District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

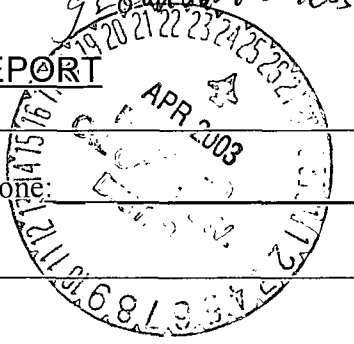
Submit 1 copy to appropriate District Office and 1 copy to the Santa Fe Office

(Revised 3/9/94)

"Failed"
Risk 33
High BTEX
at 24'
groundwater less than 100'

PIT REMEDIATION AND CLOSURE REPORT

30-045-08972



Operator: Amoco *(Site Closed by El Paso Field Services)* Telephone: _____

Address: _____

Facility Or: Elliot Gas Com M#1, Meter 73147
Well Name

Location: Unit or Qtr/Qtr Sec I Sec 33 T 30 R 9 County San Juan

Pit Type: Separator _____ Dehydrator _____ Other Drip

Land Type: BLM _____, State _____, Fee X Other _____

Pit Location: Pit dimensions: length 13', width 13', depth 2'
(Attach diagram)

Reference: wellhead X, other _____

Footage from reference: 106'

Direction from reference: 199 Degrees X East North _____ of _____ West South _____

Depth To Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet to 99 feet Greater than 100 feet	(20 points) (10 points) (0 points) 10
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.)	Yes No	(20 points) (0 points) 0
Distance To Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches.)	Less than 200 feet 200 feet to 1000 feet Greater than 1000 feet	(20 points) (10 points) (0 points) 0

RANKING SCORE (TOTAL POINTS): 10

Date Remediation Started: 05/11/94 Date completed: 05/11/94

Remediation Method: (Check all appropriate sections.) Excavation X Approx. cubic yards 35

Landfarmed _____ Insitu Bioremediation _____

Other _____

Remediation Location: (i.e. landfarmed onsite, name and location of offsite facility) Onsite _____ Offsite Tierra

General Description of Remedial Action: Line markers on location. Started remediating to 12'. Soil black and gray. Lots of sand. 12' floor and four walls still black and gray. PID 576.

Ground Water Encountered: No X Yes _____ Depth _____

Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths)

Sample location Four walls and center of pit composite

Sample depth 12'

Sample Date 05/11/94 Sample time 12:20

Sample Results

Benzene(ppm) <0.50

Total BTEX(ppm) 415

Field headspace(ppm) 576

TPH 8260

Ground Water Sample: Yes _____ No X (If yes, attach sample results)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Date 4/22/03

Signature Scott T. Pope

Printed Name and Title Scott Pope, Senior Environmental Scientist

elpaso

PIT CLOSURE REQUEST

Elliot Gas Com M#1
Meter/Line ID 73147

SITE DETAILS

Legals - Twn: 30N	**Rng: 9W**	**Sec: 33**	**Unit: I**
NMOCD Hazard Ranking: 10		**Land Type: Fee**	
Operator: Amoco Production Company		**Pit Closure Date: 5/11/94**	

RATIONALE FOR RISK-BASED CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A test pit was excavated to 12 feet (ft) below ground surface (bgs) and a soil sample was collected for field headspace and laboratory analysis for TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 576 ppm, laboratory analysis indicated a benzene concentration of <0.50 mg/kg, a total BTEX concentration of 415 mg/kg, and TPH concentration of 8,260 mg/kg. The TPH and total BTEX measurements exceeded recommended remediation levels for the Hazard Ranking Score.

Approximately 35 cubic yards of impacted soil was excavated and removed off-site to the Tierra land farm for treatment and disposal. The pit was backfilled with clean soil and graded in a manner to direct surface runoff away from the pit area.

A Phase II excavation was completed to a depth of 24 ½ ft bgs. No groundwater was encountered in the excavation. Approximately 100 cubic yards of impacted soils were excavated and hauled to the Tierra Landfarm. One laboratory sample was collected at 24 ½ ft bgs. Headspace analysis indicated an organic vapor content of 480 ppm, laboratory analysis indicated a benzene concentration of 12.4 mg/kg, a total BTEX concentration of 1,519 mg/kg, and a TPH concentration of 5,600 mg/kg. The benzene concentration was below recommended remediation levels for the Hazard Ranking Score. After the excavation was completed, the pit was backfilled with clean soil and graded in a manner to direct surface runoff away from the pit area.

A Phase III boring was completed to auger refusal at 22 feet bgs. Environmental samples were not collected in this boring due to elevated organic vapor readings in the soils at the base of the boring.

El Paso Field Services requests closure of the above mentioned pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for approximately eight years.
- A majority (approximately 135 cubic yards) of the impacted soil was excavated to the practical extent of the equipment and subsurface conditions, and disposed of at an off-site facility.
- The test pit was backfilled with clean soil and the former pit area graded to direct surface runoff away from the former pit.
- Backfilling the excavation with clean soil eliminated the potential for direct contact with hazardous constituents by livestock or the public; i.e., direct contact exposure pathways are incomplete.

- Groundwater was not encountered in the Phase II excavation (24 feet bgs).
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Residual hydrocarbons in the soil represent will likely degrade by natural attenuation with minimal risk to human health and the environment.
- The benzene concentration was below recommended remediation levels for the Hazard Ranking Score.

ATTACHMENTS

Field Pit Assessment Form
Field Pit Remediation/Closure Form
Phase II Soil Boring Log
Laboratory Analytical Results

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73147 Location: ELLIOT GAS COM M #1

Operator #: 0203 Operator Name: ~~0203 MP~~ AMOCO 4.18.94 P/L District: BLOOMFIELD

Coordinates: Letter: I Section 33 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____

Site Assessment Date: 4.18.94 Area: 10 Run: 43

SITE ASSESSMENT

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

Land Type: BLM ☐ (1) State ☐ (2) Fee ☒ (3) Indian _____

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 _____

(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: 10 **POINTS**

REMARKS

Remarks : ONLY PIT ON LOCATION. PIT IS DRY.

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 38	945127
MTR CODE | SITE NAME:	73147	N/A
SAMPLE DATE | TIME (Hrs):	5-11-94	1220
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5-12-94	5-12-94
DATE OF BTEX EXT. | ANAL.:	5/17/94	5/18/94
TYPE | DESCRIPTION:	VC	Brown Sand | Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.50	MG/KG	20			
TOLUENE	29	MG/KG	20			
ETHYL BENZENE	25	MG/KG	20			
TOTAL XYLENES	360	MG/KG	20			
TOTAL BTEX JWD 6/24/94	~~52~~ 415	MG/KG				
TPH (418.1)	8260	MG/KG			.51	28
HEADSPACE PID	576	PPM				
PERCENT SOLIDS	93.7	%				

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

ne Surrogate Recovery was at 522 % for this sample All QA/QC was acceptable.

arrative:
I results attached. Surrogate recovery outside ATI QC limits due to matrix interference.

F = Dilution Factor Used

pproved By: John Faldi Date: 7/14/94

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73147 Location: Elliot GAS Com M #1

Coordinates: Letter: I Section 33 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Date Started : 5-11-94 Area: 10 Run: 43

FIELD OBSERVATIONS

Sample Number(s): KPH 38 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 576 PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐ (1)	☒ (2)

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 35
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

Envirotech	☐ (1)	☒ (3)	Tierra
Other Facility	☐ (2)	Name:	_____

Pit Closure Date: 5-11-94 Pit Closed By: B.E.T

REMARKS

Remarks : LINE MARKERS ON LOCATION. STARTED REMEDIATING TO 12' SOIL BLACK + GRAY LOTS OF SAND. 12' FLOOR + FOUR WALLS STILL BLACK + GRAY. P.I.D 576.

Signature of Specialist: Kelly Padilla

(SP3191) 04/07/94

FIELD PIT REMEDIATION/CLOSURE FORM/PHASE II

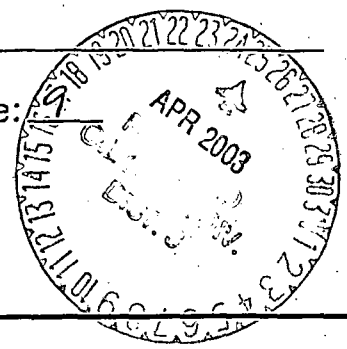
GENERAL

Meter: 73147 Location: Elliot Gas Com #1

Coordinates: Letter: I Section 33 Township: 30 Range: 11

Or Latitude _____ Longitude _____

Date Started : 5/10/95 Area: 10 Run: 43



FIELD OBSERVATIONS

Sample Number(s): KD 434 (17') KD 435 (24½') _____ _____

Sample Depth: 24½ Feet

Final PID Reading 480 ppm PID Reading Depth _____ Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

Final Dimensions: Length 53' Width 16' Depth 24½

CLOSURE

Remediation Method :

Excavation ☒ (1) Approx. Cubic Yards 100

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☐ (3)

Overburden Cubic Yards 166

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: 5/10/95 Pit Closed By: BEF

REMARKS

Remarks : Removed of Overburden from pit, Excavated pit to 17', Took pid Sample # 434 At this Depth - Reading 340 ppm, Benched Excavation And Continued Excavating to A Depth of 24½, Took pid Sample, Closed pit

See other side →

Signature of Specialist: Thury Deaven

(SP3195) 05/01/95

Phase II
Backhoe

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 435	946801
MTR CODE | SITE NAME:	73147	N/A
SAMPLE DATE | TIME (Hrs):	5/10/95	1055
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	05-12-95	
DATE OF BTEX EXT. | ANAL.:	5/11/95	5/13/95
TYPE | DESCRIPTION:	VL	Light brown Sand & Clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	12.4	MG/KG	1.07817		2.65	20
TOLUENE	373	MG/KG				
ETHYL BENZENE	83.3	MG/KG				
TOTAL XYLENES	1,050	MG/KG		D1		
TOTAL BTEX	1,519	MG/KG				
TPH (418.1)	5600	MG/KG			1.0	28
HEADSPACE PID	480	PPM				
PERCENT SOLIDS	65	%				

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

The Surrogate Recovery was at 95.1 % for this sample All QA/QC was acceptable.

Narrative:
ATI Results attached for TPH 8015

DF = Dilution Factor Used

Approved By: John Fuller Date: 5/17/95

Phase III
Drilling

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

Philip Environmental Services Corp.
[illegible]00 Monroe Road
[illegible]mington, New Mexico 87401
(606) 326-2262 FAX (606) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase ~~601~~ 6000
Project Location Elliot Gas Com M#1, 73147

Elevation
Borehole Location T30, R9, S.33, I
GWL Depth
Logged By S.Kelly
Drilled By M. Donohue
Date/Time Started 9/8/95, 0900
Date/Time Completed 9/8/95, 0945

Well Logged By S.Kelly
Personnel On-Site M. Donohue, J. O'Keefe
Contractors On-Site
Client Personnel On-Site

Drilling Method 4¼" ID HSA
Air Monitoring Method CGI, 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				Backfill to 12'						
5										
10										
15										
20		18-20	1.1'	silty SAND, 5-20% silt, fine sand, trace med. sand, loose, damp, dk. grey.					146/218	—0915
25				TOB- 22.0'						
30										
35										
40										

Comments: Auger refusal at 22.0', feels like cobble. No sample taken due to high headspace readings at refusal. BH grouted to surface.

Geologist Signature Sarah Kelly