DEPUTY OIL & GAS INSPECTOR

DEC 21 1993

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Approved

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

ELLIOTT G CM N 1
Meter/Line ID - 75126

SITE DETAILS

Legals - Twn: 30 **Rng:** 09 **Sec:** 33 **Unit:** I
NMOCD Hazard Ranking: 10 **Land Type:** 4 - Fee
Operator: AMOCO PRODUCTION COMPANY **Pit Closure Date: 05/11/94**

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

Meter: 75126 Location: ELLIOT GCM N 1
Operator #: 0203 Operator Name: AMOCO P/L District: BLOOMFIELD
Coordinates: Letter: I Section 33 Township: 30 Range: 9
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 5-11-94 Area: 10 Run: 43

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 _____
(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: 10 **POINTS**

REMARKS

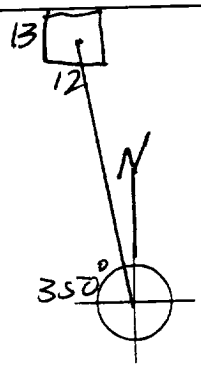
Remarks : 3 PITS ON LOCATION, DRY PIT

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 350 Footage from Wellhead 174

b) Length : 13 Width : 12 Depth : 18"



REMARKS

Remarks : RUN TECH LEFT NOTE IDENTIFYING THAT THIS LOCATION WAS FPNG

Completed By:

Signature

5-31-02

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 75126 Location: ELLIOT GAS Com N#1

Coordinates: Letter: I Section 33 Township: 30 Range: 9

Or Latitude ________ Longitude ________

Date Started : 5-11-94 Area: 10 Run: 43

FIELD OBSERVATIONS

Sample Number(s): K.P#39 ________ ________ ________

Sample Depth: 12' Feet

Final PID Reading 380 PID Reading Depth 12' Feet

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

CLOSURE

Remediation Method :

Excavation ☒ (1) Approx. Cubic Yards 45

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☐ (3)

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: ________

Pit Closure Date: 5-11-94 Pit Closed By: B.E.I

REMARKS

Remarks : Some LINE markers ON Location. Started Remediating To 12' Soil Light Brown Lots of SAnd. Smells Real BAD. SAmple At 12' PID 380

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 39	945128
MTR CODE | SITE NAME:	75126	N/A
SAMPLE DATE | TIME (Hrs):	5-11-94	1340
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5-12-94	5-12-94
DATE OF BTEX EXT. | ANAL.:	5/17/94	5/18/94
TYPE | DESCRIPTION:	VC	Fine Brown Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.50	MG/KG	20			
TOLUENE	84	MG/KG	20			
ETHYL BENZENE	34	MG/KG	20			
TOTAL XYLENES	370	MG/KG	50 5/19			
TOTAL BTEX	489	MG/KG				
TPH (418.1)	1800	MG/KG			2.2	28
HEADSPACE PID	380	PPM				
PERCENT SOLIDS	90.9	%				

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

The Surrogate Recovery was at 44 % for this sample All QA/QC was acceptable.

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

DF = Dilution Factor Used

Approved By: _____ Date: 7/14/94

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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                           *
*****************************************************************
```

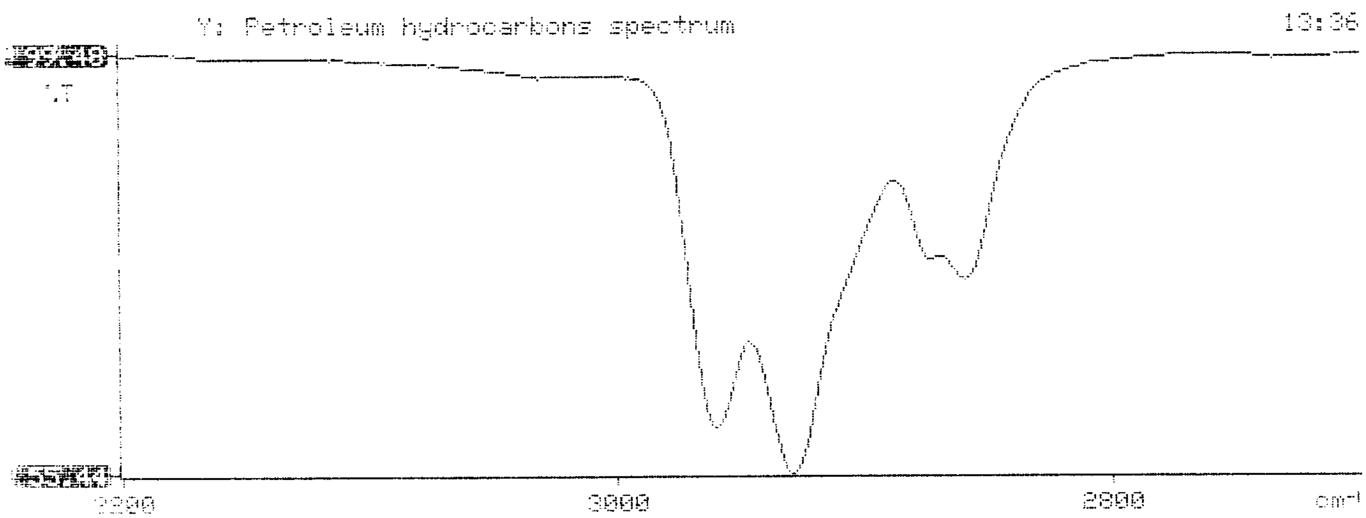
94/05/12 13:35

Sample identification
945128

Initial mass of sample, g
2.000

Volume of sample after extraction, ml
25.000

Petroleum hydrocarbons, ppm
1083.491
Net absorbance of hydrocarbons (2930 cm-1)
0.253



Analytical **Technologies,** Inc.

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

ATI I.D. **405359**

May 25, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **05/13/94**, 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.

EPA Method 418.1 analysis was added for sample 945125 on 05/17/94.

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:jd

Enclosure

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405359
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
10	945127	NON-AQ	05/11/94	05/17/94	05/18/94	20
11	945128	NON-AQ	05/11/94	05/17/94	05/18/94	20
12	945129	NON-AQ	05/11/94	05/17/94	05/18/94	50

PARAMETER	UNITS	10	11	12
BENZENE	MG/KG	<0.50	<0.50	<1.2
TOLUENE	MG/KG	29	84	<1.2
ETHYLBENZENE	MG/KG	25	34	28
TOTAL XYLENES	MG/KG	360	370 D50	480
SURROGATE:				
BROMOFLUOROBENZENE (%)		522*	44*	NA**

D50=DILUTED 50X, ANALYZED 05/19/94

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE
**SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

PHASE II

RECORD OF SUBSURFACE EX. RATION

Borehole # BH-1
Well #
Page 1 of 1

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 Elliot Gas COM N#1, 7512

Elevation
Borehole Location
GWL Depth
Logged By S.Kelly
Drilled By K. Padilla
Date/Time Started 6/22/23/95, 0740 RK 6/23/95
Date/Time Completed 6/23/95, 0820

Well Logged By S.Kelly
Personnel On-Site K. Padilla, F. Rivera, D. Isaac
Contractors On-Site
Client Personnel On-Site
RK 6/23/95
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!						
15	1	15-17	.7'	silty SAND, grey, fine, angular sand, loose, damp					11/24/5	0755
20	2	20-22	1.1'	SAA - color turning to light brown near 22!					5/48	0805
25	3	25-27	.9'	SAA - with streaks of rust coloring, sandy GRAVEL in shoe of split spoon - w/ med angular gravel, med. dense, dry.					0/33	0814
				BOH - 27'						

Comments: 25'-27' sample sent to lab (SEK'20) for BTEX & TPH. Sample bagged and iced prior to being put in jar. BH grouted to surface.

Geologist Signature Sarah Kelly

SPLIT

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT

Phase II Drilling

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	SEK20	94692S
MTR CODE | SITE NAME:	75126	N/A
SAMPLE DATE | TIME (Hrs):	6-23-95	0827
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6/27/95	6/27/95
DATE OF BTEX EXT. | ANAL.:		
TYPE | DESCRIPTION:	VG	Brown sand & clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS DF	Q	M(g)	V(ml)	ATI Results
BENZENE	<0.5	MG/KG					<0.025
TOLUENE	<0.5	MG/KG					<0.025
ETHYL BENZENE	<0.5	MG/KG					<0.025
TOTAL XYLENES	<1.5	MG/KG					<0.025
TOTAL BTEX	<3.0	MG/KG					<0.10
TPH (418.1)	57.6	MG/KG			2.04	28	<20
HEADSPACE PID	33	PPM					Surrogate % 94
PERCENT SOLIDS	89.8	%					Dilution Factor 1

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

The Surrogate Recovery was at 92.1 for this samp All QA/QC was acceptable.

Narrative: ATI Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 7/14/95

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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                     *
**********************************************************
*
 95/06/27   14:14
*
*   Sample identification
 946925
*
*   Initial mass of sample, g
 2.060
*
*   Volume of sample after extraction, ml
 28.000
*
*   Petroleum hydrocarbons, ppm
 57.590
*   Net absorbance of hydrocarbons (2930 cm-1)
 0.017
*
*
*
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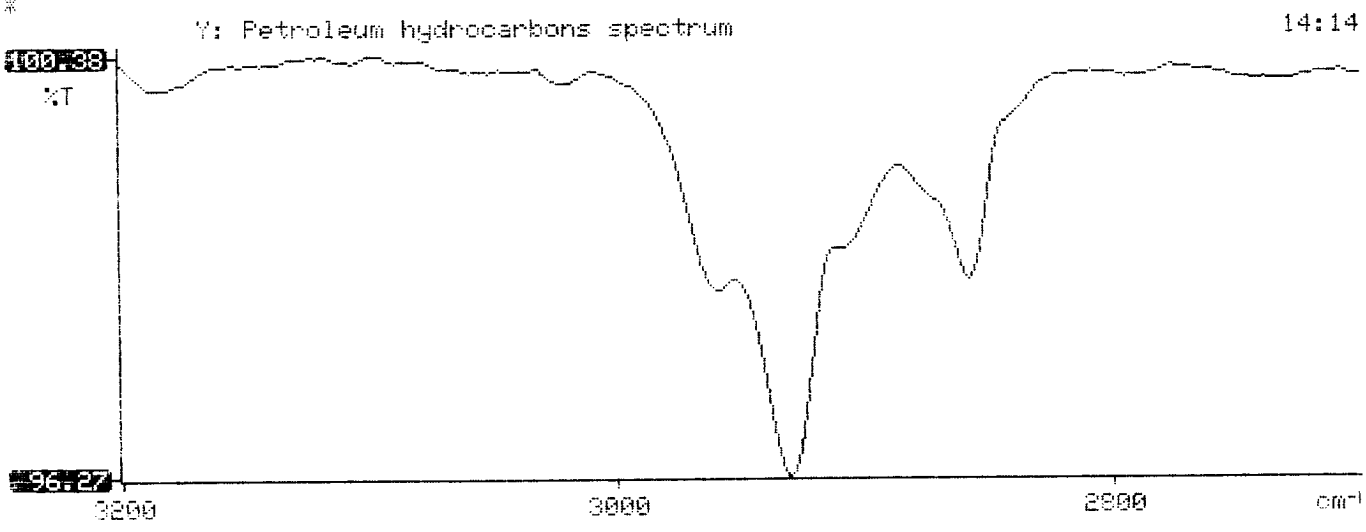


Analytical Technologies, Inc.

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

ATI I.D. **506426**

July 10, 1995

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/29/95**, 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

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.: 506426

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	946925	NON-AQ	06/23/95	06/29/95	06/30/95	1

PARAMETER	UNITS	07
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%) 94

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 506426
PROJECT #	: 24324	DATE RECEIVED	: 06/29/95
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 06/30/95

PARAMETER	UNITS	07
PETROLEUM HYDROCARBONS, IR	MG/KG	<20

946925

SPLIT

BTEX SOIL SAMPLE WORKSHEET

File	946925A	**Date Printed**	6/28/95
Soil Mass (g)	4.92	**Multiplier (L/g)**	0.00102
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.20325

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.00**	0.508
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.00**	0.508
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.00**	0.508
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.00	1.016
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.00	0.508
		Total xylenes (mg/Kg):	**0.00**	1.524
		Total BTEX (mg/Kg):	**0.00**	

BFB Recovery: 92.1 %

EL PASO NATURAL GAS

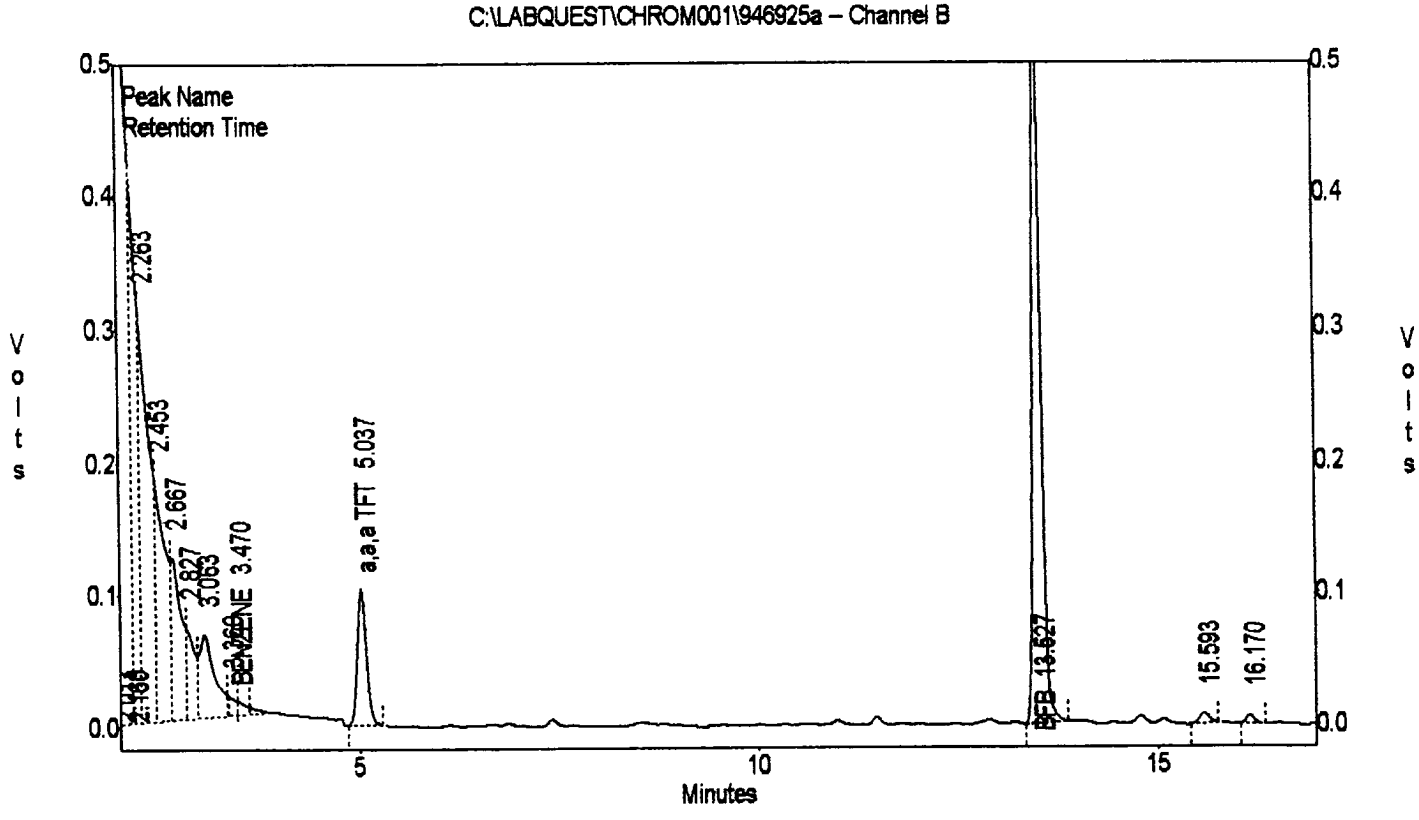
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\946925a
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 946925,4.92G/100uL
Acquired : Jun 27, 1995 19:29:34
Printed : Jun 27, 1995 19:55:52
User : John

Channel B Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.470	70742	~~4.5973~~
a,a,a TFT	5.037	814754	108.9024
TOLUENE	6.680	0	0.0000
ETHYLBENZENE	10.610	0	0.0000
M & P XYLENE	11.000	0	0.0000
O XYLENE	12.053	0	0.0000
BFB	13.527	3952260	92.1020

NA
6/28/95



EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\946925a
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 946925,4.92G/100uL
Acquired : Jun 27, 1995 19:29:34
Printed : Jun 27, 1995 19:55:47
User : John

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.453	0	0.0000
a,a,a TFT	5.033	3170394	85.4098
TOLUENE	6.867	153248	-0.3799
ETHYLBENZENE	10.650	135287	-0.0438
M & P XYLENE	10.997	254911	-3.7033
O XYLENE	12.040	106339	0.1610
BFB	13.523	48945356	74.3466