EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

RECEIVED
JUL 2 1998
OIL CON. DIV.
DIST. 3

SAN JUAN 29-6 UNIT #61
Meter/Line ID - 72326

SITE DETAILS

Legals - Twn: 29 **Rng:** 06 **Sec:** 19 **Unit:** K
NMOCD Hazard Ranking: 30 **Land Type:** 4 - Fee
Operator: PHILLIPS PETROLEUM COMPAN **Pit Closure Date: 06/27/94**

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.

GENERAL

Meter: 72326 Location: San Juan 29-6 unit #61
Operator #: 7035 Operator Name: Phillips P/L District: Bloomfield
Coordinates: Letter: K Section 19 Township: 29 Range: 6W
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6-6-94 Area: 10 Run: 91

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: 30 **POINTS**

REMARKS

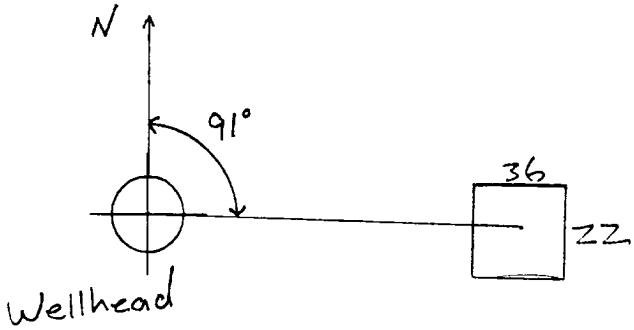
Remarks : one pit on location pit is dry
location inside VZ. on Redline & Topo
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 91 Footage from Wellhead 81

b) Length : 36 Width : 22 Depth : 2.5



REMARKS

Remarks : Photos - 1140

End Dump

Completed By:

Signature

6-6-94

Date

PHASE I
EXCAVATION

GENERAL

Meter: 72326 Location: SAN JUAN 29-6 UNIT #61

Coordinates: Letter: K Section 19 Township: 29 Range: 6W

Or Latitude _____ Longitude _____

Date Started : 6-27-94 Area: 10 Run: 91

FIELD OBSERVATIONS

Sample Number(s): KP#109 KP#110 KP#111 _____

Sample Depth: 12' Feet

Final PID Reading 230 PID Reading Depth 12' Feet

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

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 180
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

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

Pit Closure Date: 6-27-94 Pit Closed By: B.E.T

REMARKS

Remarks : Some Line markers started Remediating 12' soil TURNED DARK gray with a smell. At 12 soil still DARK gray with a smell. Bottom of Pit AND North wall still gray.

Signature of Specialist: Kelly Padilla

(SP3191) 04/07/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP109	94525
MTR CODE | SITE NAME:	72326	N/A
SAMPLE DATE | TIME (Hrs):	6-27-94	1344
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6-30-94	6/30/94
DATE OF BTEX EXT. | ANAL.:	6/30/94	6/30/94
TYPE | DESCRIPTION:	VC	fine brown sand & clay

REMARKS: split

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS				ATI Result
			DF	Q	M(g)	V(ml)	
BENZENE	<0.14	MG/KG					<0.1
TOLUENE	0.79	MG/KG					<0.1
ETHYL BENZENE	0.24	MG/KG					<0.1
TOTAL XYLENES	<0.31	MG/KG					0.0
TOTAL BTEX	1.48	MG/KG	0.0280		1.07	30	0.1
TPH (418.1)	111	MG/KG			2.33	28	<2
HEADSPACE PID	230	PPM					7/8
PERCENT SOLIDS	90.8	%					

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

The Surrogate Recovery was at 98.7 % for this sample All QA/QC was acceptable. DF = 1 SR = 97

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: _____ Date: 7/7/94

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

Perkin-Elmer Model 1600 FT-IR
Spectrometer

Sample Identification
Number

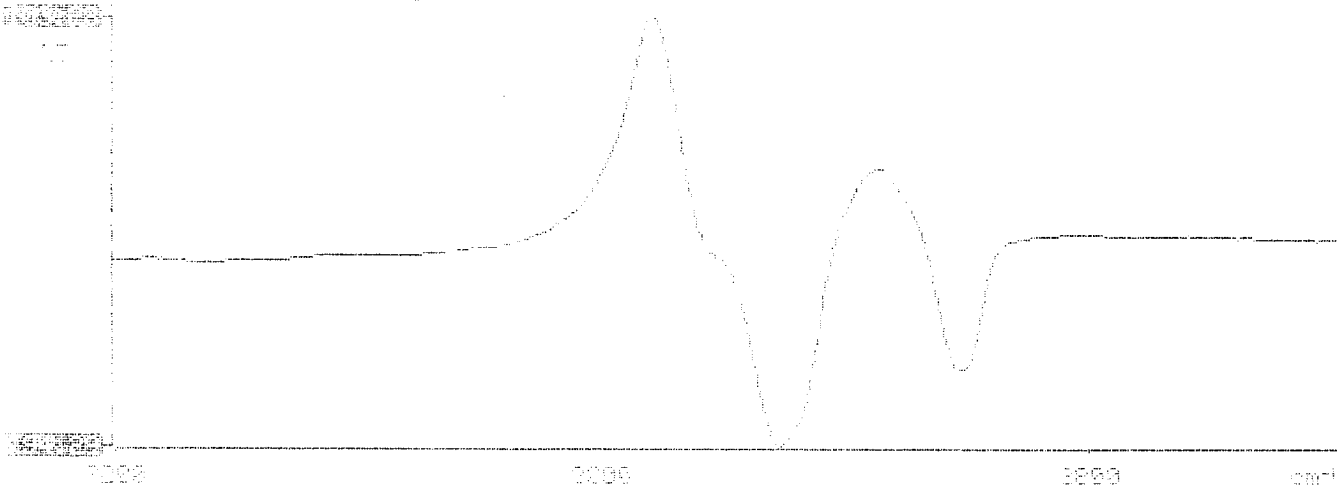
Initial mass of sample, g
1.345

Volume of sample after extraction, ml
25.000

Petroleum hydrocarbons, ppm
112.672

Net absorbance of hydrocarbons (2930 cm-1)
0.210

Petroleum hydrocarbons spectrum



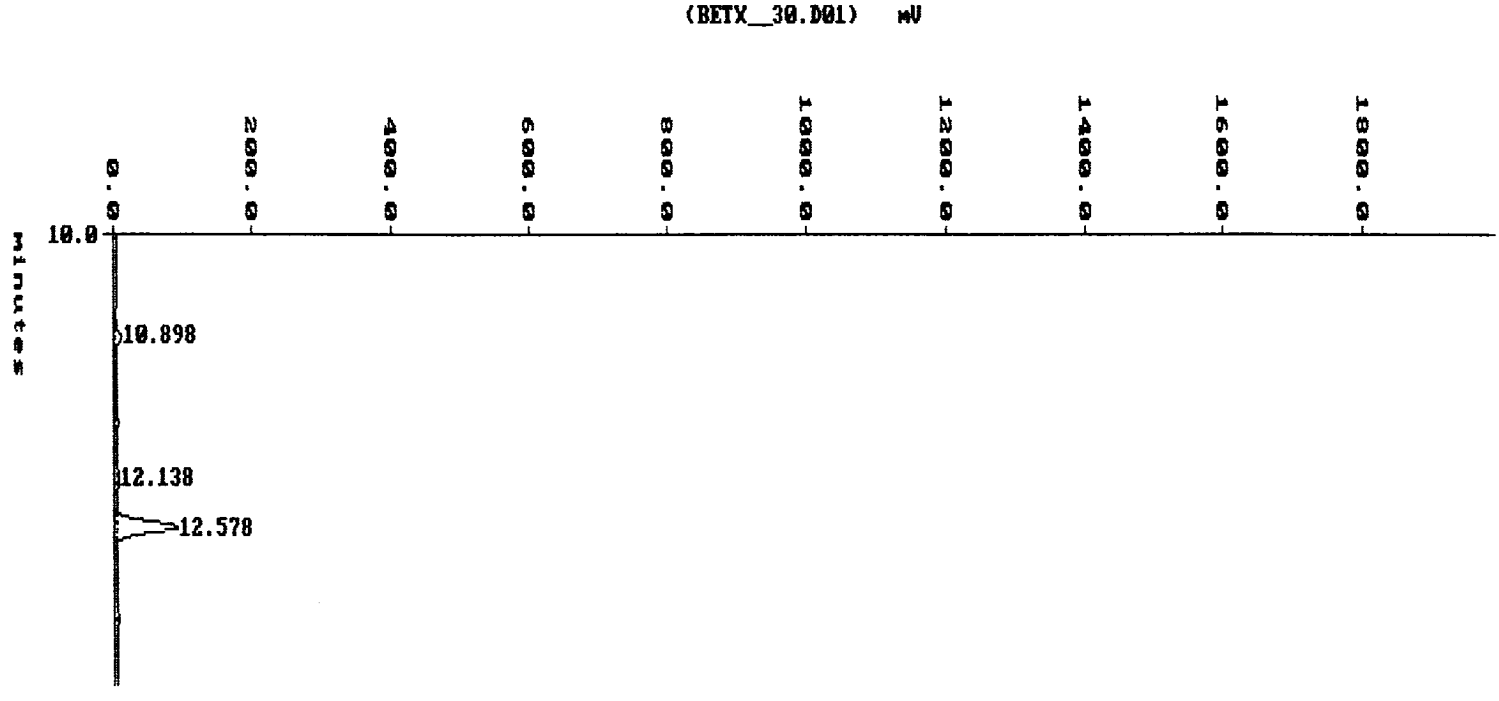
File : BETX__30.D01 945525 MTR 72326 John Lambdin
Run : 01 Type : Sample
Path : C:\CHROM
Collection : 12:18:00 Jun 30 1994 Meth(A): BETX [06:41:35 Jun 30 1994]
Integration: 12:18:00 Jun 30 1994 Meth(A): BETX [06:41:35 Jun 30 1994]
Report : 12:44:08 Jun 30 1994 Meth(A): BETX [06:41:35 Jun 30 1994]

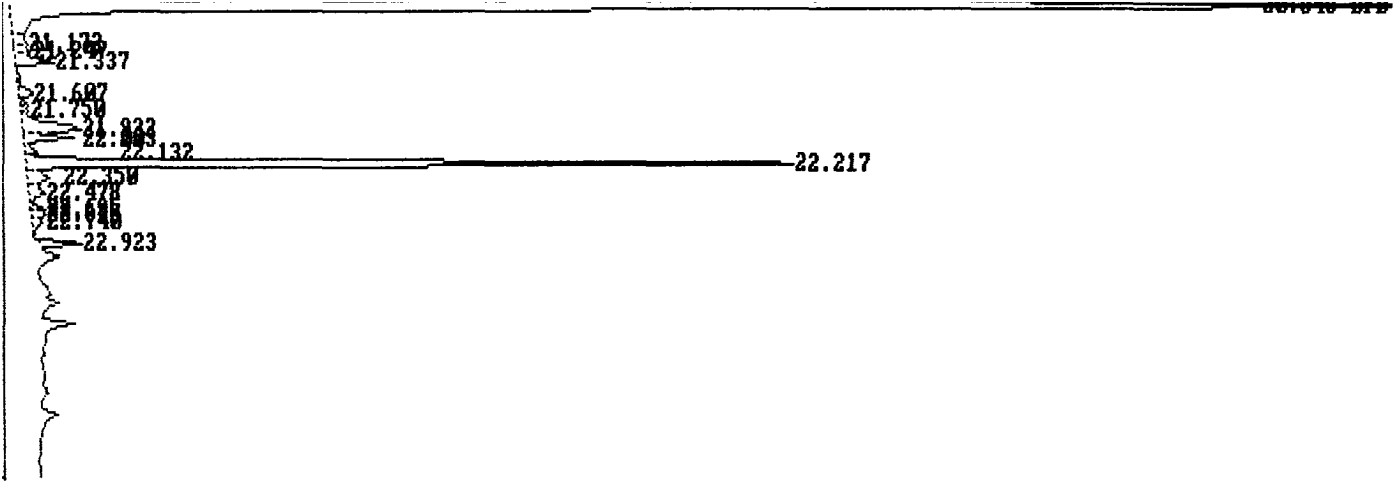
Sample Amt : 1.00000e+0 Dilution: 2.00000e+1

EXTERNAL STANDARD (AREA)

RT	Area	BC	ExpRT	RF	ug/L	Name
			10.282	8.44764e-6	<5 ug/L	Benzene
10.898	53435	T		0.00000e+0	0.0000	Unknown
12.138	49091	T		0.00000e+0	0.0000	Unknown
12.578	618049	T		0.00000e+0	0.0000	Unknown
			12.648	1.69506e-4		a,a,a TFT
15.117	66210	T	15.174	2.13377e-5	28.2555	Toluene
15.832	32465	V		0.00000e+0	0.0000	Unknown
19.433	40537	T	19.446	1.06872e-5	8.6647	Ethylbenzene
19.658	126350	T	19.679	-3.03050e-5	<5 ug/L ~~76.5806~~	m & p-Xylene
20.247	69314	T	20.253	4.37741e-6	6.0684	o-Xylene
20.848	20938272	T	20.869	4.71182e-6	98.65 1973.1453	BFB
21.172	88905	T		0.00000e+0	0.0000	Unknown
21.247	78430	T		0.00000e+0	0.0000	Unknown
21.337	194580	T		0.00000e+0	0.0000	Unknown
21.607	99782	T		0.00000e+0	0.0000	Unknown
21.750	31511	T		0.00000e+0	0.0000	Unknown
21.932	494298	T		0.00000e+0	0.0000	Unknown
22.003	183400	T		0.00000e+0	0.0000	Unknown
22.131	87210	T		0.00000e+0	0.0000	Unknown
22.217	2381450	T		0.00000e+0	0.0000	Unknown
22.350	170559	T		0.00000e+0	0.0000	Unknown
22.478	127663	T		0.00000e+0	0.0000	Unknown
22.625	70119	T		0.00000e+0	0.0000	Unknown
22.675	78931	T		0.00000e+0	0.0000	Unknown
22.740	63477	V		0.00000e+0	0.0000	Unknown
22.923	136492	V		0.00000e+0	0.0000	Unknown

7/11/94



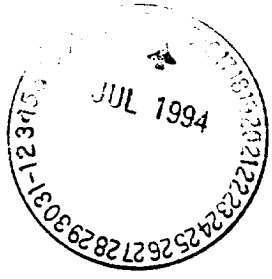

21.337
21.607
21.750
22.132
22.217
22.923

Analytical **Technologies,** Inc.

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

ATI I.D. **407301**

July 12, 1994



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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/01/94**, 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.: 407301
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	945525	NON-AQ	06/27/94	07/07/94	07/07/94	1
05	945526	NON-AQ	06/27/94	07/07/94	07/08/94	1
06	945527	NON-AQ	06/27/94	07/07/94	07/07/94	1

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	<0.025	0.13	<0.025
ETHYLBENZENE	MG/KG	<0.025	0.026	<0.025
TOTAL XYLENES	MG/KG	0.028	0.28	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		97	83	90

Split Sample

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 407301
PROJECT #	: 24324	DATE RECEIVED	: 07/01/94
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 07/08/94

PARAMETER	UNITS	04	10
PETROLEUM HYDROCARBONS, IR	MG/KG	<20	710

Split Sample
EPNG # 945525

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Philip Environmental Services Corp.
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Borehole # BH-1
Well #
Page 1 of 2

Project Name EPNG Pits
Project Number 14509 Phase ~~601~~ 6000
Project Location San Juan 29-6, Unit Nb. 61
72326

Elevation
Borehole Location T29, R6, S.19, K
GWL Depth
Logged By S.Kelly
Drilled By M. Donohue
Date/Time Started 8/17/95, 0900
Date/Time Completed 8/17/95, 1435

Well Logged By S.Kelly
Personnel On-Site M. Donohue, J. O'Keife, J. Long
Contractors On-Site
Client Personnel On-Site

Drilling Method 4¼" ID HSA
Air Monitoring Method CGI, 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: NDU BZ	BH	S/HS	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15										
20	1	19-20	.5/2.0'	clayey SILT, brown, very soft, non-plastic 5-20% $ clay. ek					37 HZ	0935 382-AK 8/17/95
25	2	23-25	.5'/2.0'	SAA w/ trace fine sand.		25			280 329	0940
30	3	28-30	.8'/2.0'	SAND, olive brown, fine sand, loose, damp. trace silt.		29			173 324	0947
35	4	33-35	.8'/2.0'	clayey SILT - SAA, but soft. SAA					298 277	0955
40	5	38-40		SAA					139 226	1004

Comments:

Geologist Signature Sarah Kelly

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 2 of 2

Philip Environmental Services Corp.
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase 601
Project Location San Juan 29-6, Unit No. 61
72326

Elevation
Borehole Location
GWL Depth
Logged By S.Kelly
Drilled By
Date/Time Started
Date/Time Completed

Well Logged By S.Kelly
Personnel On-Site
Contractors On-Site
Client Personnel On-Site

Drilling Method
Air Monitoring Method CGI, 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: NDU BZ	BH	S/HS	Drilling Conditions & Blow Counts
40				SAA						
45	6	43-45	.9'/2.0'	SAND, olive brown, fine sand, loose, damp.		45			58/217	1012
50 (10)	7	48-50	.8'/2.0'	SAA					132/251	1024
55 (65) (15)	8	53-56	.9'/2.0'	SAA					54/238	1040
60 (20)	9	58-60	.8'/2.0'	SAA					56/263	1104
65 (25)	10	63-65	.85'/2.0'	SAA, but with 5-20% silt.		67			57/231	1128
70 (30)	11	68-70		silty SAND, olive brown, 15-30% silt, trace clay, loose, damp					150/225	1149
75 (35)	12	73-75	.8/20'	SAA, but grey		76			2/70	1227
80 (40)	13	78-80		silty CLAY, dk grey, 15-30% silt, nonplastic, firm, damp.					0/46	1247

TOB = 80.0'

Comments:
78'-80' sample (SEK63) sent to lab (BTEX & TPH) BH grouted to surface.

Geologist Signature Sarah Kelly

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:	SEK63	947266
MTR CODE | SITE NAME:	72326	San Juan 29-6, Unit #61
SAMPLE DATE | TIME (Hrs):	08-17-95	12:47
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8/21/95	8-21-95
DATE OF BTEX EXT. | ANAL.:	8/21/95	
TYPE | DESCRIPTION:	VG	Dark 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)	89.2 RB 8/23/95	MG/KG			2.05	28
HEADSPACE PID	46	PPM				
PERCENT SOLIDS	86.8	%				

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

The Surrogate Recovery was at 112% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

D.F. 8/25/95

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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               *
**************************************************
*
 95/09/21  11:54
*
*  Sample identification
 947266
*
*  Initial mass of sample, g
 2.050
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 89.186
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.021
*
*
*
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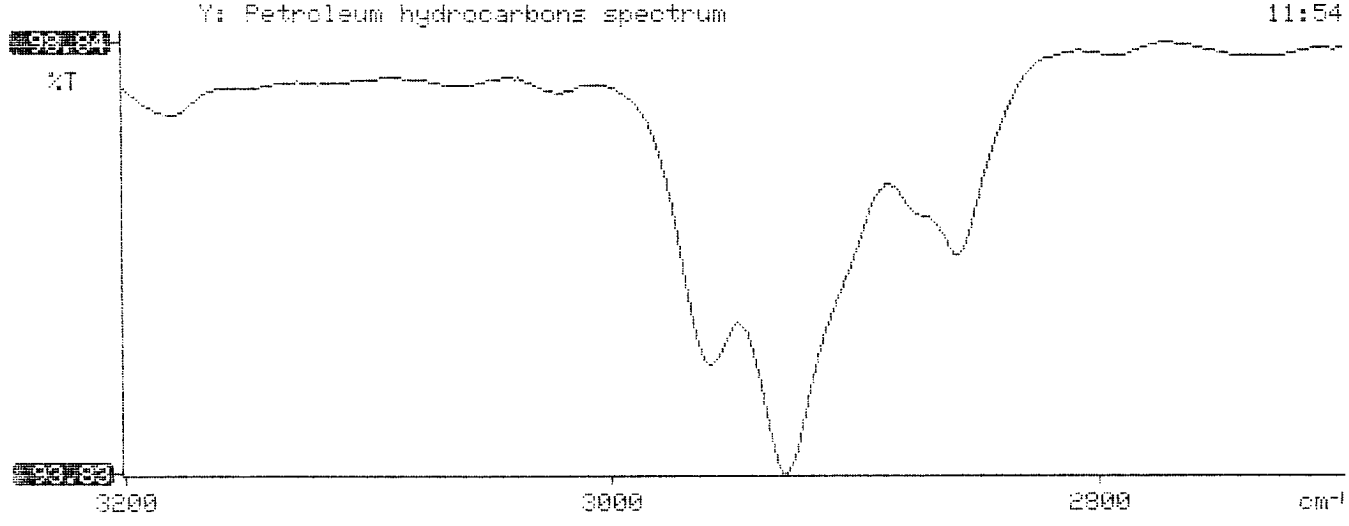

BTEX SOIL SAMPLE WORKSHEET

File	947266	**Date Printed**	8/24/95
Soil Mass (g)	5.08	**Multiplier (L/g)**	0.00098
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19685

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.492
Toluene (ug/L)	0.28	**Toluene (mg/Kg):**	**0.055**	0.492
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.492
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	0.984
o-xylene (ug/L)	0.05	o-xylene (mg/Kg):	0.010	0.492
		Total xylenes (mg/Kg):	**0.010**	1.476
		Total BTEX (mg/Kg):	**0.065**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082195.021
Method : C:\LABQUEST\METHODS\9001.met
Sample ID : 947266,5.08G,100U
Acquired : Aug 22, 1995 01:23:45
Printed : Aug 22, 1995 01:50:01
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.410	0	0.0000
a,a,a TFT	4.990	5407549	103.9719
TOLUENE	6.820	371320	0.2811
ETHYLBENZENE	10.543	0	0.0000
M & P XYLENE	10.933	1081045	-1.9636
O XYLENE	11.993	135886	0.0512
BFB	13.477	80649680	111.9610