Kenny E. Foust
DEPUTY OIL & GAS INSPECTOR

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEC 2 1 1998

Approved

SAN JUAN 28-7 UNIT 187E
Meter/Line ID - 95593

RECEIVED
JUL 2 1998
OIL CON. DIV.

SITE DETAILS

Legals - Twn: 28 **Rng:** 07 **Sec:** 24 **Unit:** P
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
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: 95593 Location: San Juan 28-7 Unit 187E
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: P Section 24 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 _____

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
(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 + Vuln. - Inside 3pits. Will close/. Pit Dry

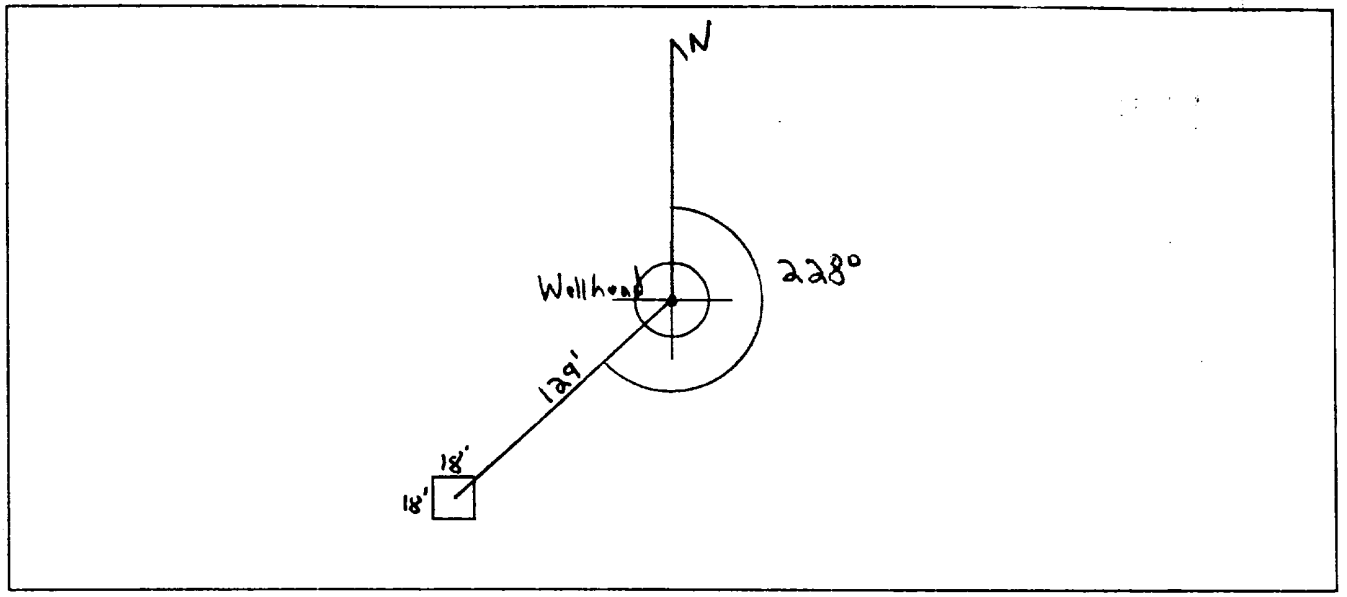
DIG+HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 228° Footage from Wellhead 129'

b) Length : 18' Width : 18' Depth : 3'



REMARKS

Remarks :

Pictures @ 1447 (17-21)
End Dump

Completed By:

Cory Chase
Signature

6/2/94
Date

PHASE I
EXCAVATION

FIE' PIT REMEDIATION/CLOSU'E FORM

GENERAL

Meter: 95593 Location: San Juan #28-7 unit 187E

Coordinates: Letter: O Section 24 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Date Started : 6-16-94 Area: 03 Run: 41

FIELD OBSERVATIONS

Sample Number(s): KD 107 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 681 ppm PID Reading Depth 12' 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: 6-16-94 Pit Closed By: BEI

REMARKS

Remarks : Excavated pit to 12', took final PID sample, closed pit

Signature of Specialist: Kurt Fair

(SP3191) 04/07/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 107	94564
MTR CODE | SITE NAME:	95593	N/A
SAMPLE DATE | TIME (Hrs):	6-16-94	1320
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6-20-94	6/20/94
DATE OF BTEX EXT. | ANAL.:	6/21/94	6/23/94
TYPE | DESCRIPTION:	VC	Brown fine Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.12	MG/KG	5			
TOLUENE	0.58	MG/KG	5			
ETHYL BENZENE	1.3	MG/KG	5			
TOTAL XYLENES	40	MG/KG	5			
TOTAL BTEX	42	MG/KG				
TPH (418.1)	1360	MG/KG			2.3	28
HEADSPACE PID	681	PPM				
PERCENT SOLIDS	90.5	%				

– 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 outs ATI QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By: Date: 7/7/94

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

 94/06/20  11:31

*  Sample identification
 945A4

*  Initial mass of sample, g
 2.230

*  Volume of sample after extraction, ml
 28.000

*  Petroleum hydrocarbons, ppm
 1360.136
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.191
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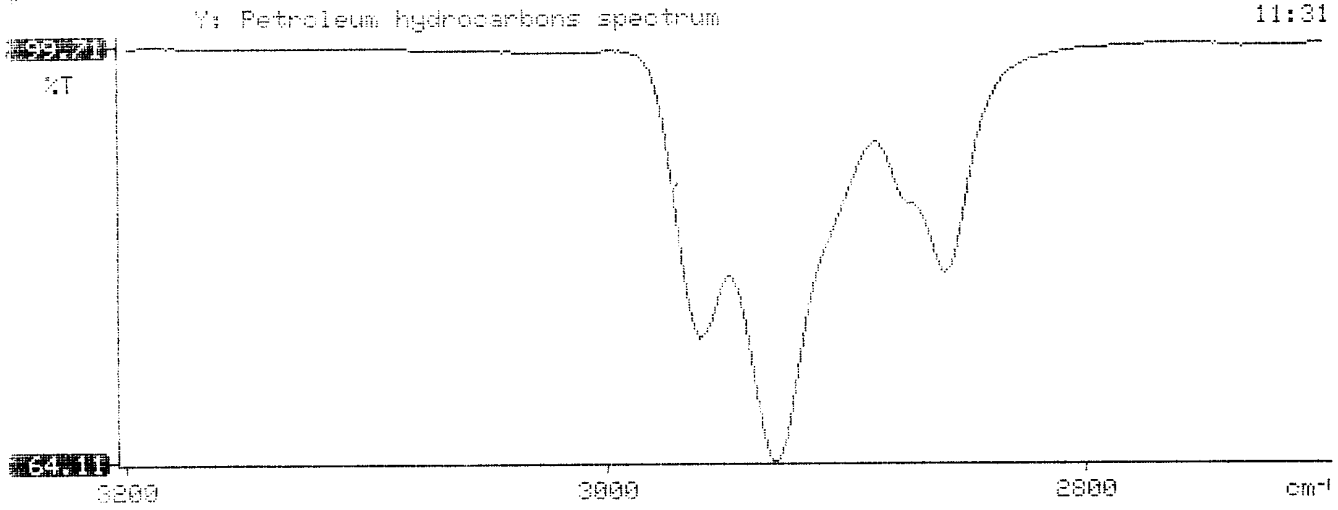


Analytical **Technologies,** Inc.

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

ATI I.D. **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.

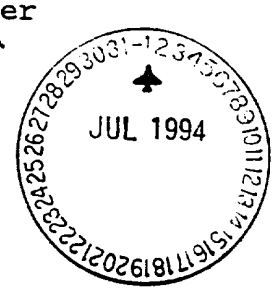
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

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

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 Unit 187E 955S

Elevation
Borehole Location QQ- S24- T28- R7
GWL Depth
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 9/11/95 -0945
Date/Time Completed 9/11/95 - 1015

Well Logged By CM Chance
Personnel On-Site K Padilla, F. Rivera, P. 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 12'						
5										
10										
15	1	15-17	18"	Br SAND, vf-F sand, tr silt, loose, dry			0	0	0/0	0950 hr
				TD 17'						
20										
25										
30										
35										
40										

Comments: CMC 112 (15-17') sent to lab (BTEX, TPH) BH grouted to surface

Geologist Signature Cory C Chance

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:	CMC 112	947441
MTR CODE | SITE NAME:	95593	San Juan 28-7 Unit 187E
SAMPLE DATE | TIME (Hrs):	09-11-95	0950
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	9-12-95	
DATE OF BTEX EXT. | ANAL.:	9/12/95	9/15/95
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)	18.1	MG/KG			2.19	28
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	96	%				

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

The Surrogate Recovery was at 98% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 9-18-95

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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                     *
**********************************************************
*
 95/09/12  13:46
*
*  Sample identification
 947441
*
*  Initial mass of sample, g
 2.190
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 18.093
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.013
*
*
*
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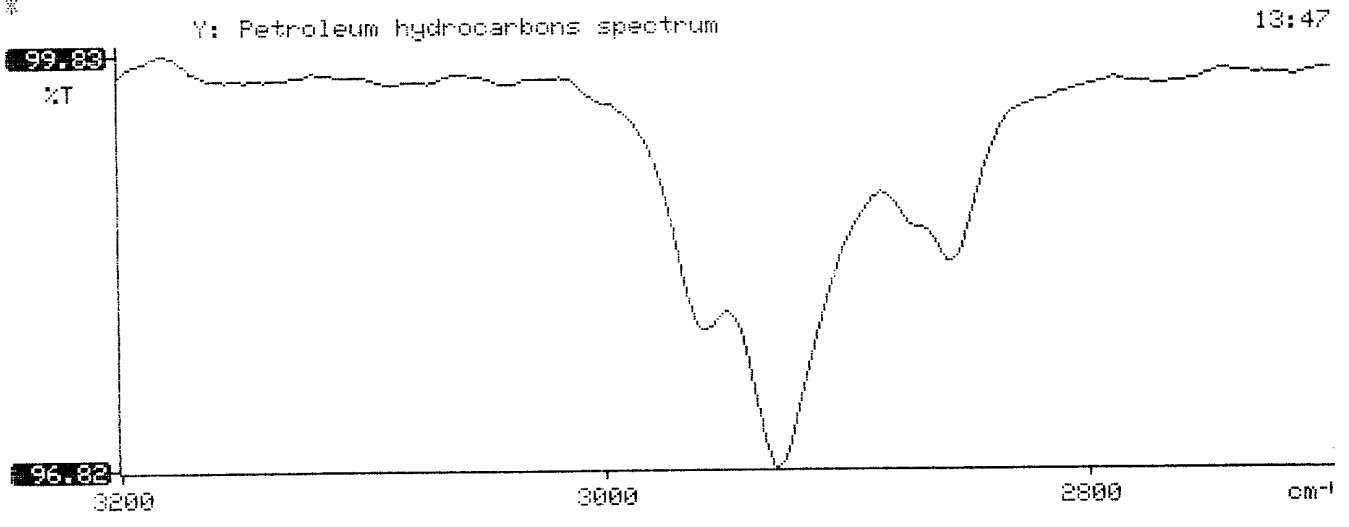

BTEX SOIL SAMPLE WORKSHEET

File	947441	**Date Printed**	9/15/95
Soil Mass (g)	4.98	**Multiplier (L/g)**	0.00100
Extraction vol. (mL)	20	**DF (Analytical)**	200
Shot Volume (uL)	100	**DF (Report)**	0.20080

				Det. Limit
Benzene (ug/L)	0.00	**Benzene (mg/Kg):**	**0.000**	0.502
Toluene (ug/L)	0.00	**Toluene (mg/Kg):**	**0.000**	0.502
Ethylbenzene (ug/L)	0.00	**Ethylbenzene (mg/Kg):**	**0.000**	0.502
p & m-xylene (ug/L)	0.44	p & m-xylene (mg/Kg):	0.088	1.004
o-xylene (ug/L)	0.00	o-xylene (mg/Kg):	0.000	0.502
		Total xylenes (mg/Kg):	**0.088**	1.506
		Total BTEX (mg/Kg):	**0.088**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\091595-1.005
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 947441,4.98G,100U
Acquired : Sep 15, 1995 12:06:56
Printed : Sep 15, 1995 12:33:16
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.490	0	0.0000
a,a,a TFT	4.903	4035884	116.8707
TOLUENE	6.771	0	0.0000
ETHYLBENZENE	10.513	0	0.0000
M & P XYLENE	10.853	97809	0.4417
O XYLENE	11.927	0	0.0000
BFB	13.390	58538440	97.6858