Denny & Jeff
DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Approved

RECEIVED
JUL 2 1998
OIL CON. DIV.

SAN JUAN 29-6 UNIT #68
Meter/Line ID - 73117

SITE DETAILS

Legals - Twn: 29 **Rng:** 06 **Sec:** 29 **Unit:** A
NMOCD Hazard Ranking: 50 **Land Type:** 4 - Fee
Operator: PHILLIPS PETROLEUM COMPAN **Pit Closure Date: 06/23/94**

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.
- 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

5

GENERAL

Meter: 73117 Location: San Juan 29-6 unit # 68
Operator #: Phillips Operator Name: 7035 P/L District: Bloomfield
Coordinates: Letter: A Section 29 Township: 29 Range: 6
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6-6-94 Area: 10 Run: 61

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 Gobernador 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: 50 **POINTS**

REMARKS

Remarks : one pit with tank on one end. Dry

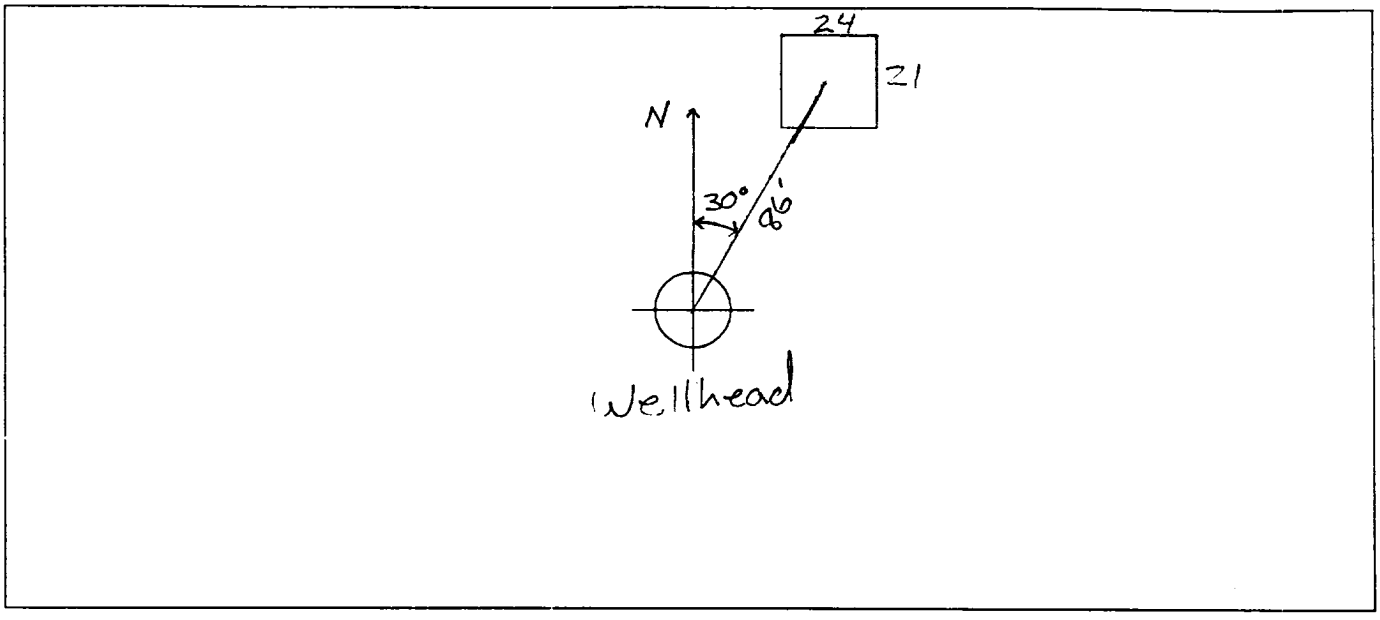
Location inside V.Z. on Redline of TOPO DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 30 Footage from Wellhead 86

b) Length : 24 Width : 21 Depth : 3



REMARKS

Remarks : Photos - 1340 hrs

End Dump

Completed By:

Signature

6-6-94

Date

PHASE I EXCAVATION

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 114	945504
MTR CODE | SITE NAME:	73117	N/A
SAMPLE DATE | TIME (Hrs):	6-23-94	1220
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6/27/94	6/27/94
DATE OF BTEX EXT. | ANAL.:	6/28/94	6/28/94
TYPE | DESCRIPTION:	VC	Brown Sand/Clay

REMARKS: Split. Rerun TPH 7/19 = 704 mg/Kg

RESULTS

6/29, 6/3

PARAMETER	RESULT	UNITS	QUALIFIERS DF	Q	M(g)	V(ml)	ATI Result
BENZENE	<0.048	MG/KG					<0.1
TOLUENE	0.147	MG/KG					<0.1
ETHYL BENZENE	0.184	MG/KG					0.38
TOTAL XYLENES	5.91	MG/KG					12
TOTAL BTEX	6.29	MG/KG	0.00966		2.07	20	13
TPH (418.1)	161	MG/KG			2.11	28	1000
HEADSPACE PID	698	PPM					6/29
PERCENT SOLIDS	87.1	%					

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

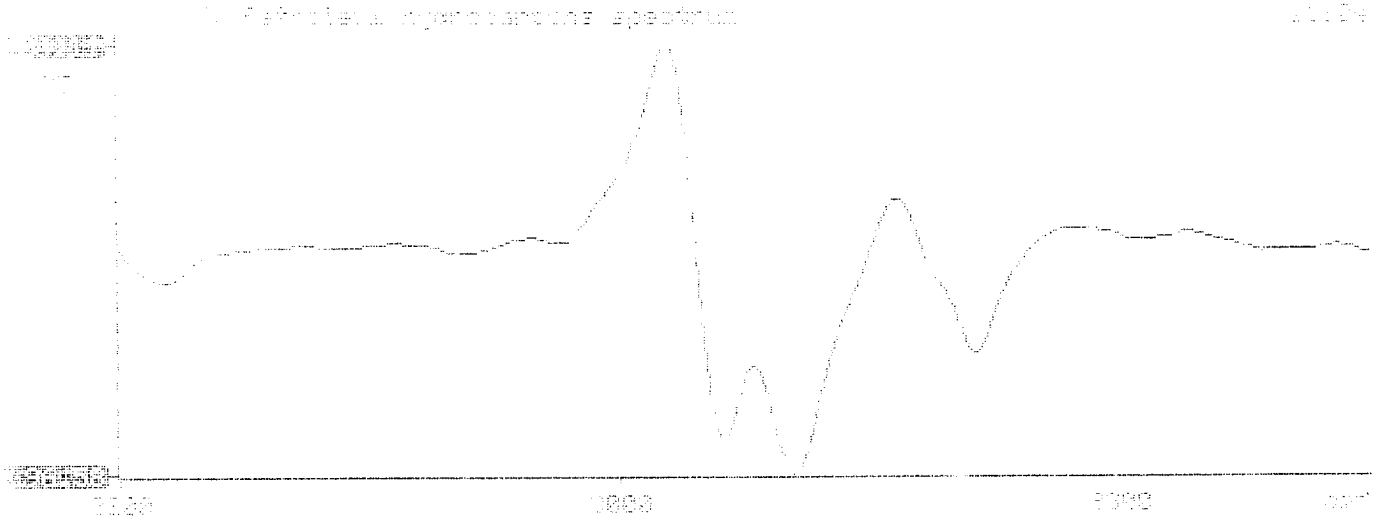
SR=94%

The Surrogate Recovery was at 173 % for this sample All QA/QC was acceptable. DF=5

Narrative:
Surrogate recovery was outside EPNG QC limits due to matrix interference. ATI results attached.

DF = Dilution Factor Used

Approved By: _____ Date: 7/17/94



Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

Analyst: [illegible]

1. Sample Identification
Barge04

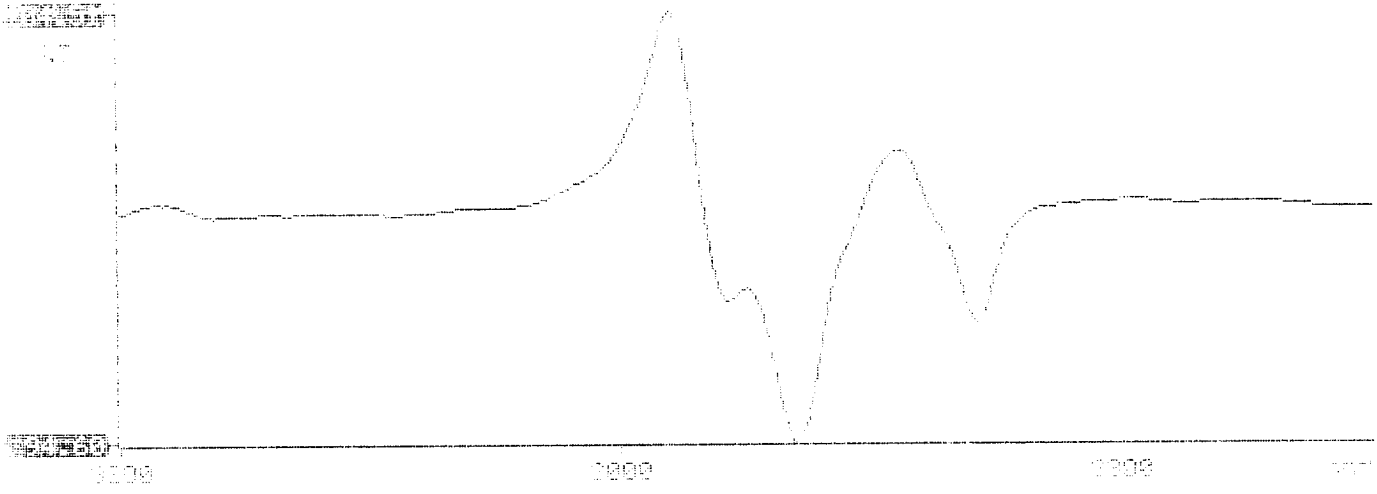
2. Initial mass of sample, g
2.110

3. Volume of sample after extraction, ml
[illegible]100

4. Petroleum hydrocarbons, ppm
[illegible]6

5. Net absorbance of hydrocarbons (2930 cm-1)
0.024

6. Petroleum hydrocarbons spectrum



File : BETX__05.D01 945504 MTR 73117 John Lambdin
Run : 01 Type : Sample
Path : C:\CHROM
Collection : 14:41:52 Jun 28 1994 Meth(A): BETX [14:01:22 Jun 28 1994]
Integration: 14:41:52 Jun 28 1994 Meth(A): BETX [14:01:22 Jun 28 1994]
Report : 15:08:01 Jun 28 1994 Meth(A): BETX [14:01:22 Jun 28 1994]

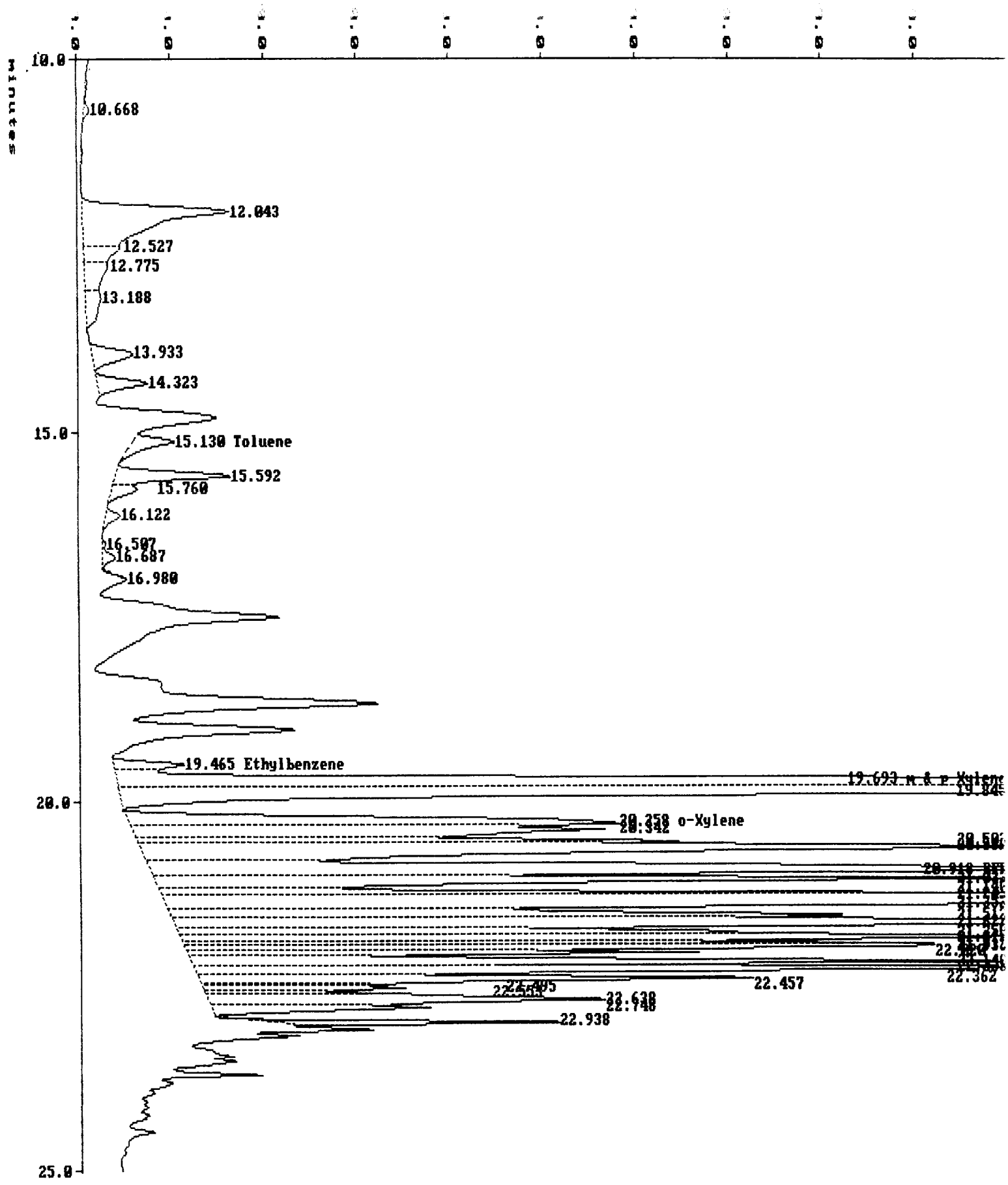
Sample Amt : 1.00000e+0 Dilution: 2.00000e+0

EXTERNAL STANDARD (AREA)

RT	Area	BC	ExpRT	RF		ug/L	Name
			10.282	8.44764e-6		15ug/L	Benzene
10.668	89418			0.00000e+0		0.0000	Unknown
12.043	5867359	T		0.00000e+0		0.0000	Unknown
12.527	870698	T		0.00000e+0		0.0000	Unknown
			12.648	1.69506e-4		147.6	a,a,a TFT
12.775	914402	T	1.69506e-4	0.00000e+0		0.0000	Unknown
13.188	750253	V		0.00000e+0		0.0000	Unknown
13.933	992355	T		0.00000e+0		0.0000	Unknown
14.323	926449			0.00000e+0		0.0000	Unknown
15.130	798296	V	15.174	9.54784e-6	1.62	15.2440	Toluene
15.591	1854409	T		0.00000e+0		0.0000	Unknown
15.760	491274	V		0.00000e+0		0.0000	Unknown
16.122	264867	V		0.00000e+0		0.0000	Unknown
16.506	42589	T		0.00000e+0		0.0000	Unknown
16.686	223931	V		0.00000e+0		0.0000	Unknown
16.980	35345			0.00000e+0		0.0000	Unknown
19.465	1027289	T	19.446	9.27050e-6	9.52	19.0470	Ethylbenzene
19.693	26767184	T	19.679	8.59200e-6	230.0	459.9673	m & p-Xylene
19.845	18641596	V		0.00000e+0		0.0000	Unknown
20.258	8205885	T	20.253	9.24567e-6	75.9	151.7378	o-Xylene
20.342	7443567	T		0.00000e+0		0.0000	Unknown
20.502	4611243	T		0.00000e+0		0.0000	Unknown
20.582	15423701	T		0.00000e+0		0.0000	Unknown
20.918	18409742	T	20.869	4.71034e-6		173.4324	BFB
21.033	9562735	T		0.00000e+0		0.0000	Unknown
21.140	485082	T		0.00000e+0		0.0000	Unknown
21.243	6279505	T		0.00000e+0		0.0000	Unknown
21.352	35172996	T		0.00000e+0		0.0000	Unknown
21.513	7244501	T		0.00000e+0		0.0000	Unknown
21.622	20556628	T		0.00000e+0		0.0000	Unknown
21.758	5111490	T		0.00000e+0		0.0000	Unknown
21.815	9955620	T		0.00000e+0		0.0000	Unknown
21.912	4061482	T		0.00000e+0		0.0000	Unknown
21.933	5624007	T		0.00000e+0		0.0000	Unknown
22.020	3555513	T		0.00000e+0		0.0000	Unknown
22.148	7870083	T		0.00000e+0		0.0000	Unknown
22.235	12082004	T		0.00000e+0		0.0000	Unknown
22.361	5715784	T		0.00000e+0		0.0000	Unknown
22.457	510274	T		0.00000e+0		0.0000	Unknown
22.495	1291749	T		0.00000e+0		0.0000	Unknown
22.553	897654	T		0.00000e+0		0.0000	Unknown
22.638	5185951	T		0.00000e+0		0.0000	Unknown
22.748	1927254	V		0.00000e+0		0.0000	Unknown
22.938	1389221	V		0.00000e+0		0.0000	Unknown

7/11/94

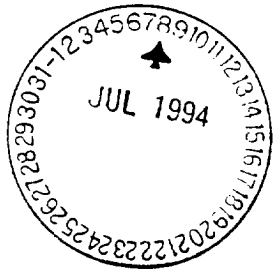
(BETX__05.D01) mV


Minutes
10.0
15.0
20.0
25.0
10.668
12.043
12.527
12.775
13.188
13.933
14.323
15.130 Toluene
15.592
15.760
16.122
16.507
16.687
16.980
19.465 Ethylbenzene
o-Xylene
22.457
22.938

Analytical **Technologies,** Inc.

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

ATI I.D. **406418**



July 6, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/28/94**, 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.: 406418
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945504	NON-AQ	06/23/94	06/29/94	06/30/94	5
02	945505	NON-AQ	06/23/94	06/29/94	06/30/94	20
03	945511	NON-AQ	06/24/94	06/29/94	06/30/94	20

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.12	0.81	1.1
TOLUENE	MG/KG	<0.12	105	47
ETHYLBENZENE	MG/KG	0.38	19	8.0
TOTAL XYLENES	MG/KG	12	310	190
SURROGATE:				
BROMOFLUOROBENZENE (%)		94	107	76

Split Sample

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 406418
PROJECT #	: 24324	DATE RECEIVED	: 06/28/94
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 06/29/94

PARAMETER	UNITS	01
PETROLEUM HYDROCARBONS, IR	MG/KG	1000

EPNG Sample # 945504

Split Sample

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73117 Location: San Juan 29-6 Unit #68

Coordinates: Letter: A Section 29 Township: 29 Range: 6

Or Latitude _____ Longitude _____

Date Started : 6-22-94 Area: 10 Run: 61

FIELD OBSERVATIONS

Sample Number(s): KD114 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 698 ppm PID Reading Depth 12' Feet

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

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 220
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

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

Pit Closure Date: 6-23-94 Pit Closed By: BEI

REMARKS

Remarks : Started pit on 6-22-94, Continued Excavation on 6-23-94 Excavated pit to 12', took PID Sample, Closed pit

Signature of Specialist: Kerry Dawn

(SP3191) 04/07/94

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 2

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 29-6 Unit #68
73117

Elevation
Borehole Location T 29, R 6, S 29, A
GWL Depth
Logged By Jeff W. Kindley
Drilled By G. Sudduth
Date/Time Started 08/21/95 1015
Date/Time Completed 08/21/95 1304

Well Logged By Jeff W. Kindley
Personnel On-Site G. Sudduth, 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	S/LS	Drilling Conditions & Blow Counts
0				Backfill material to 12'						
5										
10										
15										
20	1	18-20	1.7/2.0	CL, DK br CLAY, dry, Hard, low plasticity, hydrocarbon odor.					428/340	1039 47 blows per Foot
25	2	23-25	1.7/2.0	S.A.A.					260/261	1048 52 blows per Foot
30	3	28-30	1.7/2.0	S.A.A					71/271	1054 45 blows per Foot
35	4	33-35	1.7/2.0	ML, BR SILT, dry, Hard, nonplastic					320/716	1104 50 blows per Foot
40	5	38-40	1.6/2.0	CL, DK BR CLAY, dry, hard, low plasticity, hydrocarbon odor.					127/104	1114 60 blows per Foot

Comments:

Geologist Signature

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 2 of 2

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 29-6 Unit # 6

Elevation
Borehole Location T29, R6, S29, A
GWL Depth
Logged By Jeff W. Kindley
Drilled By G Suddurth
Date/Time Started 08/21/95 1015
Date/Time Completed 08/21/95 1304

7317
Well Logged By Jeff W. Kindley
Personnel On-Site G. Suddurth, D. Roberts, H Kar
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
40										
				S.A.A						
45	6	43-45	16/20						114/89	1123 45 blows per Foot
				CL, DK BR CLAY, moist very stiff, medium plasticity no odor,						
50	7	48-50	18/20						30/95	1138 30 blows per foot
				S.A.A Boring terminated at 55'						
55	8	53-55	16/20						9/22	1158 30 blows per Foot
20										
25										
30										
35										
40										

Comments: Sample collected at 53 to 55 feet and submitted for analysis of BTEX and TPH. BH grouted to the surface

Geologist Signature Jeffrey Kindley

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:	JWK 37	947290
MTR CODE | SITE NAME:	73117	San Juan 29-6 Unit #68
SAMPLE DATE | TIME (Hrs):	08/~~28~~/31/95	11:58
PROJECT:	Phase ~~II~~ PDS/22/95 Drilling	
DATE OF TPH EXT. | ANAL.:	8/22/95	8-22-95
DATE OF BTEX EXT. | ANAL.:	8/23/95	8/23/95
TYPE | DESCRIPTION:	VG	Brown Clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< .5	MG/KG				
TOLUENE	< .5	MG/KG				
ETHYL BENZENE	< .5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	PDS/22/95 ~~67~~ 66.8	MG/KG			2.17	28
HEADSPACE PID	22	PPM				
PERCENT SOLIDS	80.7	%				

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

The Surrogate Recovery was at 110 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 8/28/95

```
**********************************************************
*                    Test Method for                     *
*     Oil and Grease and Petroleum Hydrocarbons          *
*                  in Water and Soil                     *
*                                                        *
*            Perkin-Elmer Model 1600 FT-IR               *
*                  Analysis Report                       *
**********************************************************
*
 95/08/22  13:48
*
*  Sample identification
 947290
*
*  Initial mass of sample, g
 2.170
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 66.811
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.019
*
*
*
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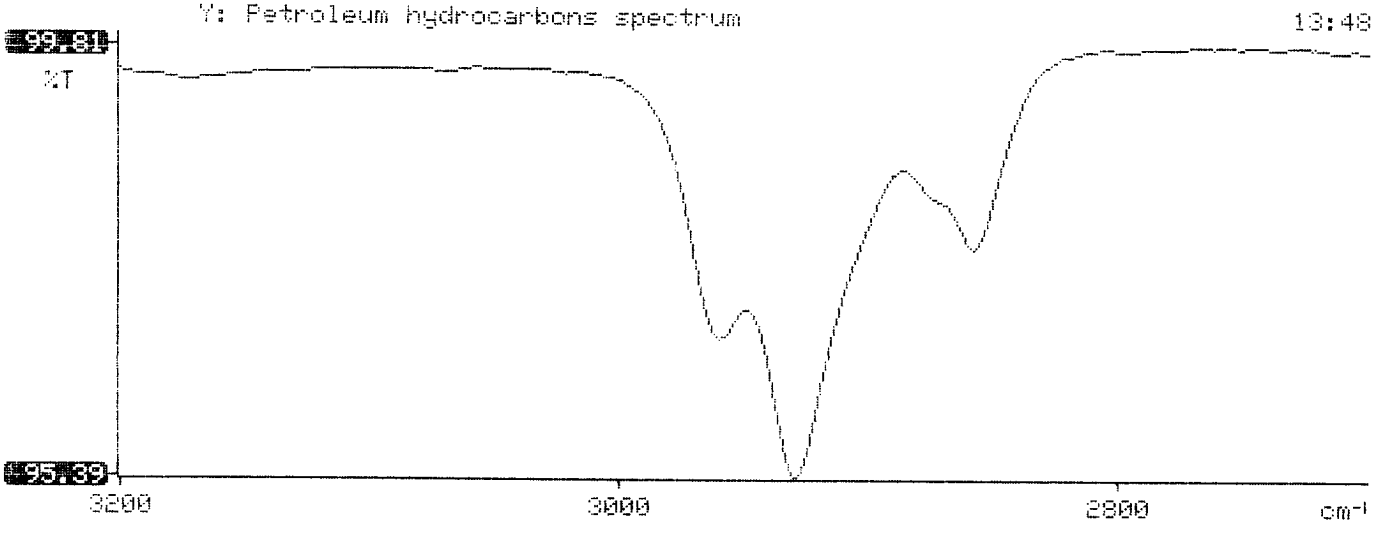

BTEX SOIL SAMPLE WORKSHEET

File	947290	**Date Printed**	8/25/95
Soil Mass (g)	4.97	**Multiplier (L/g)**	0.00101
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.20121

			Det. Limit
Benzene (ug/L)	1.52	**Benzene (mg/Kg):**	**0.306**	0.503
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.503
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.503
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	1.006
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.503
		Total xylenes (mg/Kg):	**0.000**	1.509
		Total BTEX (mg/Kg):	**0.306**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082395-1.027
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947290,4.97G,100U
Acquired : Aug 24, 1995 08:04:18
Printed : Aug 24, 1995 08:30:53
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.427	194149	1.5232
a,a,a TFT	4.950	5152903	99.0758
TOLUENE	6.887	0	0.0000
ETHYLBENZENE	10.563	57949	-0.3574
M & P XYLENE	10.907	361139	-4.1047
O XYLENE	11.963	57251	-0.2038
BFB	13.447	79107360	109.8199