DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Approved

RECEIVED
JUL 2 1998
OIL CON. DIV.

FOSTER 1
Meter/Line ID - 95642

SITE DETAILS

Legals - Twn: 25 **Rng:** 07 **Sec:** 08 **Unit:** B
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: LA PLATA GATHERING SYS. I **Pit Closure Date: 07/15/94**

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: 95-642 Location: Foster 1
Operator #: 5555 Operator Name: La Plata Gathering P/L District: Ballard
Coordinates: Letter: B Section 8 Township: 25 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 6/30/94 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 Palluche 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 : Red line Book: Inside, Vulnerable Zone Map: Inside
Two pits, both pits are dry, will close one pit

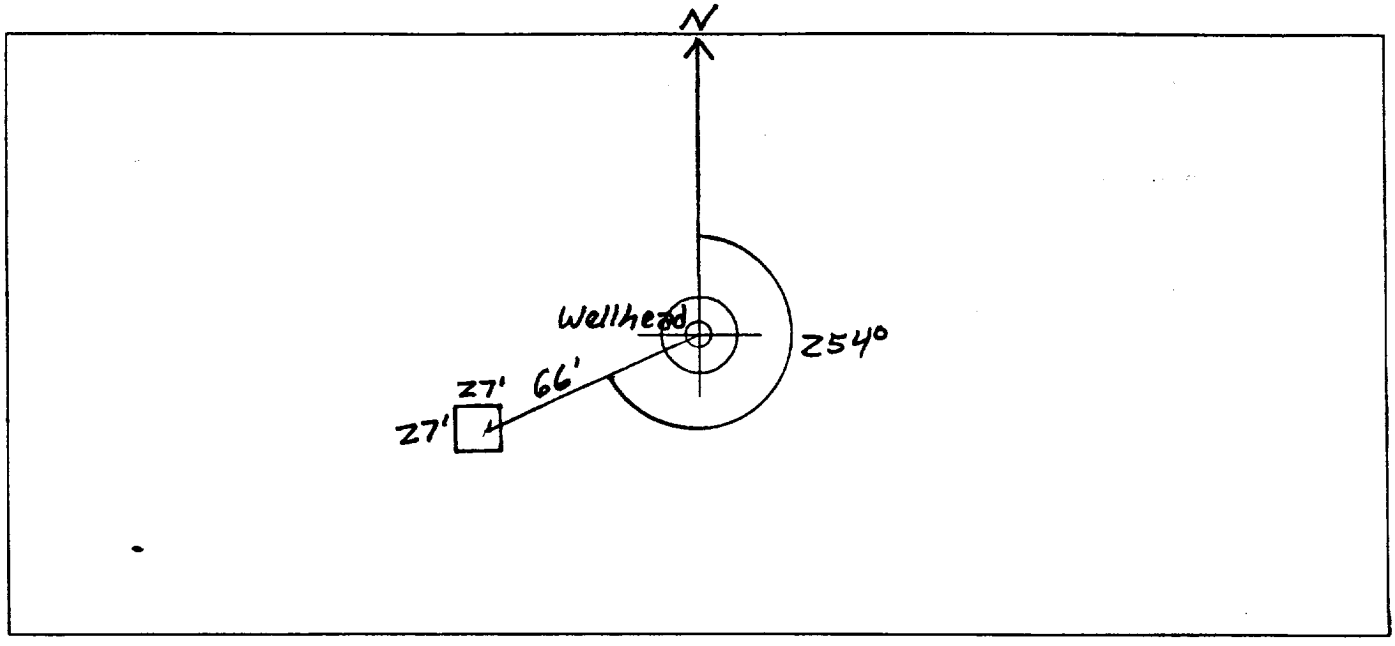
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 254° Footage from Wellhead 66'

b) Length : 27' Width : 27' Depth : 4'



REMARKS

Remarks : SK 6/30/94

Pictures at 10 & 5 (12-15)

Dump Truck

Completed By:

Sandra Kelly
Signature

6/30/94
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 95642 Location: Foster 1

Coordinates: Letter: B Section 8 Township: 25 Range: 7

Or Latitude _____ Longitude _____

Date Started : 7/15/94 Run: 07 41

FIELD OBSERVATIONS

Sample Number(s): KD 151 _____ _____ _____

Sample Depth: 6' Feet

Final PID Reading 262 ppm PID Reading Depth 6' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒	Approx. Cubic Yards 40
Onsite Bioremediation	☐	
Backfill Pit Without Excavation	☐	

Soil Disposition:

Envirotech	☒	☐	Tierra
Other Facility	☐	Name:	

Pit Closure Date: 7/15/94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 6', Hit Hard Shale Layer, took P.D Sample, Closed pit.

Signature of Specialist: [signature]

(SP3191) 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:	SD 151	945686
MTR CODE | SITE NAME:	95642	N/A
SAMPLE DATE | TIME (Hrs):	7-15-94	1130
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	7/19/94	7/19/94
DATE OF BTEX EXT. | ANAL.:	7/24/94	7/24/94
TYPE | DESCRIPTION:	VC	Brown Grey Sandstone

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.5	MG/KG	20			
TOLUENE	50	MG/KG	20			
ETHYL BENZENE	<0.5	MG/KG	20			
TOTAL XYLENES	11	MG/KG	20			
TOTAL BTEX	62	MG/KG				
TPH (418.1)	2110	MG/KG			2.02	28
HEADSPACE PID	262	PPM				
PERCENT SOLIDS	~~90.2~~ 7/19/94	90.2 %				

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

The Surrogate Recovery was at 73 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: [signature] Date: 8/17/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

94/07/19 14:21

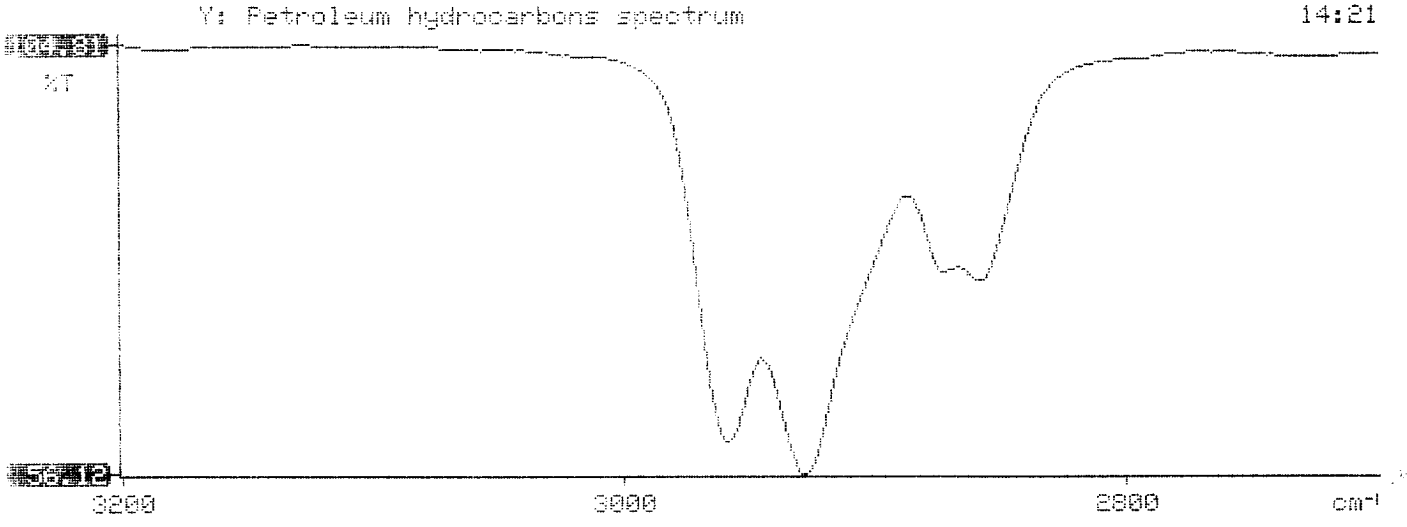
Sample identification
945686

Initial mass of sample, g
2.020

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
2113.578

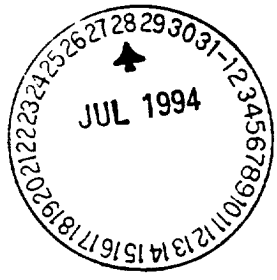
Net absorbance of hydrocarbons (2930 cm-1)
0.268



Analytical **Technologies,** Inc.

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

ATI I.D. **407376**



July 27, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/20/94**, 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.: 407376
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
13	945686	NON-AQ	07/15/94	07/24/94	07/24/94	20
14	945687	NON-AQ	07/15/94	07/21/94	07/22/94	5
15	945695	NON-AQ	07/18/94	07/24/94	07/24/94	5

PARAMETER	UNITS	13	14	15
BENZENE	MG/KG	<0.5	<0.13	<0.13
TOLUENE	MG/KG	50	6.1	<0.13
ETHYLBENZENE	MG/KG	<0.5	0.93	0.58
TOTAL XYLENES	MG/KG	11	6.9	11
SURROGATE:				
BROMOFLUOROBENZENE (%)		73	88	73

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

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 Foster 1 95642

Elevation
Borehole Location Letter B- 5S-7E-R7
GWL Depth
Logged By J.F. LaBarbera
Drilled By ~~K. Padilla~~ D. Gatto
Date/Time Started 8/4/95 - 0928
Date/Time Completed - 1045

Well Logged By J.F. LaBarbera
Personnel On-Site ~~K. Padilla~~, F. Rivera, D. Charlie, D. Gatto
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	NS/S	Drilling Conditions & Blow Counts
0				Fill						
5										
10	1	10-10.66	8	Gray, mod. hard, SHALE, some Fe Ox, dry, odor.	X		0	135	468/551	0958
15	2	15-15.66	8	AA, no Fe staining, sl odor,			0	35	1084/276	0947
20	3	20-20.5	5	Gray, hard, v fn, SANDSTONE, dry, no odor noted.			0	7	529/0	1002 Hard drilling
	4	23-23.5	5	AA			0	1	97/-	Refusal 1023
25				TOB at 23.5' - Refusal						
30										
35										
40										

Comments: This log and sample is to replace Foster 1 TD incorrectly sampled on 8/2/95, JFL #1.
Sample JFL #7 from 23-23.5' sent to lab for BTEX/TPH analysis.

Geologist Signature J. LaBarbera

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:	JFL 47	947155
MTR CODE | SITE NAME:	95642	Foster 1
SAMPLE DATE | TIME (Hrs):	08/04/95	10:23
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	8-7-95	8-7-95
DATE OF BTEX EXT. | ANAL.:	8-12-95	8-1-95
TYPE | DESCRIPTION:	VG	Light grey sand & clay

Field 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)	63.2	MG/KG			2.0	28
HEADSPACE PID	97	PPM				
PERCENT SOLIDS	92.0	%				

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

The Surrogate Recovery was at 109 for this sample All QA/QC was acceptable.

Narrative: ATI Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 8/28/95

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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               *
**************************************************
*
 95/08/07  13:55
*
*  Sample identification
 947155
*
*  Initial mass of sample, g
 2.000
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 63.187
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.018
*
*
*
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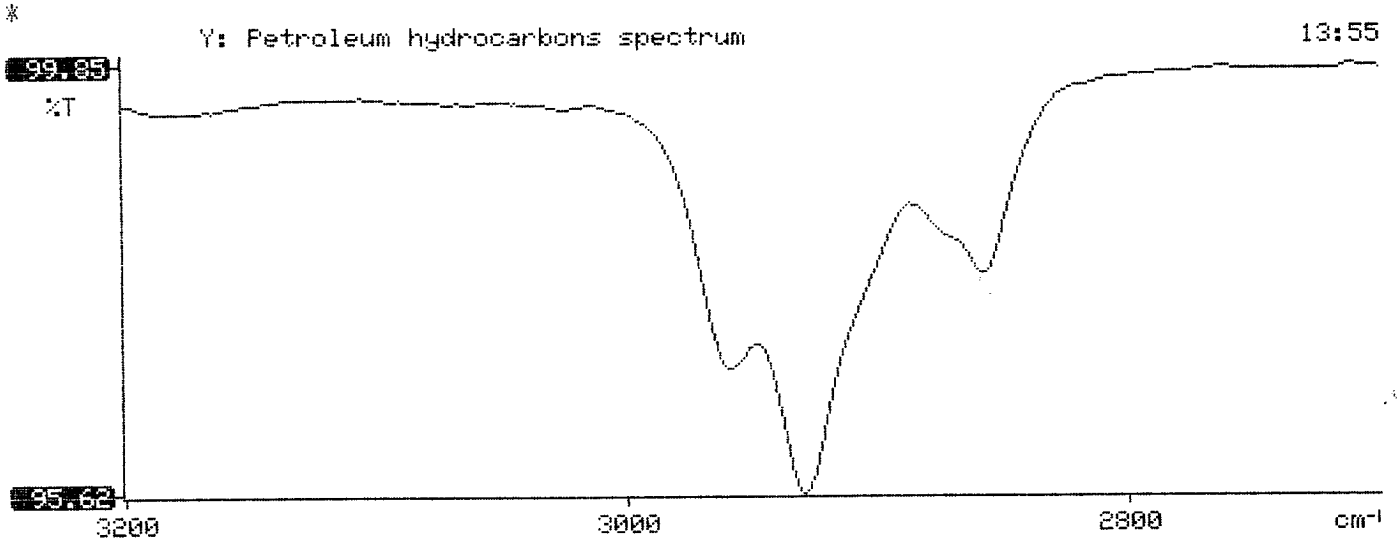

Analytical **Technologies,** Inc.

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

ATI I.D. **508367**

August 17, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I, II & III PITS 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

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 508367

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I, II & III

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	947153	NON-AQ	08/04/95	08/12/95	08/12/95	1
02	947154	NON-AQ	08/04/95	08/12/95	08/12/95	1
03	947155	NON-AQ	08/04/95	08/12/95	08/12/95	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	<0.025	<0.025	<0.025
ETHYLBENZENE	MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES	MG/KG	<0.025	0.040	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		109	111	109