Jerry Sexton
DEPUTY OIL & GAS INSPECTOR
DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

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

FEDERAL 8 #22
Meter/Line ID - 94744

SITE DETAILS

Legals - Twn: 26 **Rng:** 07 **Sec:** 08 **Unit:** F
NMOCD Hazard Ranking: 30 **Land Type:** 2 - Federal
Operator: LOUIS DREYFUS NATURAL GAS **Pit Closure Date:** 07/12/94

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: 94744 Location: FEDERAL 8 #22
Operator #: 0448 Operator Name: LOUIS DREYFUS P/L District: BALLARD
Coordinates: Letter: F Section 8 Township: 26 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 6.22.94 Area: 07 Run: 41

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 BIG RINCON 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: 30 **POINTS**

REMARKS

Remarks : THREE PITS ON LOCATION, WILL CLOSE ONLY ONE. PIT IS OILY. LOCATION IS IN BIG RINCON CANYON EAST OF THE WASH. REDLINE AND TOPO CONFIRMED LOCATION IS INSIDE V.2.

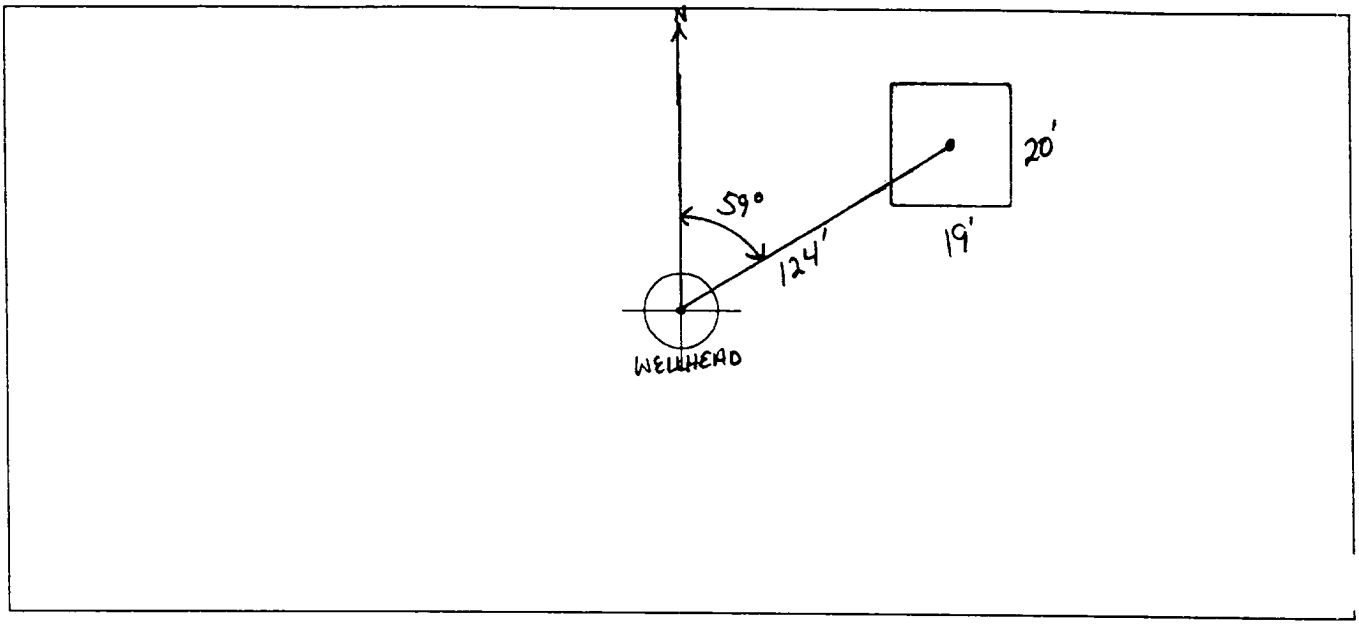
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 59° Footage from Wellhead 124'

b) Length : 20' Width : 19' Depth : 3'



REMARKS

Remarks :

TOOK PICTURES AT 3:03 P.M.

END DUMP

Completed By:

Robert Thompson

Signature

6-22-94

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94744 Location: Federal 8 #22

Coordinates: Letter: F Section 8 Township: 26 Range: 7

Or Latitude _____ Longitude _____

Date Started : 7/12/94 Run: 07 41

FIELD OBSERVATIONS

Sample Number(s): KD 141 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 791 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 120

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 7/12/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', TOOK PID Sample, Closed pit.

Signature of Specialist: Kelly Deaver

(SP3181) 03/16/9

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD141	945638
MTR CODE | SITE NAME:	94744	N/A
SAMPLE DATE | TIME (Hrs):	7-12-94	1220
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7-14-94	7/14/94
DATE OF BTEX EXT. | ANAL.:	7/17/94	7/19/94
TYPE | DESCRIPTION:	VC	Fine Brown Sand/Clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	20.5	MG/KG	20			
TOLUENE	9.2	MG/KG	20			
ETHYL BENZENE	4.4	MG/KG	20			
TOTAL XYLENES	82	MG/KG	20			
TOTAL BTEX	96	MG/KG				
TPH (418.1)	13,200	MG/KG			0.57	28
HEADSPACE PID	791	PPM				
PERCENT SOLIDS	88.1	%				

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

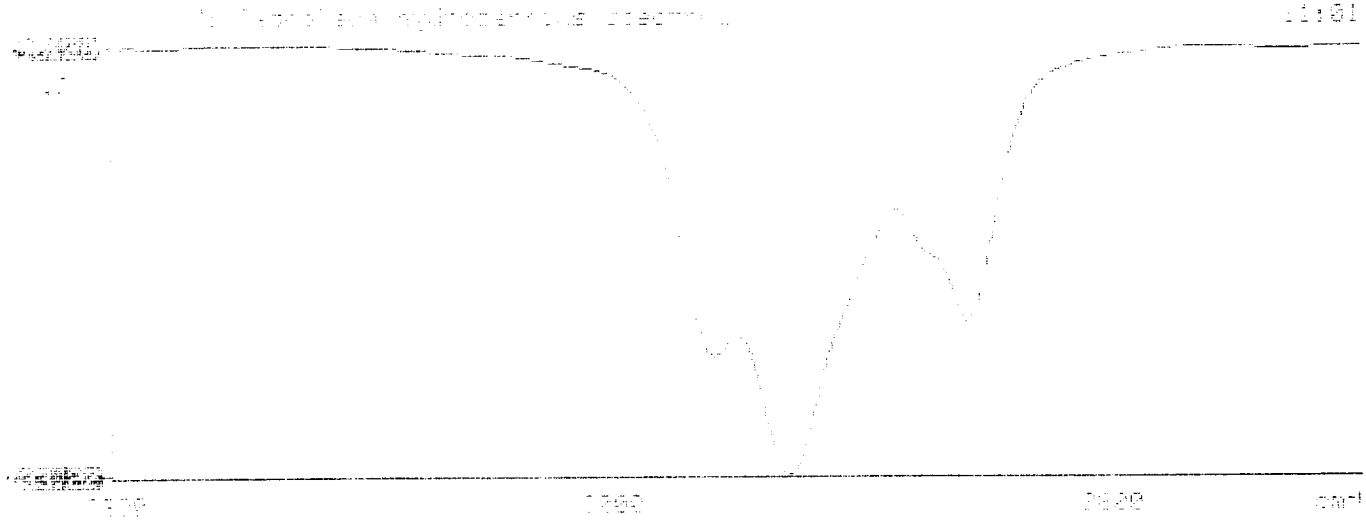
The Surrogate Recovery was at 110 % for this sample All QA/QC was acceptable.

Narrative: TTI results attached.

DF = Dilution Factor Used

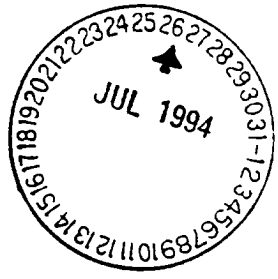
QP

8/12/94



Analytical Technologies, Inc.

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



ATI I.D. **407359**

July 25, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/15/94**, 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.: 407359
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945636	NON-AQ	07/12/94	07/17/94	07/18/94	20
02	945637	NON-AQ	07/12/94	07/17/94	07/18/94	1
03	945638	NON-AQ	07/12/94	07/17/94	07/19/94	20

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.5	<0.025	<0.5
TOLUENE	MG/KG	<0.5	0.026	9.2
ETHYLBENZENE	MG/KG	2.4	<0.025	4.4
TOTAL XYLENES	MG/KG	38	<0.025	82
SURROGATE:				
BROMOFLUOROBENZENE (%)		70	94	110

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 2

Burlington Environmental Inc.
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 Federal 18-~~2R~~ 7744

Elevation
Borehole Location Letter F-S8-T26-R7
GWL Depth
Logged By J.F. LaBarbera
Drilled By K. Padilla
Date/Time Started 6/3/95 - 0823
Date/Time Completed - 1050

Well Logged By J.F. LaBarbera
Personnel On-Site K. Padilla, F. Rivera, D. Charlie
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	HS S	Drilling Conditions & Blow Counts
0				FILL						
5										
10										
15	1	15-16	12	15-15.15- Brown, v. loose, silty, v. fn. SAND, dry, no odor noted. 15.15-75 - Brown, v. soft, CLAY, med. plasticity, damp.	SM / CL		0	0	71 / 0 → clay	0837
20	2	20-20.66	8	Brown, loose, clayey SILT, dry, no odor noted, little med sand	ML		0	0	635 / 0.7	~~0850~~ 0850
25	3	25-25.33	4	Brown, hard, ~~fri~~ fn to coarse, SANDSTONE, poorly cemented, dry	X		0	0	500 / 1.0	0904
30	4	30-30.5	6	Brown, hard ~~hard~~, v fn SANDSTONE, tr silt, dry, poorly cemented.			0	0	677 / 1.1	0918
35	5	35-40	11	35-35.5 Lt Brown, AA 35.5-35.75 - Yellow/Brown, silty, v fn SANDSTONE, Thin layer of Black silt 35.75 - White, silty, v fn SANDSTONE - All poorly cemented.			0	0	859 / 1.2	0935
40										very hard drilling.

Comments:

Geologist Signature John F. LaBarbera

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 2 of 2

Burlington Environmental Inc.
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 Federal 8-#22 94744

Elevation
Borehole Location Letter F-35-T26-R7
GWL Depth
Logged By J.F. LaBarbera
Drilled By K. Padilla
Date/Time Started 8/3/95 - 0823
Date/Time Completed - 1050

Well Logged By J.F. LaBarbera
Personnel On-Site K. Padilla, F. Rivera, D. Charlie
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 HS BZ	BH	S	Drilling Conditions & Blow Counts
0	6	40-41	11	White/Lt. Brown, silty, V fn to fn, SANDSTONE, tr med sand, dry TOB at 41' - Refusal			0	0	470/0	Refusal 0959
10										
15										
20										
25										
30										
35										
40										

Comments: Sample JFL #2 from 40-41' sent to lab for BTEX/TPH analysis.

Geologist Signature

El Paso Natural Gas Company

Phase II Drilling
Federal 8-#22

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JFL 42	947141
MTR CODE | SITE NAME:	74744	N/A
SAMPLE DATE | TIME (Hrs):	08/03/95	09:59
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8-4-95	8-4-95
DATE OF BTEX EXT. | ANAL.:	8-9-95	8-10-95
TYPE | DESCRIPTION:	VG	Light brown 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)	83.9	MG/KG			1.98	25
HEADSPACE PID	670	PPM				
PERCENT SOLIDS	93.3	%				

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

The Surrogate Recovery was at 98 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 8/22/95

```
*****************************************************
*                    Test Method for                *
*      Oil and Grease and Petroleum Hydrocarbons    *
*                   in Water and Soil               *
*                                                   *
*            Perkin-Elmer Model 1600 FT-IR          *
*                    Analysis Report                *
*****************************************************
*
 95/08/04  13:20
*
*  Sample identification
 947141
*
*  Initial mass of sample, g
 1.980
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 83.922
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.020
*
*
*
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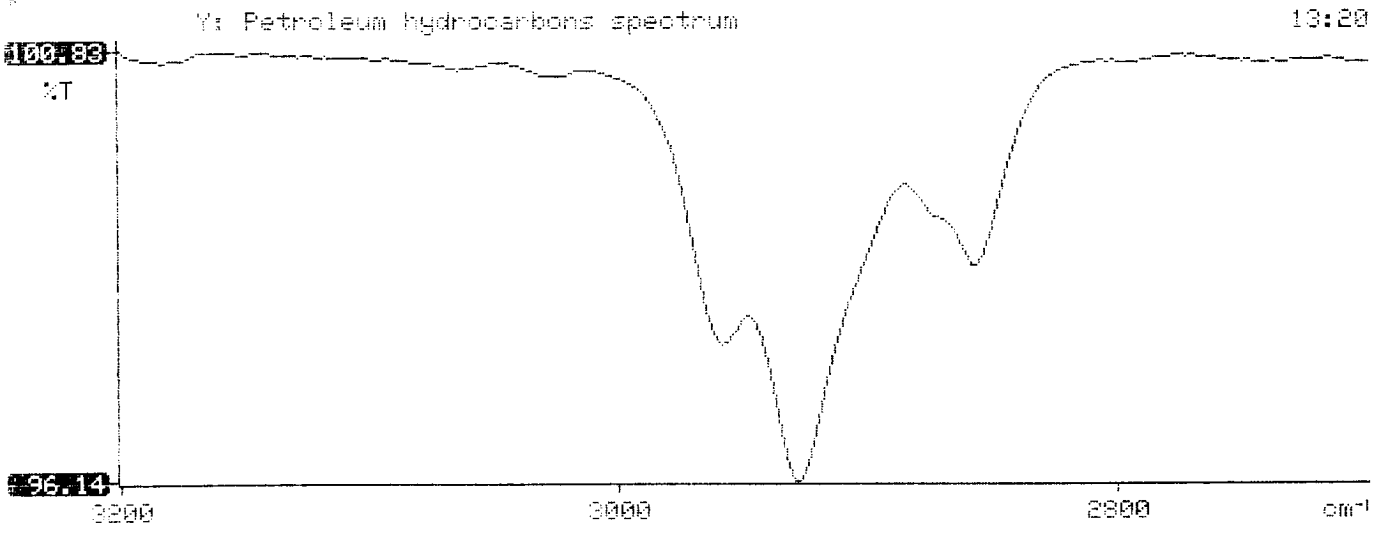

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 508342

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	947141	NON-AQ	08/03/95	08/09/95	08/10/95	1
05	947142	NON-AQ	08/03/95	08/09/95	08/09/95	1
06	947143	NON-AQ	08/03/95	08/09/95	08/09/95	1

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	0.032
TOLUENE	MG/KG	<0.025	<0.025	0.042
ETHYLBENZENE	MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES	MG/KG	<0.025	<0.025	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		98	104	98

Analytical Technologies, Inc.

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

ATI I.D. **508342**

August 11, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I & II 24324

Attention: John Lambdin

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

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure