EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

RECEIVED
JUL 2 1998
OIL CON. DIV.

ANDERSON B #1
Meter/Line ID - 87940

SITE DETAILS

Legals - Twn: 25 **Rng:** 03 **Sec:** 33 **Unit:** M
NMOCD Hazard Ranking: 40 **Land Type:** 4 - Fee
Operator: DUGAN PRODUCTION CORP **Pit Closure Date: 10/25/94**

RATIONALE FOR RISK-BASED CLOSURE:

The above mentioned production pit was assessed and ranked according to the criteria in the New Mexico Conservation Division's Unlined Surface Impoundment Closure Guidelines.

The primary source, discharge to the pit, has been removed. There has been no discharge to the production pit for at least five years and the pit has been closed for at least three years.

The production pit has been remediated to the practical extent of the trackhoe or to the top of bedrock. Initial laboratory analysis has indicated that the soil remaining at the bottom of the excavation is above standards based on the hazard ranking score. Contaminated soil was removed and transported to an approved landfarm for disposal. The initial excavation was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching any residual hydrocarbons remaining in the soil. Therefore, further mobility of residual hydrocarbons is unlikely.

Since the soil samples from the initial excavation were above standards, a test boring was drilled and a sample was collected to evaluate the vertical extent of impact to soils. Test boring sample results indicated soils below standards beneath the original excavation.

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

- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All source material has been removed from the ground surface, eliminating potential direct contact with livestock and the general public.
- Groundwater was not encountered in the initial excavation or test boring; therefore, impact to groundwater is unlikely.
- Soil samples collected beneath the initial excavation were below standards.
- No potential receptors are within 1,000 feet of the site.
- Residual hydrocarbons remaining in the soil at the bottom of the initial excavation will naturally degrade in time with minimal risk to the environment.

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 87-940 Location: Anderson "B" - Well No. 1
Operator #: 1862 Operator Name: Dugan Production P/L District: Ojito
Coordinates: Letter: M Section 33 Township: 25 Range: 3
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 8/8/94 Area: 08 Run: 91

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 Leeson Canyon
(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: 40 **POINTS**

REMARKS

Remarks : Redline Book - Inside Vulnerable Zone Topo - Inside
One pit, pit is dry, will close one pit.

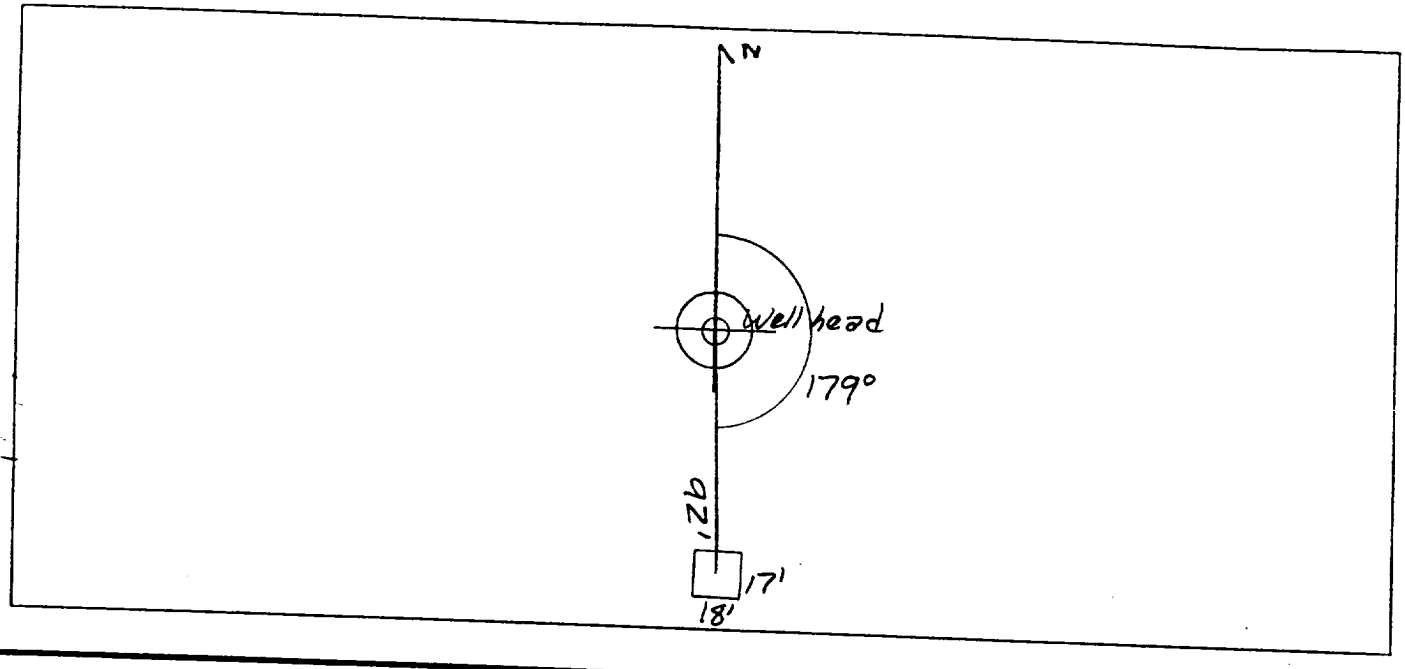
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 179° Footage from Wellhead 92'

b) Length : 18' Width : 17' Depth : 3'



REMARKS

Remarks :

Pictures @ 1506 (21-24, Roll 1)
Dump Truck
Pit is approximately 1000' from a residence.

Completed By:

Sarah Kelly
Signature

8/1/24
Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 87940 Location: Anderson 'B' well #1

Coordinates: Letter: M Section 33 Township: 25 Range: 3

Or Latitude _____ Longitude _____

Date Started : 10/25/94 Run: 08 91

FIELD OBSERVATIONS

Sample Number(s): KD349 _____ _____ _____

Sample Depth: 6' Feet

Final PID Reading 394 ppm PID Reading Depth 6' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒	Approx. Cubic Yards 30
Onsite Bioremediation	☐	
Backfill Pit Without Excavation	☐	

Soil Disposition:

Envirotech	☒	☐	Tierra
Other Facility	☐	Name:	_____

Pit Closure Date: 10/25/94 Pit Closed By: JEI

REMARKS

Remarks : Excavated pit to 6', Hit Sandstone, TOOK PID Sample, closed pit.

Signature of Specialist: Penny Deaver

(SP3191) 03/16/94

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 349	94/64/50
MTR CODE | SITE NAME:	879NO	N/A
SAMPLE DATE | TIME (Hrs):	10-25-94	0920
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	10-28-94	10-28-94
DATE OF BTEX EXT. | ANAL.:	11-4-94	11-5-94
TYPE | DESCRIPTION:	VC	grey coarse sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS				ATI Results
			DF	Q	M(g)	V(ml)	
BENZENE	<0.10	MG/KG	~~D~~ N/A ~~.005076~~			5V	0.69
TOLUENE	<0.10	MG/KG	N/A			5V	10.0
ETHYL BENZENE	0.838	MG/KG	.005076		3.94	20	1.9
TOTAL XYLENES	5.06	MG/KG	.005076		3.94	20	23
TOTAL BTEX	5.90	MG/KG	.005076		3.94	20	35.6 ~~35.59~~ KDK 11/14/94
TPH (418.1)	974	MG/KG	N/A ~~.005076~~		2.03	28	340
HEADSPACE PID	394	PPM					Surrogate % 69
PERCENT SOLIDS	91.7	%					Dilution Factor 20

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

The Surrogate Recovery was at 88.7 for this samp All QA/QC was acceptable.

Narrative:

ATI Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 11-5-94

SOIL INIAL

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM\946450a
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946450, 0.26 g
Acquired : Nov 04, 1994 15:14:35
Printed : Nov 04, 1994 15:40:47
User : John

x.0192

x.005 d / 0.26 g

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)	
BENZENE	10.167	0	0.00000	0.0000	< 0.10
a,a,a TFT	12.467	22978766	7303.77002	3142.0605	
TOLUENE	15.067	0	0.00000	0.0000	< 0.10
ETHYLBENZENE	19.367	7140878	116407.63281	55.9770	1.08 mg/kg
M & P XYLENE	19.650	41881020	167589.01563	299.6367	5.76 mg/kg
O XYLENE	20.183	0	0.00000	0.0000	
BFB	20.783	24666684	169985.04688	133.9262	

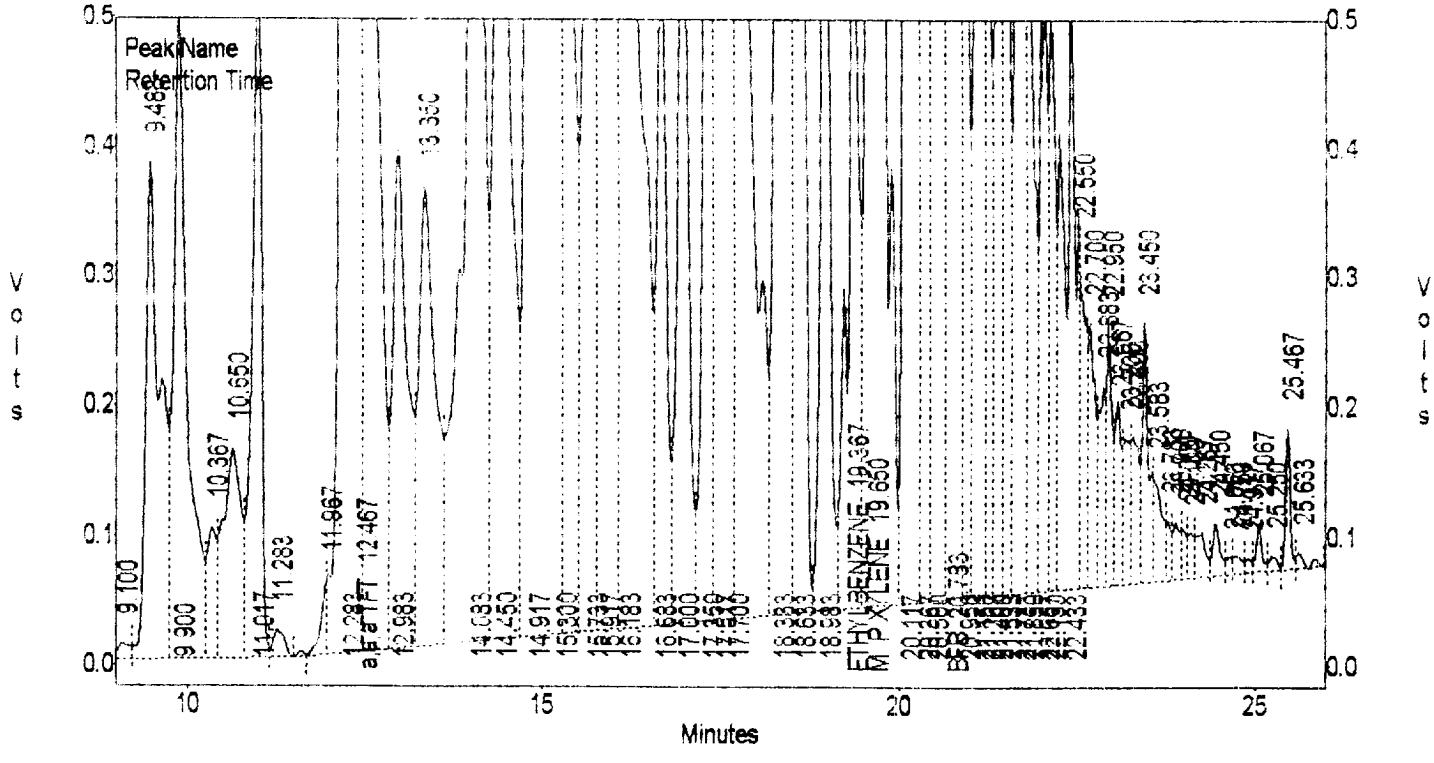
134% Recovery of Surrogate

Totals :

96667344		3631.6006

11/4/94

C:\LABQUEST\CHROM\946450a – Channel A



EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

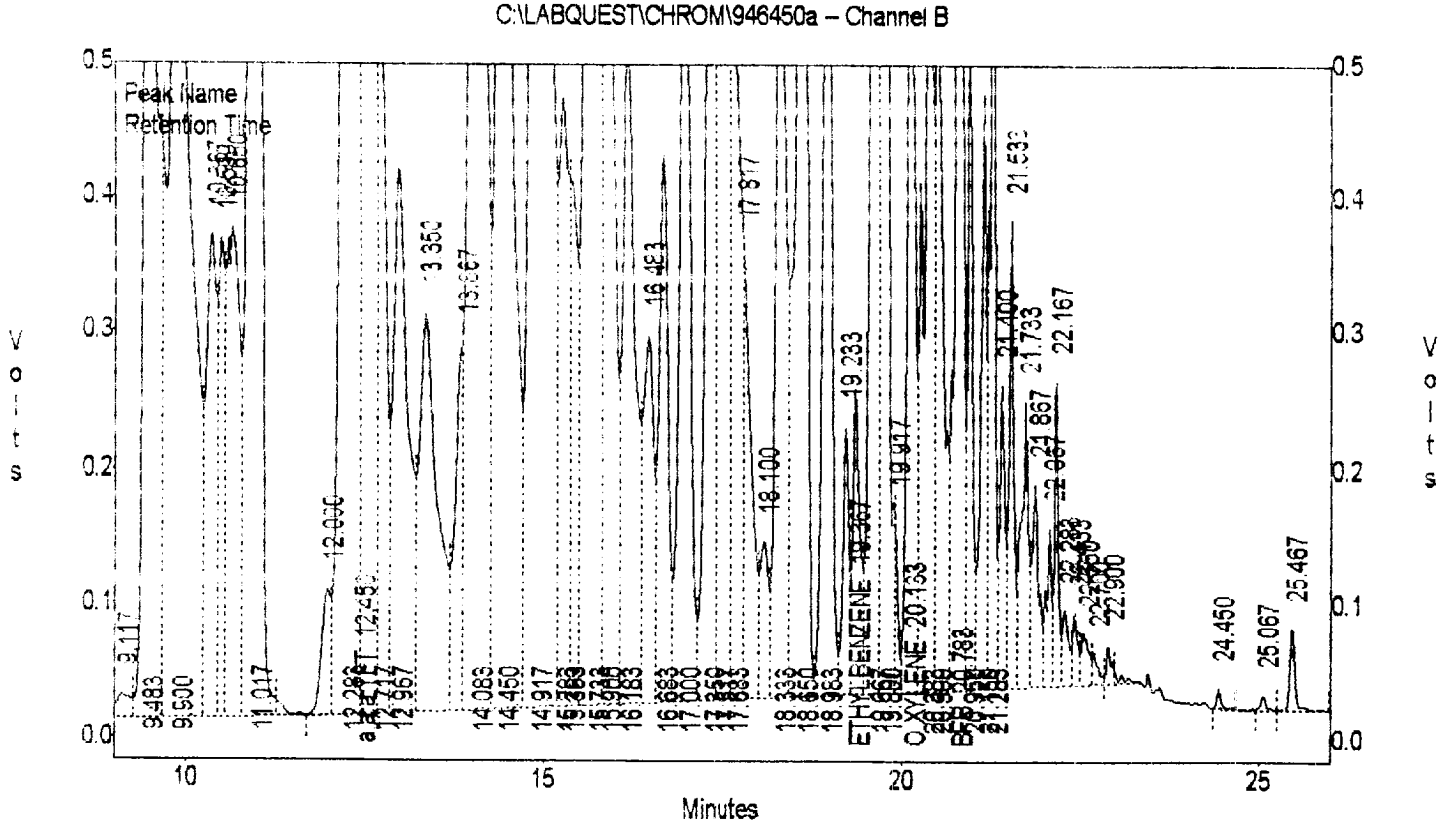
File : C:\LABQUEST\CHROM\946450a
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946450, 0.26 g
Acquired : Nov 04, 1994 15:14:35
Printed : Nov 04, 1994 15:40:52
User : John

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.183	0	0.00000	0.0000
a,a,a TFT	12.150	17576886	1612.83142	10897.2510
TOLUENE	15.067	0	0.00000	0.0000
ETHYLBENZENE	19.367	1599824	15800.91699	88.5273
M & P XYLENE	19.600	0	0.00000	0.0000
O XYLENE	20.133	5374888	15663.30664	301.1354
BFB	20.783	7047284	18546.16797	390.0650

Totals :

		31598982		11676.9795



EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM\946450b
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946450, 3.94g/20ml MeOH, 100u
Acquired : Nov 05, 1994 15:01:22
Printed : Nov 05, 1994 15:27:33
User : John

DF = .005076142

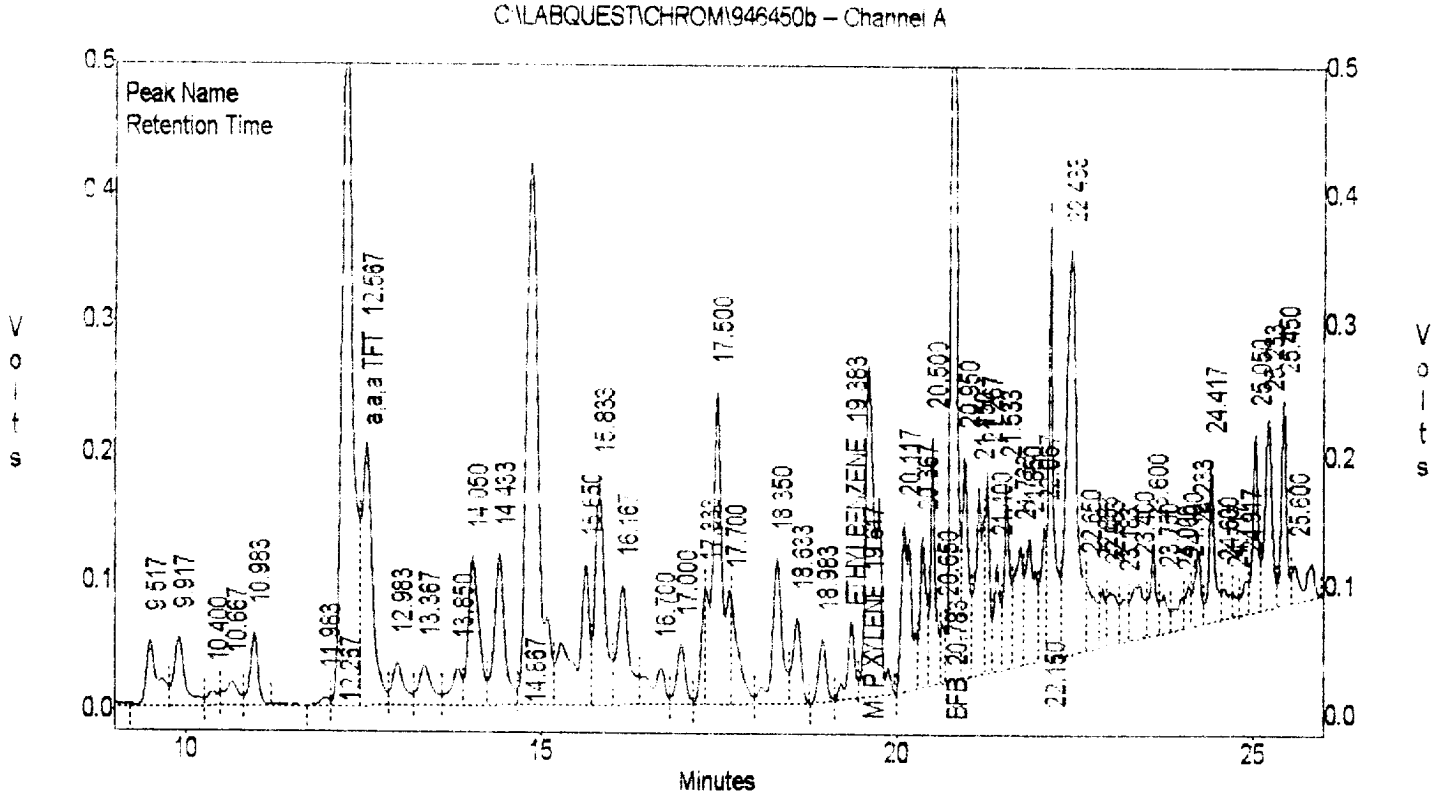
at 1/50

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.217	0	0.00000	0.0000
a,a,a TFT	12.567	2156905	7303.77002	294.9301
TOLUENE	15.100	0	0.00000	0.0000
ETHYLBENZENE	19.383	420569	116407.63281	3.2968 x50 = 165 x DF = 0.838
M & P XYLENE	19.617	2671722	167589.01563	19.1148 x50 = 996 x DF = 5.06 mg
O XYLENE	20.183	0	0.00000	0.0000
BFB	20.783	16345094	169985.04688	88.7447

Totals :

21594292		406.0863



EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

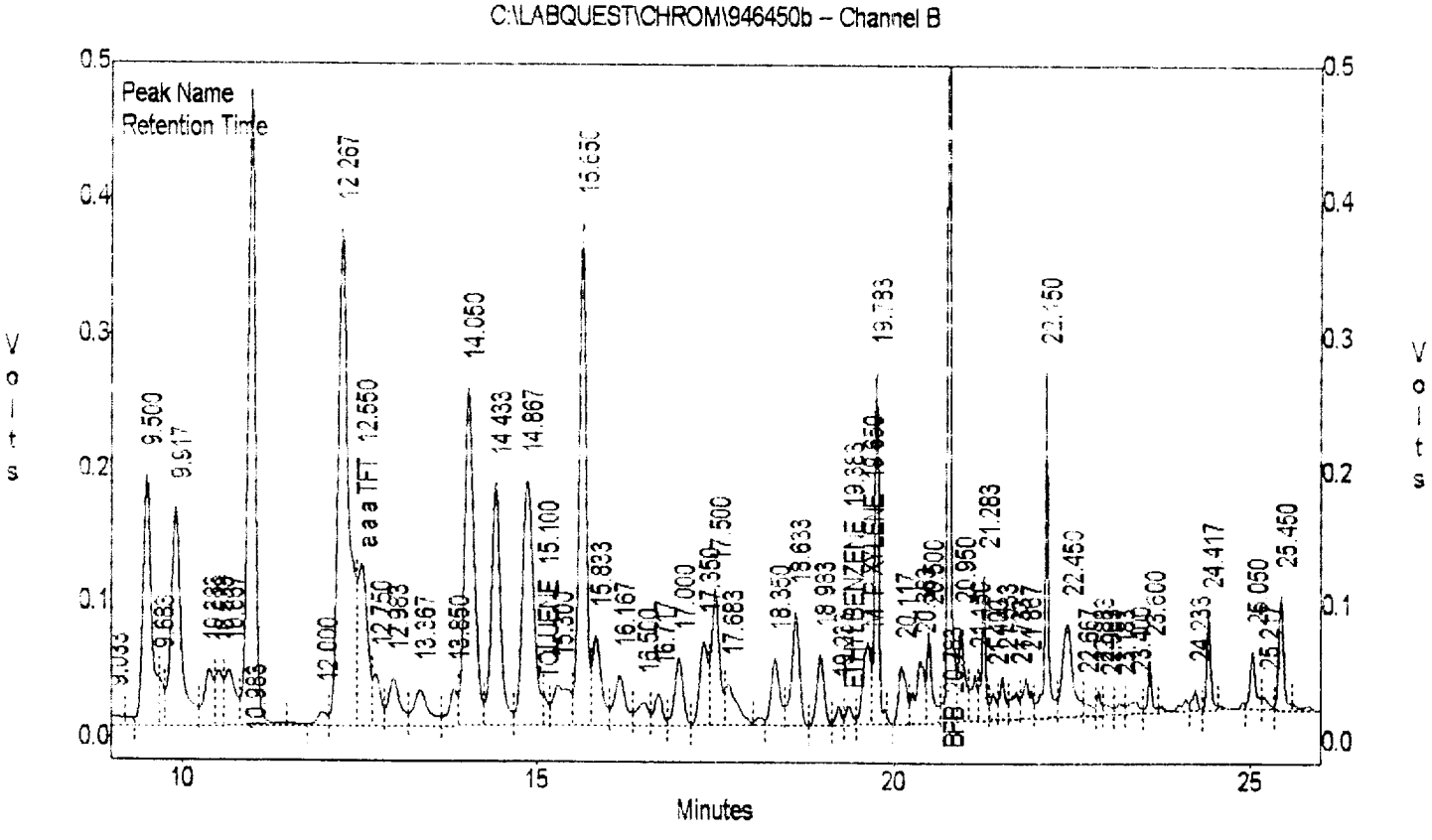
File : C:\LABQUEST\CHROM\946450b
Method : C:\LABQUEST\METHODS\SOILS.MET
Sample ID : 946450, 3.94g/20ml MeOH, 100u
Acquired : Nov 05, 1994 15:01:22
Printed : Nov 05, 1994 15:27:38
User : John

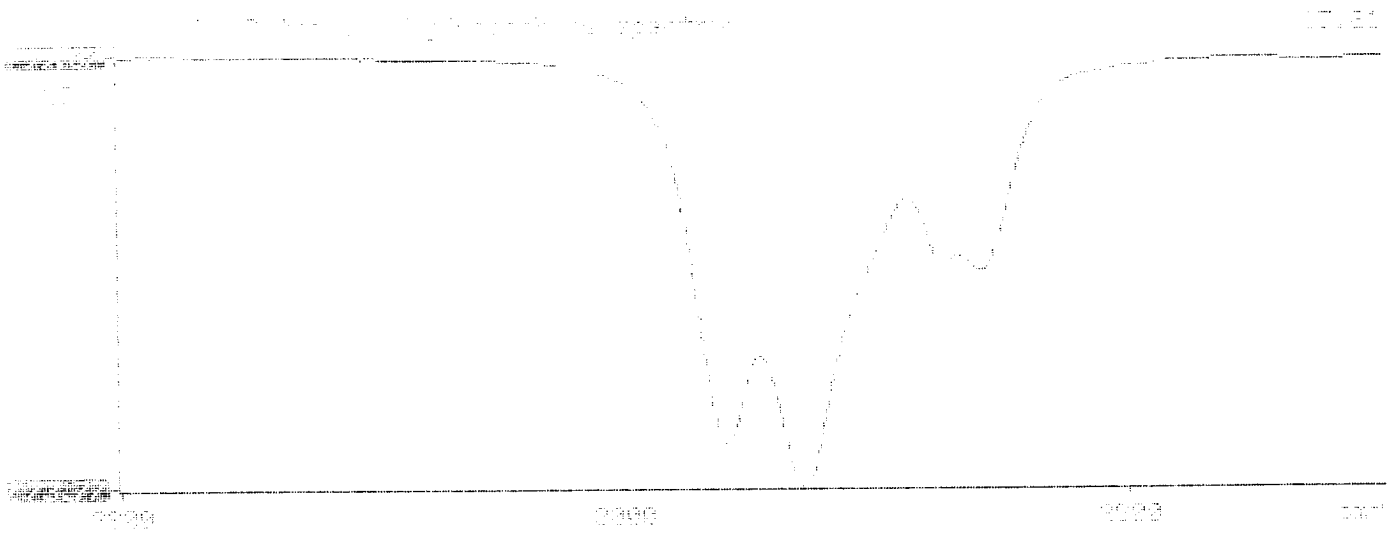
Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.233	0	0.00000	0.0000
a,a,a TFT	12.550	1124912	1612.83142	697.4191
TOLUENE	15.100	89370	16955.15430	4.6859
ETHYLBENZENE	19.383	88362	15800.91699	4.8896
M & P XYLENE	19.650	448119	16103.94629	24.8002
O XYLENE	20.183	0	0.00000	0.0000
BFB	20.783	2481485	18546.16797	137.3475

Totals :

4222250 869.1422





ILLEGIBLE

Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **411303**

November 10, 1994

El Paso Natural Gas Co.
P.O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **11/01/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

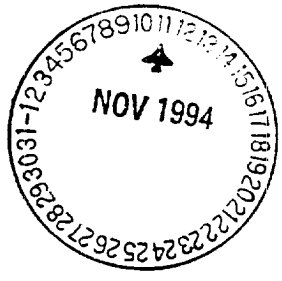
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 411303

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	946450	NON-AQ	10/25/94	11/01/94	11/02/94	20
08	946451	NON-AQ	10/25/94	11/01/94	11/02/94	20
09	946452	NON-AQ	10/25/94	11/01/94	11/02/94	1

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	0.69	<0.5	<0.025
TOLUENE	MG/KG	10	2.6	<0.025
ETHYLBENZENE	MG/KG	1.9	<0.5	<0.025
TOTAL XYLENES	MG/KG	23	3.6	0.10
SURROGATE:				
BROMOFLUOROBENZENE (%)		69	76	92

Analytical **Technologies,** Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 411303
PROJECT #	: 24324	DATE RECEIVED	: 11/01/94
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 11/02/94

PARAMETER	UNITS	07
PETROLEUM HYDROCARBONS, IR	MG/KG	340

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG PITS
Project Number 14509 Phase 6000 / 77
Project Location Anderson B#1 87940

Elevation
Borehole Location
GWL Depth
Logged By CM CHANCE
Drilled By ~~M DONOHUE~~ K. Padilla
Date/Time Started 6/6/95 - 1245
Date/Time Completed 6/6/95 - 1500

Well Logged By CM Chance
Personnel On-Site K. Padilla, F. Rivera
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	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth, Lithology Change (feet)	Air Monitoring Units: PPM BZ	Air Monitoring BH	Air Monitoring S HS	Drilling Conditions & Blow Counts
0				Backfill to 6'						
5										
10	1	10-12	6"	Grn silty SAND, vf-f sand, med dense, sl moist			0	0	350 / 506	-1255hr
15	2	15-16	4"	lt Brn silty SAND, vf-f sand, med dense, sl moist			0	1	221 / 661	-1308
20	3	20-22	8"	lt Brn silty SAND, vf-f sand, tr med sand, med dense, sl moist			0	10	127 / 537	-1320
	4	22-22.5	5"	Grn CLAY, hard, high plastic,			0	0	1 / 292	-1330 Very hard
	5	23-24	4½"	dry Brn silty CLAY, hard, med plastic, dry			0	0	6 / 159	-1400
25	6	25-27	5"	lt Br silty SAND, vf-f sand, tr med sand very dense, sl moist, sl odor			0	0	175 / 288	-1413
30	7	30-32	6"	Gry sandy CLAY, vf sand, very stiff, nonplastic, dry			0	0	6 / 12	-1427
				TDB 32'						
35										
40										

Comments: 30-32' sample (CMC39) sent to lab (BTEX, TPH)

Geologist Signature

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:	cmc 39	946877
MTR CODE ! SITE NAME:	87940	N/A
SAMPLE DATE ! TIME (Hrs):	6-6-95	1427
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	6-7-95	6-7-95
DATE OF BTEX EXT. ANAL.:	6-8-95	6-12-95
TYPE ! DESCRIPTION:	VG	gray sand + clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	41.3	MG/KG			1.99	28
HEADSPACE PID	12	PPM				
PERCENT SOLIDS	93.0	%				

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

The Surrogate Recovery was at 91 % for this sample All QA/QC was acceptable.

Narrative:

ATI Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 6/28/95

```
*********************************************************
*                    Test Method for                    *
*      Oil and Grease and Petroleum Hydrocarbons        *
*                  In Water and Soil                    *
*                                                       *
*            Perkin-Elmer Model 1600 FT-IR              *
*                  Analysis Report                      *
*********************************************************

 07/06/87   14:14

 Sample Identification
 946877

 Initial mass of sample, g
 1.990

 Volume of sample after extraction, ml
 25.000

 Petroleum hydrocarbons, ppm
 41.273
 Net absorbance of hydrocarbons (2930 cm-1)
 0.015
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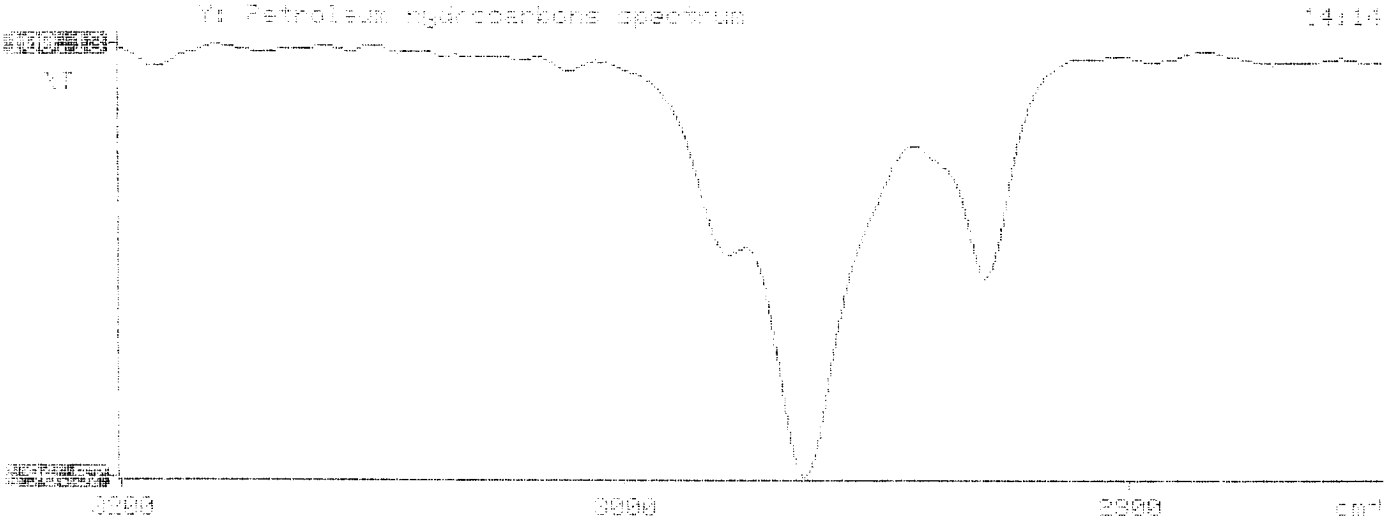

ILLEGIBLE

Analytical **Technologies,** Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **506330**

June 13, 1995

EL Paso Natural Gas
P.O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/08/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

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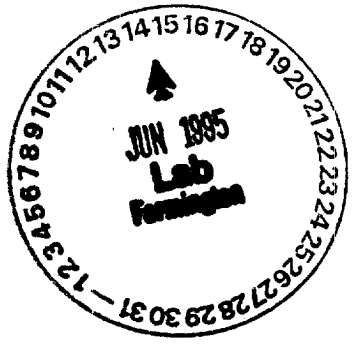

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)

CLIENT : EL PASO NATURAL GAS ATI I.D.: 506330

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	946877	NON-AQ	06/06/95	06/08/95	06/12/95	1

PARAMETER	UNITS	07
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%) 91