

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

RISK
BTEX
TPH

Garcia Gas Com B No. 1
Meter/Line ID – 75197

SITE DETAILS

Legals - Twn: 29N	Rng: 10W	Sec: 21	Unit: J
NMOCD Hazard Ranking: 30		Land Type: Fee	
Operator: Cross Timbers		Pit Closure Date: 06/20/94	

RATIONALE FOR RISK-BASED CLOSURE

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 on June 20, 1994, to 12 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 367 ppm; laboratory analysis indicated a TPH concentration of 1260 mg/kg. TPH was above required remediation levels for the Hazard Ranking Score. This site was re-assessed on April 27, 1998, because the initial assessment incorrectly included washes as a surface water body.

On June 4, 1998, a Phase II drill borehole was conducted to a depth of 22 feet and a soil sample was collected for field headspace analysis and laboratory analysis of benzene, total BTEX, and TPH. Headspace analysis indicated a concentration of 0 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3.0, and a TPH concentration of <20 mg/kg.

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

- The primary source, discharge to the pit, has been removed for almost six years.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the excavations. In addition, the estimated depth to groundwater is greater than 100 feet; therefore, impact to groundwater is unlikely.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Based on the Hazard Ranking Score, benzene, total BTEX, and TPH were below required remediation levels for the Hazard Ranking Score.

ATTACHMENT

Field Pit Assessment Form
Field Pit Remediation/Closure Form

Revised Field Pit Assessment Form
Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>75197</u> Location: <u>GARCIA GAS Com B#1</u> Operator #: _____ Operator Name: <u>Cross TIMBERS</u> P/L District: _____ Coordinates: Letter: <u>J</u> Section <u>21</u> Township: <u>29</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>4.27.98</u> Area: <u>10</u> Run: <u>93</u>
SITE ASSESSMENT	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> NMOCD Zone: (From NMOCD Maps) </div> <div style="width: 45%;"> Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3) Indian _____ </div> </div> <div style="margin-top: 10px;"> Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3) </div> <div style="margin-top: 10px;"> 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? LESS THAN 1000' FROM A WELL <input checked="" type="checkbox"/> (1) YES (20 points) <input type="checkbox"/> (2) NO (0 points) </div> <div style="margin-top: 10px;"> Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3) </div> <div style="margin-top: 10px;"> Name of Surface Water Body <u>CITIZENS DITCH</u> (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) </div> <div style="margin-top: 10px;"> Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100' </div> <div style="margin-top: 10px;"> TOTAL HAZARD RANKING SCORE: <u>30</u> POINTS </div>
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS AMONG SEVERAL HOUSES OF WHICH THE CLOSEST IS APPROXIMATELY 300' AWAY; HOWEVER, IT IS LESS THAN A 1000' FROM A WELL.</u>

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 75-197 Location: GARCIA GAS COM B#1
 Operator #: 0203 Operator Name: AMOCO P/L District: BLOOMFIELD
 Coordinates: Letter: J Section 21 Township: 29 Range: 10
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator X Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 5-19-94 Area: 10 Run: 93

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

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 _____

(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: _____ POINTS

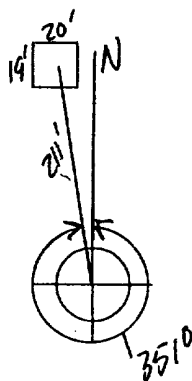
REMARKS

Remarks : ONE PIT ON LOCATION, ONE PIT TO CLOSE.
REDLINE BOOK INSIDE, TOPO. OUTSIDE VULNERABLE ZONE

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 351° Footage from Wellhead 211'
 b) Length : 20' Width : 19' Depth : 3

ORIGINAL PIT LOCATION



Remarks :

PHOTOGRAPHS 10:45

ATWOOD LANDFARM ON LOCATION

REMARKS

Completed By:

[Signature]

Signature

5-19-94

Date



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 225	945484
MTR CODE SITE NAME:	75197	N/A
SAMPLE DATE TIME (Hrs):	6-20-94	1430
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	6-21-94	6/21/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	BR / FINE SAND

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	1260	MG/KG			2.10	28
HEADSPACE PID	367	PPM				
PERCENT SOLIDS	90.7	%				

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

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

DF = Dilution Factor Used

27 D. 11

7/14/11

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>75197</u> Location: <u>Garcia Gas Well B#1</u></p> <p>Coordinates: Letter: <u>J</u> Section <u>21</u> Township: <u>29</u> Range: <u>10</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6-20-94</u> Area: <u>10</u> Run: <u>93</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW225</u> <u>VW226</u> <u>VW227</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>367</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> (1) Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>6-20-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>EPN/G line markers</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Wale Wilson</u></p>



CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER				PROJECT NAME				CONTACT LABORATORY P. O. NUMBER			
LABID				DATE				DATE			
TIME				MATRIX				SAMPLE NUMBER			
94	54779	6-20-94	9:20	Soil				196			
94	54780	6-20-94	10:35	Soil				197			
94	54781	6-20-94	11:20	Soil				198			
94	54782	6-20-94	12:30	Soil				199			
94	54783	6-20-94	13:10	Soil				200			
94	54784	6-20-94	14:30	Soil				201			
94	54785	6-20-94	14:30	Soil							
94	54786	6-20-94	14:35	Soil							
94	54787	6-20-94	15:45	Soil				202			
RELINQUISHED BY: (Signature)				RECEIVED BY: (Signature)				DATE/TIME			
Vale Wilson				Hendrix				6-20-94 17:30			
RELINQUISHED BY: (Signature)				RECEIVED BY: (Signature)				DATE/TIME			
Vale Wilson				Hendrix				6-20-94 17:30			
REQUESTED TURNAROUND TIME:				ROUTINE <input type="checkbox"/> RUSH <input type="checkbox"/>				CARRIER CO.			
BILL NO.:				CHARGE CODE				RESULTS & INVOICES TO:			
								FIELD SERVICES LABORATORY			
								EL PASO NATURAL GAS COMPANY			
								P.O. BOX 4990			
								FARMINGTON, NEW MEXICO 87499			
								FAX: 505-599-2261			

RECORD OF SUBSURFACE EXPLORATION

PHILIP SERVICES CORP.

4000 Monroe Road

Farmington, New Mexico 87401

(505) 326-2262 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 Garcia Gas Com A#1 75197

Elevation

Borehole Location LTR: J S: 21 T: 29 R: 10

GWL Depth NA

Drilled By K. PADILLA

Well Logged By C. CHANCE

Date Started 6/4/98

Date Completed 6/4/98

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										BZ=Breathing Zone BH=Borehole S/HS=Sample/Headspace
5	1	5-7	24	L+br SILT, loose, dry			0	0	0/23	-0915h
10	2	10-12	24	L+br sandy SILT, + F sand, med dense, dry			0	0	0/10	-0922h
15	3	15-17	18	L+br SILT, med dense, dry + gypsum parting			0	0	0/0	-0929h
20	4	20-22	18	ATA			0	0	0/0	-0940h Sample
25				TDB 22'						
30										
35										
40										

Comments:

Pit was backfilled w/o excavation. Drilled slightly off center in pit due to overhead power lines. Since not drilling in center of pit, will drill to at least 20' to ensure any contaminant migration is not missed. CMC 390 sent to lab @ TEX, TPH (20-22') Bt grouted to surface

Geologist Signature

Cory Chance



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	CMC390	980457
MTR CODE SITE NAME:	75197	Garcia Gas Com B #1
SAMPLE DATE TIME (Hrs):	6/4/98	1040
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL.:	6/15/98	6/18/98
DATE OF BTEX EXT. ANAL.:	6/8/98	6/8/98
TYPE DESCRIPTION:	N/A	SOIL

Field Remarks: 20-22'

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 (MOD.8015)	<20	MG/KG				
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	91.7	%				

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

The Surrogate Recovery was at 85.7 % for this sample All QA/QC was acceptable.
ative:

DF = Dilution Factor Used

Approved By: John Linder

Date: 6/23/98

American Environmental Network, Inc.

AEN I.D.

806328

June 19, 1998

EL PASO FIELD SERVICES
770 WEST NAVAJO
FARMINGTON, NM 87401



Project Name PHASE II DRILLING
Project Number (none)

Attention: JOHN LAMBDIN

On 6/9/98 American Environmental Network (NM), Inc. (ADHS License No. AZ0015), received a request to analyze **non-aq** 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

H. Mitchell Rubenstein, Ph. D.
General Manager

MR: mt

Enclosure

American Environmental Network, Inc.

CLIENT	: EL PASO FIELD SERVICES	AEN I.D.	: 806328
PROJECT #	: (none)	DATE RECEIVED	: 6/9/98
PROJECT NAME	: PHASE II DRILLING	REPORT DATE	: 6/19/98

AEN ID. #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	980427	NON-AQ	6/1/98
02	980428	NON-AQ	6/2/98
03	980457	NON-AQ	6/4/98
04	980458	NON-AQ	6/4/98
05	980459	NON-AQ	6/4/98

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
 CLIENT : EL PASO FIELD SERVICES
 PROJECT # : (none)
 PROJECT NAME : PHASE II DRILLING

AEN I.D.: 806328

SAMPLE			DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	980427	NON-AQ	6/1/98	6/15/98	6/17/98	1
02	980428	NON-AQ	6/2/98	6/15/98	6/18/98	1
03	980457	NON-AQ	6/4/98	6/15/98	6/18/98	1

PARAMETER	DET. LIMIT	UNITS	01	02	03
FUEL HYDROCARBONS, C6-C10	10	MG/KG	< 10	< 10	< 10
FUEL HYDROCARBONS, C10-C22	5.0	MG/KG	< 5.0	< 5.0	< 5.0
FUEL HYDROCARBONS, C22-C36	5.0	MG/KG	< 5.0	< 5.0	< 5.0
CULATED SUM:					

SURROGATE:
 O-TERPHENYL (%) 108 105 96
 SURROGATE LIMITS (66 - 151)

CHEMIST NOTES:
 N/A

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : EL PASO FIELD SERVICES
PROJECT # : (none)
PROJECT NAME : PHASE II DRILLING

AEN I.D.: 806328

SAMPLE			DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
04	980458	NON-AQ	6/4/98	6/15/98	6/18/98	1
05	980459	NON-AQ	6/4/98	6/15/98	6/18/98	1

PARAMETER	DET. LIMIT	UNITS	04	05
FUEL HYDROCARBONS, C6-C10	10	MG/KG	< 10	< 10
FUEL HYDROCARBONS, C10-C22	5.0	MG/KG	< 5.0	< 5.0
FUEL HYDROCARBONS, C22-C36	5.0	MG/KG	< 5.0	< 5.0

CALCULATED SUM:

SURROGATE:

O-TERPHENYL (%)		104	101
SURROGATE LIMITS	(66 - 151)		

CHEMIST NOTES:

N/A

CHAIN OF CUSTODY

DATE: 6/8/98 PAGE: 1 OF 1

PROJECT MANAGER: John Lambdin
COMPANY: El Paso Field Services Co
ADDRESS: 770 W. NAVAJO
FARMINGTON, NM 87401
PHONE: (505) 599-2144
FAX: (505) 599-2261
BILL TO: Above
COMPANY:
ADDRESS:

980427	6/1/98	1518	Soi
980428	6/2/98	0958	Soi
980457	6/4/98	1040	Soi
980458	6/4/98	1126	Soi
980459	6/4/98	1305	Soi

Petroleum Hydrocarbons (418.1) TRPH
(MOD.8015) Diesel/Direct Inject
(M8015) Gas/Purge & Trap
8021 (BTEX)/8015 (Gasoline)
8021 (BTEX) □ MTBE □ TMB □ PCE
8021 (TCL)
8021 (EDX)
8021 (HALO)
8021 (CUST)
504.1 EDB □ /DBC□ □
8260 (TCL) Volatile Organics
8260 (Full) Volatile Organics
8260 (CUST) Volatile Organics
8260 (Landfill) Volatile Organics
Pesticides /PCB (608/8081)
Herbicides (615/8151)
Base/Neutral/Acid Compounds GC/MS (625/8270)
Polynuclear Aromatics (610/8310)
General Chemistry:
Priority Pollutant Metals (13)
Target Analyte List Metals (23)
RCRA Metals (8)
RCRA Metals by TCLP (Method 1311)
Metals:

PROJECT: Phase II Drilling	PROJ. NO.:	(RUSH) <input type="checkbox"/> 24hr <input type="checkbox"/> 48hr <input type="checkbox"/> 72hr <input type="checkbox"/> 1 WEEK	(NORMAL) <input checked="" type="checkbox"/>	SIGNATURE: Marlen Hopper	TIME: 1000	RELINQUISHED BY: 2
	PROJ. NAME: Phase II Drilling	CERTIFICATION REQUIRED: <input type="checkbox"/> NM <input type="checkbox"/> SDWA <input type="checkbox"/> OTHER		PRINTED NAME: Marlen Hopper	DATE: 6/8/98	
	P.O. NO.:	METHANOL PRESERVATION <input type="checkbox"/>		COMPANY: EPFS		
SHIPPED VIA: Fed Ex		COMMENTS: <input type="checkbox"/> FIXED FEE <input type="checkbox"/>		SIGNATURE:	TIME:	
				PRINTED NAME:	DATE:	
				COMPANY:		

1/5/

N Inc.: American Environmental Network (NIM), Inc. • 2709-D Pan American Freeway, NE • Albu-

Que. New Mexico 87107 • (505) 344-3777 • Fax (505) 344-4413

DISTRIBUTION: \

- AEN. Canary - Original

PLEASE FILL THIS FORM IN COMPLETELY.

BTEX SOIL SAMPLE WORKSHEET

File	:	980457	Date Printed	:	6/9/98
Soil Mass (g)	:	5.08	Multiplier (L/g)	:	0.00098
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical):		200
Shot Volume (uL)	:	50	CAL FACTOR (Report):		0.19685

		DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L)	:	<0.5	Benzene (mg/Kg): #VALUE!	0.492
Toluene (ug/L)	:	<0.5	Toluene (mg/Kg): #VALUE!	0.492
Ethylbenzene (ug/L)	:	<0.5	Ethylbenzene (mg/Kg): #VALUE!	0.492
p & m-xylene (ug/L)	:	<1.0	p & m-xylene (mg/Kg): #VALUE!	0.984
o-xylene (ug/L)	:	<0.5	o-xylene (mg/Kg): #VALUE!	0.492
			Total xylenes (mg/Kg): #VALUE!	1.476
			Total BTEX (mg/Kg): #VALUE!	

Sample Pan wt + Sample wt Pan + Dry Pan wt % Solids

4/8/98

980427	2.63 - 11.62 =	8.99	10.86	8.23	91.5%
980427	2.63 - 11.33 =	8.70	10.63	8.00	92.0
980428	2.64 - 10.93 =	8.29	10.45	7.81	94.2
980457	2.64 - 11.56 =	8.92	10.82	8.18	91.7 _{mh}
980458	2.65 - 11.16 =	8.51	10.68	8.04 3	94.5 94.3
980459	2.65 - 11.44 =	8.79	10.74	8.09	92.0

Continued on Page _____

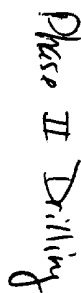
Read and Understood By _____

Signed _____

Date _____

Signed _____

Date _____



6.25.78 Brae

W
O

Page _____ of _____

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