EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

RECEIVED
JUL 2 1998
OIL CON. DIV.
DIST. 3

MKL 16R
Meter/Line ID - 94809

SITE DETAILS

Legals - Twn: 26 **Rng:** 07 **Sec:** 05 **Unit:** J
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: LOUIS DREYFUS NATURAL GAS **Pit Closure Date:** 06/02/94

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: 94809 Location: MKL 16R
Operator #: 1758 Operator Name: Louis Dreyfus Nat. Gas P/L District: Blanco
Coordinates: Letter: J Section 5 Township: 26 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: ✓ Line Drip: ___ Other: _____
Site Assessment Date: 5/19/94 Area: 03 Run: 72

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps) Inside [X] (1) Outside [ ] (2)

Land Type: BLM [X] (1) State [ ] (2) Fee [ ] (3) Indian _____

Depth to Groundwater
Less Than 50 Feet (20 points) [X] (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) [X] (2) NO (0 points)

Horizontal Distance to Surface Water Body
Less Than 200 Ft (20 points) [X] (1)
200 Ft to 1000 Ft (10 points) [ ] (2)
Greater Than 1000 Ft (0 points) [ ] (3)
Name of Surface Water Body Largo 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 & Vuln. Inside 1 Pit. Will Close. Pit Dry. Cans in Pit

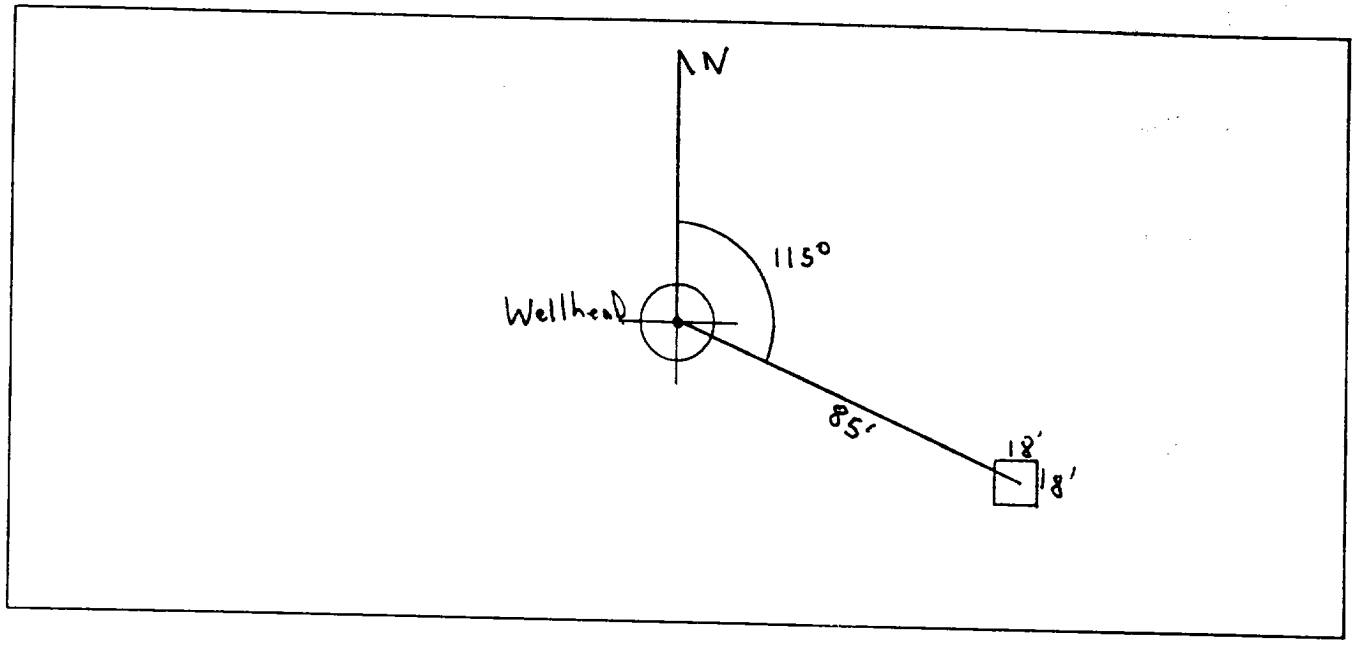
Dig + HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 115° Footage from Wellhead 85'

b) Length : 18' Width : 18' Depth : 4'



REMARKS

Remarks :

Pictures @ 0949 (1-4, roll 1)

End Dump

Completed By:

Cory Chance
Signature

5/19/94
Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94809 Location: MKL 16R

Coordinates: Letter: J Section 5 Township: 26 Range: 7

Or Latitude _____ Longitude _____

Date Started : 6-2-94 Area: 03 Run: 72

FIELD OBSERVATIONS

Sample Number(s): KD 97 _____ _____ _____

Sample Depth: 12 Feet

Final PID Reading 285 ppm PID Reading Depth 12 Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ (1) Approx. Cubic Yards 70

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☐ (3)

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: 6-2-94 Pit Closed By: BET

REMARKS

Remarks : Excavated Pit to 12', Took PID Sample, Closed Pit

Signature of Specialist: Kury Deaver

(SP3191) 04/07/94

40

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD97	945335
MTR CODE | SITE NAME:	94809	N/A
SAMPLE DATE | TIME (Hrs):	6-2-94	1450
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6-6-94	6/6/94
DATE OF BTEX EXT. | ANAL.:	6/9/94	6/10/94
TYPE | DESCRIPTION:	VC	Brown Sand & Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.70	MG/KG	20			
TOLUENE	66	MG/KG	20			
ETHYL BENZENE	24	MG/KG	20			
TOTAL XYLENES	210	MG/KG	20			
TOTAL BTEX	301	MG/KG				
TPH (418.1)	1250	MG/KG			1.99	28
HEADSPACE PID	285	PPM				
PERCENT SOLIDS	87.7	%				

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

The Surrogate Recovery was at 122 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached, Surrogate recovery was outside ATI QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By: _____ Date: 7/14/94

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Model 1600 FT-IR
Analysis Report

94/06/06 13:35

Sample identification
745535

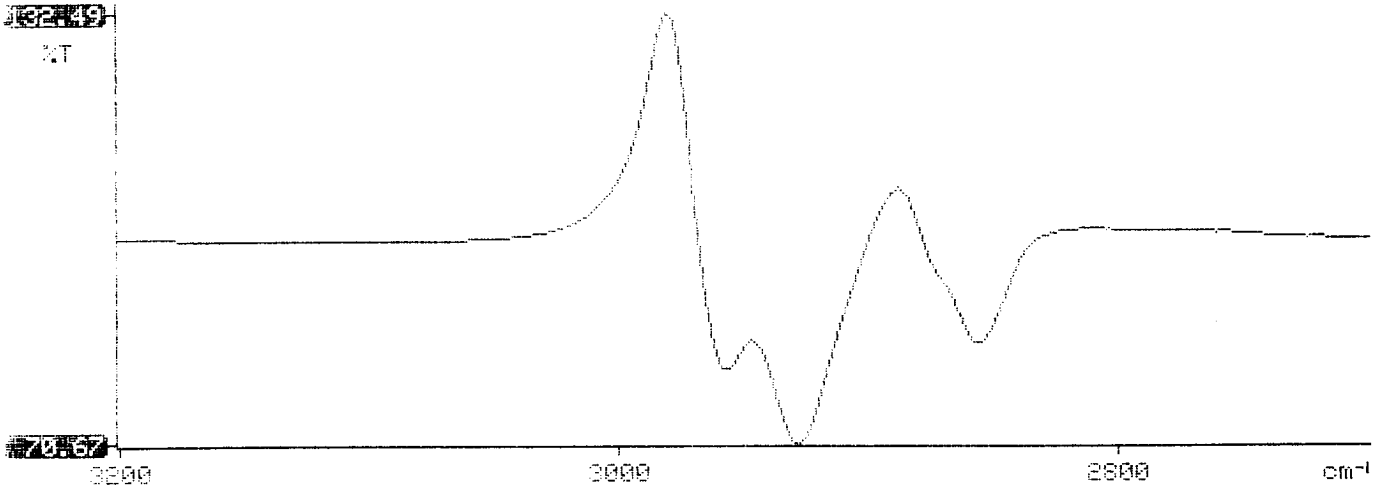
Initial mass of sample, g
1.990

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
1246.506

Net absorbance of hydrocarbons (2930 cm-1)
0.152

Y: Petroleum hydrocarbons spectrum 13:35

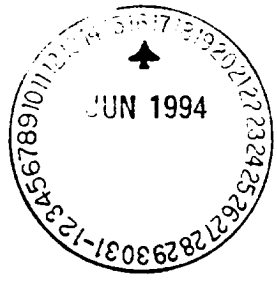


Analytical **Technologies,** Inc.

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

ATI I.D. **406331**

June 15, 1994



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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/08/94**, 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:jd

Enclosure

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 406331
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945334	NON-AQ	06/02/94	06/09/94	06/10/94	1
02	945335	NON-AQ	06/02/94	06/09/94	06/10/94	20
03	945336	NON-AQ	06/02/94	06/09/94	06/10/94	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	0.70	<0.025
TOLUENE	MG/KG	<0.025	66	0.031
ETHYLBENZENE	MG/KG	<0.025	24	<0.025
TOTAL XYLENES	MG/KG	0.028	210	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		91	122*	96

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

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 MKL 16 R 94809

Elevation
Borehole Location QJ- S5 - T26- R7
GWL Depth
Logged By CM CHANCE
Drilled By 9/19/95 ~~K Padilla~~ F. Rivera
Date/Time Started 9/19/95 - 1050
Date/Time Completed 9/19/95 - 1210

Well Logged By CM Chance
Personnel On-Site K Padilla, F. Rivera, J. Johnson
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	BH	S HS	Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15	1	15-17	4"	DK gry clayey SAND, vf sand, v. loose, sl moist			0	65	1210 / 1180	1056 hr
20	2	20-22	1"	BLK sandy CLAY, vf sand, v. soft, low plastic, dry			4	50	990 / 1333	1103
25	3	25-27	10"	DK gry CLAY, med stiff, non plastic, dry			4	50	243 / 241	1111
30	4	30-32	12"	Br CLay, med stiff, non-plastic, dry			0	93	15 / 24	1123
				TDB 32'						
35										
40										

Comments: CMC 115 (30-32') sent to lab (BTEX, TPH) sample bagged & iced prior to containerizing
BH grouted to surface

Geologist Signature Cory Chance

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 115	947498
MTR CODE | SITE NAME:	94809	MKL 16R
SAMPLE DATE | TIME (Hrs):	09-19-95	1123
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-20-95	
DATE OF BTEX EXT. | ANAL.:	9/20/95	9/22/95
TYPE | DESCRIPTION:	VG	Light brown Sand and sandstone

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)	RLB 9/20/95 2726.7	MG/KG			2.08	28
HEADSPACE PID	24	PPM				
PERCENT SOLIDS	85.7	%				

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

The Surrogate Recovery was at 96% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-26-95

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*****************************************************
*                  Test Method for                  *
*      Oil and Grease and Petroleum Hydrocarbons    *
*                  in Water and Soil                *
*                                                   *
*            Perkin-Elmer Model 1600 FT-IR          *
*                  Analysis Report                  *
*****************************************************
*
 95/09/20  15:08
*
*  Sample identification
 947498
*
*  Initial mass of sample, g
 2.080
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 26.714
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.014
*
*
*
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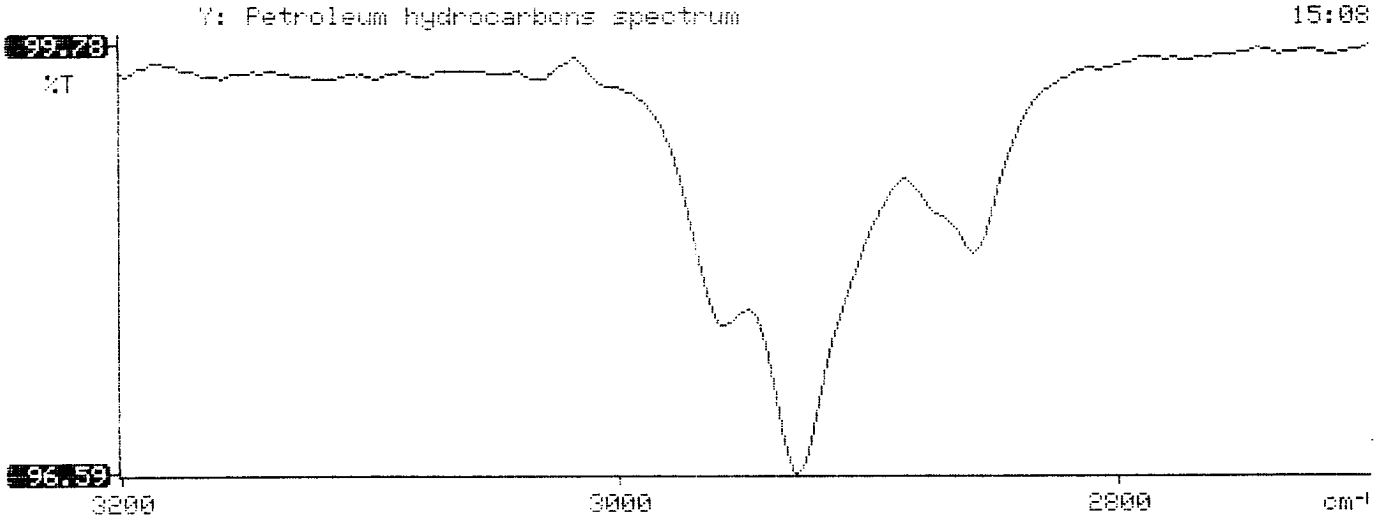

BTEX SOIL SAMPLE WORKSHEET

File	947498	**Date Printed**	9/25/95
Soil Mass (g)	5.04	**Multiplier (L/g)**	0.00099
Extraction vol. (mL)	10	**DF (Analytical)**	200
Shot Volume (uL)	50	**DF (Report)**	0.19841

				Det. Limit
Benzene (ug/L)	0.26	**Benzene (mg/Kg):**	**0.052**	0.496
Toluene (ug/L)	0.14	**Toluene (mg/Kg):**	**0.028**	0.496
Ethylbenzene (ug/L)	0.65	**Ethylbenzene (mg/Kg):**	**0.129**	0.496
p & m-xylene (ug/L)	4.14	p & m-xylene (mg/Kg):	0.821	0.992
o-xylene (ug/L)	0.30	o-xylene (mg/Kg):	0.060	0.496
		Total xylenes (mg/Kg):	**0.881**	1.488
		Total BTEX (mg/Kg):	**1.089**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\092295-0.014
Method : C:\LABQUEST\METHODS\9000.MET
Sample ID : 947498,5.04G,50U
Acquired : Sep 22, 1995 18:16:23
Printed : Sep 22, 1995 18:46:48
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.027	96358	0.2575
a,a,a-TFT	10.393	8147379	93.1280
TOLUENE	12.810	49996	0.1374
ETHYLBENZENE	17.150	217948	0.6474
M,P-XYLENES	17.527	1662057	4.1428
O-XYLENE	18.710	97400	0.2975
BFB	19.793	52434892	96.1965