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
1220 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

Risk Defined bedrock

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

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

30-045-25461

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

Address: _____

Facility Or: Mexico Fed L-1-R, Meter 94911 _____
Well Name

Location: Unit or Qtr/Qtr Sec K Sec 10 T 30 R 13 County San Juan

Pit Type: Separator _____ Dehydrator X Other _____

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

Pit Location: Pit dimensions: length 17', width 17', depth 4'
(Attach diagram)

Reference: wellhead X, other _____

Footage from reference: 124'

Direction from reference: 163 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) 0
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.)		Yes (20 points) No (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): 0

Date Remediation Started: 01/30/95 Date completed: 01/30/95

Remediation Method: (Check all appropriate sections.) Excavation X Approx. cubic yards 30

Landfarmed _____ Insitu Bioremediation _____

Other _____

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

General Description of Remedial Action: No line markers. Started remediating to 12'. Hit sandstone at 8'. Sampled Closed pit.

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 8'

Sample Date 01/30/95 Sample time 12:30

Sample Results

Benzene(ppm) 33.0

Total BTEX(ppm) 749

Field headspace(ppm) 136

TPH 8610

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 4/23/03

Signature _____ Printed Name and Title Scott Pope, Senior Environmental Scientist

elpaso

PIT CLOSURE REQUEST

Mexico Fed L-1-R
Meter/Line ID 94911

SITE DETAILS

Legals - Twn: 30N	**Rng: 13W**	**Sec: 10**	**Unit: K**
NMOCD Hazard Ranking: 0		**Land Type: BLM**	
Operator: Dugan Production Company		**Pit Closure Date: 1/30/95**	

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 8 feet (ft) below ground surface (bgs) where sandstone was encountered and a soil sample was collected for field headspace and laboratory analysis for TPH and BTEX. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 136 ppm; laboratory analysis indicated a benzene concentration of 33 mg/kg, a total BTEX concentration of 749 mg/kg, and a TPH concentration of 8,610 mg/kg. The benzene, total BTEX, and TPH measurements exceeded recommended remediation levels for the Hazard Ranking Score of 0.

Approximately 30 cubic yards of soil were excavated and hauled to Tierra, a commercial landfarm, 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 boring was completed with auger refusal (sandstone) at 16.3 ft bgs. A soil sample was collected at 15-15.5 ft bgs for field headspace and laboratory analysis for TPH and BTEX. No groundwater was encountered in the soil boring. Headspace analysis indicated an organic vapor content of 1,873 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 61 mg/kg, and a TPH concentration of 133 mg/kg. The benzene and TPH concentrations were below recommended remediation levels for the Hazard Ranking Score of 0.

No Phase III activities were conducted.

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 over 8 years.
- The impacted soil was excavated to the practical extent of the equipment and subsurface conditions. All excavated soil was disposed of offsite.
- Bedrock was encountered at 8 ft bgs making further excavation impractical.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Backfilling the pit 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.

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 94911 Location: MEXICO FED L-1-R
Operator #: 1862 Operator Name: DUGAN P/L District: LUTZ
Coordinates: Letter K Section 10 Township: 30 Range: 13
or Latitude _____ Longitude _____
Pit Type: Dehydrator ✓ Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 1-12-95 Area: 02 Run: 31
Revised Date: _____

SITE ASSESSMENT

NMOCD Zone:
(from NMCOD Maps)

Land Type:
Intside [X] (1)
Outside [ ] (2)

BLM [X] (1)
State [ ] (2)
Fee [ ] (3)
Indian _____

Depth to Groundwater
Less than 50 Feet (20 points) [ ] (1)
50 Feet to 99 Feet (10 Points) [ ] (2)
Greater than 100 Feet (0 Points) [X] (3)

Well Protection Area
Is it less than 1000 feet from well, spring or other source of fresh water extraction?
or; Is it less than 200 feet from a private domestic water source?
[ ] YES (20 Points) [X] NO (0 Points)

Horizontal Distance to Surface Water Body
Less than 200 Feet (20 points) [ ] (1)
200 Feet to 1000 Feet (10 Points) [ ] (2)
Greater than 1000 Feet (0 Points) [X] (3)

Name of Surface Water Body LA PLATA RIVER

(Surface Water Body: Perennial River, Stream, Creek, Irrigation Canal, Ditch, Lake, Pond)

Distance to Nearest Ephemeral Stream [ ] (1) < 100 feet (Navajo Pits Only)
[ ] (2) > 100 feet

TOTAL HAZARD RANKING SCORE 0 **POINTS**

REMARKS

Remarks: REVISION BASED ON REASSESSMENT OF THE DEPTH TO GROUND WATER AND THE HORIZONTAL DISTANCE TO SURFACE WATER.

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 94911 Location: Mexico Fed ~~C-1-R~~ cmc 1/12/95 L-1-R

Operator #: 1862 Operator Name: Dugan P/L District: KUTZ

Coordinates: Letter: K Section 10 Township: 30 Range: 13

Or Latitude _____ Longitude _____

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

Site Assessment Date: 1/12/95 Area: 02 Run: 31

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 S. Twin Wash (off Laplata R.)

(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 Topo: Inside

3 pits. Closed. Dehy on pit is draining into 55 gal drum.

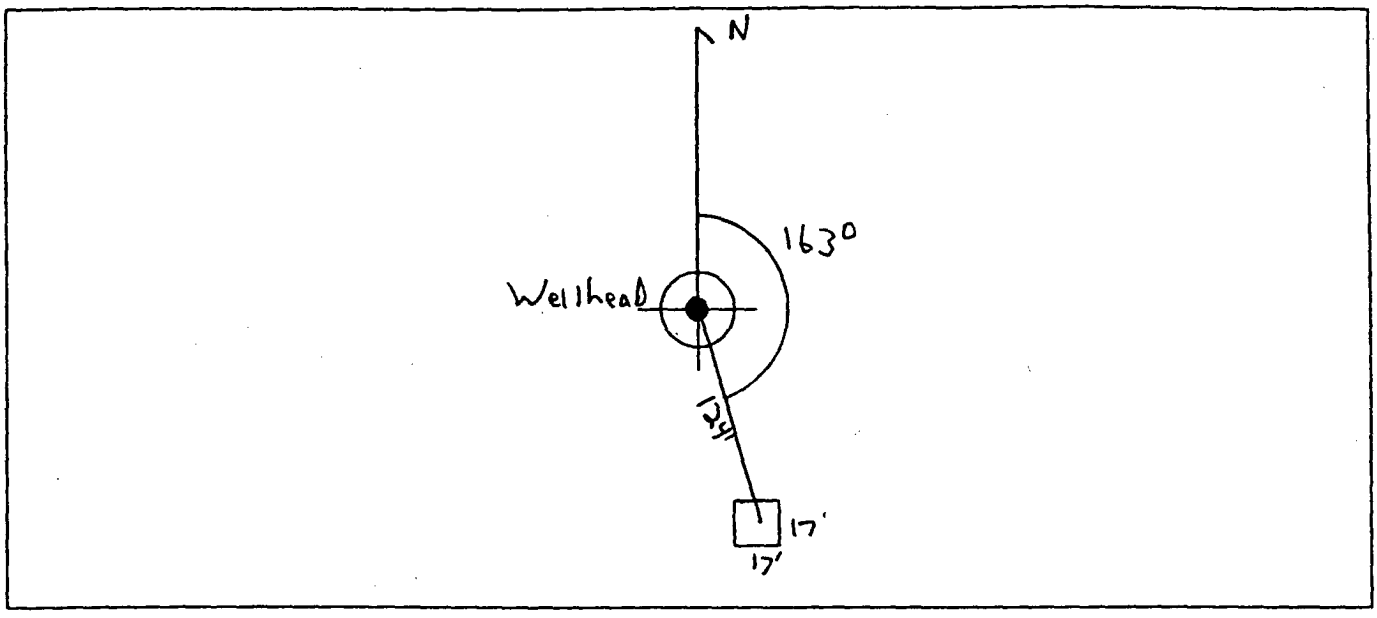
PIT HAZY

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 163° Footage from Wellhead 124'

b) Length : 17' Width : 17' Depth : 4'



REMARKS

Remarks :

Pictures @ 1424hr 16-19 roll-1

Completed By:

Cory Chance
Signature

1/12/95
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94911 Location: MEXICO Fed L-1-R

Coordinates: Letter: K Section 10 Township: 30 Range: 13

Or Latitude _____ Longitude _____

Date Started : 1-30-95 Run: 02 31

FIELD OBSERVATIONS

Sample Number(s): KP 396 _____ _____ _____

Sample Depth: 8' Feet

Final PID Reading 136 PID Reading Depth 8' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☐ Approx. Cubic Yards 30

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☒

Soil Disposition:

Envirotech ☐ ☒ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 1-30-95 Pit Closed By: B.EJ

REMARKS

Remarks : No LINE MARKERS STARTED REMEDIATING TO 12'
HIT SAND STONE AT 8' SAMPLED CLOSED PIT.

Signature of Specialist: Kelly Padilla

EPNG 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:	KP 396	946609
MTR CODE | SITE NAME:	94911	N/A
SAMPLE DATE | TIME (Hrs):	1-30-95	1330
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	2/2/95	2/2/95
DATE OF BTEX EXT. | ANAL.:	1/31/95	2/1/95 & 2/2/95
TYPE | DESCRIPTION:	VC	Brown sand and clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	33.0	MG/KG	0.2000		5.00	20
TOLUENE	241	MG/KG	0.57143	D1		
ETHYL BENZENE	40.6	MG/KG	0.2000			
TOTAL XYLENES	434	MG/KG	0.57143	D1		
TOTAL BTEX	749	MG/KG				
TPH (418.1)	8610	MG/KG			0.63	28
HEADSPACE PID	136	PPM				
PERCENT SOLIDS	89.2	%				

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

Surrogate Recovery was at 84.7 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: [signature] Date: 2-22-95

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG PITS
Project Number 14509 Phase 6000 77
Project Location Mexico Fed L-1-R 94911

Elevation
Borehole Location QK- SID - T30- R13
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 10/5/95 - 1226
Date/Time Completed 10/5/95 - 1330

Well Logged By CM Chance
Personnel On-Site K Padilla, F. Rivera, D. Charlie
Contractors On-Site
Client Personnel On-Site
Drilling Method 4 1/4" ID HSA
Air Monitoring Method PID, CGI

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: PPM BZ	BH	S HS	Drilling Conditions & Blow Counts
0				Backfill to 8'						
5										
10	1	10-10.5	4"	lt br silty SAND, vf-f sand, dense, dry			3	12	1224 / 2155	-1243h -hard drlng
15	2	15-15.5	4"	AA			2	38	451 / 1877	-1252 -Refusal @ 16' -1302
	3	16-16.3	0	TDB 16.3'						
20	3 CMC 10/5/95									
25										
30										
35										
40										

Comments: Refusal @ 16' w/ augers. No recovery w/ split spoon. CMC 1TD (15-15.5) sent to lab (BTEX, TPH). BH grouted to surface. Sample bagged & iced prior to containerizing

Geologist Signature Cory Chance

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:	CMC 130	947596
MTR CODE | SITE NAME:	94911	Mexico Fed L-1-R
SAMPLE DATE | TIME (Hrs):	10-05-95	1252
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	10/6/95	
DATE OF BTEX EXT. | ANAL.:	10/6/95	10/6/95
TYPE | DESCRIPTION:	VG	[illegible]

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	11.9	MG/KG				
ETHYL BENZENE	3.9	MG/KG				
TOTAL XYLENES	45.2	MG/KG				
TOTAL BTEX	61.0	MG/KG				
TPH (418.1)	133	MG/KG			2.16	28
HEADSPACE PID	1873	PPM				
PERCENT SOLIDS	95.7	%				

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

The Surrogate Recovery was at 97% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 10-11-95