

**EL PASO FIELD SERVICES  
PRODUCTION PIT CLOSURE**

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*Rock  
Bedrock*

**Navajo Indian No. 6E  
Meter/Line ID – 94580**

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**SITE DETAILS**

**Legals - Twn: 26N**

**Rng: 8W**

**Sec: 6**

**Unit: L**

**NMOCD Hazard Ranking: 20**

**Land Type: BLM**

**Operator: Taurus**

**Pit Closure Date: 10/30/98**

*THP 57%*

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**RATIONALE FOR CLOSURE**

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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 four feet and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit and bedrock was encountered at six feet below ground surface. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 0 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 <20 mg/kg.

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

- The primary source, discharge to the pit, has been removed for almost two years.
- Bedrock was encountered in the excavation at four feet below ground surface making further remediation impractical; therefore, impact to groundwater is unlikely.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Residual hydrocarbons in the soil will degrade naturally, with minimal risk to the environment.
- Based on the Hazard Ranking Score, benzene, total BTEX, and TPH were below required remediation levels.

**ATTACHMENT**

Field Pit Assessment Form

Field Pit Remediation/Closure Form

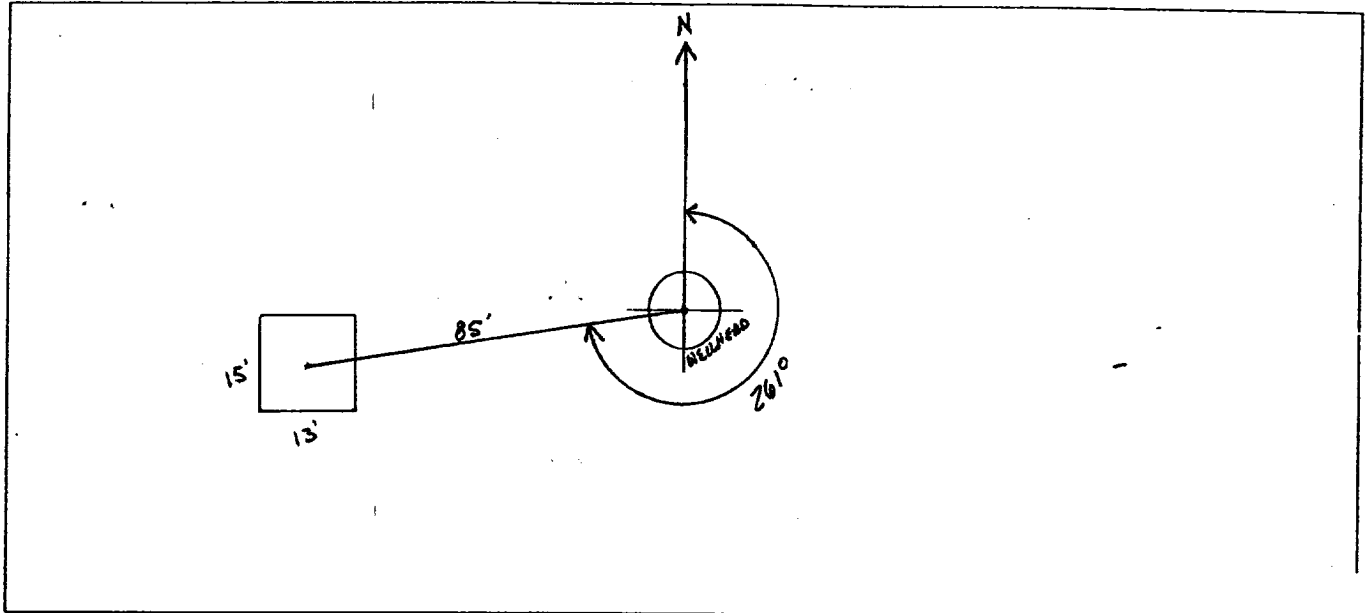
Laboratory Analytical Results

# FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94580</u> Location: <u>NAVAJO INDIAN #6E</u></p> <p>Operator #: _____ Operator Name: <u>TAURUS</u> P/L District: <u>BALLARD</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>6</u> Township: <u>26</u> Range: <u>8</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>6-1-98</u> Area: _____ Run: _____</p>																
SITE ASSESSMENT	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p><b>Land Type:</b></p> <table border="0"> <tr> <td>Inside</td> <td><input checked="" type="checkbox"/> (1)</td> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>Outside</td> <td><input type="checkbox"/> (2)</td> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td></td> <td></td> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>_____</td> </tr> </table> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area</b></p> <p>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?</p> <p><input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)</p> <p><input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>20</u> POINTS</p>	Inside	<input checked="" type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)	Outside	<input type="checkbox"/> (2)	State	<input type="checkbox"/> (2)			Fee	<input type="checkbox"/> (3)			Indian	_____
Inside	<input checked="" type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)														
Outside	<input type="checkbox"/> (2)	State	<input type="checkbox"/> (2)														
		Fee	<input type="checkbox"/> (3)														
		Indian	_____														
REMARKS	<p>Remarks: <u>LOCATION IS IN A REMOTE AREA ON A SMALL HILL APPROXIMATELY 250' WEST OF BLANCO WASH.</u></p>																

### ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 261° Footage from Wellhead 85'  
b) Length : 15' Width : 13' Depth : 3'



Remarks :

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Completed By:

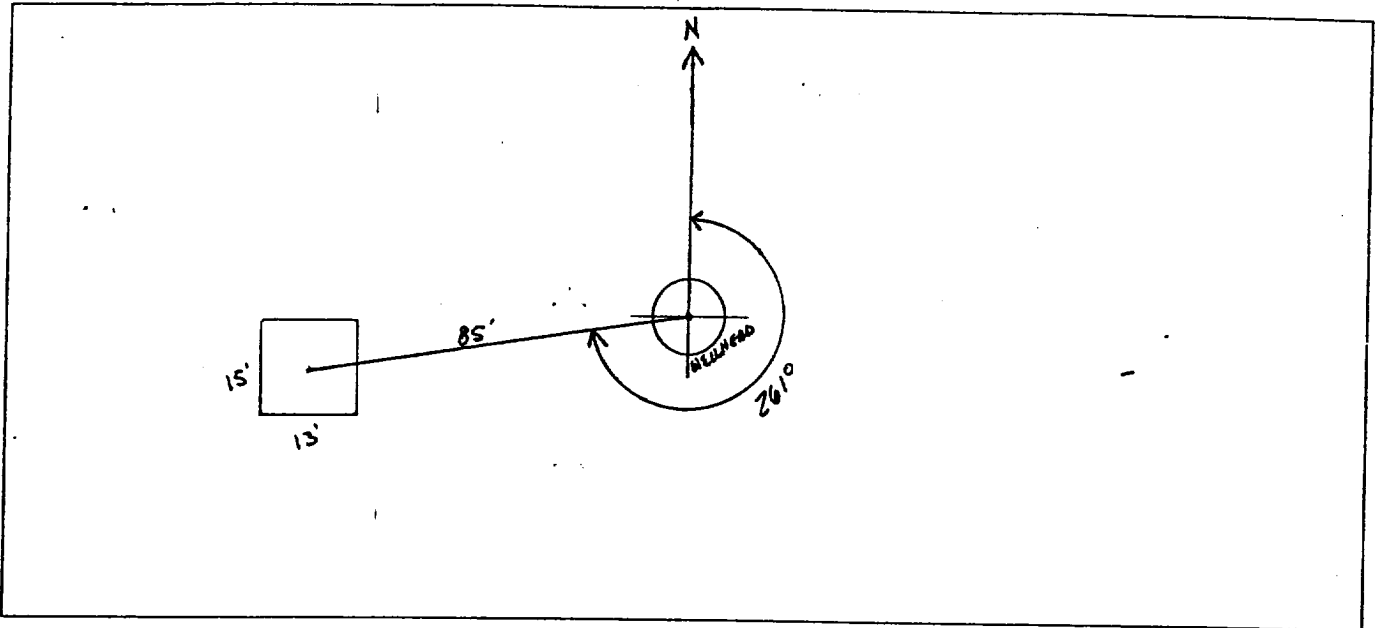
Robert Champion  
Signature

6-1-98  
Date

## ORIGINAL PIT LOCATION

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## REMARKS

Remarks :

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Completed By:

Robert Champion  
Signature

6-1-98  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

Phase I, Excavation

GENERAL	<p>Meter: <u>94580</u> Location: <u>Navajo Indian #6E</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>6</u> Township: <u>26</u> Range: <u>8</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>10-28-98</u> Area: _____ Run: _____</p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>PRA-5</u></p> <p>Sample Depth: <u>4</u> Feet</p> <p>Final PID Reading <u>0.0PPM</u> PID Reading Depth <u>4</u> Feet</p> <p>Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>28.8</u></p> <p>Onsite Bioremediation <input type="checkbox"/> (2) <u>Clean Soil</u></p> <p>Backfill Pit Without Excavation <input type="checkbox"/> (3) <u>NO SOIL HAULED</u></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>10-30-98</u> Pit Closed By: <u>Philip</u></p>
REMARKS	<p>Remarks : <u>13X15X4 (N-0.0PPM) (S-0.0PPM)</u></p> <p><u>(E-0.0PPM) (W-0.0PPM) (C-0.0PPM) (B-0.0PPM sandstone)</u></p> <p><u>Soil light in color sand - Hit sand stone at 4'</u></p> <p><u>Backfill pit w/ Original soil. needs <sup>100</sup> loads of Clean soil.</u></p> <p>Signature of Specialist: <u>Paul Archuleta</u></p>



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT  
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	PRA-5	980758
MTR CODE   SITE NAME:	94580	Navajo Indian #6E
SAMPLE DATE   TIME (Hrs):	10/28/98	1036
PROJECT:	Phase I Excavation	
DATE OF TPH EXT.   ANAL.:	10/30/98	10/30/98
DATE OF BTEX EXT.   ANAL.:	10/29/98	11/2/98
TYPE   DESCRIPTION:	VG	SOIL

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 (MOD.8015)	<20	MG/KG				
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	90.6	%				

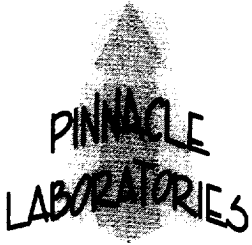
-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 104.2 % for this sample All QA/QC was acceptable.  
Negative:

DF = Dilution Factor Used

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_



2709-D Pan American Freeway NE  
Albuquerque, New Mexico 87107  
Phone (505) 344-3777  
Fax (505) 344-4413

Pinnacle Lab ID number      **810119**  
November 05, 1998

EL PASO FIELD SERVICES  
770 WEST NAVAJO  
FARMINGTON, NM 87401

Project Name                      PHASE I EXC.  
Project Number                  (none)

Attention:      JOHN LAMBDIN

On 10/30/98 Pinnacle Laboratories, Inc. Inc., (ADHS License No. AZ0592), received a request to analyze **non-aq** 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.

Kimberly D. McNeill  
Project Manager

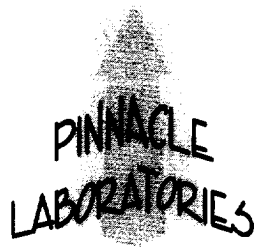
MR: mt

Enclosure

H. Mitchell Rubenstein, Ph. D.  
General Manager

*Reviewed and Accepted*  
*J. J. J.*  
*11/9/98*

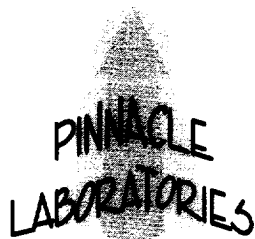




2709-D Pan American Freeway NE  
Albuquerque, New Mexico 87107  
Phone (505) 344-3777  
Fax (505) 344-4413

CLIENT	: EL PASO FIELD SERVICES	PINNACLE ID	: 810119
PROJECT #	: (none)	DATE RECEIVED	: 10/30/98
PROJECT NAME	: PHASE I EXC.	REPORT DATE	: 11/5/98
AEN			DATE
ID. #	CLIENT DESCRIPTION	MATRIX	COLLECTED
01	980758	NON-AQ	10/28/98





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Phone (505) 344-3777  
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### GAS CHROMATOGRAPHY RESULTS

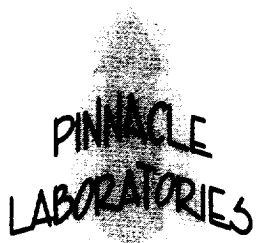
TEST : EPA 8015 MODIFIED (DIRECT INJECT)  
CLIENT : EL PASO FIELD SERVICES  
PROJECT # : (none)  
PROJECT NAME : PHASE I EXC.

PINNACLE I.D.: 810119

PROJECT NAME		: PHASE I EXC.				
SAMPLE			DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	980758	NON-AQ	10/28/98	10/30/98	10/30/98	1
PARAMETER		DET. LIMIT	UNITS	01		
FUEL HYDROCARBONS, C6-C10		10	MG/KG	< 10		
FUEL HYDROCARBONS, C10-C22		5.0	MG/KG	< 5.0		
FUEL HYDROCARBONS, C22-C36		5.0	MG/KG	< 5.0		
CALCULATED SUM:						

SURROGATE:  
O-TERPHENYL (%) 134  
SURROGATE LIMITS ( 66 - 151 )

CHEMIST NOTES:  
N/A



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Albuquerque, New Mexico 87107  
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GAS CHROMATOGRAPHY RESULTS  
REAGENT BLANK

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)	PINNACLE I.D.	: 810119
BLANK I.D.	: 103098	DATE EXTRACTED	: 10/30/98
CLIENT	: EL PASO FIELD SERVICES	DATE ANALYZED	: 11/2/98
PROJECT #	: (none)	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: PHASE I EXC.		

PARAMETER	UNITS	
FUEL HYDROCARBONS, C6-C10	MG/KG	< 10
FUEL HYDROCARBONS, C10-C22	MG/KG	< 5.0
FUEL HYDROCARBONS, C22-C36	MG/KG	< 5.0

SURROGATE:  
O-<sup>-</sup> PHENYL (%) 114  
SURROGATE LIMITS ( 80 - 151 )

CHEMIST NOTES:  
N/A

SHADED AREAS ARE FOR LAB USE ONLY.

PLEASE FILL THIS FORM IN COMPLETELY.

PROJECT MANAGER: John Lambdin				COMPANY: E1 Paso Field Services			
ADDRESS: 770 W Navajo				ADDRESS: Farmington, NM 87401			
PHONE: (505) 599-2144				PHONE: (505) 599-2261			
FAX: (505) 599-2261				FAX: (505) 599-2261			
BILL TO: Above				BILL TO: Above			
COMPANY: Above				COMPANY: Above			
ADDRESS: Above				ADDRESS: Above			
SAMPLE ID: 980758				DATE: 10/29/98			
TIME: 1036				MATRIX: Soil			
LAB ID: 01				LAB ID: 01			
PROJECT INFORMATION				PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS			
PROJ NO: Phase I Exc.				(RUSH) <input type="checkbox"/> 124hr <input type="checkbox"/> 48hr <input type="checkbox"/> 72hr <input type="checkbox"/> 1 WEEK (NORMAL) <input checked="" type="checkbox"/>			
PROJ NAME: Phase I Exc.				CERTIFICATION REQUIRED: <input type="checkbox"/> NM <input type="checkbox"/> SDWA <input type="checkbox"/> OTHER			
P.O. NO:				METHANOL PRESERVATION <input type="checkbox"/>			
SHIPPED VIA: Fed Ex				COMMENTS: FIXED FEE <input type="checkbox"/>			
SAMPLE RECEIPT				NO. CONTAINERS: 1			
CUSTODY SEALS: Q/N/NA				RECEIVED INTACT			
BU: 440C				BU: 440C			
RELINQUISHED BY: 1				RELINQUISHED BY: 2			
Signature: [Signature]				Signature: [Signature]			
Printed Name: Marion Hopper				Printed Name: [Signature]			
Date: 10/29/98				Date: 10/30/98			
Company: EPCS				Company: American Environmental Network (NM), Inc.			
RECEIVED BY: 1				RECEIVED BY: (LAB) 2			
Signature: [Signature]				Signature: [Signature]			
Printed Name: [Signature]				Printed Name: [Signature]			
Date: 10/30/98				Date: 10/30/98			
Company: American Environmental Network (NM), Inc.				Company: American Environmental Network (NM), Inc.			

Sample	Pan wt - Sample wt	Pan + Dry	Dry wt	% Solid
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10/26/98

980751	$2.61 - 11.78 =$	9.17	11.40	8.79	95.9 %
980751 dup	$2.60 - 14.49 =$	11.89	13.98	11.38	95.7
980752	$2.61 - 14.56 =$	11.95	13.75	11.14	93.2
980753	$2.62 - 12.43 =$	9.81	11.53	8.91	90.8
980754	$2.62 - 13.50 =$	10.88	12.55	9.93	91.3

10/29/98

980755	$2.62 - 11.67 =$	9.05	10.87	8.25	91.2 %
980756	$2.61 - 11.82 =$	9.21	11.13	8.52	92.5
980757	$2.63 - 11.63 =$	9.00	11.13	8.50	94.4
980758	$2.63 - 11.95 =$	9.32	11.07	8.44	90.6
980758 dup	$2.62 - 11.66 =$	9.04	10.78	8.16	90.3
980759	$2.63 - 11.62 =$	8.99	10.72	8.09	90.0

11/3/98

980760					
980760 dup					
980761					
980762					
980763					
980764					
980765					

Continued on Page

Read and Understood By

Signed

Date

Signed

Date

# BTEX SOIL SAMPLE WORKSHEET

File	:	980758	Date Printed	:	11/3/98
Soil Mass (g)	:	5.07	Multiplier (L/g)	:	0.00099
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical):	:	200
Shot Volume (uL)	:	50	CAL FACTOR (Report):	:	0.19724

	DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L) : <0.5	Benzene (mg/Kg):	#VALUE!	0.493
Toluene (ug/L) : <0.5	Toluene (mg/Kg):	#VALUE!	0.493
Ethylbenzene (ug/L) : <0.5	Ethylbenzene (mg/Kg):	#VALUE!	0.493
p & m-xylene (ug/L) : <1.0	p & m-xylene (mg/Kg):	#VALUE!	0.986
o-xylene (ug/L) : <0.5	o-xylene (mg/Kg):	#VALUE!	0.493
	Total xylenes (mg/Kg):	#VALUE!	1.479
	Total BTEX (mg/Kg):	#VALUE!	



CHAIN OF CUSTODY RECORD

Phase I

Excavation

12-11-98 Anal. 12-17-98 Closure  
12-11-98 Clean. 12-17-98 Appr.

Page 1 of 1

PROJECT NUMBER # 24324		PROJECT NAME Pit Closure Project		DATE 10/28/98		TOTAL NUMBER OF CONTAINERS 1		SAMPLE TYPE TPH EPA 418.1		BTEX EPA 8020		LAB PID		Headspace PID		SEQUENCE # 5		REMARKS MC 94580 Nuvaco Indian #6E	
LAB ID 980758	DATE 10/28/98	TIME 10:30	MATRIX Soil	FIELD ID PDA-5															
RELINQUISHED BY: (Signature) <i>Paul Q. Chubert</i>		DATE/TIME 10/28/98 10:42		RECEIVED BY: (Signature) <i>Stennis Bird</i>		DATE/TIME 10/28/98 1535		RELINQUISHED BY: (Signature) <i>Stennis Bird</i>		DATE/TIME 10/28/98 1411		RECEIVED BY: (Signature) <i>John Felder</i>							
REQUESTED TURNAROUND TIME: <input checked="" type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH				SAMPLE RECEIPT REMARKS Intact and 340F				RESULTS & INVOICES TO: FIELD SERVICES LABORATORY EL PASO NATURAL GAS COMPANY P.O. BOX 4990 FARMINGTON, NEW MEXICO 87499											
CARRIER CO.				CHARGE CODE															
BILL NO.:																			