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

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☒ No ☐
Type of action: Registration of a pit or below-grade tank ☐ Closure of a pit or below-grade tank ☒

Operator: Public Service Company of New Mexico Telephone: (505) 241-2016 e-mail address: rdelapp@pnm.com
Address: Alvarado Square, Mail Stop 2104 Albuquerque, NM 87158-2104
Facility or well name: San Ysidro Wells No 4 API #: 30-043-20119 U/L or Qtr/Qtr SW Sec 20 T 15N R 1E
County: Sandoval Latitude: 35.51407 Longitude: -106.86111 NAD: 1927 ☐ 1983 ☒ Surface Owner Federal ☒ State ☐ Private ☐ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☒ Workover ☐ Emergency ☐ Lined ☐ Unlined ☒ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume 3452 bbl	Volume: ____bbl Type of fluid: _____ Construction material: _____ Double-walled, with leak detection? Yes ☐ If not, explain why not. _____	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet **100 feet or more**	(20 points) (10 points) **(0 points)**
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes **No**	(20 points) **(0 points)**
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet **1000 feet or more**	(20 points) (10 points) **(0 points)**
	Ranking Score (Total Points)	**(0 points)**

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if you are burying in place) onsite ☒ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☒ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:
Site remediation not necessary, closed in place.
Ranking Score: 0
Analytical Results and Site Map provided as attachment.

RECEIVED
DEC 30 2004
OIL CON. DIV.
DIST. 3

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☒, a general permit ☐, or an (attached) alternative OCD-approved plan ☒.**
Date: 1/4/05
Printed Name/Title Robin DeLapp, Sr. Env. Scientist Signature Robin K. DeLapp

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title DEPUTY OIL & GAS INSPECTOR, DIST. #3 Signature Denny Foust Date: DEC 30 2004

Print two copies of analysis

PINNACLE LABORATORIES

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

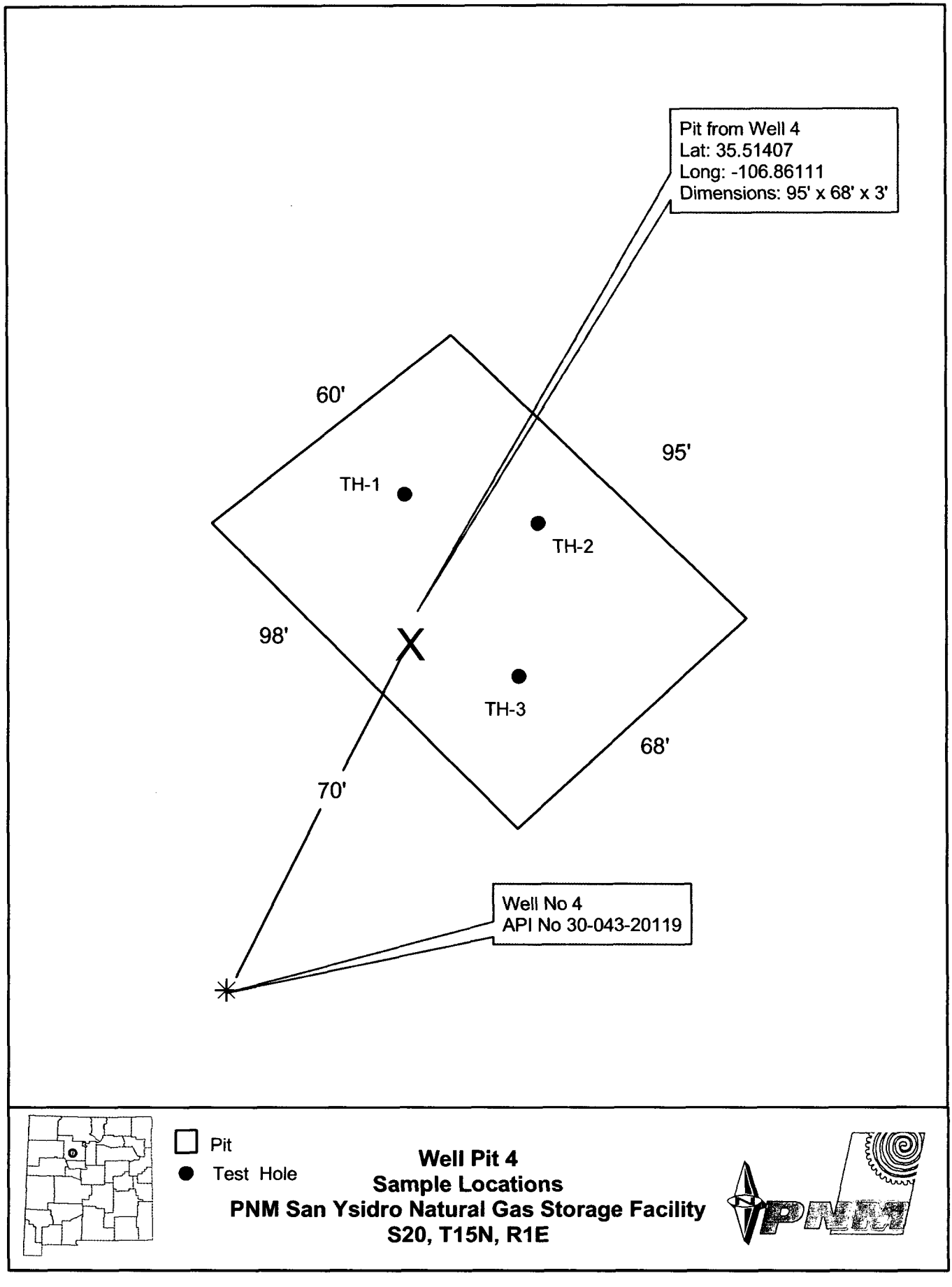
GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8021B / 8015B GRO - METHANOL PRESERVATION
CLIENT : PUBLIC SERVICE COMPANY PINNACLE I.D. : 412316
PROJECT # : (NONE) ANALYST : BP
PROJECT NAME : SAN YSIDRO

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	PIT FROM WELL 5 & 8 COMPOS 1-3	NON-AQ	12/17/2004	NA	12/20/2004	1
02	PIT FROM WELL 5 & 8 COMPOSITE 4-6	NON-AQ	12/17/2004	NA	12/20/2004	1
03	PIT FROM WELL 7	NON-AQ	12/17/2004	NA	12/20/2004	1

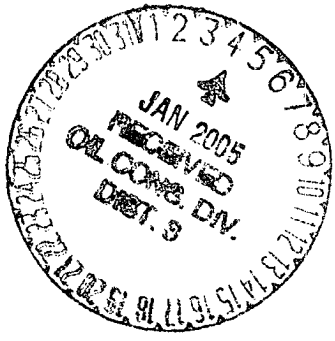
PARAMETER	DET. LIMIT	UNITS	PIT FROM WELL 5 & 8 COMPOS 1-3	PIT FROM WELL 5 & 8 COMPOSITE 4-6	PIT FROM WELL 7
FUEL HYDROCARBONS	10	MG/KG	< 10.0	< 10.0	< 10.0
HYDROCARBON RANGE			C6-C10	C6-C10	C6-C10
HYDROCARBONS QUANTITATED USING			GASOLINE	GASOLINE	GASOLINE
BENZENE	0.025	MG/KG	< 0.025	< 0.025	< 0.025
TOLUENE	0.025	MG/KG	< 0.025	< 0.025	< 0.025
ETHYLBENZENE	0.025	MG/KG	< 0.025	< 0.025	< 0.025
TOTAL XYLENES	0.050	MG/KG	< 0.050	< 0.050	< 0.050
METHYL-t-BUTYL ETHER	0.13	MG/KG	< 0.13	< 0.13	< 0.13
SURROGATE:					
BROMOFLUOROBENZENE (%)			101	101	98
SURROGATE LIMITS	(80 - 120)				
DRY WEIGHT (%)			78	76	84

CHEMIST NOTES:
N/A



Well Pit 4
Sample Locations
PNM San Ysidro Natural Gas Storage Facility
S20, T15N, R1E

PNM
Alvarado Square
Albuquerque, NM 87158-2104
505 241-2031
Fax 505 241-2376
www.pnm.com



A personal commitment to New Mexico

January 4, 2005

Denny Foust
Oil Conservation Division
District III
1000 Rio Brazos Road
Aztec, NM 87410

RE: Pit Closure Approval Request
Public Service Company of New Mexico (PNM) San Ysidro Natural Gas Storage Facility
BLM Serial Numbers: NM 18928, NM 51354, and Agreement Number 670-2

Dear Mr. Foust:

PNM has completed the site assessment on three glycol dehydrator pits proposed for closure at PNM's San Ysidro Natural Gas Storage Facility in Sandoval County, New Mexico. The pits are located in southwest quarter of Section 20, Township 15 North and Range 1 East (see attached map). The assessment was conducted in accordance with the Pit Closure Work Plan submitted to your office on December 16, 2004. The assessment included obtaining soil samples to determine if the pits are ready for closure or if any on-site soil remediation will be required.

PNM proposes to close three glycol dehydrator pits associated with four wells. The wells have been used to withdraw or inject natural gas into an underground formation since the 1970s. The glycol dehydrators were equipped with a water/gas separator. Typically all separated water was routed to unlined evaporation ponds on the property. The pits PNM proposes to close were designed to collect excess water in emergency situations. As mentioned in the Work Closure Plan, PNM has removed three associated dehydrators from service. One dehydrator was replaced and will remain active with discharges rerouted to an approved above ground disposal tank and or acceptable disposal line.

During the site assessment, PNM collected composite samples from each of the three pits. The attached figures show the test hole locations. PNM collected 2 composite samples from the single dehydrator pit that serves Wells 5 and 8. Samples were collected from six test holes that were dug to approximately 3 feet below the ground surface. However, a solid layer of gypsum was encountered from between 2 and 3 feet below the ground surface and limited the depth of the test hole in some places.

Three test holes were dug to a depth of 3 feet at the Well 7 and Well 4 pits. Composite samples were collected from these test holes. PNM conducted field sampling using a photo ionization detector (PID). The results of the heated head space field test indicate the volatile organic compound (VOC) levels were well below 100 parts per million (ppm). The highest PID level recorded was 23.7 ppm in the pit for Wells 5 and 8.

As a precautionary measure, PNM sent the composite samples to a laboratory for analysis for benzene, toluene, ethylbenzene, total xylenes (BTEX), and Methyl-t-Butyl Ether (MTBE) using EPA method 8021, fuel hydrocarbons using EPA method 8015, and for fuel hydrocarbons using EPA 8015 modified.

PNM is submitting the results of the assessment to your office along with a completed C-144 form for each pit. The laboratory analysis indicates the BTEX and hydrocarbon levels are within acceptable limits for closure. The OCD Ranking Score for each pit is zero; therefore, no on-site soil remediation is required prior to pit closure. I have summarized the laboratory analysis results in a table below.

Parameter	Pit from Wells 5 & 8 Composite from Test Holes 1-3	Pit from Wells 5 & 8 Composite from Test Holes 4-6	Pit from Well 7 Composite from Test Holes 1-3	Pit from Well 4 Composite from Test Holes 1-3
Benzene	<0.025 mg/kg	<0.025 mg/kg	<0.025 mg/kg	<0.025 mg/kg
Toluene	<0.025 mg/kg	<0.025 mg/kg	<0.025 mg/kg	<0.025 mg/kg
Ethylbenzene	<0.025 mg/kg	<0.025 mg/kg	<0.025 mg/kg	<0.025 mg/kg
Total Xylenes	<0.050 mg/kg	<0.050 mg/kg	<0.050 mg/kg	<0.050 mg/kg
Methyl-t-Butyl Ether (MTBE)	<0.13 mg/kg	<0.13 mg/kg	<0.13 mg/kg	<0.13 mg/kg
Fuel Hydrocarbons (C6 – C10 Gasoline)	<10.0 mg/kg	<10.0 mg/kg	<10.0 mg/kg	<10.0 mg/kg
Fuel Hydrocarbons (C-10-C22)	1500 D10 mg/kg	<10.0 mg/kg	<10.0 mg/kg	<10.0 mg/kg
Fuel Hydrocarbons (C-22-C36)	16 mg/kg	<10.0 mg/kg	<10.0 mg/kg	<10.0 mg/kg

In accordance with the Pit Closure Work Plan, PNM proposes to recontour the pit surface to prevent erosion and ponding of rainwater over the sites. To accomplish this, PNM will use the soil from the berms surrounding the pits. No additional soil will be needed to fill in the pits. Final closure will include re-vegetation by hand seeding. PNM seeks your approval to proceed with pit closure at San Ysidro Natural Gas Storage Facility.

Please let me know when PNM can proceed with the closure. If you have any questions concerning this issue, please call me at (505) 241-2016.

Sincerely,

Robin K. DeLapp

Robin K. DeLapp
Senior Environmental Scientist

Attachments: Laboratory Results
OCD C-144 form

cc: Connie Maestas, Bureau of Land Management, 435 Montano Road, NE, Albuquerque, NM 87107
Mark Sikelianos, Delphi, Inc., 101 Edelweiss, Tijeras, NM 87059
Kevin Lawrence, PNM, Mail Stop GF60
ESD/DCC files