District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

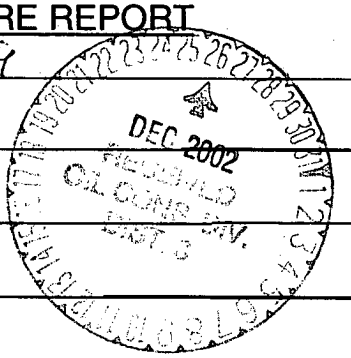
OK Defined Plume below standards

Submit 1 copy to appropriate District Office and 1 copy to the Santa Fe Office

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

30-039-21249



Operator: Phillips Telephone

Address:

Facility Or: San Juan 29-6 Unit 73A, Meter 89573
Well Name

Location: Unit or Qtr/Qtr Sec D Sec 20 T 29 R 6 County Rio Arriba

Pit Type: Separator ____ Dehydrator X Other

Land Type: BLM ____, State ____, Fee X Other

Pit Location: Pit dimensions: length 24', width 24', depth 4'
(Attach diagram)

Reference: wellhead X, other

Footage from reference: 54'

Direction from reference: 88 Degrees X East North ____ of ____ West South ____

Depth To Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water.)	Less than 50 feet	(20 points)
	50 feet to 99 feet	(10 points)
	Greater than 100 feet	(0 points) 10
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.)	Yes	(20 points)
	No	(0 points) 0
Distance To Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches.)	Less than 200 feet	(20 points)
	200 feet to 1000 feet	(10 points)
	Greater than 1000 feet	(0 points) 10

RANKING SCORE (TOTAL POINTS): 20

Date Remediation Started: 07/26/95 Date completed: 07/64/95

Remediation Method: (Check all appropriate sections.) Excavation _____ Approx. cubic yards _____

Landfarmed _____ Insitu Bioremediation _____

Other Backfill pit without excavation

Remediation Location: (i.e. landfarmed onsite, name and location of offsite facility) Onsite N/A Offsite N/A

General Description of Remedial Action: Arrived and dug sample hole. Soil in pit gray all the way through. Strong hydrocarbon odor.

Ground Water Encountered: No X Yes _____ Depth _____

Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths)

Sample location Four walls and center of pit composite

Sample depth 12'

Sample Date 07/26/95 Sample time 14:15

Sample Results

Benzene(ppm) Not reported.

Total BTEX(ppm) Not reported.

Field headspace(ppm) 220

TPH 8050

Ground Water Sample: Yes _____ No X (If yes, attach sample results)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Date 1/8/03

Signature Scott T. Pope

Printed Name and Title Scott T. Pope Senior Env. Scientist

elpaso

PIT CLOSURE REQUEST

San Juan 29-6 Unit #73A
Meter/Line ID 89573

SITE DETAILS

Legals - Twn: 29N	**Rng: 6W**	**Sec: 20**	**Unit: D**
NMOCD Hazard Ranking: 20		**Land Type: FEE**	
Operator: Phillips Petroleum Company		**Pit Closure Date: 7/26/95**	

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 to 12 feet (ft) below ground surface (bgs) and a soil sample was collected for field headspace and laboratory analysis for TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 220 ppm; laboratory analysis showed a TPH concentration of 8,050 mg/kg. The TPH measurement exceeded recommended remediation levels for the Hazard Ranking Score of 20.

No soil was disposed of offsite. The pit was backfilled with site soil, topped with clean soil from the surrounding berms, and graded in a manner to direct surface runoff away from the pit area.

A Phase II boring was completed with refusal at 41 ft bgs. No groundwater was encountered in the soil boring. One laboratory sample was collected at 40-41 ft bgs. Headspace analysis indicated an organic vapor content of 850 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3 mg/kg, and a TPH concentration of 53.0 mg/kg. The benzene, total BTEX and TPH concentrations were below recommended remediation levels for the Hazard Ranking Score.

No Phase III activities were conducted.

El Paso Field Services requests closure of the above mentioned pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over seven years.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- The clean soil from the berms placed on top of the excavation would limit the potential for direct contact with hazardous constituents by livestock or the public; i.e., current direct contact exposure pathways are unlikely to be completed.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Groundwater was not encountered in the soil boring at 41 ft bgs; local geologic features indicate the depth to groundwater is greater than 50 ft bgs.
- Benzene, total BTEX, and TPH concentrations at the bottom of the Phase II soil boring were below recommended remediation levels for the Hazard Ranking Score.

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 89573 Location: SAN JUAN 29-6 UNIT #73A
Operator #: _____ Operator Name: PHILLIPS PETROLEUM P/L District: _____
Coordinates: Letter: D Section 20 Township: 29 Range: 6
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 5·1·98 Area: 10 Run: 61

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 POND
(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)
Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 20 POINTS

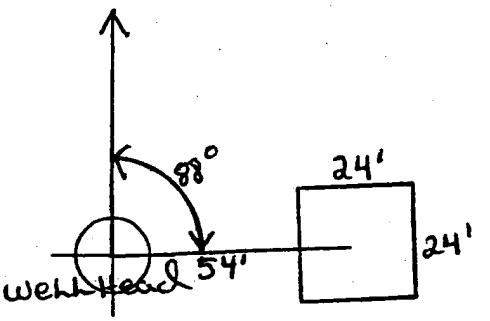
REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS IN A VALLEY APPROXIMATELY 850' TO 900' FROM A POND.

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 88° Footage from Wellhead 54'

b) Length : 24' Width : 24' Depth : 4'



ORIGINAL PIT LOCATION

Remarks :

Photos: 10:05

REMARKS

Completed By:

James L Pearson
Signature

3/7/95
Date

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 452	947094
MTR CODE | SITE NAME:	89573	N/A
SAMPLE DATE | TIME (Hrs):	07-26-95	14:15
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	07-27-95	07-27-95
DATE OF BTEX EXT. | ANAL.:		
TYPE | DESCRIPTION:	VG	

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	8050	MG/KG			0.51	28
HEADSPACE PID	220	PPM				
PERCENT SOLIDS	86.6	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 8/3/95

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 89573 Location: SAN JUAN 29-6 unit # 73A

Coordinates: Letter: D Section 20 Township: 29 Range: 06

Or Latitude _____ Longitude _____

Date Started : 7-26-95 Run: 10 61

FIELD OBSERVATIONS

Sample Number(s): MK452 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 220 PPM PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☐ Approx. Cubic Yards _____

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☒

Soil Disposition:

Envirotech ☐ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 7-26-95 Pit Closed By: Philip

REMARKS

Remarks : Arrived Dug sample Hole Soil in pit ~~black~~ Grey all the way through Strong Hydrocarbon odor

Signature of Specialist: Morgan Littleton

(SP3191) 03/16/94

RECORD OF SUBSURFACE EXPLORATION

PHILIP SERVICES CORP.
[redacted] Monroe Road
[redacted]ington, 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 SAN JUAN 29-6 #73A 89573

Elevation
Borehole Location LTR: D S: 20 T: 29 R: 6
GWL Depth NA
Drilled By K. PADILLA
Well Logged By H. BRADBURY
Date Started 8/31/98
Date Completed 8/31/98

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 BZ	BH	S/HS	Drilling Conditions & Blow Counts
										BZ=Breathing Zone BH=Borehole S/HS=Sample/Headspace
0										
5										
10				EXCAVATION SAMPLE COLLECTED AT 12'						
15	1	15-17	12	DK BR SANDY CLAY, FINE SAND MED STIFF, MED PLASTICITY. DRY	CL		0	3800	8562/531	0952 hrs
20	2	20-21'	6"	LT BR SANDSTONE FINE SAND LOW CEMENTED, DRY			0	7338	362/1582	1000 hrs
25	3	25-26	6"	LT BR SANDSTONE, FINE SAND, LOW - MED CEMENTED DRY			0	949	9483/566	1008 hrs hard drilling
30	4	30-31	6"	LT BR SANDSTONE, FINE SAND, LOW CEMENTED, DRY			0	635	893/5081	1027 hrs
35	5	35-36	4"	LT BR SANDSTONE, FINE SAND LOW-MED CEMENTED, DRY			0	766	7218/763	1043 hrs
40	6	40-41	4"	LT BR SANDSTONE, FINE SAND MED CEMENTED, DRY TBB 41			0	55	HAB 926/850	1123 hrs

Comments: HAB 14 40-41 SENT TO LAB FOR BTEX, TPH. AUGER REFUSAL AT 41'. GW NOT ENCOUNTERED. BH GROUTED TO SURFACE

Geologist Signature Holly Bradbury

8/18/98\Drillog

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	HAB14	980603
MTR CODE | SITE NAME:	89573	San Juan 29-6 #73A
SAMPLE DATE | TIME (Hrs):	8/31/98	1123
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9/6/98	9/6/98
DATE OF BTEX EXT. | ANAL.:	9/3/98	9/3/98
TYPE | DESCRIPTION:	VG	SOIL

Field Remarks: 40-41'

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)	53.0	MG/KG				
HEADSPACE PID	850	PPM				
PERCENT SOLIDS	97.3	%				

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

Surrogate Recovery was at 98.4 % for this sample All QA/QC was acceptable.

ative:

DF = Dilution Factor Used

Approved By: [signature] Date: 10/8/98

BTEX SOIL SAMPLE WORKSHEET

File :	980603	Date Printed :	9/8/98
Soil Mass (g) :	5.37	Multiplier (L/g) :	0.00093
Extraction vol. (mL) :	10	CAL FACTOR (Analytical):	200
Shot Volume (uL) :	50	CAL FACTOR (Report):	0.18622

		DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L) :	<0.5	Benzene (mg/Kg):	#VALUE!	0.466
Toluene (ug/L) :	<0.5	Toluene (mg/Kg):	#VALUE!	0.466
Ethylbenzene (ug/L) :	<0.5	Ethylbenzene (mg/Kg):	#VALUE!	0.466
p & m-xylene (ug/L) :	<1.0	p & m-xylene (mg/Kg):	#VALUE!	0.931
o-xylene (ug/L) :	<0.5	o-xylene (mg/Kg):	#VALUE!	0.466
		Total xylenes (mg/Kg):	#VALUE!	1.397
		Total BTEX (mg/Kg):	#VALUE!	

PINNACLE LABORATORIES

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMOTOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : EL PASO FIELD SERVICES PINNACLE I.D.: 809020
PROJECT # : (none)
PROJECT NAME : PHASE II DRILLING

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	980596	NON-AQ	8/27/98	9/5/98	9/6/98	1
02	980597	NON-AQ	8/27/98	9/5/98	9/6/98	1
03	980598	NON-AQ	8/27/98	9/5/98	9/6/98	1

PARAMETER	DET. LIMIT	UNITS	01	02	03
FUEL HYDROCARBONS, C6-C10	10	**MG/KG**	**12**	< 10	< 10
FUEL HYDROCARBONS, C10-C22	5.0	**MG/KG**	< 5.0	**32**	< 5.0
FUEL HYDROCARBONS, C22-C36	5.0	MG/KG	< 5.0	< 5.0	< 5.0
CALCULATED SUM:			**12.0**	**32.0**	
SURROGATE:					
O-TERPHENYL (%)			142	151	151
SURROGATE LIMITS	(66 - 151)				

CHEMIST NOTES:
N/A

PINNACLE LABORATORIES

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMOTOGRAPHY RESULTS

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

PINNACLE I.D.: 809020

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	980603	NON-AQ	8/31/98	9/6/98	9/6/98	1
05	980604	NON-AQ	9/1/98	9/6/98	9/6/98	1

PARAMETER	DET. LIMIT	UNITS	04	05
FUEL HYDROCARBONS, C6-C10	10	**MG/KG**	**17**	**36**
FUEL HYDROCARBONS, C10-C22	5.0	**MG/KG**	**36**	**16**
FUEL HYDROCARBONS, C22-C36	5.0	MG/KG	< 5.0	< 5.0
CULATED SUM:			**53.0**	**52.0**
SURROGATE:				
O-TERPHENYL (%)			103	98
SURROGATE LIMITS	(66 - 151)			

CHEMIST NOTES:
N/A

PINNACLE LABORATORIES

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMOTOGRAPHY QUALITY CONTROL
MSMSD

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)		
MSMSD #	: 090698	PINNACLE I.D.	: 809020
CLIENT	: EL PASO FIELD SERVICES	DATE EXTRACTED	: 9/6/98
PROJECT #	: (none)	DATE ANALYZED	: 9/6/98
PROJECT NAME	: PHASE II DRILLING	SAMPLE MATRIX	: NON-AQ
		UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD	REC LIMITS	RPD LIMITS
FUEL HYDROCARBONS	<5.0	100	112	112	101	101	10	(56 - 148)	20

CHEMIST NOTES:

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$