

EL PASO FIELD SERVICES  
DEPUTY OIL & GAS INSPECTOR  
**PRODUCTION PIT CLOSURE**

DEC 21 1998

MKL #5A  
Meter/Line ID - 94604

RECEIVED  
JUL 2 1998

SITE DETAILS

Legals - Twn: 26 Rng: 07

Sec: 06

Unit: O

NMOCD Hazard Ranking: 20

Land Type: 4 - Fee

Operator: LOUIS DREYFUS NATURAL GAS

OIL CON. DIV.  
DIST. 3  
Pit Closure Date: 07/22/94

**RATIONALE FOR RISK-BASED CLOSURE:**

The above mentioned production pit was assessed and ranked according to the criteria in the New Mexico Conservation Division's Unlined Surface Impoundment Closure Guidelines.

The primary source, discharge to the pit, has been removed. There has been no discharge to the production pit for at least five years and the pit has been closed for at least three years.

The production pit has been remediated to the practical extent of the trackhoe or to the top of bedrock. Initial laboratory analysis has indicated that the soil remaining at the bottom of the excavation is above standards based on the hazard ranking score. Contaminated soil was removed and transported to an approved landfarm for disposal. The initial excavation was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching any residual hydrocarbons remaining in the soil. Therefore, further mobility of residual hydrocarbons is unlikely.

Since the soil samples from the initial excavation were above standards, a test boring was drilled and a sample was collected to evaluate the vertical extent of impact to soils. Test boring sample results indicated soils below standards beneath the original excavation.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All source material has been removed from the ground surface, eliminating potential direct contact with livestock and the general public.
- Groundwater was not encountered in the initial excavation or test boring; therefore, impact to groundwater is unlikely.
- Soil samples collected beneath the initial excavation were below standards.
- No potential receptors are within 1,000 feet of the site.
- Residual hydrocarbons remaining in the soil at the bottom of the initial excavation will naturally degrade in time with minimal risk to the environment.

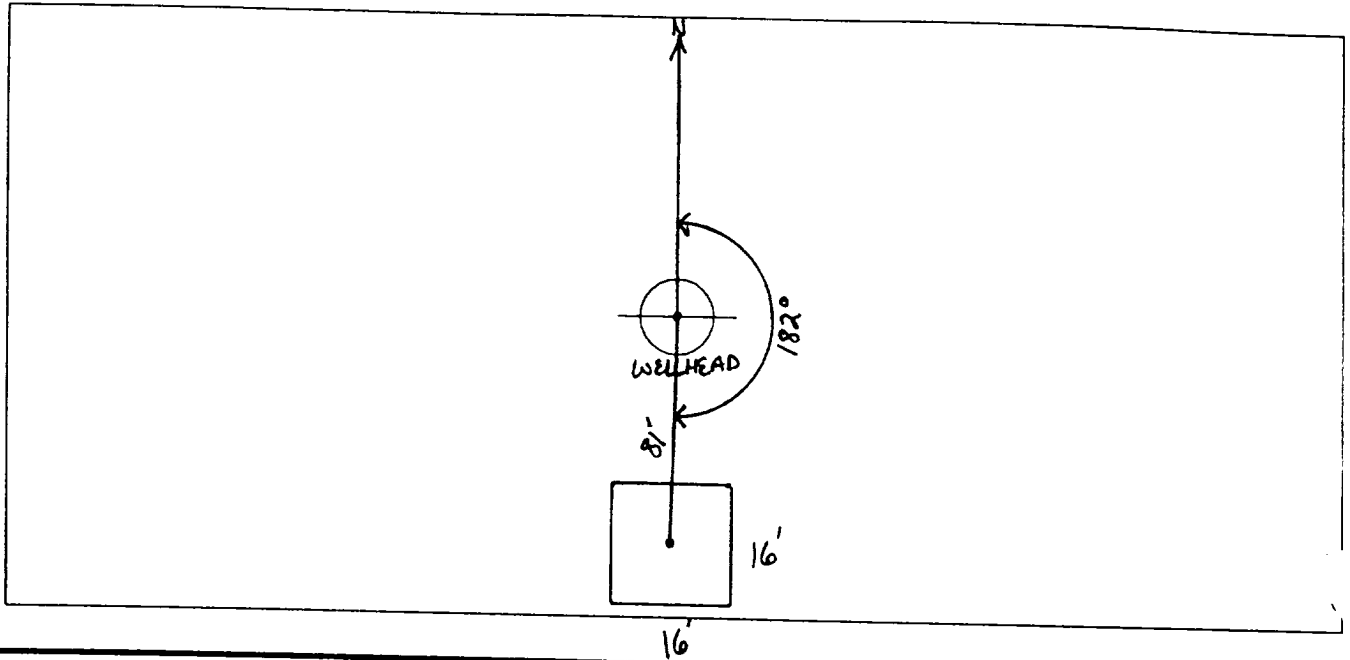
# FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94604</u> Location: <u>MKL #SA</u></p> <p>Operator #: <u>0448</u> Operator Name: <u>LOUIS DREYFUSP/L</u> District: <u>BALLARD</u></p> <p>Coordinates: Letter: <u>0</u> Section <u>6</u> Township: <u>26</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>6.15.94</u> Area: <u>07</u> Run: <u>51</u></p>
SITE ASSESSMENT	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> <p><b>Land Type:</b> BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3) Indian _____</p> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p><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)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>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)</p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only) <input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE: <u>20</u> POINTS</b></p>
REMARKS	<p>Remarks: <sup>6.15.94</sup> <u>TWO PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY.</u>  <u>LOCATION IS EAST OF HEIFER CANYON AND A LITTLE SOUTH OF LARBO WASH.</u>  <u>REDLINE AND TOPO CONFIRMED LOCATION IS INSIDE V.2.</u></p>

DIG & HAZARD

### ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 182° Footage from Wellhead 81'  
b) Length : 16' Width : 16' Depth : 2'



### REMARKS :

TOOK PICTURES AT 3:00 P.M.

END DUMP

Completed By:

Robert Thompson

Signature

6-15-94

Date

# **PHASE I EXCAVATION**

# FII ) PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94604 Location: MKL # 5A  
 Coordinates: Letter: O Section 6 Township: 26 Range: 7  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Date Started : 7-22-94 Area: 07 Run: 51 7/25/94 BR

FIELD OBSERVATIONS

Sample Number(s): KP144  
 Sample Depth: 7' Feet  
 Final PID Reading 234 PID Reading Depth 7' Feet  
 Yes No  
 Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth \_\_\_\_\_ Feet

CLOSURE

Remediation Method :  
 Excavation ☒ (1) Approx. Cubic Yards 20  
 Onsite Bioremediation ☐ (2)  
 Backfill Pit Without Excavation ☐ (3)  
 Soil Disposition:  
 Envirotech ☒ (1) ☐ (3) Tierra  
 Other Facility ☐ (2) Name: \_\_\_\_\_  
 Pit Closure Date: 7-22-94 Pit Closed By: B.E.I

REMARKS

Remarks : Some Line marker. Started Remediating to 12'  
At 7' Hit SAND STONE.

Signature of Specialist: Kelly Padilla



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT  
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 144	945753
MTR CODE   SITE NAME:	94604	N/A
SAMPLE DATE   TIME (Hrs):	7-22-94	1108
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	7-26-94	7-26-94
DATE OF BTEX EXT.   ANAL.:	7/27/94	7/28/94
TYPE   DESCRIPTION:	VC	Dark Brown Sand + clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	1.5	MG/KG	10			
TOLUENE	28	MG/KG	10			
ETHYL BENZENE	4.1	MG/KG	10			
TOTAL XYLENES	5.5	MG/KG	10			
TOTAL BTEX	89	MG/KG				
TPH (418.1)	7150	MG/KG			0.56	28
HEADSPACE PID	234	PPM				
PERCENT SOLIDS	87.8	%				

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

The Surrogate Recovery was at 78 % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached.

DF = Dilution Factor Used

Approved By:

AS

Date:

8/12/94

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*                               *
*      Test Method for          *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil       *
*                               *
*      Perkin-Elmer Model 1600 FT-IR                    *
*      Analysis Report      *
*****

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94/07/26 13:30

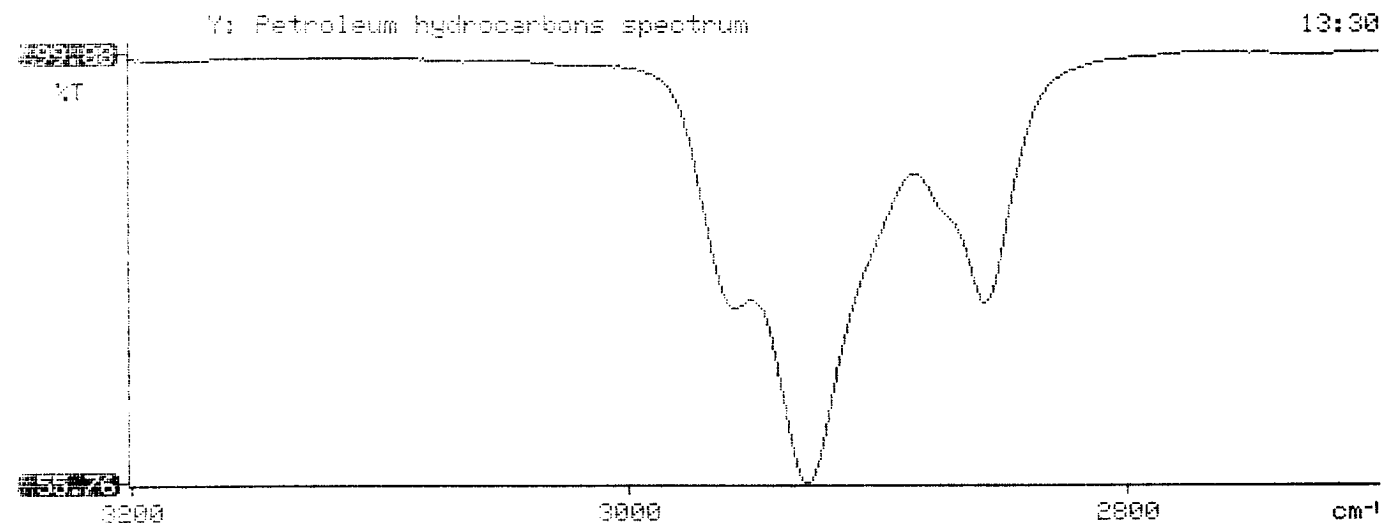
% Sample Identification  
745753

% Initial mass of sample, g  
0.560

% Volume of sample after extraction, ml  
28.000

% Petroleum hydrocarbons, ppm  
7149.218

% Net absorbance of hydrocarbons (2930 cm<sup>-1</sup>)  
0.252





Analytical **Technologies, Inc.**

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

ATI I.D. 407410

July 29, 1994

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





Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 07/27/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples 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.

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

  
Letitia Krakowski, Ph.D.  
Project Manager

  
H. Mitchell Rubenstein, Ph.D.  
Laboratory Manager

MR:jt

Enclosure





Analytical **Technologies**, Inc.

## GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)  
CLIENT : EL PASO NATURAL GAS CO.      ATI I.D.: 407410  
PROJECT # : 24324  
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945753	NON-AQ	07/22/94	07/27/94	07/28/94	10
08	945754	NON-AQ	07/22/94	07/27/94	07/28/94	1
09	945755	NON-AQ	07/22/94	07/27/94	07/28/94	10
PARAMETER			UNITS	07	08	09
BENZENE			MG/KG	1.5	<0.025	0.49
TOLUENE			MG/KG	28	0.042	33
ETHYLBENZENE			MG/KG	4.1	<0.025	10
TOTAL XYLENES			MG/KG	55	<0.025	130

### SURROGATE:

BROMOFLUOROBENZENE (%)	78	80	87
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# PHASE II

# RECORD OF SUBSURFACE EXPLORATION

Burlington Environmental Inc.  
4000 Monroe Road  
Farmington, New Mexico 87401  
(505) 326-2262 FAX (505) 326-2388

Borehole # BH-1  
Well #  
Page 1 of 1

Project Name EPNG PITS  
Project Number 14509 Phase 6000.77  
Project Location MKA #5A 94404

Elevation  
Borehole Location Letter O-S6-T24-R7  
GWL Depth  
Logged By J.F. LaBarbera  
Drilled By K. Padilla M. Donahue  
Date/Time Started 7/31/95 - 1431  
Date/Time Completed - 1158

Well Logged By J.F. LaBarbera  
Personnel On-Site K. Padilla, F. Rivera, D. Charlie  
Contractors On-Site M. Donahue, J. O'Keefe, D. Galt  
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			Drilling Conditions & Blow Counts
0										
5										
10	1	10-11	11	Brown, fine to coarse, SANDY STONE, poorly cemented, dry, odor	X		9	52	<del>506</del> 189	1041
15										
20	2	18-18.25	4	AA			4	71	<del>323</del> 325	1103
25	3	23-24	11	AA, little silt, sl. odor			0	75	<del>65</del> 106	1109
30	4	28-28.33	4	AA, trace silt			0	46	<del>27</del> 1.1	1117
35				TOB at 28.33'						
40										

Comments:

Sample JPL 34 from 28-28.33' sent to lab for BTEX/TPH analysis.

Geologist Signature

*John LaBarbera*



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

Phase II Drilling  
MKL #5A  
(28-28.33')

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JFL 34	947110
MTR CODE   SITE NAME:	94604	N/A
SAMPLE DATE   TIME (Hrs):	07/31/95	11:17
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	8-1-95	8-1-95
DATE OF BTEX EXT.   ANAL.:	8-3-95	8-4-95
TYPE   DESCRIPTION:	V6	Polown Course Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	RLB 8/1/95 4342.5	MG/KG			1.90	28
HEADSPACE PID	27	PPM				
PERCENT SOLIDS	95.2	%				

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

The Surrogate Recovery was at 92 % for this sample All QA/QC was acceptable.  
Narrative:

AT1 Results attached.

DF = Dilution Factor Used

Approved By:

Date:

8/22/95

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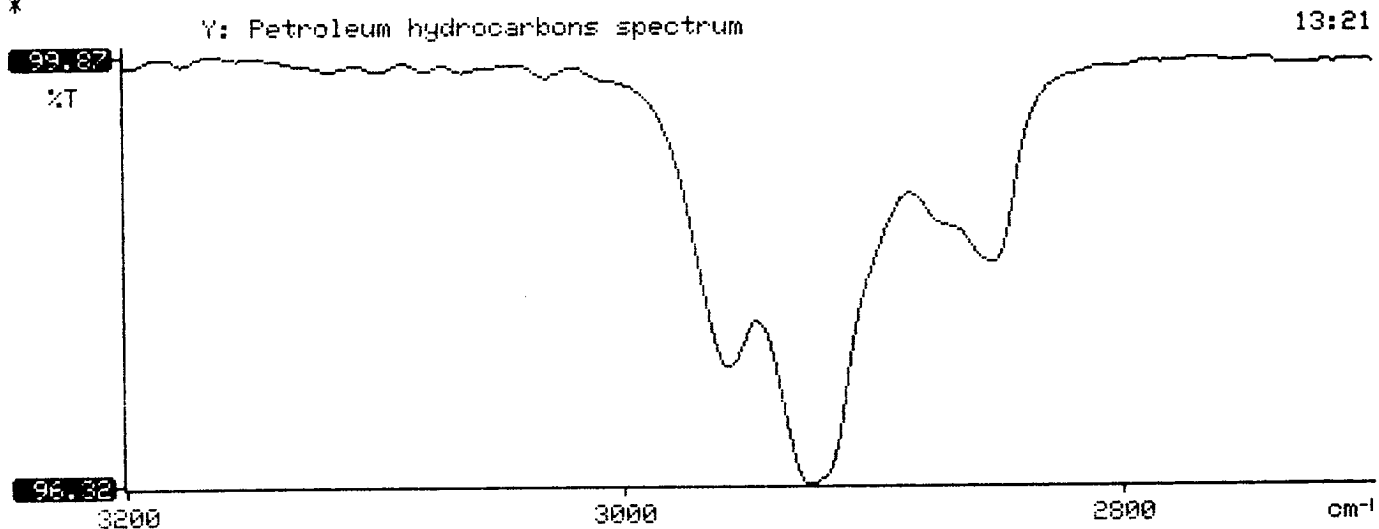
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*                               *
*      Test Method for         *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil      *
*                               *
*      Perkin-Elmer Model 1600 FT-IR                  *
*      Analysis Report                                *
*                               *
*****

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* 95/08/01 13:21
*
* Sample identification
* 947110
*
* Initial mass of sample, g
* 1.980
*
* Volume of sample after extraction, ml
* 28.000
*
* Petroleum hydrocarbons, ppm
* 42.547
* Net absorbance of hydrocarbons (2930 cm-1)
* 0.015
*
*
*

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Analytical **Technologies**, Inc.

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

ATI I.D. 508322

August 8, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I & II 24324

Attention: John Lambdin

On 08/03/95, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples 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.

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

Kimberly D. McNeill  
Project Manager

MR:jt

Enclosure

H. Mitchell Rubenstein, Ph.D.  
Laboratory Manager



# GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)  
 CLIENT : EL PASO NATURAL GAS ATI I.D.: 508322  
 PROJECT # : 24324  
 PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	947108	NON-AQ	07/31/95	08/03/95	08/04/95	1
02	947109	NON-AQ	07/31/95	08/03/95	08/04/95	1
03	947110	NON-AQ	07/31/95	08/03/95	08/04/95	1
PARAMETER			UNITS	01	02	03
BENZENE			MG/KG	<0.025	<0.025	<0.025
TOLUENE			MG/KG	0.029	<0.025	<0.025
ETHYLBENZENE			MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES			MG/KG	0.059	<0.025	<0.025

## SURROGATE:

BROMOFLUOROBENZENE (%) 92 94 92