EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

RECEIVED
JUL 2 1999
OIL CON. DIV.

SAN JUAN 28-7 UNIT 241E
Meter/Line ID - 93656

SITE DETAILS

Legals - Twn: 28 **Rng:** 07 **Sec:** 09 **Unit:** G
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 06/13/94**

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: 93656 Location: San Juan 28-7 Unit 241E
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: G Section 9 Township: 28 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ✓ Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 6/3/94 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 (off Delgadita)
(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, Unlined - Inside
3 pits. Will close 1.

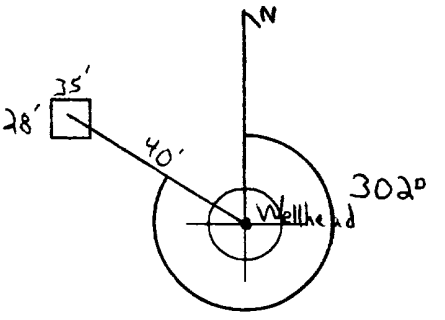
DIG+HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 302° Footage from Wellhead 40'

b) Length : 35' Width : 28' Depth : 5'



REMARKS

Remarks :

Pictures @ 0948 hr. (6-9)

END Dump

Completed By:

Cory Chase
Signature

6/3/94
Date

PHASE I
EXCAVATION

FI D PIT REMEDIATION/CLOS RE FORM

GENERAL

Meter: 93656 Location: SAN JUAN 28-7 UNIT 241E

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

Or Latitude _____ Longitude _____

Date Started : 6-13-94 Area: 03 Run: 41

FIELD OBSERVATIONS

Sample Number(s): KPH101 _____ _____ _____

Sample Depth: 6' Feet

Final PID Reading 464 PID Reading Depth 6' Feet

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

CLOSURE

Remediation Method :

Excavation	☒ (1)	Approx. Cubic Yards 60
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☐ (3)	

Soil Disposition:

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

Pit Closure Date: 6-13-94 Pit Closed By: B.E.I

REMARKS

Remarks : Some Line markers on location. Started Remediating 12' At 6' Hit SAND STONE TOOK Sample PID 464 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

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP101	945436
MTR CODE | SITE NAME:	93656	N/A
SAMPLE DATE | TIME (Hrs):	6-13-94	1510
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:	VC	Lt Brown Fine Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.10	MG/KG	1			
TOLUENE	0.55	MG/KG	1			
ETHYL BENZENE	1.7	MG/KG	1			
TOTAL XYLENES	42	6/21 MG/KG	5			
TOTAL BTEX	44	MG/KG				
TPH (418.1)	1540	MG/KG			2.07	28
HEADSPACE PID	464	PPM				
PERCENT SOLIDS	90.0	%				

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

The Surrogate Recovery was at 90 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: _____ Date: 7/7/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

13:28

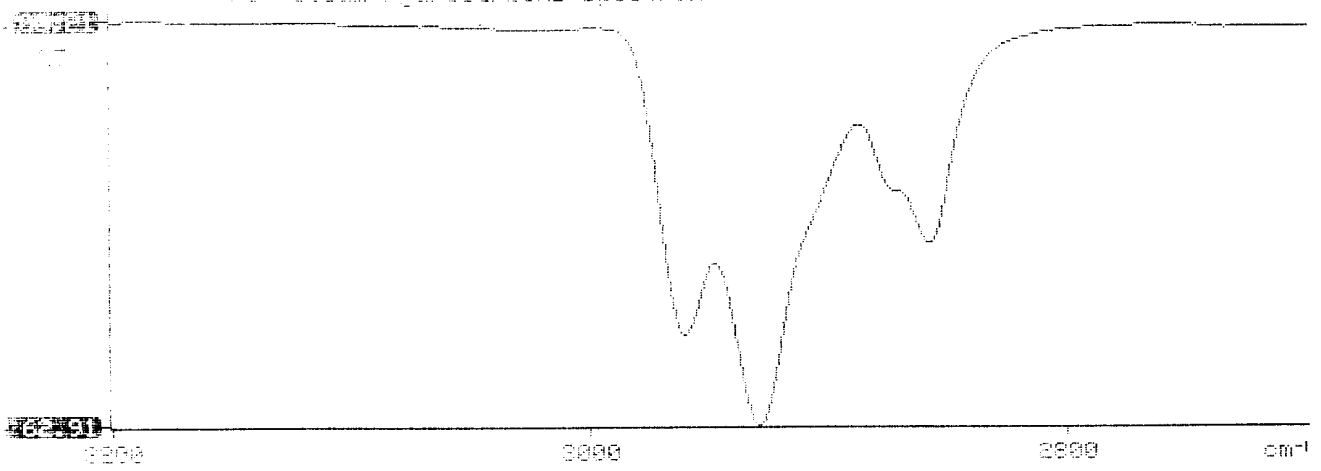
Sample Identification

Initial mass of sample, g
1.070

Volume of sample after extraction, ml
25.100

Petroleum hydrocarbons, ppm
1222.136
Net absorbance of hydrocarbons (2930 cm-1)
0.215

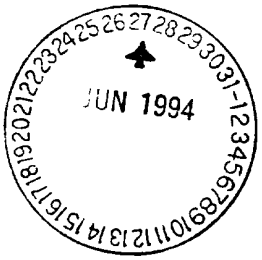
Petroleum hydrocarbons spectrum



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 4990
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

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 406367

PROJECT # : 24324

PROJECT NAME : PIT 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*

D5=DILUTED 5X, ANALYZED 06/21/94
*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 241E 93656

Elevation
Borehole Location QG-SG-T28-R7
GWL Depth
Logged By Phillip Moss
Drilled By H. Padilla
Date/Time Started 9-7-95/12:45
Date/Time Completed 9-7-95/13:30

Well Logged By Phillip Moss
Personnel On-Site H. Padilla, E. Rivera, D. Chacke, 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 6'.						
10	1	10-12'	SS 12"	SILTstone, gray, poorly-cemented thin-bedded, hydrocarbon odor			0	95	122/61	12:54
						14'				
15	2	15-17'	SS 9.5"	Sandstone, fg., brownish gray, thin-bedded, poorly-cemented, ~ odor			0	47	26/21	13:07
20				TD = 17'						

Comments: PLM 9 (15-17') sent to lab (BTEX, TPH). BH grouted to the surface.

Geologist Signature Phillip 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:	PLM9	947421
MTR CODE | SITE NAME:	93656	San Juan 28-7 Unit 241E
SAMPLE DATE | TIME (Hrs):	09-07-95	1307
PROJECT:	Pharett Drilling	
DATE OF TPH EXT. | ANAL.:	9-8-95	
DATE OF BTEX EXT. | ANAL.:	9/8/95	9/12/95
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)	52.6	MG/KG			1.95	28
HEADSPACE PID	21	PPM				
PERCENT SOLIDS	92	%				

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

The Surrogate Recovery was at 94% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-13-95

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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                     *
**********************************************************
*
 95/09/08  16:32
*
*  Sample identification
 947421
*
*  Initial mass of sample, g
 1.950
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 52.640
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.017
*
*
*
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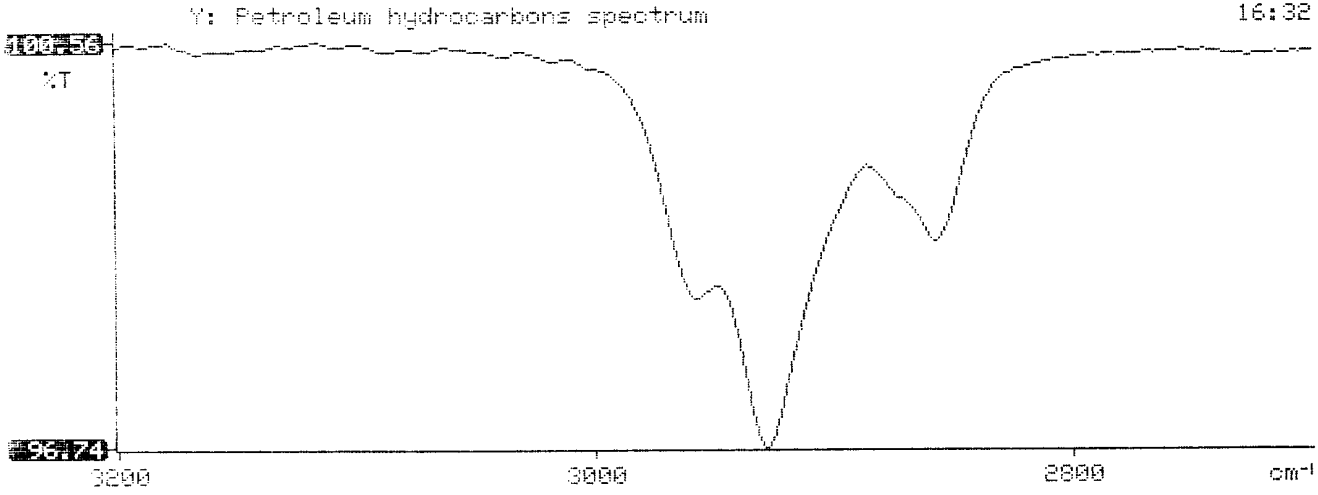

BTEX SOIL SAMPLE WORKSHEET

File	: 947421	**Date Printed**	: 9/13/95		
Soil Mass (g)	: 5.01	**Multiplier (L/g)**	: 0.00100		
Extraction vol. (mL)	: 20	**DF (Analytical)**	: 200		
Shot Volume (uL)	: 100	**DF (Report)**	: 0.19960		
					Det. Limit
Benzene (ug/L)	: 0.00	**Benzene (mg/Kg):**		**0.000**	0.499
Toluene (ug/L)	: 0.00	**Toluene (mg/Kg):**		**0.000**	0.499
Ethylbenzene (ug/L)	: 0.00	**Ethylbenzene (mg/Kg):**		**0.000**	0.499
p & m-xylene (ug/L)	: 0.00	p & m-xylene (mg/Kg):		0.000	0.998
o-xylene (ug/L)	: 0.00	o-xylene (mg/Kg):		0.000	0.499
		Total xylenes (mg/Kg):		**0.000**	1.497
		Total BTEX (mg/Kg):		**0.000**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\091295-1.010
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : ~~947422,5.02G,100U~~ mh
Acquired : Sep 12, 1995 15:55:04
Printed : Sep 12, 1995 16:21:23
User : MARLON

947421
5.01g 100µL

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.410	0	0.0000
a,a,a TFT	4.907	3166416	91.6927
TOLUENE	6.771	0	0.0000
ETHYLBENZENE	10.513	0	0.0000
M & P XYLENE	10.860	63301	-4.1664
O XYLENE	11.927	0	0.0000
BFB	13.417	56143492	93.6893