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

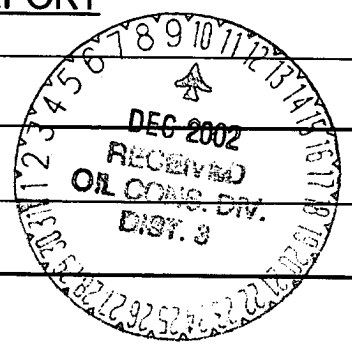
Risk defined Plume exceeds standard

OK

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 Telephone:

Address: 30-039-60090

Facility Or: Rincon Unit #41, Meter 70972
Well Name

Location: Unit or Qtr/Qtr Sec A Sec 35 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 20', width 21', depth 0'
(Attach diagram)

Reference: wellhead X, other _____

Footage from reference: 103'

Direction from reference: 324 Degrees X East North _____ of _____ West South _____

Depth To Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water.) TPH 504 at 45 feet	Less than 50 feet	(20 points)
	50 feet to 99 feet	(10 points) 0
	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~~ 0

Date Remediation Started: 11/30/94 Date completed: 11/30/94

Remediation Method: Excavation X Approx. cubic yards 140

(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. Were unable to remove clean 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 11/30/94 Sample time 14:20

Sample Results

Benzene(ppm) 7.15

Total BTEX(ppm) 591.5

Field headspace(ppm) 652

TPH 6190

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

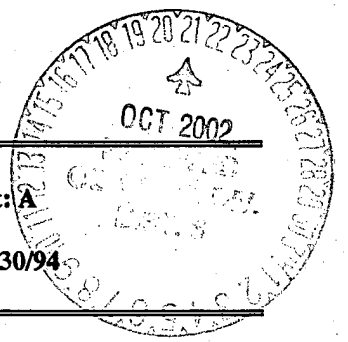
Signature Scott T. Pope

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

elpaso

PIT CLOSURE REQUEST

Rincon Unit #41
Meter/Line ID 70972



SITE DETAILS

Legals - Twn: 27N **Rng:7** **Sec:35** **Unit: A**
NMOCD Hazard Ranking: 20 **Land Type: BLM**
Operator: Unocal **Pit Closure Date: 11/30/94**

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 analyses for BTEX failed QA/QC criteria and are considered not representative of the environment. The TPH concentration in the sample was 6,190 mg/kg, exceeding its recommended remediation level for the Hazard Ranking Score of 20.

Approximately 140 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 with refusal at 45 ft bgs. No groundwater was encountered in the soil boring. One laboratory sample was collected at 38-40 ft bgs. Headspace analysis indicated an organic vapor content of 257 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 504 mg/kg. Only the TPH concentration exceeded its recommended remediation level for the Hazard Ranking Score.

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 45 ft bgs.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.

- The TPH concentration at 45 ft bgs was less than 10% of the concentration at 12 ft bgs indicating that significant downward migration is not occurring. Further, 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: 70972 Location: RINCON Unit #41
Operator #: _____ Operator Name: unocal P/L District: Blanco
Coordinates: Letter: A Section 35 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

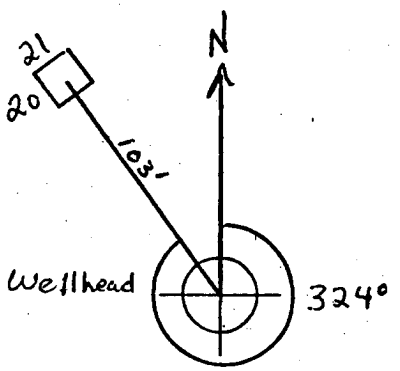
Remarks : Topo - Inside Redline Inside

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 324° Footage from Wellhead 103

b) Length : 20 Width : 21 Depth : 0



REMARKS

Remarks :

Pictures 1045 (1-4) Roll-5

Pit appeared to have been moved. All measurements taken from the approximate center of old pit. Marked w/ survey lath

Completed By:

Scott T. Pope

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 380	9416514
MTR CODE | SITE NAME:	70972	N/A
SAMPLE DATE | TIME (Hrs):	11-30-94	1420
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	12-5-94	12-5-94
DATE OF BTEX EXT. | ANAL.:	12/01/94	12/02 & 12/6/94
TYPE | DESCRIPTION:	VC	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	7.15	MG/KG	~~1.02~~ 2.04/16 ~~1.02~~ 5.10/mm		4.90	20	~~0.41~~ 0.41 12/06/94
TOLUENE	77.8	MG/KG	1.02				5.10
ETHYL BENZENE	57.1	MG/KG					15.3
TOTAL XYLENES	449.1	MG/KG					20
TOTAL BTEX	591.5	MG/KG					40.7
TPH (418.1)	6190	MG/KG			0.89	28	—
HEADSPACE PID	652	PPM					Surrogate % *
PERCENT SOLIDS	87.2	%					Dilution Factor

DL mg/kg

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

The Surrogate Recovery was at 137.1% for this samp All QA/QC was acceptable.

NOT USED JP 12/27/94

Narrative: Evaluation w BFB

ATI Results attached. * Surrogate Recovery not obtainable due to sample dilution.

DF = Dilution Factor Used

Approved By: JP 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: 70972 Location: Rincon Unit #41

Coordinates: Letter: A Section 35 Township: 27 Range: 7

Or Latitude _____ Longitude _____

Date Started : 11/30/94 Run: 03 22

FIELD OBSERVATIONS

Sample Number(s): KD 380 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 652ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 140

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 11/30/94 Pit Closed By: BEI

REMARKS

Remarks : Unocal had previously covered pit, were unable to remove clean overburden. Excavated pit to 12', took pid sample, closed pit.

Signature of Specialist: Kenny Denner

(SP3181) 03/16/94

El Paso Natural Gas Company

CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER	PROJECT NAME
# 24324	Pit Closure Project

SAMPLERS: (Signature) Kenny Deann DATE: 11/30/94

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
9465 14	11/30/94	1420	soil	KD 380	1	UC	X	X				344	

CONTRACT LABORATORY P. O. NUMBER

RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)
Kenny Deann	11/30/94 1650	Brenda Riess	Brenda Riess	12/1/94 1025	
RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED OF LABORATORY 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-08-0565 A (Rev. 05-94)

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 2

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~~ 6000
Project Location Rincon Unit #41, 70972

Elevation
Borehole Location T27, R7, S.35, A
GWL Depth
Logged By S.Kelly
Drilled By M. Donohue
Date/Time Started 9/1/95, 1030
Date/Time Completed 9/1/95, 1330

Well Logged By S.Kelly
Personnel On-Site M. Donohue, J. O'Keefe, D. Tsalate
Contractors On-Site
Client Personnel On-Site
Drilling Method 4¼" 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	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15										
20	1	18-20	1.8'/2.0'	clayey SILT, dk reddish brown, 15-35% clay, nonplastic, med. dense dry					47 359	1042 At approx. 18' drilling got very hard, like rock.
25	2	23-25	0/2.0'	No recovery		25			— —	drilling is very slow at 23'.
	3	24-26	.95/2.0'	SILT, reddish grey, dense, dry					126 352	~~Auger refusal at 24'~~ 1K 9/1/95
30	4	28-30		SAA					3 153	
35	5	33-35	1.4'/2.0'	SAA					133 145	1145
40	6	38-40	1.65'/2.0'	SAA					172 257	1215

Comments: 38'-40' sample (SEK78) sent to lab (BTEX & TPH). Sample was bagged and iced prior to being put in jar. BH grouted to surface.

Geologist Signature Susan Kelly

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 2 of 2

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
Project Location Rincon Unit #41, 7097Z

Elevation
Borehole Location
GWL Depth
Logged By S.Kelly
Drilled By
Date/Time Started
Date/Time Completed

Well Logged By S.Kelly
Personnel On-Site
Contractors On-Site
Client Personnel On-Site

Drilling Method
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	Drilling Conditions & Blow Counts
40										
45	7	43-45		No recovery TOB-45.0' Refusal @ 45.0'						
10										
15										
20										
25										
30										
35										
40										

Comments:

Geologist Signature Sarah Kelly

El Paso Natural Gas Company

Phase II Drilling

CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER	PROJECT NAME
4509	Pit Closure Project # 24324

SAMPLERS: (Signature) Mark Kelly DATE: 9/1/95

LAB ID	DATE	TIME	MATRIX	SAMPLE NUMBER	TOTAL NUMBER OF CONTAINERS	SAMPLE TYPE	REQUESTED ANALYSIS: TPH EPA 418.1	REQUESTED ANALYSIS: BTEX EPA 8020	PID HS ppm	SE #	REMARKS
392	9/1/95	0945	Soil	SEK 77	1	VG	V	V	1	62	Rincon Unit #42, 7104S 28'-30'
393	9/1/95	1215	Soil	SEK 78	1	VG	V	V	257	63	Rincon Unit #41, 7097Z 38'-40'

SEK 9/1/95

CONTRACT LABORATORY P. O. NUMBER

RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)
Mark Kelly 340F	9/1/95 1515	Julie Dinkle	Julie Dinkle	9/5/95 10:20 26'	
RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED OF LABORATORY 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

FM-08-0565A (Rev 03-9

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 78	947393
MTR CODE | SITE NAME:	70972	Rincon Unit #41
SAMPLE DATE | TIME (Hrs):	09-01-95	1215
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-5-95	
DATE OF BTEX EXT. | ANAL.:	9/6/95	9/10/95
TYPE | DESCRIPTION:	VG	DARK BROWN, SAND & SAND STONE

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)	504	MG/KG			2.16	28
HEADSPACE PID	257	PPM				
PERCENT SOLIDS	93.3	%				

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

The Surrogate Recovery was at 85% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

JD

Date: 9-11-95

BTEX SOIL SAMPLE WORKSHEET

File	947393	**Date Printed**	9/11/95
Soil Mass (g)	4.98	**Multiplier (L/g)**	0.00100
Extraction vol. (mL)	20	**DF (Analytical)**	400
Shot Volume (uL)	50	**DF (Report)**	0.40161

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	1.004
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	1.004
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	1.004
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	2.008
o-xylene (ug/L)	1.18	o-xylene (mg/Kg):	0.474	1.004
		Total xylenes (mg/Kg):	**0.474**	3.012
		Total BTEX (mg/Kg):	**0.474**	