3R - 161

REPORTS

DATE:

July 1, 1998

EL PASO ENERGY

RECEIVED

JUL 0 6 1998

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

July 1, 1998

Mr. William C. Olson
NMOCD
2040 S. Pacheco
Santa Fe, NM 87504
Certified Mail: Z 164 299 017
Z 164 299 020

Mr. Bill Liesse
BLM, FDO
1235 La Plata Hwy.
Farmington, NM 87401
Certified Mail: Z 164 299 018

Mr. Jim Walker
EPA - Water Division (WTR-9)
75 Hawthorne Street
San Francisco, CA 94105
Certified Mail: P 358 645 408

Re: Pit Closure Reports/Request for Approval

El Paso Field Services (EPFS) has enclosed, for your approval, pit closure reports for locations that have been remediated and closed.

The closure reports for the locations represented in this enclosure meet the following criteria:

- Pits were located inside the Vulnerable Groundwater Zone.
- The majority of the pits were initially excavated to practical extent.
- At least one of the analytical parameters in the initial verification sample exceeded clean up criteria.
- A soil boring was subsequently performed through the center of the original pit.
- Samples collected from the bottom of the soil boring meet all parameters for clean up criteria.
- The soil boring confirms that groundwater has not been impacted.

EPFS hereby requests your approval for a risk based closure of these pit locations. If you have any questions regarding this information, please contact me at 505/599-2141 or at my E-Mail address: millers@epenergy.com.

Sincerely,

Sandra Miller

Sandra D. Miller
Environmental Manager

xc: Mr. Denny Foust, NMOCD - Aztec w/enclosures (Z 164 299 016, Z 164 299 021)
Ms. Charmaine Tso - Navajo EPA w/enclosures (Z 164 299 019)

EPFS PIT CLOSURE SUMMARY

RECEIVED
JUL 0 6 1998
ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Charley Pah #2
Meter/Line ID - 70804

DENIED
Hit ground water
No grand water sample

SITE DETAILS

Legals - Twn: 27 **Rng:** 9 **Sec:** 12 **Unit:** B
NMOCD Hazard Ranking: 60 **Land Type:** Navajo
Operator: Texaco

PREVIOUS ACTIVITIES

Site Assessment: 6/14/94 **Excavation:** 8/17/94 **Soil Boring:** 2/10/97
Monitor Well: N/A **Re-Excavation: N/A** **Geoprobe: N/A**

CONCLUSIONS

The initial excavation was excavated to the practical extent of the trackhoe, which was 12 feet below ground surface (bgs). PID field screening indicated subsurface soils to be 283 ppm at 12 feet bgs. Excavation was terminated and a sample was collected. Sample analysis indicated total BTEX to be above standards at 98.9 mg/kg and TPH above standards at 368 mg/kg. A test boring was drilled in the center of the initial excavation to determine the vertical extent of impact to soil. A brown silty clay was encountered at 15 feet bgs and continued to approximately 16 feet bgs. At 16 feet bgs a light gray-brown, fine grained sand was encountered and continued to approximately 17 feet bgs. At 20 feet bgs the soil lithology changed again to an inter-bedded brown silty and sandy clay which continued to the termination of the boring at 20 feet bgs. Groundwater was encountered at approximately 21 feet and rose to 16.4 feet bgs in the boring. A groundwater monitoring well was not installed in the boring. A soil sample was collected for BTEX and TPH analysis at 20-22 feet bgs. Laboratory analysis showed all BTEX and TPH compounds to be below laboratory detection limits.

RECOMMENDATIONS

No further action is recommended at the site for the following reasons:

- The bulk of the impacted soil was removed during the phase 1 excavation.
- The initial excavation was terminated in a clay material.
- Test boring sample results indicated soils below standards 8 feet beneath the initial excavation.
- Residual hydrocarbons remaining in the soils at the bottom of the initial excavation will naturally degrade in time with minimal risk to the environment.

FIELD PIT SITE ASSESSMENT FORM

11

GENERAL

Meter: 70804 Location: Charley Pah Well No 2
Operator #: 0263 Operator Name: Texaco P/L District: Ballard
Coordinates: Letter: B Section 12 Township: 27 Range: 9
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 6-14-94 Area: 11 Run: 71

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☒ (1)
Outside ☐ (2)

Land Type:
BLM ☐ (1)
State ☐ (2)
Fee ☐ (3)
Indian Eastern Navajo Agency

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 Blanco 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: 60 **POINTS**

REMARKS

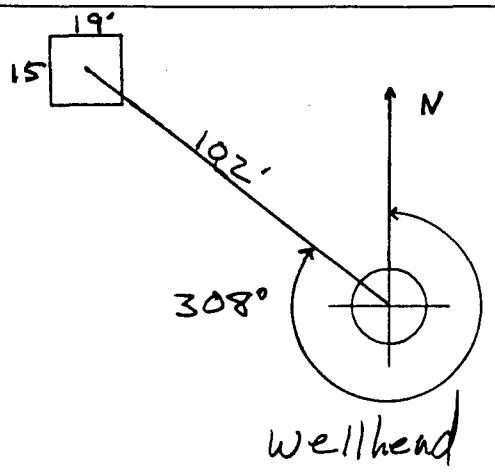
Remarks : one pit on location -- dry
Inside V.Z. on Redline of Topo

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 308 Footage from Wellhead 102

b) Length : 19 Width : 15 Depth : 3



REMARKS

Remarks : Photos – 1513

Completed By:

Signature

6-14-94

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 70804 Location: Charley PAH well #2

Coordinates: Letter: B Section 12 Township: 27 Range: 9

Or Latitude _____ Longitude _____

Date Started : 8/17/94 Run: 11 71

FIELD OBSERVATIONS

Sample Number(s): KD 718 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 283 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 80

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 8/17/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', Took PID sample, Closed pit.

Signature of Specialist: Kenny Deaver

(SP3181) 03/16/94

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP218	945949
MTR CODE | SITE NAME:	70804	Charley Pah #2
SAMPLE DATE | TIME (Hrs):	8/17/94	1230
PROJECT:	PHASE I	
DATE OF TPH EXT. | ANAL.:	8/18/94	8/18/94
DATE OF BTEX EXT. | ANAL.:	8/22/94	8/22/94
TYPE | DESCRIPTION:	VC	Gray fine sand/clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.5	MG/KG	20	D		
TOLUENE	42.0	MG/KG	20	D		
ETHYL BENZENE	4.90	MG/KG	20	D		
TOTAL XYLENES	52.0	MG/KG	20	D		
TOTAL BTEX	98.9	MG/KG				
TPH (418.1)	368	MG/KG			2.05	28
HEADSPACE PID	283	PPM				
PERCENT SOLIDS	88.3	%				

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

The Surrogate Recovery was at 135 for this sample All QA/QC was acceptable.
The "D" qualifier indicates reported result for this analyte is calculated basd on a secondary dilution factor.

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

DF = Dilution Factor Used

Approved By: John Kuelch INGVZPIT.XLS Date: 9/2/94

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:	KD 218	94599
MTR CODE | SITE NAME:	70804	N/A
SAMPLE DATE | TIME (Hrs):	8/17/94	1230
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8/18/94	8/18/94
DATE OF BTEX EXT. | ANAL.:	8/22/94	8/22/94
TYPE | DESCRIPTION:	~~SS~~ VC WTW 8/18/94	Grey fine sand/clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	10.5	MG/KG	20			
TOLUENE	42	MG/KG	20			
ETHYL BENZENE	4.9	MG/KG	20			
TOTAL XYLENES	52	MG/KG	20			
TOTAL BTEX	99	MG/KG				
TPH (418.1)	368	MG/KG			2.05	28
HEADSPACE PID	283	PPM				
PERCENT SOLIDS	~~89.5~~	88.3 %				

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

The Surrogate Recovery was at 135 % 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: 9/2/94

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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                     *
**********************************************************
*
 94/08/18  13:40
*
*  Sample identification
 946949
*
*  Initial mass of sample, g
 2.050
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 368.496
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.050
*
*
*
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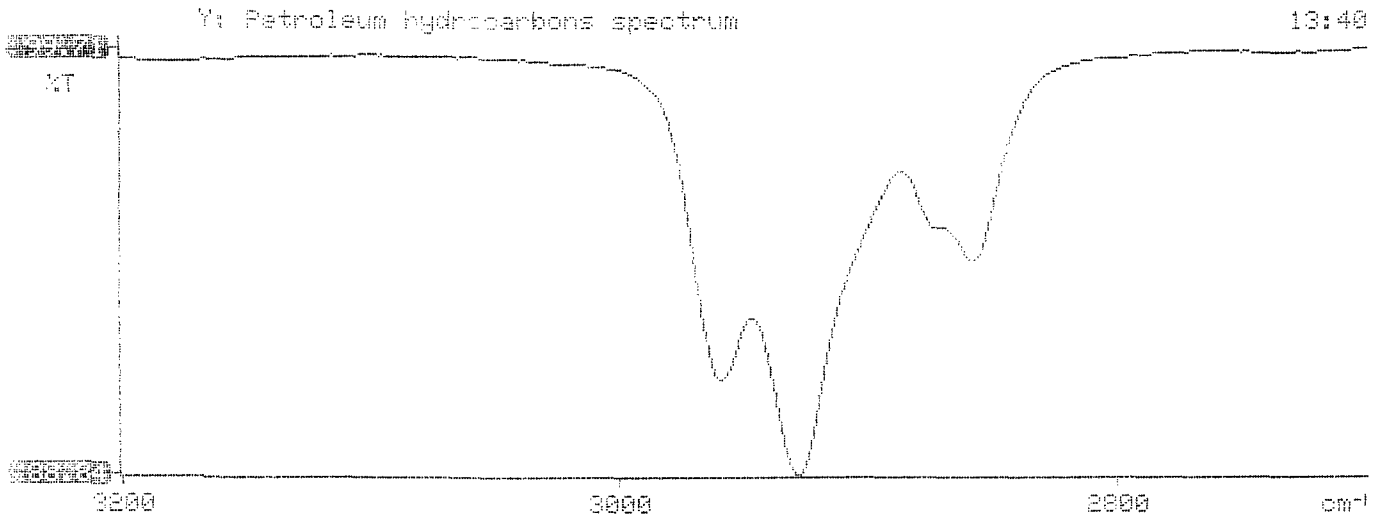


Analytical **Technologies,** Inc.

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

ATI I.D. **408380**

August 24, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **08/19/94**, 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.

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.: 408380

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945945	NON-AQ	08/16/94	08/22/94	08/22/94	10
02	945946	NON-AQ	08/16/94	08/22/94	08/22/94	20
03	945949	NON-AQ	08/17/94	08/22/94	08/22/94	20

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	4.5	<0.5	<0.5
TOLUENE	MG/KG	22	15	42
ETHYLBENZENE	MG/KG	1.6	8.4	4.9
TOTAL XYLENES	MG/KG	52	93	52
SURROGATE:				
BROMOFLUOROBENZENE (%)		65*	74	135*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page ____ of ____

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

Project Name EPFS GW PITS
Project Number 17520 Phase 6001.77
Project Location Charley Pad No 2 7080Y

Elevation
Borehole Location T27-R9-S12-Ltr B
GWL Depth
Logged By CM Chance
Drilled By K. Padilla
Date/Time Started 2/10/97 -0945
Date/Time Completed 2/10/97 -1045

Well Logged By CM Chance
Personnel On-Site D. Cesark, D Charley, C Mace
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: PPM BZ	BH	S/H/S	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15	1	15-17	24	Br silty CLAY, med stiff, med-high plastic, dry Lt gry-Br SAND, vF-F sand, loose, v. moist			0	0	0/0	0953h GWQ 16.4' BGS
20	2	20-22	24	Br silty CLAY, med stiff, med-high plastic, tr xtln parting dry Br clay SAND, vF-F sand, loose, saturated TOB 22'					6/2	1000h
25										
30										
35										
40										

Comments: Hit GW @ 19'. GW rose to 16.4' after 10 min. CMC299 collected from 20-22' & submitted to lab (BTEX, TPH) Bentonite added to boring & then grouted to surface (BENTONITE)

Geologist Signature Cory Chance

2/7/97\DRILLOG.XLS

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	CMC299	970079
MTR CODE | SITE NAME:	70804	Charley Pah #2
SAMPLE DATE | TIME (Hrs):	2/10/97	1000
PROJECT:	Phase II Drilling 20-22'	
DATE OF TPH EXT. | ANAL.:	2/13/97	2/13/97
DATE OF BTEX EXT. | ANAL.:	2/14/97	2/14/97
TYPE | DESCRIPTION:	VG	Gray/brown speckled clay

Field Remarks: _____

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 (418.1)	<10	MG/KG			2.48	28
HEADSPACE PID	2	PPM				
PERCENT SOLIDS	79.0	%				

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

The Surrogate Recovery was at 92.7 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: John Faubion Date: 2-25-97

EL PASO FIELD SERVICES LABORATORY
EPA METHOD 8020 - BTEX

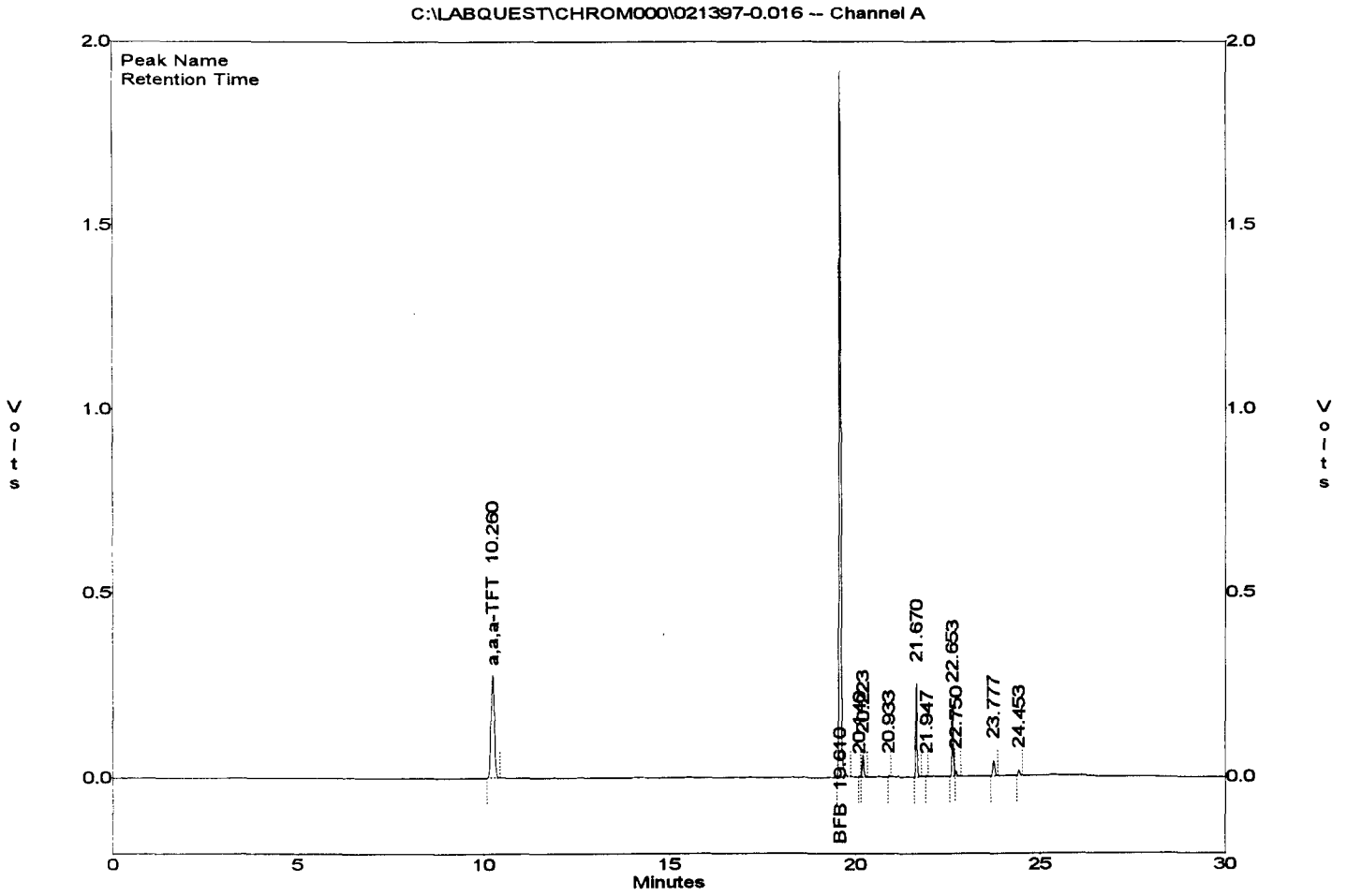
File : C:\LABQUEST\CHROM000\021397-0.016
Method : C:\LABQUEST\METHODS\0-021297.MET
Sample ID : 970079,5.54G,50U
Acquired : Feb 14, 1997 02:26:44
Printed : Feb 14, 1997 02:57:11
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.050	0	0.0000
a,a,a-TFT	10.260	1769730	93.7760
TOLUENE	12.567	0	0.0000
ETHYLBENZENE	16.790	0	0.0000
M,P-XYLENES	17.170	0	0.0000
O-XYLENE	18.310	0	0.0000
BFB	19.610	6772550	92.7127

Channel A Group Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
TOTAL XYLENES		0	0.0000



BTEX SOIL SAMPLE WORKSHEET

File	970079	**Date Printed**	2/18/97		
Soil Mass (g)	5.54	**Multiplier (L/g)**	0.00090		
Extraction vol. (mL)	10	**CAL FACTOR (Analytical):**	200		
Shot Volume (uL)	50	**CAL FACTOR (Report):**	0.18051		
		DILUTION FACTOR:	**1**	**Det. Limit**	
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.451	
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.451	
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.451	
p & m-xylene (ug/L)	0.00	*p & m-xylene (mg/Kg):*	0.000	0.903	
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.451	
		Total xylenes (mg/Kg):	**0.000**	1.354	
		Total BTEX (mg/Kg):	**0.000**		

```
**********************************************************
*                    Test Method for                     *
*      Oil and Grease and Petroleum Hydrocarbons         *
*                   in Water and Soil                    *
*                                                        *
*             Perkin-Elmer Model 1600 FT-IR              *
*                    Analysis Report                     *
**********************************************************
*
 97/02/13  14:52
*
*  Sample identification
 970079
*
*  Initial mass of sample, g
 2.480
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 -8.789
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.155
*
*
*
```