excavation <input type="checkbox"/>
	Soil Disposition:
	Envirotech <input checked="" type="checkbox"/> Tierra <input type="checkbox"/> Other Facility <input type="checkbox"/> Name: _____
Pit Closure Date: <u>6/21/95</u> Pit Closed By: <u>PEI</u>	

REMARKS	Remarks : <u>Removed 430 yds of Contaminated Soil. Removed 100 yds of over Burden. Did not close pit AS per Rick Cosby's instruction. Did not haul in any Backfill.</u>

Signature of Specialist: <u>Kenny Damm</u>
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El Paso
Natural Gas Company

NEW MEXICO OIL CONSERVATION DIVISION
RECEIVED

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P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

July 5, 1995

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

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**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

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

REMARKS: _____

RESULTS

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

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

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

DF = Dilution Factor Used

Approved By: John Fard

Date: 6/28/95

EL PASO MATURAL GAS - FIELD SERVICES LAB

QUALITY CONTROL REPORT

EPA METHOD 8020 - BTEX

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

QA/QC for 6/27/95

LABORATORY DUPLICATES:

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

Narrative: Acceptable.

LABORATORY CALIBRATION CHECKS, LABORATORY CONTROL SAMPLES:

SAMPLE NUMBER	TYPE	KNOWN RESULT (PPB)	FOUND RESULT (PPB)	ZR	ACCEPTABLE		
					RANGE	YES	NO
ICV 25 PPB std							
Benzene	Standard	25.0	20.4	81.6	75 - 125 %	X	
Toluene	Standard	25.0	25.8	103.2	75 - 125 %	X	
Ethyl benzene	Standard	25.0	24.9	99.6	75 - 125 %	X	
Total Xylenes	Standard	75.0	76.2	101.6	75 - 125 %	X	

SAMPLE NUMBER	TYPE	KNOWN RESULT (PPB)	FOUND RESULT (PPB)	ZR	ACCEPTABLE		
					RANGE	YES	NO
LCS 25 PPB							
Benzene	Standard	25.0	25.5	102	39 - 150	X	
Toluene	Standard	25.0	25.4	102	46 - 148	X	
Ethyl benzene	Standard	25.0	24.9	100	32 - 160	X	
Total Xylenes	Standard	75.0	76.3	102	Not Given	X	

Narrative: Acceptable.

LABORATORY SPIKES:

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

Narrative: Acceptable.

LABORATORY , REAGENT AND TRIP BLANKS:

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

Narrative: Acceptable!

Approved By: John Swick

Date: 29-Jun-95

QUALITY CONTROL REPORT

TPH by Modified 418.1 by Infrared

8 SJR-ponds

4 Pit Samples

13 SJR-landfarm

Date of Analysis: June 27, 1995

LABORATORY CONTROL SAMPLES: CALIBRATION CHECKS

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

Narrative: Acceptable.

LABORATORY DUPLICATES:

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

Narrative : Acceptable.

LABORATORY SPIKES:

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

Narrative: Acceptable.

REFERENCE SOIL (Laboratory Control Sample):

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

Narrative: Acceptable.

LABORATORY REAGENT BLANK:

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

Narrative: Acceptable.

Approved By: 

Date: 28-Jun-95

Extracted: 06/27/95



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 3, 1995

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

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

RE: TANK INSTALLATION/PIT CLOSURE PLAN LINDRITH PIG SYSTEM

Dear Mr. Marquez:

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

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

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

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

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

cc: OCD Aztec District Office



OIL CONSERVATION DIVISION
RECEIVED

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P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

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

February 23, 1995

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

Dear Mr. Olson:

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

Pit Closure

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

Tank Installation

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

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

Thank you,

Patrick Marquez
Compliance Engineer

cc:

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

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

Thanks



