Ernie Busch
DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Approved

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

SAN JUAN 28-7 UNIT 252
Meter/Line ID - 90564

SITE DETAILS

Legals - Twn: 28 **Rng:** 07 **Sec:** 32 **Unit:** C
NMOCD Hazard Ranking: 60 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date:** 07/11/94

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.
- 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: 90564 Location: San Juan 28-7 Unit 252
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: C Section 32 Township: 28 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator √ Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 5/27/94 Area: 13 Run: 61

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 Martin 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: 60 **POINTS**

REMARKS

Remarks : Redline-Inside, Vuln-Inside (on line)
4 pits. Will Close 1. Pit Dry

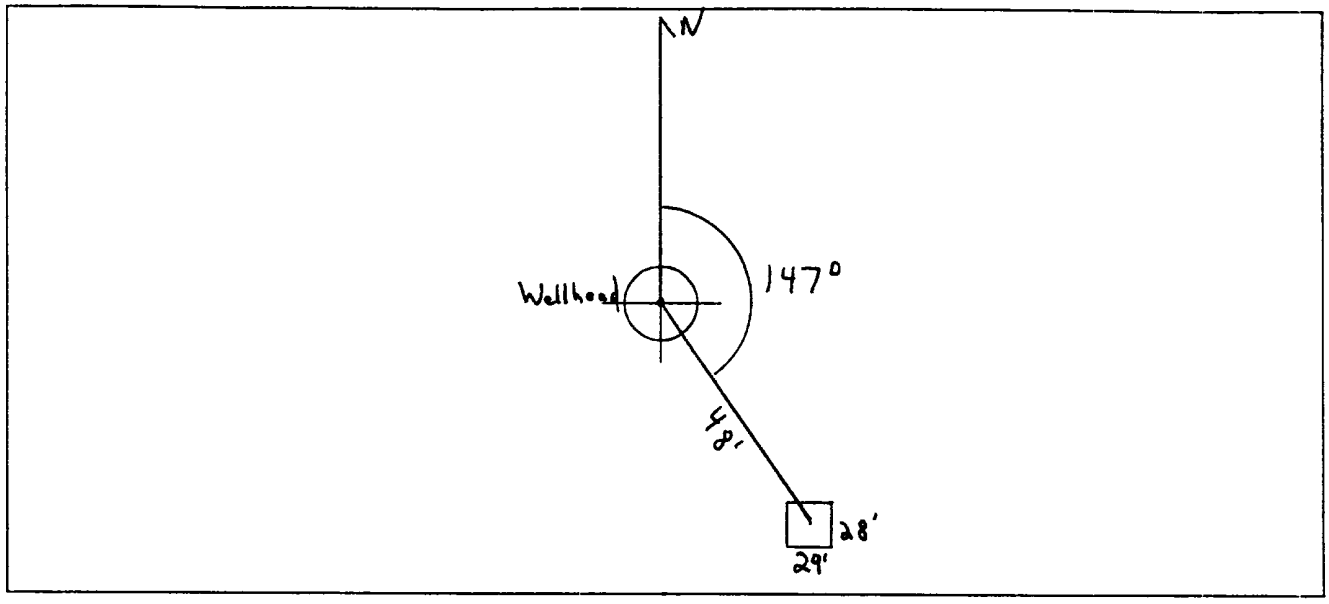
DIG+HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 147° Footage from Wellhead 48'

b) Length : 29' Width : 28' Depth : 4'



REMARKS

Remarks :

Pictures @ 1541 (16-19)

Dump Truck

Completed By:

Signature

5/27/94

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 90564 Location: SAN JUAN 28-7 UNIT 252

Coordinates: Letter: C Section 32 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Date Started : 7-11-94 Area: 13 Run: 61

FIELD OBSERVATIONS

Sample Number(s): KP 121 _____ _____ _____

Sample Depth: 10' Feet

Final PID Reading 592 PID Reading Depth 10' Feet

	Yes	No
Groundwater Encountered	☐ (1)	☒ (2)

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 170
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

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

Pit Closure Date: 7-11-94 Pit Closed By: B.&J

REMARKS

Remarks : Some Line markers. Started Remediating to 12' soil turned Black & Gray with a Smell. Hit sand stone at 10' soil turned Dark Gray .. Pid 592 closed pit.

Signature of Specialist: Kelly Padilla

(SP3191) 04/07/9

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:	KP121	945626
MTR CODE | SITE NAME:	90564	San Juan 28-7 Unit 252
SAMPLE DATE | TIME (Hrs):	11-Jul-94	1533
PROJECT:	Phase I Excavation	
DATE OF TPH EXT. | ANAL.:	7/12/94	7/12/94
DATE OF BTEX EXT. | ANAL.:	7/12/94	7/12/94
TYPE | DESCRIPTION:	VC	Lt. grey sandstone/clay

Field Remarks: Split

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG				
TOLUENE	0.188	MG/KG				
ETHYL BENZENE	0.422	MG/KG				
TOTAL XYLENES	8.10	MG/KG				
TOTAL BTEX	8.74	MG/KG				
TPH (418.1)	488	MG/KG			2.17	28.0
HEADSPACE PID	592	PPM				
PERCENT SOLIDS	87.5	%				

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

The Surrogate Recovery was at 62.2 % for this sample All QA/QC was acceptable.

Narrative:

Surrogate recovery was outside EPNG QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By: John Gardner

Date: Original: 8/8/94 Re-printed: 3/16/95

Test Method for
Oil and Petroleum Hydrocarbons
in Water and Soil

Perkin-Elmer Modal 1600 FT-IR
Analysis Report

Sample identification
45421

Initial mass of sample, g
1.170

Volume of sample after extraction, ml
25.000

Petroleum hydrocarbons, ppm
458.468

Net absorbance of hydrocarbons (2930 cm-1)
0.017

Petroleum hydrocarbons spectrum

12:06

%T

3200 3000 2800 cm-1

2.02g
20ml

945626 ~~MDUP~~ 7/15/94

File : BETX__05.D01
Run : 01
Path : C:\CHROM
Collection : 13:47:31 Jul 15 1994 Meth(A): BETX [12:00:54 Jul 14 1994]
Integration: 13:47:31 Jul 15 1994 Meth(A): BETX [12:00:54 Jul 14 1994]
Report : 14:13:42 Jul 15 1994 Meth(A): BETX [12:00:54 Jul 14 1994]

John Lambdi
Type : Sampl

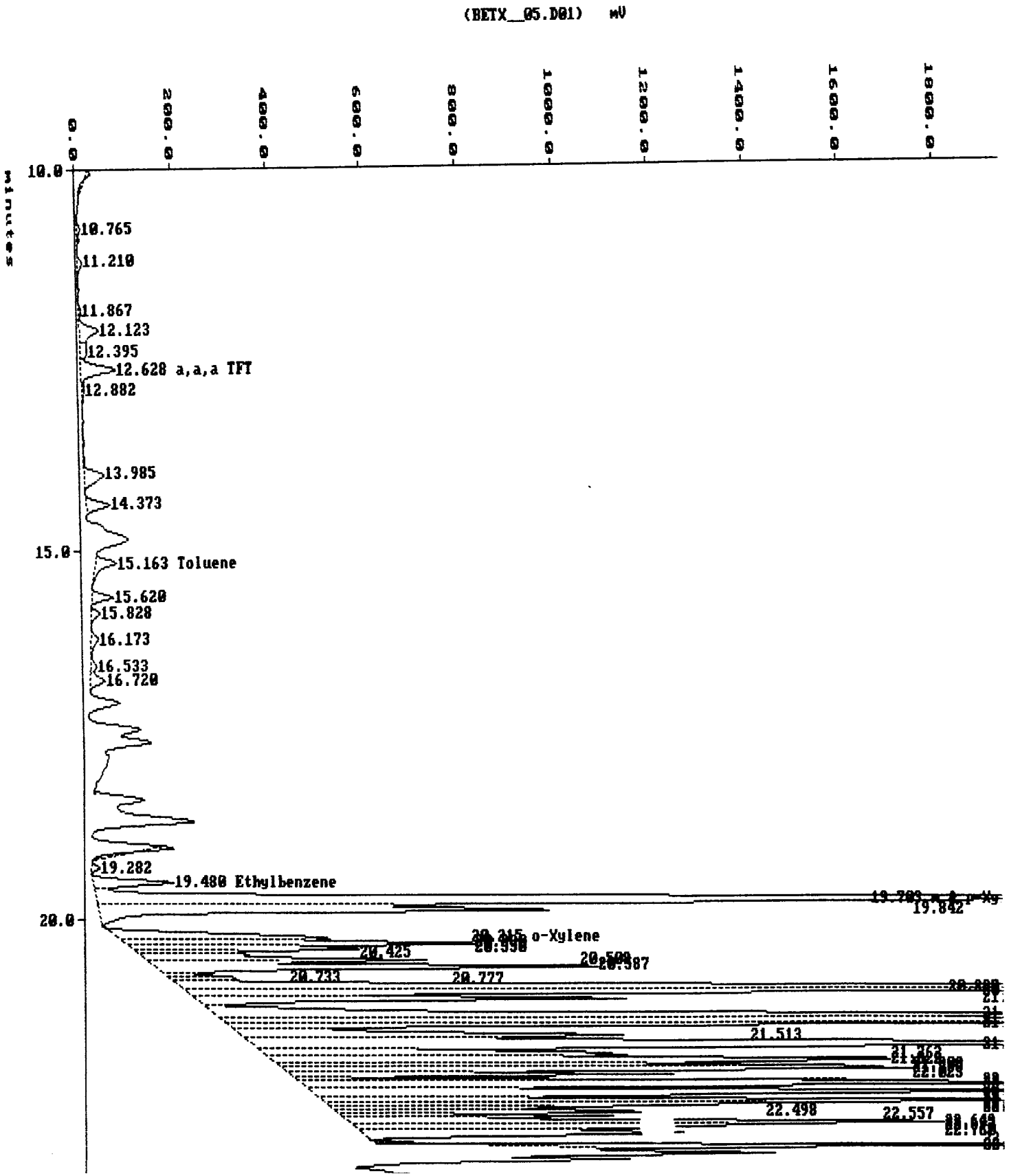
Sample Amt : 1.00000e+0 Dilution: 5.00000e+0

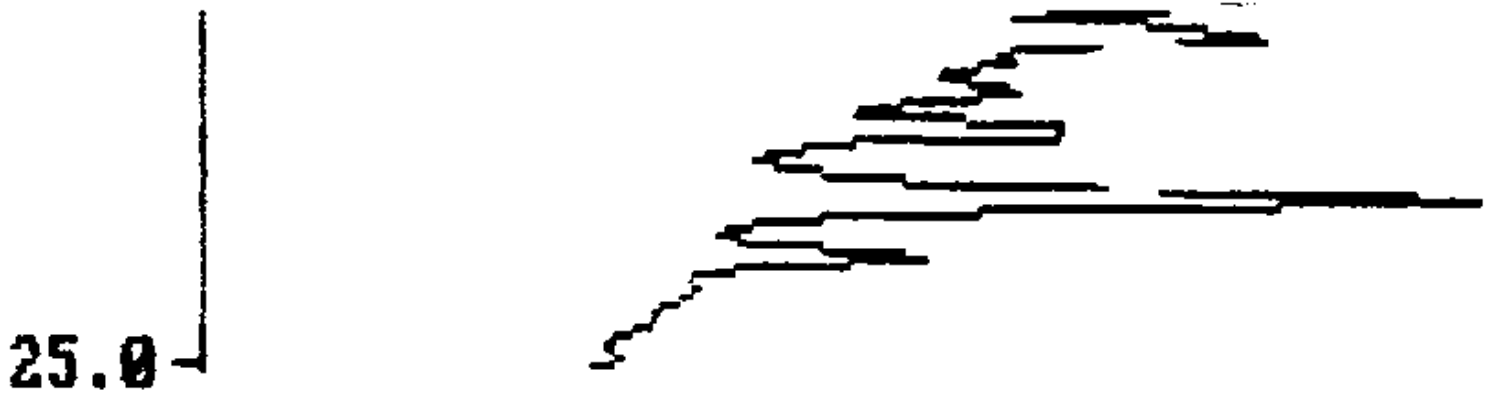
EXTERNAL STANDARD (AREA)

RT	Area	BC	ExpRT	RF		ug/L	Name
			10.266	8.44764e-6	42.5		Benzene
10.765	43758	T		0.00000e+0		0.0000	Unknown
11.210	81905	V		0.00000e+0		0.0000	Unknown
11.867	35722	T		0.00000e+0		0.0000	Unknown
12.123	382929	T		0.00000e+0		0.0000	Unknown
12.395	166121	T		0.00000e+0		0.0000	Unknown
12.628	578102	T	12.628	1.53869e-4	88.9	444.7606	R a,a,a TFT
12.882	57763			0.00000e+0		0.0000	Unknown
13.985	403185	V		0.00000e+0		0.0000	Unknown
14.373	347092			0.00000e+0		0.0000	Unknown
15.163	347721	V	15.150	1.09295e-5	3.8	19.0021	Toluene
15.620	277217	T		0.00000e+0		0.0000	Unknown
15.828	136472	T		0.00000e+0		0.0000	Unknown
16.173	163951	T		0.00000e+0		0.0000	Unknown
16.533	106160	T		0.00000e+0		0.0000	Unknown
16.720	226355	V		0.00000e+0		0.0000	Unknown
19.282	70761	V		0.00000e+0		0.0000	Unknown
19.480	918459	T	19.416	9.27740e-6	8.4	42.6046	Ethylbenzene
19.703	16761177	T	19.648	8.48187e-6	142	710.8308	m & p-Xylene
19.842	4645989	V		0.00000e+0		0.0000	Unknown
20.215	2350043	T	20.221	9.14233e-6	21.4	107.4244	o-Xylene
20.280	2660537	T		0.00000e+0		0.0000	Unknown
20.350	1701734	T		0.00000e+0	163.4	0.0000	Unknown
20.425	617349	T		0.00000e+0		0.0000	Unknown
20.508	2301235	T		0.00000e+0		0.0000	Unknown
20.587	3744562	T		0.00000e+0		0.0000	Unknown
20.733	464791	T		0.00000e+0		0.0000	Unknown
20.776	379721	T		0.00000e+0		0.0000	Unknown
20.887	13224411	T	20.837	4.70556e-6	62.2	311.1414	BFB
20.928	7971994	T		0.00000e+0		0.0000	Unknown
21.035	3151856	T		0.00000e+0		0.0000	Unknown
21.240	7991247	T		0.00000e+0		0.0000	Unknown
21.318	13600675	T		0.00000e+0		0.0000	Unknown
21.350	6881721	T		0.00000e+0		0.0000	Unknown
21.513	3573999	T		0.00000e+0		0.0000	Unknown
21.628	16921980	T		0.00000e+0		0.0000	Unknown
21.762	3363612	T		0.00000e+0		0.0000	Unknown
21.822	6040786	T		0.00000e+0		0.0000	Unknown
21.908	2560112	T		0.00000e+0		0.0000	Unknown
21.953	4471379	T		0.00000e+0		0.0000	Unknown
22.023	2174985	T		0.00000e+0		0.0000	Unknown
22.110	2293805	T		0.00000e+0		0.0000	Unknown
22.151	6654274	T		0.00000e+0		0.0000	Unknown
22.242	13344274	T		0.00000e+0		0.0000	Unknown
22.365	5233445	T		0.00000e+0		0.0000	Unknown

7/15/94

22.453	839514	T	0.00000e+0	0.0000	Unknown
22.498	1601235	T	0.00000e+0	0.0000	Unknown
22.557	1347374	T	0.00000e+0	0.0000	Unknown
22.643	4766793	T	0.00000e+0	0.0000	Unknown
22.697	2031803	T	0.00000e+0	0.0000	Unknown
22.760	3143854	V	0.00000e+0	0.0000	Unknown
22.878	110349	V	0.00000e+0	0.0000	Unknown
22.943	2689766	V	0.00000e+0	0.0000	Unknown

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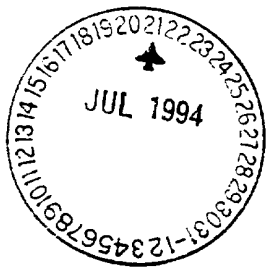
Analytical **Technologies,** Inc.

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

ATI I.D. **407346**



July 20, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **07/13/94**, 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.

Samples were run by either internal or external surrogate method. The following samples were run by internal surrogate method: 02, 03, 05, 08, 09, 10, and 12.

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.: 407346

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
10	945624	NON-AQ	07/11/94	07/14/94	07/16/94	1
11	945625	NON-AQ	07/11/94	07/14/94	07/16/94	1
12	945626	NON-AQ	07/11/94	07/14/94	07/16/94	5

PARAMETER	UNITS	10	11	12
BENZENE	MG/KG	<0.025	0.49	0.30
TOLUENE	MG/KG	<0.025	4.0	3.0
ETHYLBENZENE	MG/KG	<0.025	2.5	1.2
TOTAL XYLENES	MG/KG	0.17	36	19
SURROGATE:				
BROMOFLUOROBENZENE (%)		88	118*	101

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

Split Sample

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 407346
PROJECT #	: 24324	DATE RECEIVED	: 07/13/94
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 07/15/94

PARAMETER	UNITS	01	12
PETROLEUM HYDROCARBONS, IR	MG/KG	13000	670

Split Sample
EPNG Sample #945626

PHASE II

RECORD OF SUBSURFACE EXPLORATION

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Borehole # BH-1
Well #

Project Name: EPNG PITS
Project Number: 14509 Phase 6000 77
Project Location: San Juan 28-7 Unit 252 90564

Well Logged By: ~~CM Chance~~ cmc 9/3/95 PL Moss
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

Elevation:
Borehole Location: QC-S32-T28-R7
GWL Depth:
Logged By: ~~CM CHANCE~~ cmc 9/3/95 PL Moss
Drilled By: K Padilla
Date/Time Started: ~~8/31/95~~ 9/5/95 / 10:25
Date/Time Completed: ~~[illegible]~~ 9/5/95 / 11:50

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 HS	Drilling Conditions & Blow Counts
0–10				Backfill to 10'						
15	1	15-17	SS 7.5"	sandstone, fine grained, lt. brown, friable, thin bedded, strong hydrocarbon odor			0	54	651 / 774	-1040 SS refusal at 16'
							18	44	NA	-1048
20	2	20-22	SS 0"	NA No recovery.						
							3 (~~6~~ plm 9/5/95)	21.5 (~~15~~ 44 plm 9/5/95)	41 / 5 (plm 9/5/95)	-1058
25	3	25-27	SS 5"	sandstone, fine grained, lt. brown, poorly-cemented, thin bedded						
30	4	30-32	SS 3½"	AA			1	10	41 / 2	-1106
				TD @ 32'						

Comments: PLM1 (30-32') sent to lab (BTEX, TPH). Drilled to 30', anticipated a higher head space reading at 25-27'. BH grouted to surface. Not enough volume for QA samples. Sample bagged and read before putting into jar.

Geologist Signature: Philip 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:	PLM1	947394
MTR CODE | SITE NAME:	90564	San Juan 28-7 Unit 252
SAMPLE DATE | TIME (Hrs):	09-05-95	1106
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-6-95	9-6-95
DATE OF BTEX EXT. | ANAL.:	9/6/95	9/10/95
TYPE | DESCRIPTION:	VG	LIGHT 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)	~~OB 1.0~~ 53.4	MG/KG			7.09	28
HEADSPACE PID	2	PPM				
PERCENT SOLIDS	93.2	%				

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

The Surrogate Recovery was at 87 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-11-95

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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                     *
**********************************************************
*
 95/09/06  14:14
*
*  Sample identification
 947394
*
*  Initial mass of sample, g
 2.090
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 53.441
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.017
*
*
*
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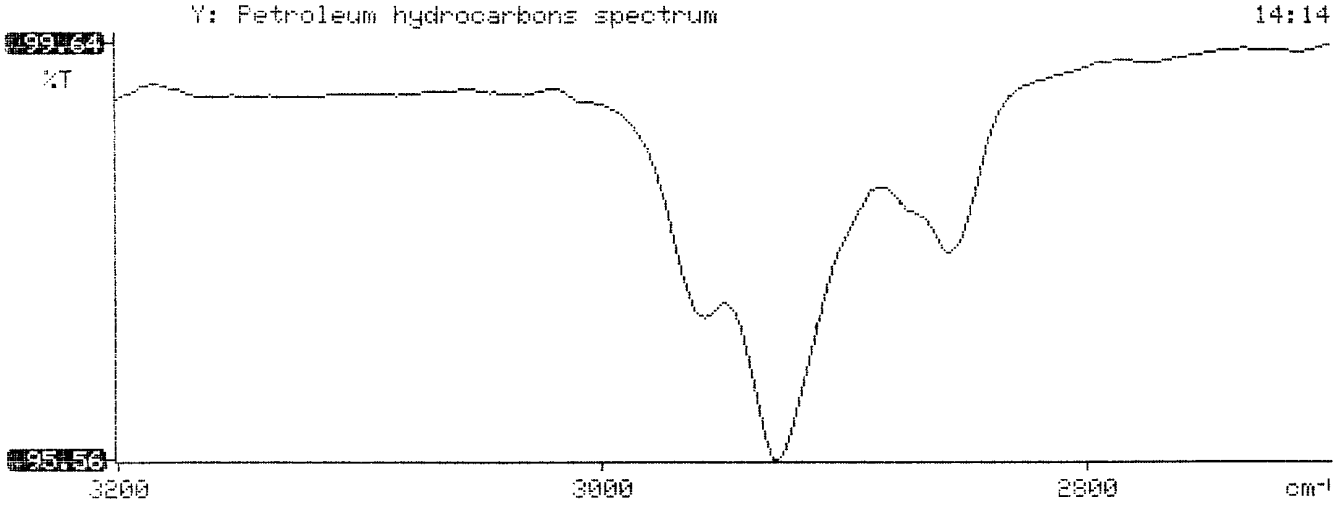

BTEX SOIL SAMPLE WORKSHEET

File	947394	**Date Printed**	9/11/95
Soil Mass (g)	5.00	**Multiplier (L/g)**	0.00100
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.20000

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.500
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.500
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.500
p & m-xylene (ug/L)	0.00	p & m-xylene (mg/Kg):	0.000	1.000
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.500
		Total xylenes (mg/Kg):	**0.000**	1.500
		Total BTEX (mg/Kg):	**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\090795-1.013
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947394,5.00G,100U
Acquired : Sep 10, 1995 19:30:28
Printed : Sep 10, 1995 19:56:50
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.410	0	0.0000
a,a,a TFT	4.947	3125485	90.5075
TOLUENE	6.747	0	0.0000
ETHYLBENZENE	10.513	0	0.0000
M & P XYLENE	10.870	76415	-4.1134
O XYLENE	11.927	0	0.0000
BFB	13.413	52077028	86.9034