EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

RECEIVED
JUL 2 1999
OIL CON. DIV.

SAN JUAN 28-7 UNIT #113
Meter/Line ID - 90597

SITE DETAILS

Legals - Twn: 27 **Rng:** 07 **Sec:** 18 **Unit:** A
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 07/08/94**

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.

J:\18954\rbc

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 90597 Location: San Juan 28-7 Unit 113
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: A Section 18 Township: 27 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ✓ Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6/6/94 Area: 03 Run: 32

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 Smith 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-Inside, Vulv-Inside
3pits. Closed Pit Dry

DIG+HAUL

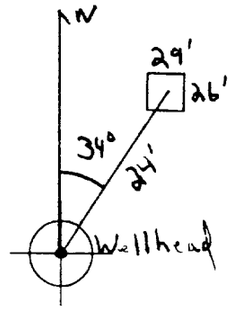
(SF3190) 04/08/94

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 34° Footage from Wellhead 24'

b) Length : 29' Width : 26' Depth : 4'



REMARKS

Remarks :

Pictures @ 1144 (20-23)

End Dump

Completed By:

Cory Chase
Signature

6/6/94
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 90597 Location: SAN JUAN 28-7 UNIT 113

Coordinates: Letter: A Section 18 Township: 27 Range: 7

Or Latitude _____ Longitude _____

Date Started : 7-8-94 Area: 03 Run: 32

FIELD OBSERVATIONS

Sample Number(s): KP 120 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 997 PID Reading Depth 12' Feet

	Yes	No	
Groundwater Encountered	☐ (1)	☒ (2)	Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 230
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

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

Pit Closure Date: 7-8-64 Pit Closed By: B.E.T

REMARKS

Remarks : Some Line markers on location. Started Remediating To 12' Soil Turned dark Black with a smell. At 12' soil Still the same PID. Closed Pit.

Signature of Specialist: Kelly Padilla

(SP3191) 04/07/

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 120	945616
MTR CODE | SITE NAME:	90597	N/A
SAMPLE DATE | TIME (Hrs):	7-8-94	1150
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-12-94	7/12/94
DATE OF BTEX EXT. | ANAL.:	7/14/94	7/16/94
TYPE | DESCRIPTION:	VC	Brown Clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	1.6	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	16	MG/KG	1			
TOTAL BTEX	18	MG/KG				
TPH (418.1)	116	MG/KG			2.17	28
HEADSPACE PID	997	PPM				
PERCENT SOLIDS	87.4	%				

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

The Surrogate Recovery was at 103 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: Date: 8/8/94

Test Method for
[illegible] Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

[illegible]

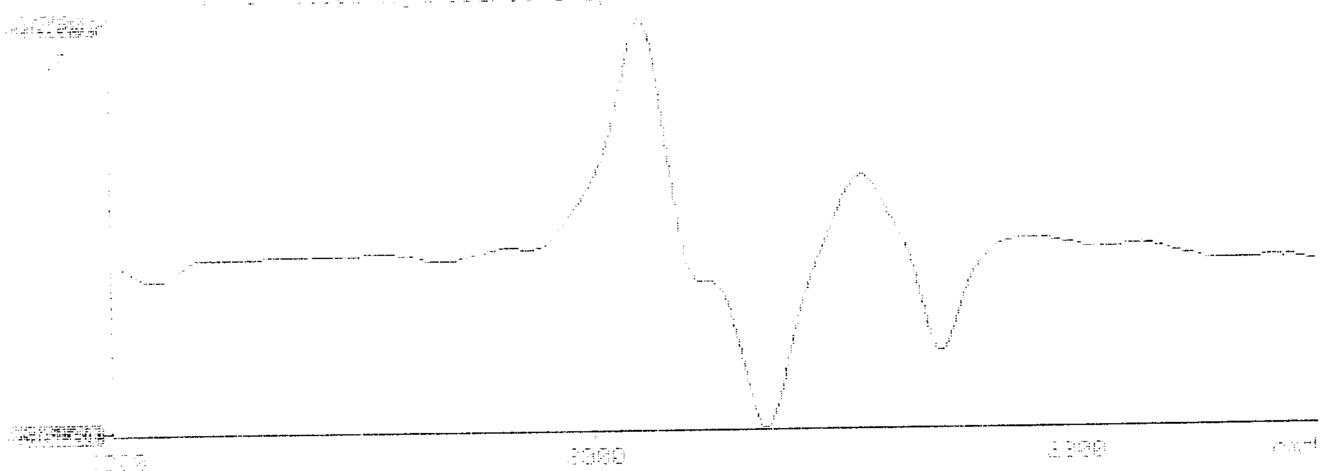
Sample Identification
[illegible]

[illegible] mass of sample, [illegible]
[illegible]

Volume of sample after extraction, ml
[illegible]

Petroleum hydrocarbons, ppm
[illegible]
Net absorbance of hydrocarbons (2930 cm-1)
[illegible]

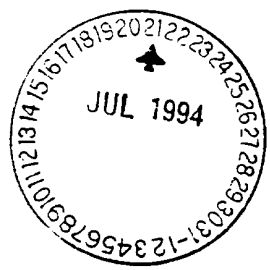
Petroleum hydrocarbons spectrum 09:17



Analytical Technologies, Inc.

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

ATI I.D. **407346**



July 20, 1994

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

Project Name/Number: PIT CLOSURE 24321

Attention: John Lambdin

On **07/13/94**, 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.

Samples were run by either internal or external surrogate method. The following samples were run by internal surrogate method: 02, 03, 05, 08, 09, 10, and 12.

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.: 407346

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945616	NON-AQ	07/08/94	07/14/94	07/16/94	1
08	945617	NON-AQ	07/08/94	07/14/94	07/16/94	2
09	945618	NON-AQ	07/08/94	07/14/94	07/16/94	5

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	<0.025	<0.05	<0.13
TOLUENE	MG/KG	1.6	0.11	11
ETHYLBENZENE	MG/KG	<0.025	0.14	3.9
TOTAL XYLENES	MG/KG	16	1.3	63
SURROGATE:				
BROMOFLUOROBENZENE (%)		103	118*	72

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

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 San Juan 28-7 Unit 113 90597

Elevation
Borehole Location QA - S18 - T27 - R7
GWL Depth
Logged By CM CHANCE
Drilled By ~~K Padilla~~ S. Snider
Date/Time Started 9/6/95 - 1255
Date/Time Completed 9/6/95 - 1445

Well Logged By CM Chance
Personnel On-Site ~~K Padilla~~ D. Roberts H. Keil
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	HS	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15	1	15-17	14"	Br silty SAND, vF-F sand, v dense dry Br sandy CLAY, vF sand, stiff, med plastic			8	190	950 / 1203	-1403 hr
20	2	20-20.5	5"	lt grey silty SAND, vF sand, v. dense, sl moist			0	220	1092 / 1128	-1410
25	3	24-24.5	4"	lt br SANDSTONE, F-med sand, to coarse, TOB 24.5'			3	180	871 / 158	-Hard drlg -Refusal @ 24' -1442
30										
35										
40										

Comments: CMC 101 (24-24.5') sent to lab (BTEX, TPH). Samples bagged & iced prior to containerization. Refusal @ 24.5'. BH grouted to surface

Geologist Signature Cory Chance

8/23/95\DRILLOG1.XLS

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 101	94 7410
MTR CODE | SITE NAME:	90597	San Juan 28-7 Unit 113
SAMPLE DATE | TIME (Hrs):	09-06-95	1422
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-8-95	
DATE OF BTEX EXT. | ANAL.:	9/8/95	9/11/95
TYPE | DESCRIPTION:	VG	LIGHT BROWN SAND & CLAY

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	57.8	MG/KG			2.01	28
HEADSPACE PID	158	PPM				
PERCENT SOLIDS	93.9	%				

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

The Surrogate Recovery was at 87% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-13-95

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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                     *
**********************************************************
*
 95/09/08   15:14
*
*  Sample identification
 947410
*
*  Initial mass of sample, g
 2.010
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 57.840
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.017
*
*
*
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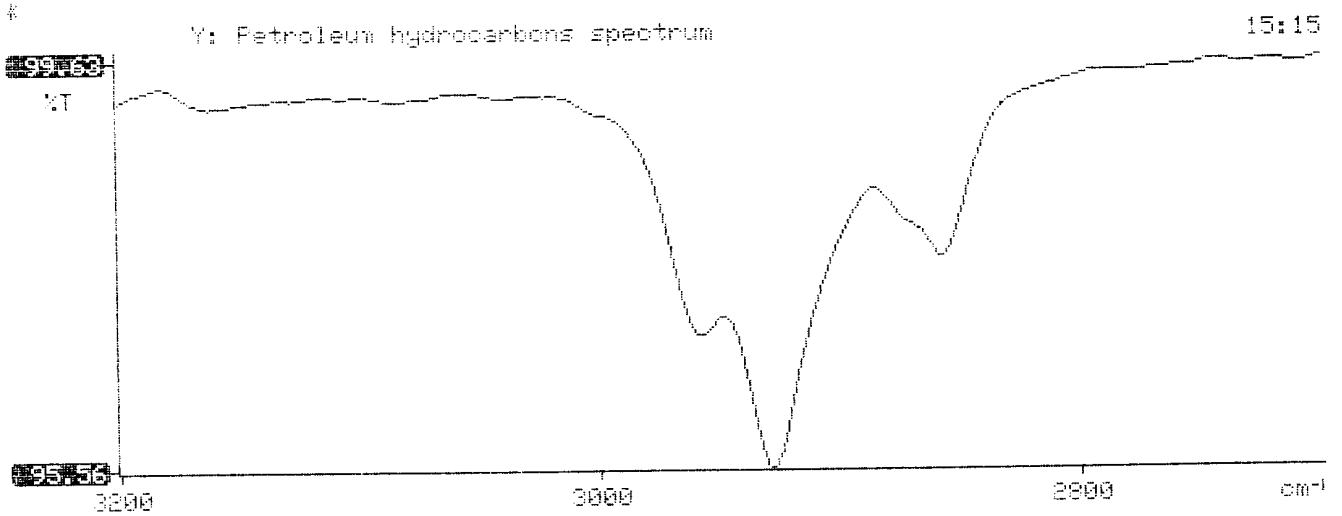

BTEX SOIL SAMPLE WORKSHEET

File	947410	**Date Printed**	9/12/95
Soil Mass (g)	5.25	**Multiplier (L/g)**	0.00095
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19048

			Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.476
Toluene (ug/L)	0.91	**Toluene (mg/Kg):**	**0.173**	0.476
Ethylbenzene (ug/L)	0.59	**Ethylbenzene (mg/Kg):**	**0.112**	0.476
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	0.952
o-xylene (ug/L)	1.28	o-xylene (mg/Kg):	0.244	0.476
		Total xylenes (mg/Kg):	**0.244**	1.429
		Total BTEX (mg/Kg):	**0.530**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\091195-1.012
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947410,5.25G,100U
Acquired : Sep 12, 1995 00:44:48
Printed : Sep 12, 1995 01:11:09
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.410	0	0.0000
a,a,a TFT	4.957	3025330	87.6072
TOLUENE	6.780	428714	0.9055
ETHYLBENZENE	10.533	56559	0.5934
M & P XYLENE	10.887	676682	-1.6854
O XYLENE	11.943	72740	1.2783
BFB	13.427	52262732	87.2133