EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

RECEIVED
JUL 2 1999
OIL CON. DIV.

S.J. 28-7 #21A
Meter/Line ID - 90613

SITE DETAILS

Legals - Twn: 28 **Rng:** 07 **Sec:** 09 **Unit:** P
NMOCD Hazard Ranking: 30 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 05/31/95**

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: 90613 Location: S.J. 28-7 # 21A
Operator #: 0203 Operator Name: AMOCO P/L District: BLANCO
Coordinates: Letter: P Section 9 Township: 28 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 12·8·94 Area: 03 Run: 41

SITE ASSESSMENT

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

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

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 PUEBLO 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: 30 **POINTS**

REMARKS

Remarks : REDLINE & TOPO SHOW LOCATION INSIDE V.Z. THREE PITS ON LOCATION TOO BELONG TO AMOCO. WILL CLOSE ONLY ONE PIT.

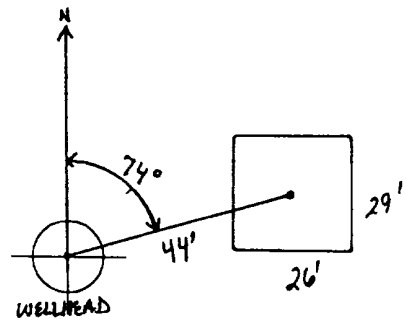
DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 74° Footage from Wellhead 44'

b) Length : 29' Width : 26' Depth : 3'



REMARKS

Remarks :

PHOTOS - 1030

Completed By:

Signature

12.8.94

Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 90613 Location: San Juan 28-7 #21A

Coordinates: Letter: P Section 9 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Date Started : 5/31/95 Run: 03 41

FIELD OBSERVATIONS

Sample Number(s): KD 442 _____ _____ _____

Sample Depth: 5' Feet

Final PID Reading 566ppm PID Reading Depth 5' 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: 5/31/95 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 5', hit Sandstone, took pid Sample, closed pit.

Signature of Specialist: _____

(SP3191) 03/16/94

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:	KD 4/2	946853
MTR CODE | SITE NAME:	90613	N/A
SAMPLE DATE | TIME (Hrs):	5-31-95	1050
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6-2-95	6-2-95
DATE OF BTEX EXT. | ANAL.:	6-5-95	6-7-95
TYPE | DESCRIPTION:	VC	Light Brown sand and clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.20	MG/KG	5			
TOLUENE	3.3	MG/KG	5			
ETHYL BENZENE	1.3	MG/KG	5			
TOTAL XYLENES	16	MG/KG	5			
TOTAL BTEX	20.8	MG/KG				
TPH (418.1)	1370	MG/KG			2.00	28
HEADSPACE PID	566	PPM				
PERCENT SOLIDS	90.2	%				

-- 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: J.P. Date: 6/28/95

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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                     *
**********************************************************

 97/06/02  11:44

 Sample Identification
 446852

 Initial mass of sample, g
 2.000

 Volume of sample after extraction, ml
 28.000

 Petroleum hydrocarbons, ppm
 1370.927
 Net absorbance of hydrocarbons (2930 cm-1)
 0.176
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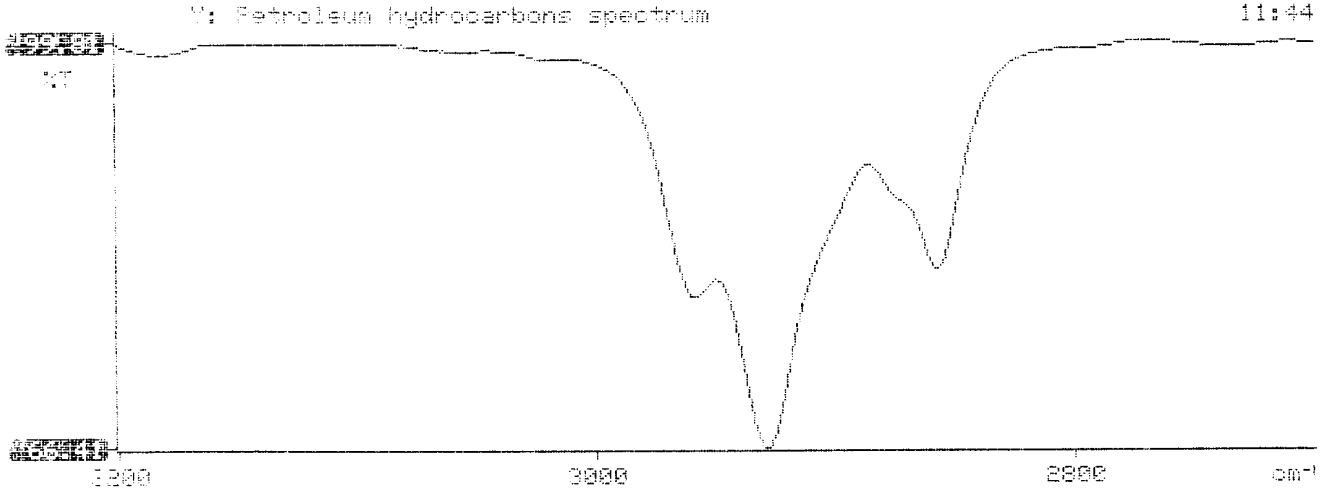


Analytical **Technologies,** Inc.

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

ATI I.D. **506317**

June 9, 1995

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **06/03/95**, 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.

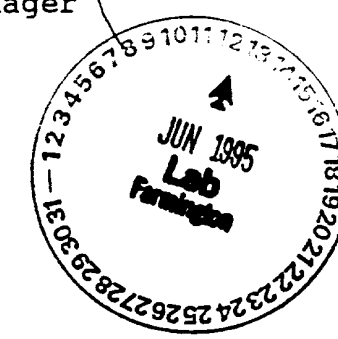
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

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.: 506317

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	946851	NON-AQ	05/30/95	06/05/95	06/07/95	1
05	946852	NON-AQ	05/30/95	06/05/95	06/08/95	50
06	946853	NON-AQ	05/31/95	06/05/95	06/07/95	5

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	12	0.20
TOLUENE	MG/KG	0.076	220	3.3
ETHYLBENZENE	MG/KG	<0.025	26	1.3
TOTAL XYLENES	MG/KG	<0.025	350	16
SURROGATE:				
BROMOFLUOROBENZENE (%)		95	93	109

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well #
Page 1 of 1

PHILIP ENVIRONMENTAL
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 #21A 90613

Elevation
Borehole Location QP - S9 - T28 - R7
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 11/20/95 - 0915
Date/Time Completed 11/20/95 - 1000

Well Logged By CM Chance
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

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				Backfill to 5'						
5										Hard Drlng
10	1	10-10.5	4	1+ yr weathered SANDSTONE, vf sand, mod. cemented, hard			0	1	1/4	DRY
				TDB 10.5'						
15										
20										
25										
30										
35										
40										

Comments: CMC 188 (10-10.5') sent to lab (BTEX, TPH). BH grouted to surface.

Geologist Signature Tony Chavez

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:	CMC188	947804
MTR CODE | SITE NAME:	90613	San Juan 28-7 #21A
SAMPLE DATE | TIME (Hrs):	11-20-95	0934
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	11/27/95	
DATE OF BTEX EXT. | ANAL.:	11/21/95	11/21/95
TYPE | DESCRIPTION:	VG	Light brown 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)	<10	MG/KG			2.0	28
HEADSPACE PID	4	PPM				
PERCENT SOLIDS	88.4	%				

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

The Surrogate Recovery was at 100 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 11/28/95

BTEX SOIL SAMPLE WORKSHEET

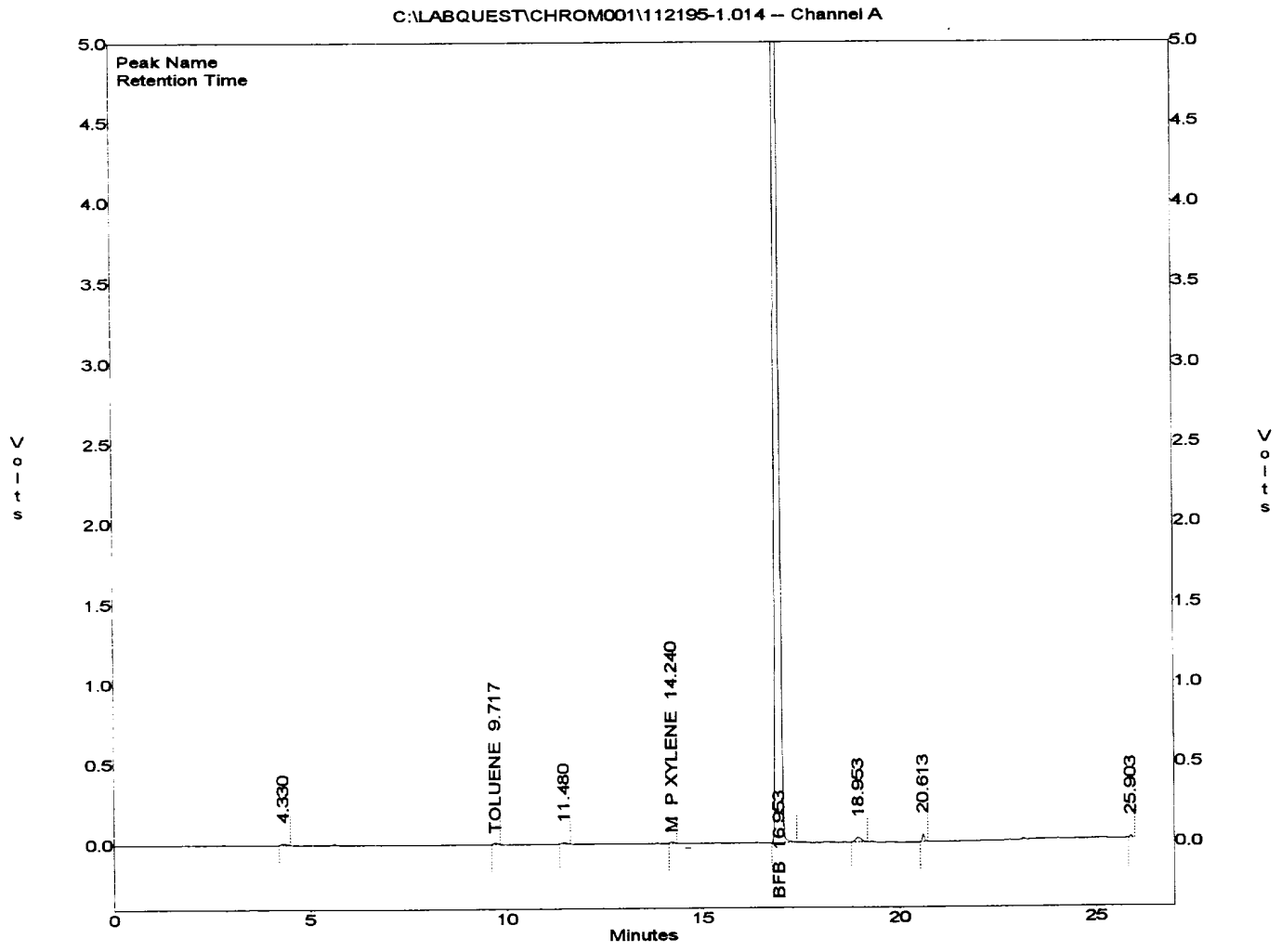
File	947804	**Date Printed**	11/22/95	
Soil Mass (g)	5.01	**Multiplier (L/g)**	0.00100	
Extraction vol. (mL)	10	**CAL FACTOR (Analytical):**	200	
Shot Volume (uL)	50	**CAL FACTOR (Report):**	0.19960	
		DILUTION FACTOR:	**1**	**Det. Limit**
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.499
Toluene (ug/L)	0.21	**Toluene (mg/Kg):**	**0.042**	0.499
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.499
p & m-xylene (ug/L)	0.23	p & m-xylene (mg/Kg):	0.046	0.998
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.499
		Total xylenes (mg/Kg):	**0.046**	1.497
		Total BTEX (mg/Kg):	**0.088**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\112195-1.014
Method : C:\LABQUEST\METHODS\1-112095.MET
Sample ID : 947804,5.01G,50U
Acquired : Nov 21, 1995 23:30:58
Printed : Nov 21, 1995 23:57:17
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	5.603	0	0.0000
TOLUENE	9.717	55725	0.2096
ETHYLBENZENE	13.837	0	0.0000
M & P XYLENE	14.240	58696	0.2272
O XYLENE	15.357	0	0.0000
BFB	16.953	66153200	100.4902



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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                     *
**********************************************************
*
 95/11/27  12:47
*
*  Sample identification
 947804
*
*  Initial mass of sample, g
 2.000
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 -16.494
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.008
*
*
*
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