EL PASO EU	LD SERVICE	S		
EL PASO EU Y OIL & GRANDE FIN	N PIT CLOSU	IRE		REGEIWER
DEC 2 1 1990				
β		RIDDLE (CLS 2A	UU JUL 2 1998 L-
1411 8000		Meter/Line I	D - 89934	MIG LOON DIN
III and a surround and	د د الم الم الم الم	SITE DET	TAILS	DIST, 3
Legals - Twn: 3	Rng: 09	Sec: 30	Unit: J	
NMOCD Hazar	d Ranking: 40		Land Type	: 2 - Federal
Onematory AMO	CO PRODUCTION C	COMPANY		Pit Closure Date: 09/15/94

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

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	TENERAL	Meter: <u>89-934</u> Location: <u>Riddle CLS ZH</u> Operator #: <u>6203</u> Operator Name: <u>Broduction</u> P/L District: <u>Aztec</u> Coordinates: Letter: <u>Section 30</u> Township ZL
	TEL	Coordinates: Letter: <u>J</u> Section <u>30</u> Township: <u>31</u> Range: <u>9</u> Or Latitude Longitude
	פ	Pit Type: Dehydratan
		Pit Type: Dehydrator Location Drip: X Line Drip:Other: Site Assessment Date: <u>\$/30/94</u> Area: <u>04</u> Run: <u>\$3</u>
		NMOCD Zone:
1		(From NMOCD Land Type: BLM (1)
		Maps) Inside 🖾 (1) State 🗋 (2)
		Outside $\Box(2)$
	ŀ	-ren to dioundwater
		Less Than 50 Feet (20 points) 🛛 (1)
		50 Ft to 99 Ft (10 points) (20 points) (20 (1)) Greater Than 100 Ft (0 points) (2) (3)
F		Wellhead Protection Area
IEN		Is it less than 1000 ft fam.
SSN		fresh water extraction? , or ; Is it less than 200 ft from a private
ASSESSMENT		
•		Horizontal Distance to Surface Water Body
SITE		
SI		200 Ft to 1000 Ft (10 points) (2) Greater Than 1000 Ft (0 points) (2) Name of Surface W (10 points) (3)
	1	Name of Surface Water Rod () (3)
	1	Name of Surface Water Body <u>Little Pump Canyon</u> Surface Water Body : Possani Lat
		Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)
		Distance to Nearest Ephemeral Stream (1) < 100'(Navajo Pits Only)
	1	THE HALARD RANKING SCORE:
REMARKS		Remarks · Robling Barka Tracila
MAJ	F	our pits, location drip pit has a small amount of liquid
RE		In it. Will close one pit.
		DIGA HAUL

ŝ ORIGINAL PIT LOCATION Original Pit : a) Degrees from North <u>249</u>^o Footage from Wellhead <u>44</u> b) Length : <u>45</u>['] Width : <u>35</u>['] Depth : <u>4</u>['] ORIGINAL PIT LOCATION NN Z490 head 44' 35' 45' 구 Remarks : Pictures @0954 (5-8, RollZ) Dump Truck REMARKS Completed By: Jack Kelly 8/30/94 Signature Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>89934</u> Location: <u>Riddle CLS 2A</u> Coordinates: Letter: <u>I</u> Section <u>30</u> Township: <u>31</u> Range: <u>9</u> Or Latitude Longitude Date Started : <u>9~15-94</u> Run: <u>04</u> <u>83</u>
FIELD OBSERVATIONS	Sample Number(s): <u>KP 236</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>095</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered I Approximate DepthFeet
CLOSURE	Remediation Method : Excavation Image: Approx. Cubic Yards60 Onsite Bioremediation Image: I
REMARKS	Remarks: <u>Some Line markers</u> . <u>Pit has some oil & Water</u> Push in sides of Pit to Solidify. <u>Before we could Have Off</u> . <u>At 12' Soil Looked Like it cleaned up fid ogs closed</u> . <u>Pit</u> .
	Signature of Specialist: Killy Padlla (SP3191) 03/16/94

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FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	K7 236	946128
MTR CODE SITE NAME:	39934	N/A
SAMPLE DATE TIME (Hrs):	9-15-44	151 D
SAMPLED BY:		N/A
DATE OF TPH EXT. ANAL.:	9/20 94	9/20/94
DATE OF BTEX EXT. ANAL.:	9/22/44	9/23/94
TYPE DESCRIPTION:	V L	DKBrown fine Sand/ClAy

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS					
PARAMETER			DF	Q	M(g)	V(ml)		
BENZENE	0.039	MG/KG	1					
TOLUENE	6.78	MG/KG	1					
ETHYL BENZENE	0.24	MG/KG						
TOTAL XYLENES	9.8	⁵⁄IG/KG	/					
TOTAL BTEX	9.18	MG/KG	-					
TPH (418.1)	13,800	MG/KG			0.50	28		
HEADSPACE PID	95	PPM						
PERCENT SOLIDS	91.1	%						

-- TPH is by EPA Method 418 1 and BTEX is by EPA Method 8020 --

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

Narrative:

ATI Results uttached.

DF = Dilution Factor Used

Approved By:

Date: 10/33/94





ATI I.D. 409389

September 29, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **09/21/94**, 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

MR:jt

Enclosure

H. Mitchell Rubenstein, Ph.D. Laboratory Manager



Corporate Offices: 5550 Morehouse Drive San Diego, CA 92121 (619) 458-9141



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GAS CHROMATOGRAPHY RESULTS

TEST CLIENT PROJECT #	: BTEX (EPA : EL PASO NA : 24324		۸S	ATI I.D.:	409389	
PROJECT NAME	: PIT CLOSU	RE				
SAMPLE ID. # CLIENT	I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01 946127	<u></u>	NON-AQ	09/15/94	09/22/94	09/23/94	1
02 946128		NON-AQ	09/15/94	09/22/94	09/23/94	1
03 946129		NON-AQ	09/15/94	09/22/94	09/23/94	1
PARAMETER	<u></u>		UNITS	01	02	03
BENZENE			MG/KG	<0.025	0.039	<0.025
TOLUENE			MG/KG	0.040	0.78	0.091
ETHYLBENZENE			MG/KG	<0.025	0.26	<0.025
TOTAL XYLENES			MG/KG	0.066	8.8	0.15
SURROGATE:						
BROMOFLUOROBE	NZENE (%)			93	70	91

.

PHASE II

RECORD OF SUBSURFACE ED DRATION Philip Environmental Services Corp. 4000 Monroe Road Farmington, New Mexico 87401 (506) 326-2262 FAX (505) 326-2388 Elevation Borehole Location <u>T31, R9, 5.30, T</u>					Project Na Project Na Project Lo Well Logg Personnel	umber ocation Jed By	EPNG Pits 14509 Riddle C S.Ke		of
GWL Depth Logged By Drilled By Date/Time Date/Time	Started		onahu 126/95 26/93	e , 1055 5, 1200	Client Per Drilling M	sonnel On-	4/4"		H <i>5H</i> 9.
Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monit Units: f BZ BH	oring	Drilling Conditions & Blow Counts
		18-20 23-25	10 2.0	Back Fill to 12' Silty SAND, light gray 10-25% silt, fine sand loose, damp. BOH-25.001				2) /O ZO
Comment	_1 s:	231. 5a	- <u>25'</u> mple	Sample (SEK40) Sen was bagged and ice	† +0 Гр	12/	b (BT	EX # ng pu	-TPH.) + in jar.
		_13	¥_दृ।	conted to surface Geologist S	Signature	Se	nok	160	Dej



ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	5EK 40	947085
MTR CODE SITE NAME:	89934	N/A
SAMPLE DATE TIME (Hrs):	07-26-95	(1:20
SAMPLED BY:		N/A
DATE OF TPH EXT. ANAL.:	07-27-95	07-27-95
DATE OF BTEX EXT. ANAL.:	8-1-95	8-1-95
TYPE DESCRIPTION:	VG	

REMARKS:

RESULTS

PARAMETER	RESULT	QUALIFIERS				
			DF	Q	M(g)	V(ml)
BENZENE	20.025	MG/KG)			
TOLUENE	20.025	MG/KG)			
ETHYL BENZENE	20.025	MG/KG	1			
TOTAL XYLENES	LO.025	MG/KG)			
TOTAL BTEX	20.10	MG/KG				
TPH (418.1)	78.5	MG/KG			2.04	28
HEADSPACE PID	2	PPM				
PERCENT SOLIDS	93.2	%				
	TPH is by EPA Method	418.1 and BTEX is by EF	A Method 8020			
he Surrogate Recovery was at	_104	% for this sample		was accepta	ible.	
ATI Resu	ts attad	ed				
F = Dilution Factor Used	0					
opproved By:	6	.:	Date:	8/22/4	5	





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

ATI I.D. 508302

August 11, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I & II 24324

Attention: John Lambdin

On **08/01/95**, 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.

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Kimberly D. McNeill Project Manager

Mitchell Rubenstein, Ph.D. Η. Laboratory Manager

MR:jt

Enclosure



Corporate Offices: 5550 Morehouse Drive San Diego, CA 92121 (619) 458-9141



GAS CHROMATOGRAPHY RESULTS

TEST

: BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 508302

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	947083	NON-AQ	07/26/95	08/01/95	08/01/95	1
02	947084	NON-AQ	07/26 /95	08/01/95	08/01/95	1
03	947085	NON-AQ	NON-AQ 07/26/95		08/01/95	1
PARAME	FER		UNITS	01	02	03
BENZEN	E		MG/KG	<0.025	<0.025	<0.025
TOLUEN	E		MG/KG	<0.025	<0.025	<0.025
ETHYLB	ENZENE		MG/KG	<0.025	<0.025	<0.025
TOTAL I	XYLENES		MG/KG	<0.025	0.027	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%)

101 99 104