

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

*Rick*  
*detrital*  
*plume*  
*encountered*  
*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

30-045-10488

Operator: Dugan Production (Site Closed by El Paso Field Services) Telephone: \_\_\_\_\_

Address: \_\_\_\_\_

Facility Or: Paul Hall #1, Meter 73284

Well Name \_\_\_\_\_

Location: Unit or Qtr/Qtr Sec N Sec 20 T 31 R 13 County San Juan

Pit Type: Separator \_\_\_\_\_ Dehydrator \_\_\_\_\_ Other Drip

Land Type: BLM X, State \_\_\_\_\_, Fee \_\_\_\_\_ Other \_\_\_\_\_

Pit Location: Pit dimensions: length 14', width 13', depth 1'

(Attach diagram)

Reference: wellhead X, other \_\_\_\_\_

Footage from reference: 79'

Direction from reference: 341 Degrees X East North \_\_\_\_\_

of

\_\_\_\_\_ West South \_\_\_\_\_

Depth To Ground Water	Less than 50 feet	(20 points)
(Vertical distance from	50 feet to 99 feet	(10 points)
contaminants to seasonal	Greater than 100 feet	( 0 points) <u>10</u>
high water elevation of		
ground water.)		

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

Distance To Surface Water:	Less than 200 feet	(20 points)
(Horizontal distance to perennial	200 feet to 1000 feet	(10 points)
lakes, ponds, rivers, streams, creeks,	Greater than 1000 feet	( 0 points) <u>0</u>
irrigation canals and ditches.)		

RANKING SCORE (TOTAL POINTS): 10

Date Remediation Started: 02/06/95 Date completed: 02/06/95

Remediation Method: Excavation \_\_\_\_\_ Approx. cubic yards \_\_\_\_\_  
(Check all appropriate sections.) Landfarmed \_\_\_\_\_ Insitu Bioremediation \_\_\_\_\_  
Other Backfill Pit Without Excavation

Remediation Location: Onsite N/A Offsite N/A  
(i.e. landfarmed onsite, name and location of offsite facility)

General Description of Remedial Action: Arrived, dug sample hole. Hit rock 4'. Soil grayish brown, strong hydro-  
carbon odor.

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 4'

Sample Date 02/06/95 Sample time 12:30

Sample Results

Benzene(ppm) Not reported

Total BTEX(ppm) Not reported

Field headspace(ppm) 276

TPH 2410

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 Scott T. Pope

Printed Name  
and Title Scott Pope, Senior Environmental Scientist

Paul Hall #1  
Meter/Line ID 73284

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**SITE DETAILS**

Legals - Twn: 31N	Rng: 13W	Sec: 20	Unit: N
NMOCD Hazard Ranking: 10		Land Type: BLM	
Operator: Dugan Production Corp.		Pit Closure Date: 2/6/95	

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**RATIONALE FOR RISK-BASED CLOSURE**

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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 4 feet (ft) below ground surface (bgs) where bedrock was encountered 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 276 ppm, laboratory analysis indicated a TPH concentration of 2,410 mg/kg. The TPH measurement exceeded recommended remediation levels for the Hazard Ranking Score of 10.

No soil was disposed of offsite. The pit was backfilled with site soil, topped with clean soil from the surrounding berms, and graded in a manner to direct surface runoff away from the pit area.

A Phase II borehole was completed with auger refusal (sandstone) at 15-16 ft bgs. A soil sample was collected at 15-16 ft bgs for field headspace and laboratory analysis for TPH and total BTEX. No groundwater was encountered in the soil boring. Headspace analysis indicated an organic vapor content of 232 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 3.82 mg/kg, and a TPH concentration of 68 mg/kg. The benzene, total BTEX, and TPH concentrations were below recommended remediation levels for the Hazard Ranking Score of 10.

No Phase III activities were performed.

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.
- Bedrock was encountered at 4 feet bgs making additional excavation impractical and further downward migration of contaminants unlikely.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- The clean soil from the berms placed on top of the excavation would limit the potential for direct contact with hazardous constituents by livestock or the public; i.e., direct contact exposure pathways are unlikely to be completed.
- Auger refusal in sandstone was encountered at 16 feet bgs.
- Groundwater was not encountered in the soil boring at 16 ft bgs; local geologic features indicate the depth to groundwater is greater than 50 ft bgs.

**REVISED**  
**FIELD PIT SITE ASSESSMENT FORM**

<b>GENERAL</b>	<p>Meter: <u>73284</u> Location: <u>Paul Hall #1</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>N</u> Section <u>20</u> Township: <u>31</u> Range: <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4/8/98</u> Area: _____ Run: _____</p>
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p style="margin-left: 150px;"><b>Land Type:</b></p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Inside <input type="checkbox"/> (1)</p> <p>Outside <input checked="" type="checkbox"/> (2)</p> </div> <div style="width: 45%;"> <p>BLM <input checked="" type="checkbox"/> (1)</p> <p>State <input type="checkbox"/> (2)</p> <p>Fee <input type="checkbox"/> (3)</p> <p>Indian _____</p> </div> </div> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area</b></p> <p>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?</p> <p style="text-align: center;"><input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)</p> <p style="margin-left: 350px;"><input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>10</u> <b>POINTS</b></p>
<b>REMARKS</b>	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is &lt; 100' vertical from center of Backer Arroyo.</u></p>

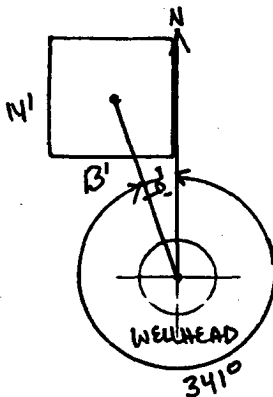
# FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>73284</u> Location: <u>PAUL HALL #1</u> Operator #: _____ Operator Name: <u>DUGAN PROD.</u> P/L District: <u>KUTZ</u> Coordinates: Letter: <u>N</u> Section <u>20</u> Township: <u>31</u> Range: <u>13</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>1-4-95</u> Area: <u>02</u> Run: <u>42</u>	
	NMOCD Zone: _____ Land Type: BLM <input checked="" type="checkbox"/> (1) (From NMOCD State <input type="checkbox"/> (2) Maps) Inside <input type="checkbox"/> (1) Fee <input type="checkbox"/> (3) Outside <input checked="" type="checkbox"/> (2) Indian _____	
SITE ASSESSMENT	<b>Depth to Groundwater</b> Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)	
	<b>Wellhead Protection Area :</b> Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction? , or ; Is it less than 200 ft from a private domestic water source? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)	
REMARKS	<b>Horizontal Distance to Surface Water Body</b> Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (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 <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'	
	<b>TOTAL HAZARD RANKING SCORE:</b> <u>10</u> POINTS	
Remarks : <u>REDLINE SHOWS INSIDE BUT TOPO SHOWS LOCATION OUTSIDE V-2</u> <u>2 PITS ON LOCATION. DEHY PIT BELONGS TO CPNG. WILL CLOSE PIT.</u>		

ORIGINAL PIT LOCATION

## ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 341° Footage from Wellhead 79'  
b) Length : 14' Width : 13' Depth : 1'



REMARKS

Remarks :

PHOTOS - 1215

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Completed By:

Robert Thompson  
Signature

1.4.95  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73284 Location: Paul Hall #1  
 Coordinates: Letter: N Section 20 Township: 31 Range: 13  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Date Started : 2-6-95 Run: 02 42

FIELD OBSERVATIONS

Sample Number(s): MK 354  
 Sample Depth: 4' Feet  
 Final PID Reading 276 PID Reading Depth 4' Feet  
 Yes No  
 Groundwater Encountered ☐ ☒ Approximate Depth \_\_\_\_\_ Feet

CLOSURE

Remediation Method :  
 Excavation ☐ Approx. Cubic Yards \_\_\_\_\_  
 Onsite Bioremediation ☐  
 Backfill Pit Without Excavation ☒  
 Soil Disposition:  
 Envirotech ☐ Tierra ☐  
 Other Facility ☐ Name: \_\_\_\_\_  
 Pit Closure Date: 2-6-95 Pit Closed By: BEI

REMARKS

Remarks : Arrived Dug Sample Hole, Hit Rock 4'  
Soil Grayish Brown Strong Hydrocarbon odor

Signature of Specialist: Morgan Killian

RECORD OF SUBSURFACE EXPLORATION

HILIP SERVICES CORP.

300 Monroe Road  
Albuquerque, New Mexico 87401  
505 262 FAX (505) 326-2388

Borehole # BH- 1  
Well # NA  
Page 1 of 1

Project Number 19643 Phase 1001.77  
Project Name EPFS PITS >10  
Project Location PAUL HALL #1 73284

Elevation  
Borehole Location LTR: N S: 20 T: 31 R: 13  
SWL Depth NA  
Drilled By K. PADILLA  
Well Logged By H. BRADBURY  
Date Started 9/8/98  
Date Completed 9/8/98

Drilling Method 4 1/4 ID HSA  
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: PPM			Drilling Conditions & Blow Counts
							BZ	BH	S/HS	
0				EXCAVATION SAMPLE COLLECTED AT 4'						BZ=Breathing Zone BH=Borehole S/HS=Sample/Headspace
5										
10	1	10-11	6	LT BR SANDSTONE, FINE SAND, LOW CEMENTED, dry			0	0	58 44	1450 hrs
15	2	15-16		DK BR SILTSTONE. LOW-MOD CEMENTATION dry			0	0	218 232	1506 hrs 1509
20	3	17-20		TOB 16'						hard drilling
25										
30										
35										
40										

Comments: HAB25 SENT TO lab FOR TPH, BTEX GW NOT ENCOUNTERED  
BH ROUTED TO SURFACE AUGER REFUSAL AT 15'-16'

Geologist Signature H. Bradbury





FIELD SERVICES LABORATORY  
ANALYTICAL REPORT  
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	HAB25	980627
MTR CODE   SITE NAME:	73284	Paul Hall #1
SAMPLE DATE   TIME (Hrs):	9/8/98	1509
PROJECT:	Phase II Drilling	
DATE OF TPH EXT.   ANAL.:	9/15/98	9/17/98
DATE OF BTEX EXT.   ANAL.:	9/14/98	9/14/98
TYPE   DESCRIPTION:	VG	SOIL

Field Remarks: 15-16'

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.5	MG/KG				
TOLUENE	0.51	MG/KG				
ETHYL BENZENE	<0.5	MG/KG				
TOTAL XYLENES	3.31	MG/KG				
TOTAL BTEX	3.82	MG/KG				
TPH (MOD.8015)	68	MG/KG				
HEADSPACE PID	232	PPM				
PERCENT SOLIDS	88.4	%				

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

The Surrogate Recovery was at 96.7 % for this sample All QA/QC was acceptable.  
ative:

DF = Dilution Factor Used

Approved By: John L. Linder

Date: 10/1/98