EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

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

SAN JUAN 28-7 UNIT 189
Meter/Line ID - 87672

SITE DETAILS

Legals - Twn: 28 **Rng:** 07 **Sec:** 35 **Unit:** A
NMOCD Hazard Ranking: 40 **Land Type:** 4 - Fee
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 06/16/94**

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: 87672 Location: San Juan 28-7 Unit 189
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: A Section 35 Township: 28 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ✓ Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6/2/94 Area: 03 Run: 41

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☒ (1)
Outside ☐ (2)

Land Type:
BLM ☐ (1)
State ☐ (2)
Fee ☐ (3)
Indian _____
Patented LAND

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 Adams Canyon (off Carrizo)
(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-Inside, Vuln-Inside (on line)
4 pits. Will close 1. Pit Dry

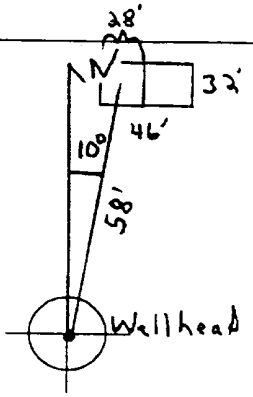
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 10° Footage from Wellhead 58'

b) Length : 46 Width : 32 Depth : 5



REMARKS

Remarks :

Pictures @ 1308 (1-4) roll 2

Dump Truck

Bermed & Fenced area of pit is 46'X32'. Actual pit is 32'X28'X5'

Completed By:

Cory Chase
Signature

6/1/94
Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 87672 Location: San Juan 28-7 unit 189

Coordinates: Letter: A Section 35 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Date Started : 6/15/94 Area: 03 Run: 41

FIELD OBSERVATIONS

Sample Number(s): 4P39 _____ _____ _____

Sample Depth: 12 Feet

Final PID Reading 584 PID Reading Depth 12 Feet

	Yes	No	
Groundwater Encountered	☐ (1)	☒ (2)	Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 200 KDK 7-11-94
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

Envirotech	☐ (1)	☒ (3)	Tierra
Other Facility	☐ (2)	Name:	_____

Pit Closure Date: 6/16/94 Pit Closed By: BEI

REMARKS

Remarks : Started Remediating pit to 12' could not complete... Finished digging pit to 12' took VC sample meter reading was 584 ppm at 59° closed pit.

* 200 cubic yards delivered to Tierra as shown on Tierra's Invoice KDK 7-11-

Signature of Specialist: James J Peace

(SP3191) 04/07/9

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JP39	94563
MTR CODE | SITE NAME:	87672	N/A
SAMPLE DATE | TIME (Hrs):	6-16-94	1210
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6-20-94	6/20/94
DATE OF BTEX EXT. | ANAL.:	6/21/94	6/22/94
TYPE | DESCRIPTION:	VC	Brown/gray clay & sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.36	MG/KG	5			
TOLUENE	5.7	MG/KG	5			
ETHYL BENZENE	2.1	MG/KG	5			
TOTAL XYLENES	45	MG/KG	5			
TOTAL BTEX	53	MG/KG				
TPH (418.1)	5430	MG/KG			1.97	28
HEADSPACE PID	584	PPM				
PERCENT SOLIDS	89.6	%				

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

The Surrogate Recovery was at 53 % 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: 7/17/94

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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                    *
********************************************************
*
 [illegible]   11:27
*
*   Sample Identification
 [illegible]
*
*   Initial mass of sample, g
 [illegible]
*
*   Volume of sample after extraction, ml
 [illegible]
*
*   Petroleum hydrocarbons, ppm
 [illegible]
*   Net absorbance of hydrocarbons (2930 cm-1)
 [illegible]
*
*
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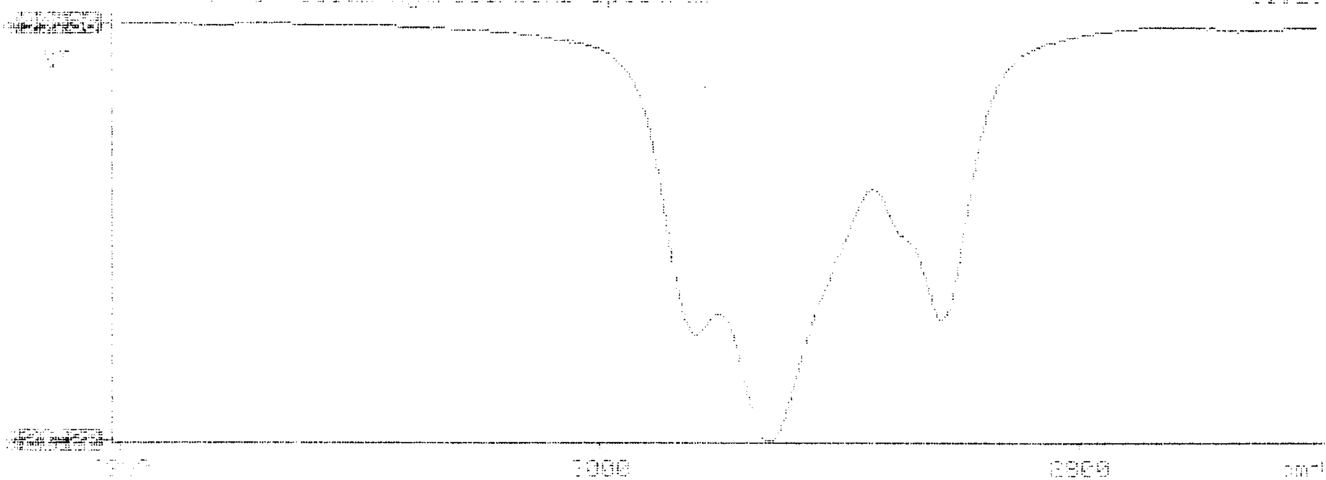
1: Petroleum hydrocarbons spectrum   11:27



ILLEGIBLE

Analytical **Technologies,** Inc.

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

ATI I.D. **406384**

June 30, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/21/94**, 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.

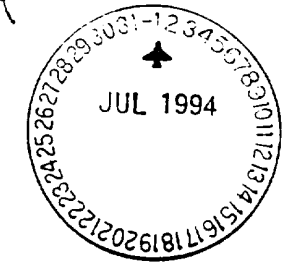
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

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 ATI I.D.: 406384

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945463	NON-AQ	06/16/94	06/21/94	06/22/94	5
02	945464	NON-AQ	06/16/94	06/21/94	06/23/94	5
03	945465	NON-AQ	06/16/94	06/21/94	06/22/94	20

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	0.36	<0.12	<0.50
TOLUENE	MG/KG	5.7	0.58	57
ETHYLBENZENE	MG/KG	2.1	1.3	13
TOTAL XYLENES	MG/KG	45	40	220
SURROGATE:				
BROMOFLUOROBENZENE (%)		53*	53*	215*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

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 San Juan 28-7 Unit 185 876 E2

Elevation
Borehole Location QA-535-T28-R7
GWL Depth
Logged By Phillip Moss
Drilled By K. Padilla
Date/Time Started 9-8-95 / 11:40
Date/Time Completed 9-9-95 / 12:05

Well Logged By Phillip Moss
Personnel On-Site K. Padilla, F. Rivera, D. Charlie, P. Moss
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 BZ	BH	S	Drilling Conditions & Blow Counts
0				Backfill to 12'.						
5										
10										
15	1	15-17'	SS 9"	Mudstone, grayish green, poorly-cemented, thin-bedded, no odor		13'	17	65	385 / 10.8	(38.5) ppm — 11:46
20				TD = 17'						
25										
30										
35										
40										

Comments: PLM 13 (15-17') sent to lab (BTEX, TPH). Sample logged and used before placing in jar. BH grouted to the surface.

Geologist Signature Phillip L. Moss

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:	PLM 13	947432
MTR CODE | SITE NAME:	87672	San Juan 28-7 Unit 189
SAMPLE DATE | TIME (Hrs):	09-08-95	1146
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-11-95	09-11-95
DATE OF BTEX EXT. | ANAL.:	9/12/95	9/14/95
TYPE | DESCRIPTION:	VG	Light grey fine 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)	RLB 9/12/95 92.6	MG/KG			2.01	28
HEADSPACE PID	11	PPM				
PERCENT SOLIDS	93.1	%				

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

The Surrogate Recovery was at 101% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-15-95

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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               *
**************************************************
*
 95/09/11   13:30
*
*  Sample identification
 947432
*
*  Initial mass of sample, g
 2.010
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 92.633
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.022
*
*
*
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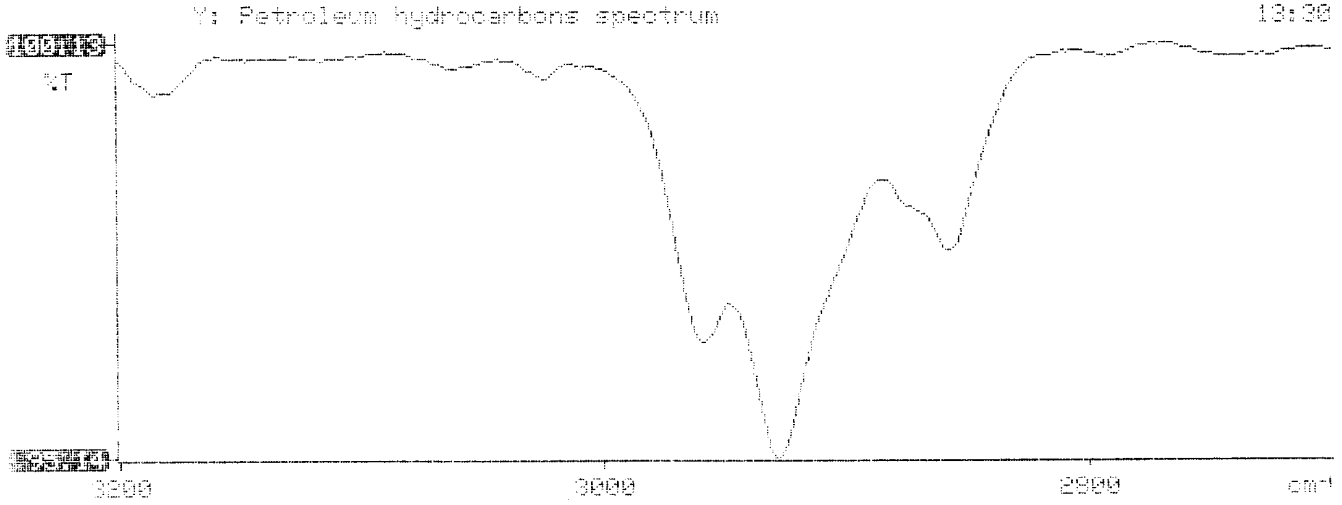

BTEX SOIL SAMPLE WORKSHEET

File	947432	**Date Printed**	9/15/95
Soil Mass (g)	5.10	**Multiplier (L/g)**	0.00098
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.19608

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.490
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.490
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.490
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	0.980
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.490
		Total xylenes (mg/Kg):	**0.000**	1.471
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\091495-0.005
Method : C:\LABQUEST\METHODS\9000.MET
Sample ID : 947432,5.10G,100U
Acquired : Sep 14, 1995 14:03:08
Printed : Sep 14, 1995 14:33:29
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	7.977	49641	-1.1254
a,a,a-TFT	11.377	13419954	103.9791
TOLUENE	14.383	64486	-2.1030
ETHYLBENZENE	19.400	0	0.0000
M,P-XYLENES	19.803	167768	-5.1570
O-XYLENE	21.057	40214	-1.0721
BFB	22.810	115182232	101.0477