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
1220 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 Risk

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

(Revised 3/9/94)

## PIT REMEDIATION AND CLOSURE REPORT

Operator: Dugan by EPFS	30-045-24797 Telephone
Address:	
Facility Or Redfern #7, Meter 93974	
Well Name	
Location: Unit or Qtr/Qtr Sec_9	T 28 R 11 County San Juan
Pit Type: Separator Dehydrator	Other Drip
Land Type: BLM X, State , F	FeeOtherOther
Pit Location: Pit dimensions: length 18'(Attach diagram)	, width <u>18'</u> , depth <u>3'</u>
Reference: wellhead X	, other
Footage from reference:38	•
Direction from reference:120	Degrees X East North
	of West South
Depth To Ground Water	Less than 50 feet (20 points)
(Vertical distance from	50 feet to 99 feet (10 points)
contaminants to seasonal high water elevation of	Greater than 100 feet (0 points) 20
ground water.)	
ground water.)	
Wellhead Protection Area:	Yes (20 points)
(Less than 200 feet from a private	No $(0 \text{ points}) \underline{0}$
domestic water source, or; less than	
1000 feet from all other water sources.)	
Distance To Surface Water:	Less than 200 feet (20 points)
(Horizontal distance to perennial	200 feet to 1000 feet (10 points)
	200 feet to 1000 feet (10 points)
lakes, ponds, rivers, streams, creeks,	Greater than 1000 feet (10 points) 0
irrigation canals and ditches.)	· · · · · · · · · · · · · · · · · · ·

Date Remediation Started	d: <u>02/10/95</u> Date completed: <u>02/10/95</u>
Remediation Method: I	Excavation X Approx. cubic yards 20
sections.)	Landfarmed Insitu Bioremediation
(	Other
(i.e. landfarmed onsite,	Onsite Offsite Envirotech
name and location of offsite facility)	
General Description of R	Remedial Action: Arrived, dug sample hole. Hit sandstone. Excavated soil was grayish tan,
Strong hydrocarbon odor	r
Ground Water Encounter	red: No X Yes Depth Depth
Final Pit:	Sample location _ Four walls and center of pit composite
Closure Sampling: (if multiple samples,	
attach sample results and diagram of sample locations and depths)	Sample depth 4'
locations and depths)	Sample Date02/10/95 Sample time08:10
,	Sample Results
	Benzene(ppm)
	Total BTEX(ppm) 43.3
	Field headspace(ppm) <u>446</u>
	TPH <u>3900</u>
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 $1/2/63$	
Signature	Printed Name Scott T. Pope and Title San P. Fall Scientist



#### Redfern #7 Meter/Line ID 93974

SITE DETAILS

Legals - Twn: 28N

Rng: 11W

Sec: 9

Unit: H

**NMOCD Hazard Ranking: 20** 

Land Type: BLM

**Operator: Dugan Production Company** 

Pit Closure Date: 2/10/95

#### 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 4 feet (ft) below ground surface (bgs) where sandstone was encountered and a soil sample was collected at 4 ft bgs for field headspace, BTEX analysis, and laboratory analysis for TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 446 ppm, benzene concentration of 2.2 mg/kg, total BTEX concentration of 43.3 mg/kg, and a TPH concentration of 3,900 mg/kg. The TPH measurement exceeded recommended remediation levels for the Hazard Ranking Score of 20.

Approximately 20 cubic yards of soil were excavated and hauled to Envirotech, a commercial landfarm, for treatment and disposal. The pit was backfilled with clean soil and graded in a manner to direct surface runoff away from the pit area.

A Phase II boring was completed to 15 ft bgs. No groundwater was encountered in the soil boring. One laboratory sample was collected at 13-15 ft bgs. Headspace analysis indicated an organic vapor content of 4 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 121 mg/kg. The benzene and total BTEX 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.
- Impacted soils were excavated to the practical extent of the equipment and subsurface conditions. All excavated soils were disposed of at an off-site location.
- Bedrock was encountered at 4 ft bgs making further excavation impractical.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the
- Backfilling the pit with clean soil has eliminated the potential for direct-contact with hazardous constituents by livestock or the public; i.e. the current direct contact exposure pathways are unlikely to be completed.
- Groundwater was not encountered in the soil boring to 15 ft bgs.



#### PIT CLOSURE REQUEST

- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Benzene and total BTEX concentrations were non-detect at the base of the Phase II soil boring (15 feet bgs).
- TPH concentrations in the soil at 13 ft bgs were approximately 3% of the concentration at 4 ft bgs, and were below the recommended remediation levels for this site. This strong attenuation with depth indicates that residual hydrocarbons will likely degrade by natural attenuation with minimal risk to the environment.

#### **ATTACHMENTS**

Field Pit Assessment Form Revised Field Pit Assessment Form Field Pit Remediation/Closure Form Phase II Soil Boring Log Laboratory Analytical Results

## REVISED FIELD PIT SITE ASSESSMENT FORM

	Meter: 73974 Location: Researed #7								
GENERAL	Operator #: 1862 Operator Name: New P/L District: Mose PEAK								
R.	Coordinates: Letter Section Township: Range:								
Z	or Latitude Longitude								
Œ	Pit Type: Dehydrator Location Drip: X Line Drip: Other:								
	Site Assessment Date: 1/20/95 Area: 0/ Run: 43								
	Revised Date: 12/11/02								
	NMOCD Zone: Land Type: BLM $\square$ (1)								
	(from NMCOD Maps) State (2)								
	Intside $\stackrel{\textstyle{\swarrow}}{=}$ (1) Fee $\stackrel{\textstyle{\square}}{=}$ (3)								
	Outside (2) Indian								
	Depth to Groundwater								
	Less than 50 Feet (20 points) $\times$ (1)								
	50 Feet to 99 Feet (10 Points) (2)								
г.	Greater than 100 Feet (0 Points) (3)								
NT									
	Well Protection Area								
S	Is it less than 1000 feet from well, spring or other source of fresh water extraction?								
ES	or; Is it less than 200 feet from a private domestic water source?								
ASSESSME	YES (20 Points) NO (0 Points)								
3 A	Horizontal Distance to Surface Water Body								
SITE	Less than 200 Feet (20 points) (1)								
S	200 Feet to 1000 Feet (10 Points) (2)								
	Greater than 1000 Feet (0 Points) (3)								
	Name of Surface Water Body Kutz Canyou								
	(Surface Water Body: Perennial River, Stream, Creek, Irrigation Canal, Ditch, Lake, Pond)								
	Distance to Nearest Ephemeral Stream (1) < 100 feet (Navajo Pits Only)								
	$\Box (1) < 100 \text{ feet} $ (14a vajo 1 its Omy) $\Box (2) > 100 \text{ feet}$								
	TOTAL HAZARD RANKING SCOREPOINTS								
KS									
<b>1</b>	Remarks: Kousson BASED ON PERASSESSMENT OF								
	DISTANCE TO NEMETST SURFACE WAKE BODY.								
EN									



## FIELD SERVICES LABORATORY ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

## SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 373	944663
MTR CODE   SITE NAME:	93974	N/A
		ରଥ । ଠ
		N/A
	2/17/95	2/17/95
[·	2/21/95	2/21/95
	VC	light Gray-Brown fine sund and
SAMPLE DATE   TIME (Hrs):  SAMPLED BY:  DATE OF TPH EXT.   ANAL.:  DATE OF BTEX EXT.   ANAL.:  TYPE   DESCRIPTION:	2/21/95	N/A  2/17/95  2/21/95  2/21/95

REMARKS:	Annyais	2000	<u> </u>	ATI		
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## **RESULTS**

DARAMETER	RESULT	UNITS:	QUALIFIERS				
PARAMETER			DF	a	M(g)	V(ml)	
BENZENE	2. A	MG/KG	20	·			
TOLUENE	6.3	MG/KG	20				
ETHYL BENZENE	۲۲.۵	MG/KG	20				
TOTAL XYLENES	34.0	MG/KG	20				
TOTAL BTEX	43.3 100× 43.27	MG/KG					
TPH (418.1)	31·19s 7900	MG/KG				. Contract State (Social Contracts State )	
HEADSPACE PID	446	PPM					
PERCENT SOLIDS	82.4	%					

PERCENT SOLIDS	1 82.4	76		Control of the Contro
	TPH is by EPA Method	418.1 and BTEX is by EPA	A Method 8020	
Surrogate Recovery was at tive:	87	_% for this sample	All QA/QC was acceptable.	
ATI Results	affached			
DE - Dilution Factor Used				



## GAS CHROMATOGRAPHY RESULTS

TEST

: BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 502381

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE	CLIENT I.D	MA	TRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
ID. #	946662	<u> </u>	N-AQ	02/09/95	02/21/95	02/21/95	1
06	946663		N-AQ	02/10/95	02/21/95	02/21/95	20
07	946664	NO	N-AQ	02/10/95	02/21/95	02/22/95	1
PARAME	TED			UNITS	05	06	07
ENZEN				MG/KG	<0.025	2.2	<0.025
LUEN				MG/KG	<0.025	6.3	<0.025
	ENZENE			MG/KG	<0.025	0.77	<0.025
	XYLENES			MG/KG	<0.025	34	<0.025
armpoc							
SURROG		(%)			91	87	95

# FIELD PIT REMEDIATION/CLOSURE FORM

TAGENER	TENERA	Meter: 93974 Location: Red Fern #7  Coordinates: Letter: H Section 9 Township: 28 Range: 11  Or Latitude Longitude ———  Date Started: 2-10-95 Run: 01 43
1	FIELD OBSERVATIONS	Sample Number(s): MK313  Sample Depth: Feet  Final PID Reading PID Reading Depth Feet  Yes No  Groundwater Encountered
	CLOSURE	Remediation Method:  Excavation  Onsite Bioremediation  Backfill Pit Without Excavation  Soil Disposition:  Envirotech  Other Facility  Name:  Pit Closure Date: 2-10-95  Pit Closed By: BET
	REMARKS	Remarks: Arrived Dug Sample Hole Hit Sand Stone Excavated Soil was Grayish Tan strong Hypro carbon odor
<u> </u>	ji .	Signature of Specialist: Morgan Killian (Sp3191) 03/16/94

## RECORD OF SUBSURFACE EXPLORATION

PHILIP ENVIRONMENTAL

4000 Monroe Read Farmington, New Mexico 67401 (505) 326-2262 FAX (505) 326-2388

	T28, R11, 59, H
GWL Depth Logged By	Jeff W. Kindley
Drilled By	K Padilla
Date/Time Started	08124195 1045
Date/Time Comple	eted 08124 195 1217

Borehole #	BH-1	/
* BeW		
Page	of	
Phase	6000.77	

Project Name EPNG Pits
Project Number 14509 Phase 6000.77
Project Location Red Lun #7 93974

Well Logged By
Personnel On-Site
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	Semple Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Monitor nits: PPI BH		Drilling Conditions & Blow Counts
E				BackFill material to 4°					
5									
10	<b>1</b>	8-10	20	SW, BR SAND, moist, medium grained, very dense, hydrocenbon ador				114	1125 84 blows gar Forst
15	2	13-15	7 2.0	Sw, BR SAND, medium grained, moist, vay dine, no odor				% /4	1149 80 blows gan Foot
20	-			Boring terminated out 15					
25 			•						
30									
35									
40									

Comments: Dangle collected from 13 to 15', Analysisod BTEX/TPH, Sample JWK 44
BH growted to the surface

Geologist Signature Hay Kndle



# FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

## SAMPLE IDENTIFICATION

Lab ID Field ID SAMPLE NUMBER: JWK 44 Redfern#7 MTR CODE | SITE NAME: 93974 1149 08-24-95 SAMPLE DATE | TIME (Hrs): Phase II Drilling PROJECT: DATE OF TPH EXT. | ANAL.: DATE OF BTEX EXT. | ANAL.: thrown sand isaid stone VG TYPE | DESCRIPTION:

Field Remarks:	

### **RESULTS**

	RESULT	UNITS	QUALIFIERS			
PARAMETER			DF	Q	M(g)	V(ml)
BENZENE	4.5	MG/KG				
TOLUENE	4,5	MG/KG				
ETHYL BENZENE	4.5	MG/KG				
TOTAL XYLENES	4 1.5	MG/KG				
TOTAL BTEX	43	MG/KG				
TPH (418.1)	121	MG/KG			2.05	200
HEADSPACE PID	4	PPM				
PERCENT SOLIDS	90.5	%				

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

ne Surrogate Rec	covery was at	<u> </u>	for this sample	All QA/QC was acceptable.	
Narrative:	÷ 1	•			
		4			