EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

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

STATE COM H#9 PC
Meter/Line ID - 75875

SITE DETAILS

Legals - Twn: 30 **Rng:** 09 **Sec:** 16 **Unit:** B
NMOCD Hazard Ranking: 40 **Land Type:** 1 - State
Operator: AMOCO PRODUCTION COMPANY **Pit Closure Date: 05/10/94**

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: 75875 Location: STATE COM # #9 P.C.
Operator #: 0203 Operator Name: AMOCO P/L District: BLOOMFIELD
Coordinates: Letter: B Section 16 Township: 30 Range: 9
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 4.22.94 Area: 10 Run: 33

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 Caballo Canyon (AKA: Wild Horse Wash)
(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 : 3 pits on Location. 2 will be closed. Pits dry
Dig & Haul

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 75875 Location: State Com H #9 P.C

Coordinates: Letter: B Section 16 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Date Started : 5-10-94 Area: 10 Run: 33

OBSERVATIONS

Sample Number(s): KD50 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 373 ppm PID Reading Depth 12' Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ (1) Approx. Cubic Yards 60

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☐ (3)

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: 5-10-94 Pit Closed By: BEI

REMARKS

Remarks : Excavated Pit to 12', Took PID Reading - closed Pit

Signature of Specialist: [signature]

40

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 50	94/5109
MTR CODE | SITE NAME:	75875	N/A
SAMPLE DATE | TIME (Hrs):	5-10-94	1215
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5-12-94	5-12-94
DATE OF BTEX EXT. | ANAL.:	5/17/94	5/19/94
TYPE | DESCRIPTION:	VC	Brown Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<2.5	MG/KG	100			
TOLUENE	11	MG/KG	100			
ETHYL BENZENE	2.9	MG/KG	100			
TOTAL XYLENES	34	MG/KG	100			
TOTAL BTEX	50	MG/KG			5.0	
TPH (418.1) / 21,700	~~21,600~~ 5/14/94	MG/KG			~~5.03~~	28
HEADSPACE PID	373	PPM				
PERCENT SOLIDS	88.4	%				

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

The Surrogate Recovery was at 104 % for this sample All QA/QC was acceptable.

Narrative: ATI Results attached.

DF = Dilution Factor Used

Approved By: John Pardi Date: 5/14/94

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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

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94/05/12 14:01

Sample identification
945139

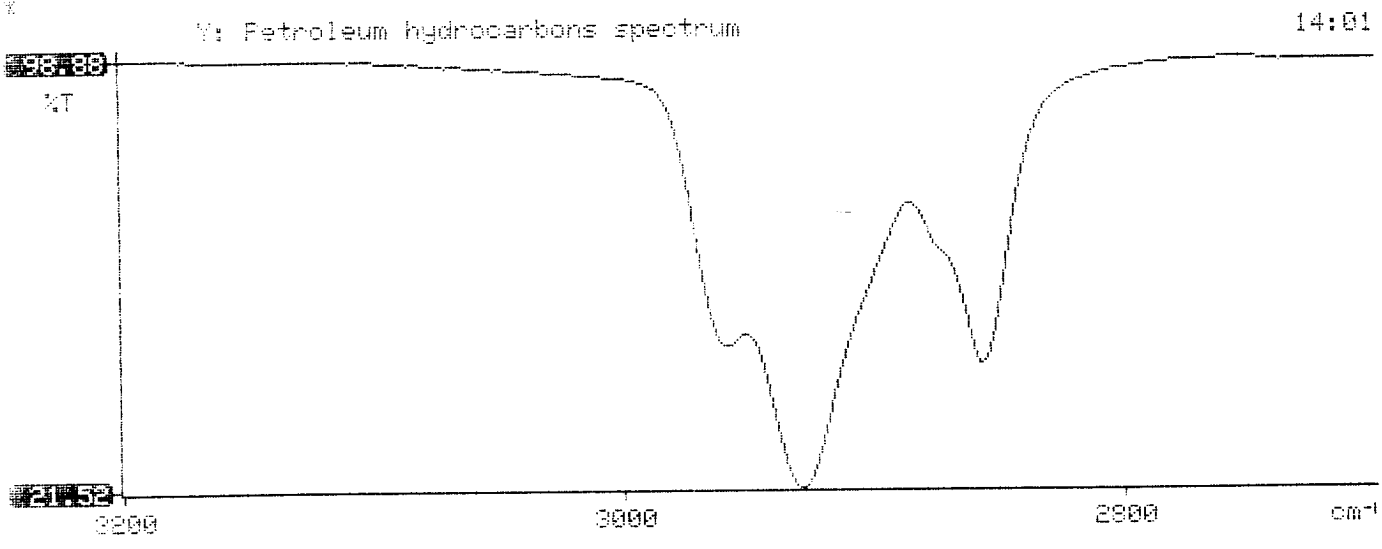
Initial mass of sample, g
0.500

Volume of sample after extraction, ml
25.000

Petroleum hydrocarbons, ppm
21687.208

Net absorbance of hydrocarbons (2930 cm-1)
0.660

Y: Petroleum hydrocarbons spectrum



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
01	945108	NON-AQ	05/10/94	05/17/94	05/18/94	1
02	945109	NON-AQ	05/10/94	05/17/94	05/19/94	100
03	945110	NON-AQ	05/10/94	05/17/94	05/18/94	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	<2.5	<0.025
TOLUENE	MG/KG	0.026	11	<0.025
ETHYLBENZENE	MG/KG	0.10	2.9	<0.025
TOTAL XYLENES	MG/KG	1.8	34	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		43*	106	91

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

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 Pit
Project Number 11957 Phase 4002 77
Project Location State Com #9 PC 75875

Elevation
Borehole Location
GWL Depth
Logged By CM Chance
Drilled By M. Donahue
Date/Time Started 5/18/95 - 1330
Date/Time Completed 5/18/95 - 1550

Well Logged By CM Chance
Personnel On-Site M. Donahue, K. Padilla, F Rivera
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: ~~NDU~~ ppm BZ	BH	S #S	Drilling Conditions & Blow Counts
0				Backfill TP 12'						
5										
10										
15	1	15-17	10"	Gr silty Sand, f-med sand, loose, sl moist, odor			15	84	399/604	-1346
20	2	20-22	5"	Gr sandy Clay, vf-f sand, soft, low plastic, odor			12	68	255/825	-1355
25	3	25-27	10"	Br Sandy Clay, vf-f sand, soft, low plastic, odor			0	120	630/1,090	-1413
30	4	30-32	11"	Blk sandy Clay, vf sand, med stiff, ~~low~~ plastic, strong odor			4	69	354/668	-1426
35	5	35-37	12"	AA			8	178	600/910	-1440
40	6	40-42	12"	AA Br silty Clay, Fe staining, hard, non-plastic			6	60	90/508	-1457

Comments:

Geologist Signature

RECORD OF SUBSURFACE EXPLORATION

Borehole # _____
Well # _____
Page 2 of 2

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name _____
Project Number _____ Phase _____
Project Location State Com 9 PC 75875

Elevation _____
Borehole Location _____
GWL Depth _____
Logged By _____
Drilled By _____
Date/Time Started _____
Date/Time Completed _____

Well Logged By _____
Personnel On-Site _____
Contractors On-Site _____
Client Personnel On-Site _____

Drilling Method _____
Air Monitoring Method _____

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	~~PID~~ S	Drilling Conditions & Blow Counts
40										
45	7	45-47	8"	Green sh, silty, hard, sl fissle					2/15	Drlng Harder 1524
				TDB 45'						
50										
55										
60										
65										
70										
75										
80										

Comments: Refusal at 45'. 45-47' sample submitted to lab for BTEX + TPH. GMC12

Geologist Signature _____

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 12	96823
MTR CODE | SITE NAME:	75875	N/A
SAMPLE DATE | TIME (Hrs):	5-18-95	1528
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5-19-95	5-19-95
DATE OF BTEX EXT. | ANAL.:	5/19/95	5/23/95
TYPE | DESCRIPTION:	VG	Dark Brown Clay in 2 oz. jar

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.50	MG/KG				
TOLUENE	< 0.50	MG/KG				
ETHYL BENZENE	< 0.50	MG/KG				
TOTAL XYLENES	< 1.50	MG/KG				
TOTAL BTEX	< 3.00	MG/KG				
TPH (418.1)	22.4	MG/KG			2.04	25
HEADSPACE PID	15	PPM				
PERCENT SOLIDS	87.8	%				

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

The Surrogate Recovery was at 92.5 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Date: 5/26/95

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

75/05/19 13:11

Sample identification
946923

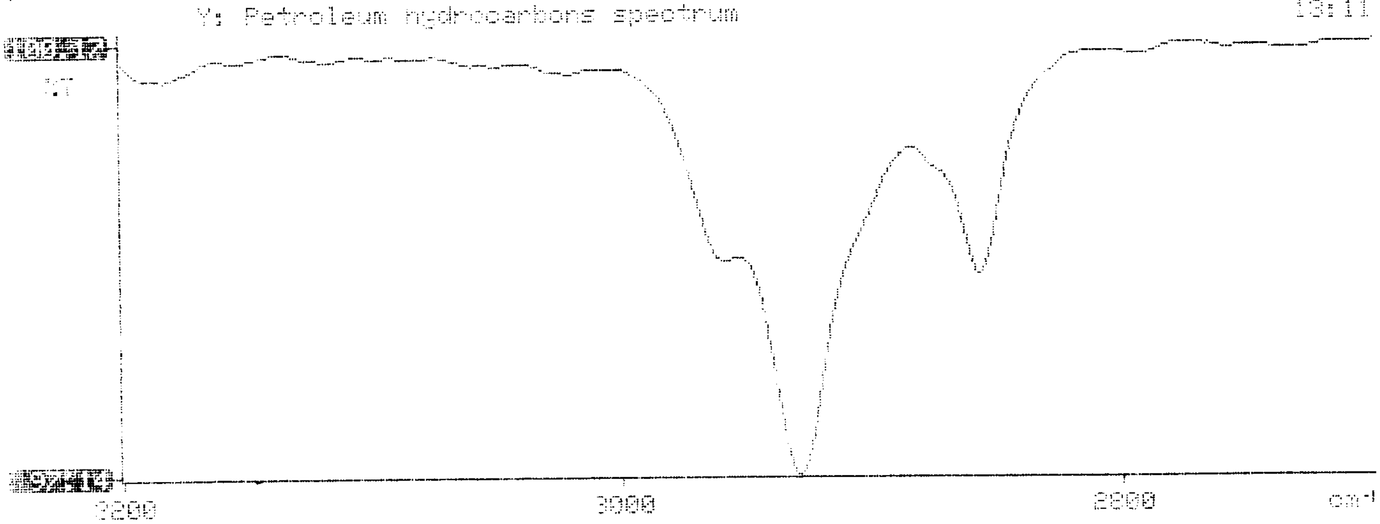
Initial mass of sample, g
2.040

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
22.408

Net absorbance of hydrocarbons (2930 cm-1)
0.013

Y: Petroleum hydrocarbons spectrum 13:11



BTEX SOIL SAMPLE WORKSHEET

File	946823A	**Date Printed**	5/24/95
Soil Mass (g)	5.04	**Multiplier (L/g)**	0.00099
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19841

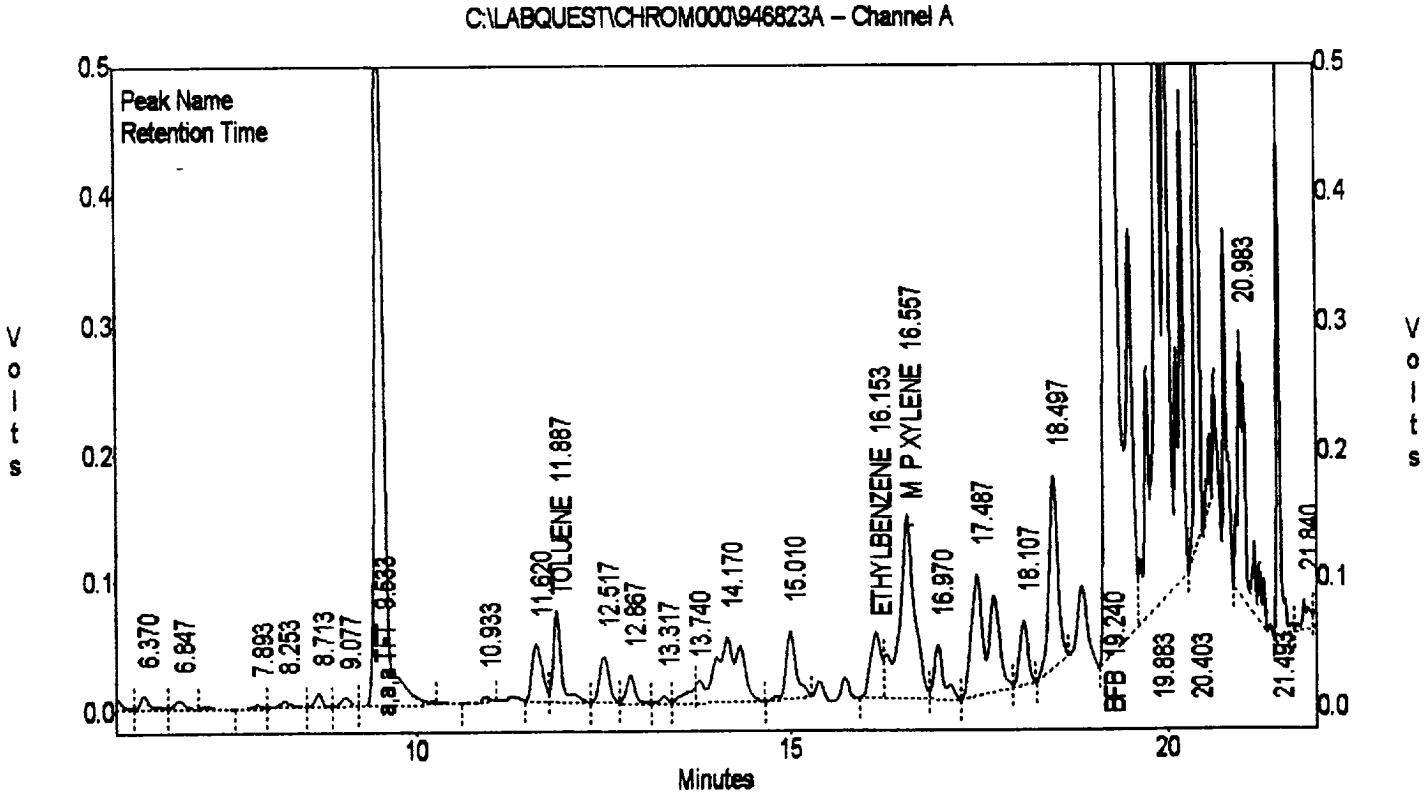
				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.00**	0.496
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.00**	0.496
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.00**	0.496
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.00	0.992
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.00	0.496
		Total xylenes (mg/Kg):	**0.00**	1.488
		Total BTEX (mg/Kg):	**0.00**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\946823A
Method : C:\LABQUEST\METHODS\9000.MET
Sample ID : 946823,5.04/100UL
Acquired : May 23, 1995 23:20:43
Printed : May 23, 1995 23:46:56
User : Tony

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	7.253	0	0.0000
a,a,a TFT	9.533	4883622	76.4156
TOLUENE	11.887	536240	-3.6555
ETHYLBENZENE	16.153	514928	-2.4023
M & P XYLENE	16.557	2041547	-1.2370
O XYLENE	17.700	0	0.0000
BFB	19.240	56440376	92.5290



EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\946823A
Method : C:\LABQUEST\METHODS\9000.MET
Sample ID : 946823,5.04/100UL
Acquired : May 23, 1995 23:20:43
Printed : May 23, 1995 23:47:01
User : Tony

Channel B Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	7.370	206025	21.3432
a,a,a TFT	9.540	307814	102.9249
TOLUENE	11.923	0	0.0000
ETHYLBENZENE	16.187	0	0.0000
M & P XYLENE	16.563	54301	16.4973
O XYLENE	17.707	0	0.0000
BFB	19.247	1944802	88.9134