

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

DEPUTY OIL & GAS INSPECTION

DEC 2 1 1994

SAN JUAN 28-7 UNIT 73
Meter/Line ID - 71909

RECEIVED
JUL 1 1994

SITE DETAILS

Legals - Twn: 28 Rng: 07 Sec: 28 Unit: A
NMOC Hazard Ranking: 40
Operator: CONOCO - MESA OPERATING L

Land Type: 2 - Federal

Pit Closure Date: 06/14/94

OIL CON. DIV.

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:

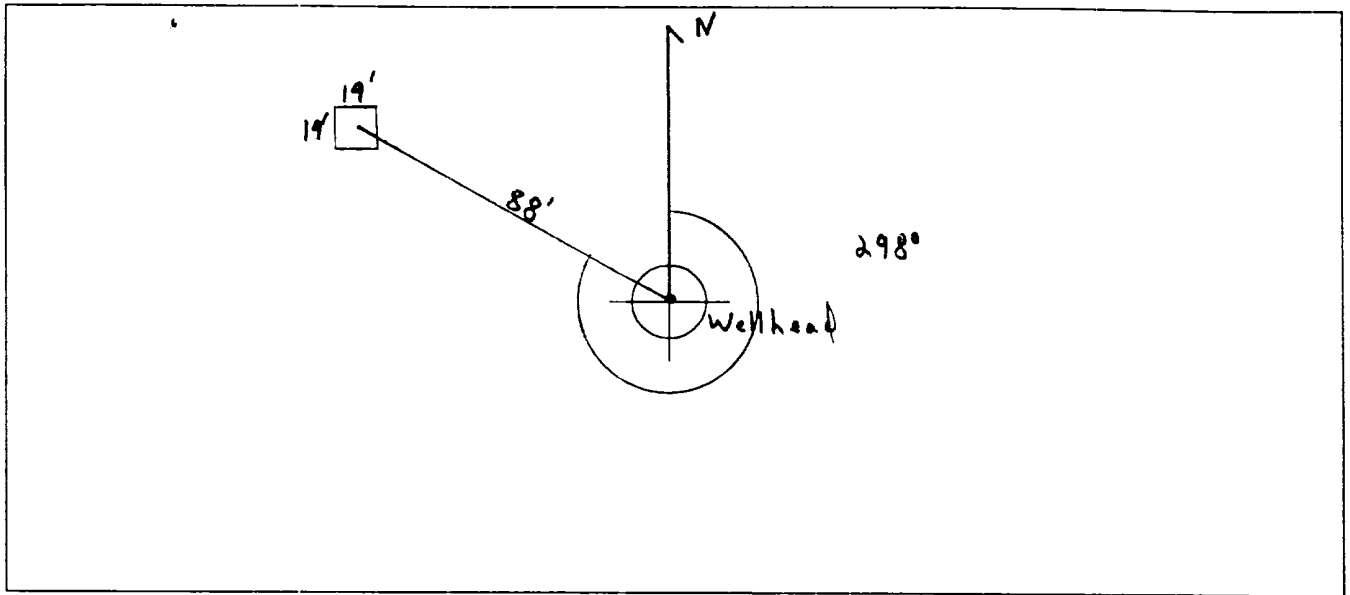
- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All 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	<p>Meter: <u>71909</u> Location: <u>San Juan 28-7 Unit 73</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>Ameco</u> P/L District: <u>Blanco</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>28</u> Township: <u>28</u> Range: <u>7</u></p> <p>Or Latitude <u>_____</u> Longitude <u>_____</u></p> <p>Pit Type: Dehydrator <u>✓</u> Location Drip: <u>✓</u> Line Drip: <u>_____</u> Other: <u>_____</u></p> <p>Site Assessment Date: <u>6/2/94</u> Area: <u>03</u> Run: <u>41</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <input type="checkbox"/> (3)</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p>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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input checked="" type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Corrize Canyon</u> (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>40</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline - Inside, Vuln - Inside</u> <u>Spits. Will close 1. Pit Dry</u></p> <p><u>DIG + Haul</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 298° Footage from Wellhead 88'
 b) Length : 19' Width : 19' Depth : 3'



ORIGINAL PIT LOCATION

Remarks :

Pictures @ 1012 (1-5) 1011
 End Dump

REMARKS

Completed By:

Cory Chase
 Signature

6/2/94
 Date

PHASE I EXCAVATION

FIE PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>71909</u> Location: <u>San Juan 28-7 unit 73</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>28</u> Township: <u>28</u> Range: <u>17</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6/14/94</u> Area: <u>03</u> Run: <u>41</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>4P36</u></p> <p>Sample Depth: <u>12</u> Feet</p> <p>Final PID Reading <u>176 ppm</u> PID Reading Depth <u>12</u> Feet</p> <p style="text-align: center;">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>40</u> ^{KDK 7-11-94}</p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>6/14/94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Remediated pit to 12' took VC sample, meter read 176 ppm at 50". Floor still black, closed pit.</u></p> <p><small>* Approx. Cubic Yards - 40 delivered to Tierra. As per Tierra's Invoice. ^{KDK 7-11-94}</small></p> <p>Signature of Specialist: <u>James J. Louisa</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	TP36	945445
MTR CODE SITE NAME:	71909	N/A
SAMPLE DATE TIME (Hrs):	6-14-94	1120
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	6/16/94	6/16/94
DATE OF BTEX EXT. ANAL.:	6/17/94	6/20/94
TYPE DESCRIPTION:	VL	Dark Grey Coarse Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.25	MG/KG	10			
TOLUENE	40.25	MG/KG	10			
ETHYL BENZENE	1.9	MG/KG	10			
TOTAL XYLENES	32	MG/KG	10			
TOTAL BTEX	34	MG/KG				
TPH (418.1)	1820	MG/KG			2.20	28
HEADSPACE PID	176	PPM				
PERCENT SOLIDS	87.3	%				

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

The Surrogate Recovery was at 56 % for this sample All QA/QC was acceptable.

Narrative:

AT I results attached. Surrogate recovery outside
AT I QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By: [Signature]

Date:

7/17/94

1. Test Method for
 2. Oil and Grease and Petroleum Hydrocarbons
 3. in Water and Soil
 4.
 5. Perlin-tliner Model 1600 FT-IR
 6. Analytical Report
 7. *****
 8.

1. Sample ID: 13-05

2. Sample Identification
 3. 145447

4. Initial mass of sample, g
 5. 1.130

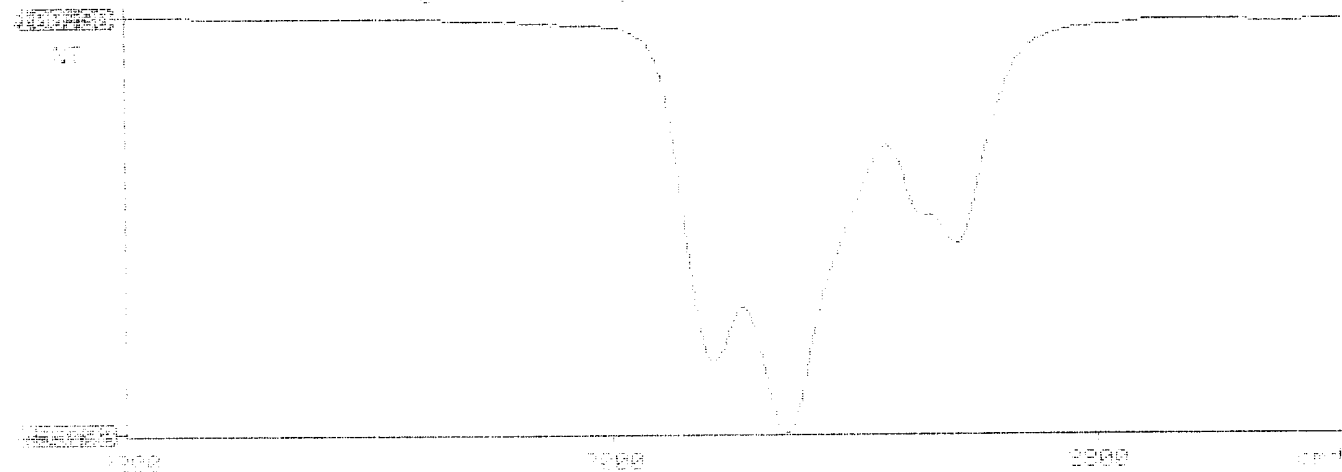
6. Volume of sample after extraction, ml
 7. 17.000

8. Petroleum hydrocarbons, ppm
 9. 150.136

10. Max absorbance of hydrocarbons (2930 cm^{-1})
 11. 0.130

12. Y: Petroleum hydrocarbons spectrum

13.33

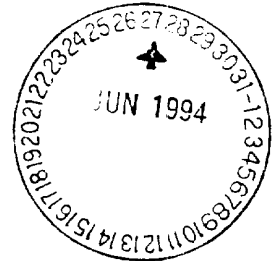




Analytical **Technologies, Inc.**

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

ATI I.D. 406367



June 24, 1994

El Paso Natural Gas Company
P.O. Box 4993
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/17/94**, 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

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 406367
 PROJECT # : 24324
 PROJECT NAME : FIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	945436	NON-AQ	06/13/94	06/17/94	06/20/94	1
05	945444	NON-AQ	06/13/94	06/17/94	06/20/94	5
06	945445	NON-AQ	06/14/94	06/17/94	06/20/94	10

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	0.10	0.42	<0.25
TOLUENE	MG/KG	0.55	11	<0.25
ETHYLBENZENE	MG/KG	1.7	0.82	1.9
TOTAL XYLENES	MG/KG	42 D5	11	32

SURROGATE:

BROMOFLUOROBENZENE (%)	90	63	56*
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D5=DILUTED 5X, ANALYZED 06/21/94

*OUTSIDE ATI QUALITY CCNTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Burlington Environmental Inc.

4000 Monroe Road

Farmington, New Mexico 87401

(505) 326-2262 FAX (505) 326-23118

Borehole # BH-1

Well #

Page 1

of 1

Project Name

EPNG PITS

Project Number

14509

Phase

6000.77

Project Location

San Juan 28-7 Unit 73 71909

Elevation

Borehole Location GA-S28-T28-12F

GWL Depth

Logged By

Phillip Moss

Drilled By

K. Adilla

Date/Time Started 9-7-95/14:00

Date/Time Completed 9-7-95/14:42

Well Logged By

Phillip Moss

Personnel On-Site

K. Adilla, F. Ritz, P. Garlick, P. Fox

Contractors On-Site

Client Personnel On-Site

Drilling Method

4 1/4 I.D. 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			Drilling Conditions & Blow Counts
							BZ	BH	S	
0				Backfill to 12'						
5										
10										
15	1	15-17'	SS 12"	SAND, f.g., very loose, brown and black, hydrocarbon odor, moist	SP		0	0	23 135	14:08
20	2	20-22'	SS 8"	SAND, f.g., very loose, brown, no odor, moist	SP		0	2.1	0 0	14:19
25				TD = 22'						
30										
35										
40										

Comments:

PL 14 10 (20-22') sent to lab (BTEX TPH). Black layer at 216". It may be the only contaminated soil in the 15-17' sample. BH grouted to surface.

Geologist Signature

Phillip L. Moss



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	PLM10	947422
MTR CODE SITE NAME:	71909	San Juan 28-7 Unit 73
SAMPLE DATE TIME (Hrs):	09-07-95	1419
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL.:	9-7-95	
DATE OF BTEX EXT. ANAL.:	9/8/95	9/12/95
TYPE DESCRIPTION:	VG	DARK BROWN SAND & CLAY

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)	38.7	MG/KG			2.04	28
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	92.9	%				

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

The Surrogate Recovery was at 92% for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By:

Date:

9-13-95

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

95/09/08 16:35

Sample identification
947422

Initial mass of sample, g
2.040

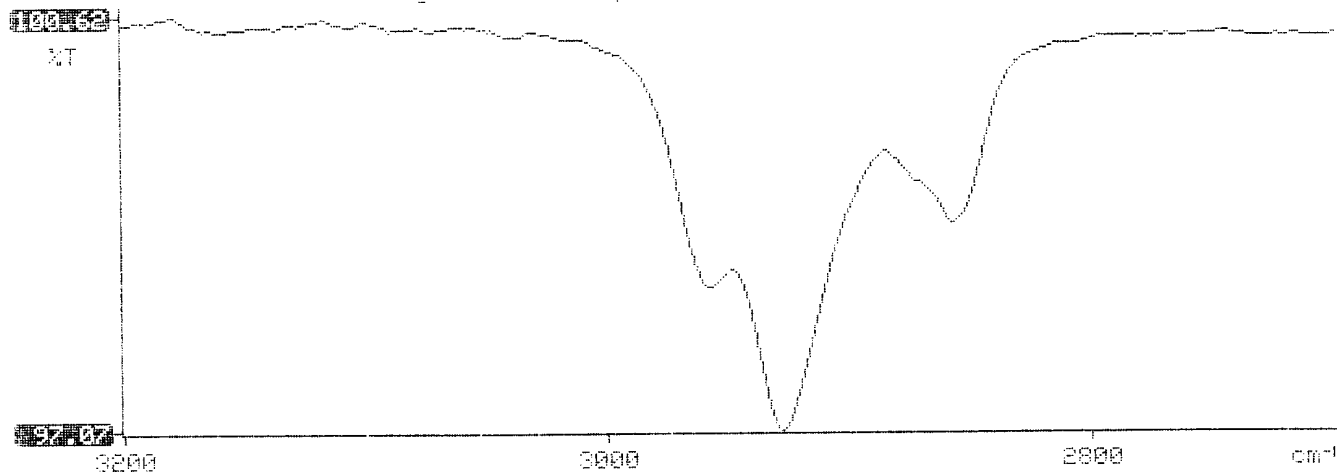
Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
38.751

Net absorbance of hydrocarbons (2930 cm^{-1})
0.015

Y: Petroleum hydrocarbons spectrum

16:35



BTEX SOIL SAMPLE WORKSHEET

File	:	947422	Date Printed	:	9/13/95
Soil Mass (g)	:	5.02	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	20	DF (Analytical)	:	200
Shot Volume (uL)	:	100	DF (Report)	:	0.19920

				Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000 0.498
Toluene (ug/L)	:	0.02	Toluene (mg/Kg):	0.004 0.498
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000 0.498
p & m-xylene (ug/L)	:	0.00	p & m-xylene (mg/Kg):	0.000 0.996
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000 0.498
			Total xylenes (mg/Kg):	0.000 1.494
			Total BTEX (mg/Kg):	0.004

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\091295-1.011
 Method : C:\LABQUEST\METHODS\9001.MET
 Sample ID : ~~CCV 50 ppb~~ mh
 Acquired : Sep 12, 1995 16:31:19
 Printed : Sep 12, 1995 16:57:42
 User : MARLON

947422
 5.02g 100 μ L

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.410	0	0.0000
a,a,a TFT	4.890	3336173	96.6085
TOLUENE	6.720	217058	0.0152
ETHYLBENZENE	10.513	0	0.0000
M & P XYLENE	10.840	287616	-3.2591
O XYLENE	11.927	0	0.0000
BFB	13.397	54963052	91.7194

C:\LABQUEST\CHROM001\091295-1.011 -- Channel A

