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

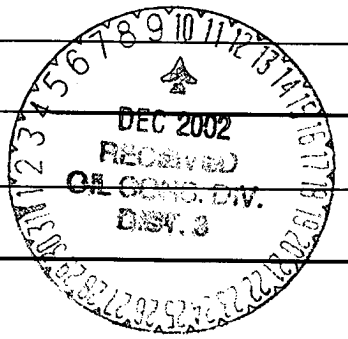
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Risk Exceeds Standards defined Plume extent TPH-204

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: Unocal 30-039-06874 Telephone: _____

Address: _____

Facility Or: Rincon Unit #38, Meter 70970
Well Name

Location: Unit or Qtr/Qtr Sec I Sec 26 T 27 R 7 County Rio Arriba

Pit Type: Separator _____ Dehydrator _____ Other Drip

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

Pit Location: Pit dimensions: length 17', width 17', depth 0'
(Attach diagram)

Reference: wellhead X, other _____

Footage from reference: 102'

Direction from reference: 327 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) 20
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) 0

RANKING SCORE (TOTAL POINTS): 20

Date Remediation Started: 11/28/94 Date completed: 11/29/94

Remediation Method: Excavation X Approx. cubic yards 130

(Check all appropriate sections.) Landfarmed _____ Insitu Bioremediation _____

Other _____

Remediation Location: (i.e. landfarmed onsite, name and location of offsite facility) Onsite _____ Offsite Envirotech

General Description of Remedial Action: Unocal had previously covered pit. Removed 12 yds of overburden . Excavated pit to 12', took PID sample, closed pit.

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 11/29/94 Sample time 14:20

Sample Results

Benzene(ppm) 1.01

Total BTEX(ppm) 34.5

Field headspace(ppm) 625

TPH 402

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

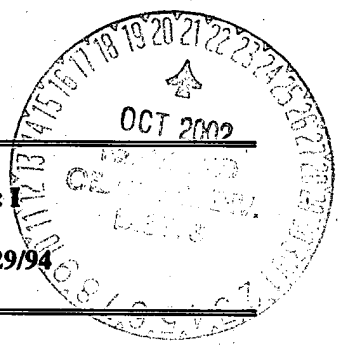
Signature Scott T. Pope

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

elpaso

PIT CLOSURE REQUEST

Rincon Unit #38
Meter/Line ID 70970



SITE DETAILS

Legals - Twn: 27N **Rng:7** **Sec:26** **Unit: I**
NMOCD Hazard Ranking: 20 **Land Type: BLM**
Operator: Unocal **Pit Closure Date: 11/29/94**

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.

The pit was excavated to 12 feet (ft) below ground surface (bgs) and a soil sample was collected for field headspace analysis and laboratory analysis for BTEX and TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 625 ppm. The laboratory results for BTEX exceeded QA/QC criteria and are not considered representative. The TPH concentration in the sample was 402 mg/kg, exceeding its recommended remediation level for the Hazard Ranking Score of 20.

Approximately 130 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 39 ft below ground surface (bgs). No groundwater was encountered in the soil boring. One laboratory sample was collected at 37-39 ft bgs. No headspace analysis was conducted because of poor sample recovery. Laboratory analysis indicated a benzene concentration of <2 mg/kg, a total BTEX concentration of <12 mg/kg, and a TPH concentration of 204 mg/kg. Benzene and total BTEX concentrations were below recommended remediation levels for the Hazard Ranking Score. The TPH concentration exceeded its recommended remediation level for its Hazard Ranking Score of 20.

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

- The primary source, discharge to the pit, has been removed for over seven years.
- The impacted soil was disposed of offsite.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Backfilling the pit with clean soil eliminated the potential for direct contact with hazardous constituents by livestock or the public; i.e., direct contact exposure pathways are incomplete.
- Groundwater was not encountered in the soil boring to 39 ft bgs.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.

- TPH concentrations at 39 ft bgs were approximately 50% of what they were at 12 ft bgs indicating that significant downward constituent migration is not occurring. This reduction in concentration with depth indicates that residual hydrocarbons in the soil will likely degrade by natural attenuation with minimal risk to the environment. .

ATTACHMENTS

Field Pit Assessment Form
Field Pit Remediation/Closure Form
Phase 2 Soil Boring Log
Laboratory Analytical Results

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 70970 Location: Rincon Unit #38

Operator #: _____ Operator Name: Unocal P/L District: Blanco

Coordinates: Letter: I Section 26 Township: 27 Range: 7

Or Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____

Site Assessment Date: 11/15/94 Area: 03 Run: 22

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 _____

(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: 20 **POINTS**

REMARKS

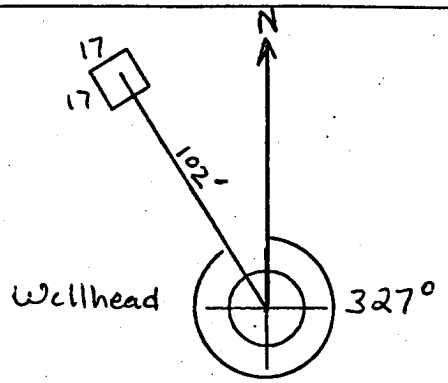
Remarks : Topo - inside Rediv Inside

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 327° Footage from Wellhead 102'

b) Length : 17 Width : 17 Depth : 0



REMARKS

Remarks :

Pictures 1025 (21-24) Roll-4

Pit Covered and capped. All measurements taken from approximate center of old pit. Approximate center marked w/ survey lath.

Completed By:

Scott T. Payne

Signature

11/15/94

Date

~~SPLIT~~

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 379	94/6512
MTR CODE | SITE NAME:	70970	N/A
SAMPLE DATE | TIME (Hrs):	11-29-94	1420
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	12-5-94	12-5-94
DATE OF BTEX EXT. | ANAL.:	12/02/94	12/02/94
TYPE | DESCRIPTION:	VC	Dark Brown sand + clay

REMARKS: BTEX to be done at EPNG and ATI labs.

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS DF	Q	M(g)	V(ml)	ATI Results
BENZENE	1.01	MG/KG	0.0832		4.81	20	< 0.25
TOLUENE	2.92	MG/KG					20.25
ETHYL BENZENE	2.69	MG/KG					0.88
TOTAL XYLENES	27.9	MG/KG					9.4
TOTAL BTEX	34.5	MG/KG					10.78
TPH (418.1)	402	MG/KG			2.02	28	
HEADSPACE PID	625	PPM					Surrogate %: 702
PERCENT SOLIDS	84.9	%					Dilution Factor: 1

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

The Surrogate Recovery was at 155.8 for this samp All QA/QC was acceptable. NOT USED

Narrative:
Refer to raw data for estimation calc. for O-xylene
Large Surrogate Recovery possibly due to interefance - refer to overlay also

DF = Dilution Factor Used ATI Results Attached.

Approved By: _____ Date: 12/27/94

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 412325
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	946512	NON-AQ	11/29/94	12/08/94	12/12/94	10
02	946513	NON-AQ	11/29/94	12/08/94	12/09/94	50
03	946514	NON-AQ	11/30/94	12/08/94	12/09/94	100

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.25	1.4	8.2
TOLUENE	MG/KG	<0.25	<1.3	74
ETHYLBENZENE	MG/KG	0.88	16	4.4
TOTAL XYLENES	MG/KG	9.4	190	20
SURROGATE:				
BROMOFLUOROBENZENE (%)		102	*	*

*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 70970 Location: Rincon Unit #38

Coordinates: Letter: I Section 26 Township: 27 Range: 7

Or Latitude _____ Longitude _____

Date Started : 11/28/94 Run: 03 22

FIELD OBSERVATIONS

Sample Number(s): KD379 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 625 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 130

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 11/29/94 Pit Closed By: BEI

REMARKS

Remarks : Unocal had previously covered pit, Removed 12' yds of overburden, Excavated pit to 12', took PID Sample, closed pit.

Signature of Specialist: Kenny Dorn

(SP3191) 03/16/94

El Paso Natural Gas Company

CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER	PROJECT NAME
# 24324	Pit Closure Project

SAMPLERS: (Signature) Kurt Fenn DATE: 11/29/94

LAB ID	DATE	TIME	MATRIX	FIELD ID	TOTAL NUMBER OF CONTAINERS	SAMPLE TYPE	REQUESTED ANALYSIS: TPH EPA 418.1	BTEX EPA 8020	LAB PID			SEQUENCE #	REMARKS
9411512	11/29/94	1420	Soil	KD 379	1	VC	X	X				343	

CONTRACT LABORATORY P. O. NUMBER

RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)
Kurt Fenn	11/29/94 1640	Brenda Kiess	Brenda Kiess	11/30/94 1410	
RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED OF LABORATORY BY: (Signature)

36°

REQUESTED TURNAROUND TIME:
☐ ROUTINE ☐ RUSH _____

CARRIER CO.

BILL NO.:

SAMPLE RECEIPT REMARKS

CHARGE CODE

RESULTS & INVOICES TO:

FIELD SERVICES LABORATORY
EL PASO NATURAL GAS COMPANY
P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

505-599-2144 FAX: 505-599-2261

White - *Testing Laboratory* Canary - *EPNG Lab* Pink - *Field Sampler*

FM-08-0565 A (Rev. 05-94)

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

Philip Environmental Services Corp.
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase ~~601~~ 6020
Project Location Rincon Unit #38, 70970

Elevation
Borehole Location T27, R7, S.26, I
GWL Depth
Logged By S.Kelly
Drilled By M. Donohue
Date/Time Started 9/7/95, 1100
Date/Time Completed 9/7/95, 1355

Well Logged By S.Kelly
Personnel On-Site M. Donohue, J. Johnson
Contractors On-Site
Client Personnel On-Site
Drilling Method 4 1/4" ID HSA
Air Monitoring Method CGI, 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: NDU BZ	BH	S/HS	Drilling Conditions & Blow Counts
0				Backfill to 12!						
5										
10										
15										Drilling got hard at 16.5'
20	1	18-20	.6'/2.0'	SILT, dk grey, dense, dry					115/807	
						22				
25	2	23-25	.8'/2.0'	SILT, brown, v. dense, dry					17/669	1152
						26				
30	3	28-30	.4'/2.0'	SILT, dk. red. v. dense, dry					45/757	1210 drilling is very slow
						34				
35	4	33-35	.2'/2.0'	SILT, grey, v. dense, dry					5/21	1220 - not enough to collect sample.
	5	37-39	.2'/2.0'	SAA				1230	0	Not enough sample to take headspace
40				TOB - 39.0'						

Comments: 37'-39' sample (SEK90) sent to lab (BTEX + TPH.) BH grouted to surface.

Geologist Signature Sarah Kelly

El Paso Natural Gas Company

CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER	PROJECT NAME
14509	Pit Closure Project # 24324

SAMPLERS: (Signature) Mark Kelly DATE: 9/7/95

	LAB ID	DATE	TIME	MATRIX	SAMPLE NUMBER	TOTAL NUMBER OF CONTAINERS	SAMPLE TYPE	REQUESTED ANALYSIS: TPH EPA 418.1	BTEX EPA 8020			PID HS ppm	SEQ #	REMARKS
1	423	9/7/95	1230	Soil	SEK80	1	VG	V	V			—	65	Rincon Unit #38, 70970 37'-39'
17	424	9/7/95	1547	Soil	SEK81	1	VG	V	V			256	66	Lat K21 L00613 Line Drip 48'-50'

SEK 9/7/95

CONTRACT LABORATORY P. O. NUMBER

REMARKS

RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)
Mark Kelly	9/7/95			9/8/95 9:35	
RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)

REQUESTED TURNAROUND TIME:
☐ ROUTINE ☐ RUSH _____

CARRIER CO.

BILL NO.:

SAMPLE RECEIPT REMARKS

CHARGE CODE

RESULTS & INVOICES TO:

FIELD SERVICES LABORATORY
EL PASO NATURAL GAS COMPANY
P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499
505-599-2144 FAX: 505-599-2261

White - *Testing Laboratory* Canary - *EPNG Lab* Pink - *Field Sampler*

FM-08-0565A (Rev. 03-94)

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:	SEK 80	947423
MTR CODE | SITE NAME:	70970	Rincon Unit #38
SAMPLE DATE | TIME (Hrs):	09-07-95	1230
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-8-95	
DATE OF BTEX EXT. | ANAL.:	9/8/95	9/12/95
TYPE DESCRIPTION:	VG	LIGHT BROWN SAND w/SANDSTONE

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 2	MG/KG	4	D		
TOLUENE	< 2	MG/KG	4	D		
ETHYL BENZENE	< 2	MG/KG	4	D		
TOTAL XYLENES	< 6	MG/KG	4	D		
TOTAL BTEX	< 12	MG/KG	4	D		
TPH (418.1)	204	MG/KG			2.04	28
HEADSPACE PID	—	PPM				
PERCENT SOLIDS	92.3	%				

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

The Surrogate Recovery was at 89% for this sample All QA/QC was acceptable.

Narrative: _____

DF = Dilution Factor Used

Approved By: _____ Date: 9-13-95

BTEX SOIL SAMPLE WORKSHEET

File	947423	Date Printed	9/13/95
Soil Mass (g)	4.99	Multiplier (L/g)	0.00100
Extraction vol. (mL)	20	DF (Analytical)	800
Shot Volume (uL)	25	DF (Report)	0.80160

				Det. Limit
Benzene (ug/L)	0.00	Benzene (mg/Kg):	**0.000**	2.004
Toluene (ug/L)	1.94	Toluene (mg/Kg):	**1.555**	2.004
Ethylbenzene (ug/L)	0.85	Ethylbenzene (mg/Kg):	**0.681**	2.004
p & m-xylene (ug/L)	0.95	p & m-xylene (mg/Kg):	0.762	4.008
o-xylene (ug/L)	1.54	o-xylene (mg/Kg):	1.234	2.004
		Total xylenes (mg/Kg):	**1.996**	6.012
		Total BTEX (mg/Kg):	**4.232**	