

EL PASO FIELD SERVICES
DEPUTY OIL PRODUCTION PIT CLOSURE

DEC 11 1994

MARSHALL B #1 (Pit #2)
Meter/Line ID - 71990

SITE DETAILS

Legals - Twn: 27 Rng: 09
NMOCD Hazard Ranking: 20
Operator: BRECK OPERATING CORP.

Sec: 14 Unit: 1
Land Type: 2 - Federal
Pit Closure Date 09/14/94

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

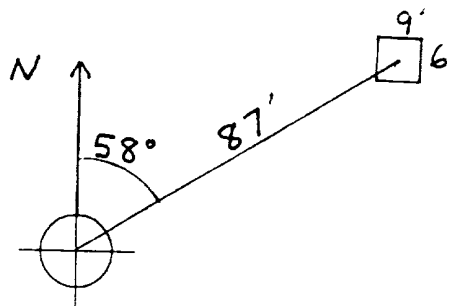
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GENERAL	<p>Meter: <u>71990</u> Location: <u>Marshall 'B' #1</u></p> <p>Operator #: _____ Operator Name: <u>Breck</u> P/L District: <u>Ballard</u></p> <p>Coordinates: Letter: <u>I</u> Section <u>14</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: <u>X</u> Other: _____</p> <p>Site Assessment Date: <u>6-16-94</u> Area: <u>11</u> Run: <u>71</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Wellhead Protection Area :</p> <p>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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Huerfano Canyon</u></p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only)</p> <p><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>20</u> POINTS</p>
REMARKS	<p>Remarks : <u>Two pits on location. Drip pit near well head. Other pit is to be closed also (near meter)</u></p> <p><u>See next assessment 2-16-94. Inside V.Z. on Redline</u></p> <p><u>Outside V.Z. on Redline & Topo</u></p> <p><u>Bushnell</u></p>

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 58 Footage from Wellhead 87
b) Length : 9 Width : 6 Depth : 1



Remarks :

Photos - 1112

Bobtail.

This pit outside V.Z. other pit on location is just inside. See next assessment

REMARKS

Completed By:

Kim Walth

Signature

6-16-94

Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>71990</u> Location: <u>Marshall B #1</u> <u>(Pit #1)</u></p> <p>Coordinates: Letter: <u>I</u> Section <u>14</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-14-94</u> Run: <u>11</u> <u>21</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW283</u></p> <p>Sample Depth: ^{4' 14" - 4' 15"} <u>72</u> 4' Feet</p> <p>Final PID Reading <u>304</u> PID Reading Depth ^{4' 14" - 4' 15"} <u>72</u> 4' Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>9-14-94</u> Pit Closed By: <u>BEZ</u></p>
REMARKS	<p>Remarks : <u>4' Sandstone</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 283	946121
MTR CODE SITE NAME:	7199C	N/A
SAMPLE DATE TIME (Hrs):	9-14-94	1045
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-20-94	9-20-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/Grey sand clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	2260	MG/KG			2.12	28
HEADSPACE PID	304	PPM				
PERCENT SOLIDS	91.2	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: JS

Date: 9/30/94

 * Test Method for *
 * Oil and Grease and Petroleum Hydrocarbons *
 * in Water and Soil *
 * *
 * Perkin-Elmer Model 1600 FT-IR *
 * Analysis Report *

94/09/00 11:07

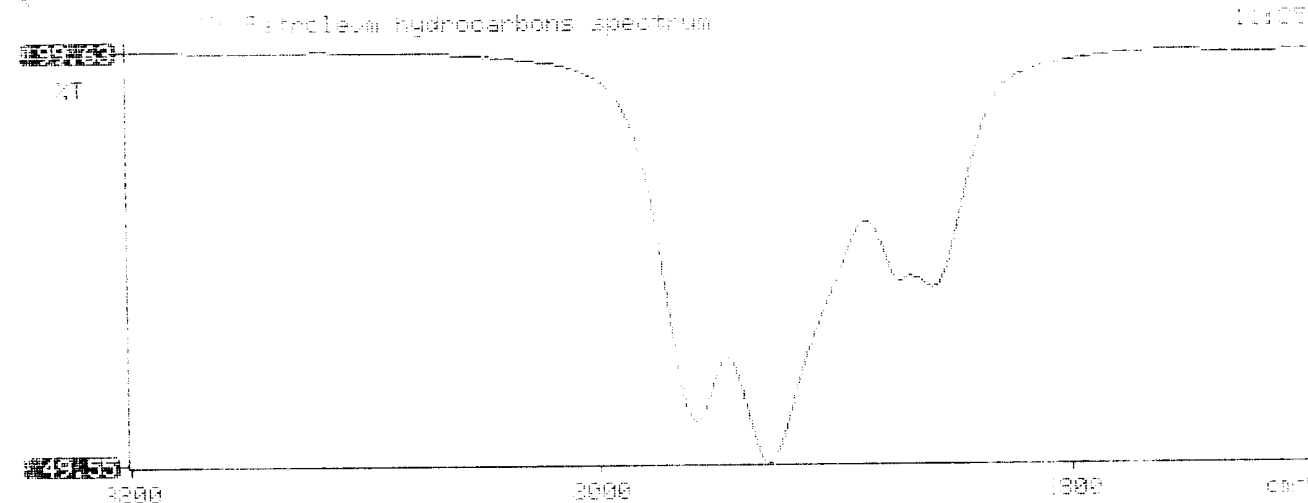
* Sample Identification
 746141

* Initial mass of sample, g
 2.120

* Volume of sample after extraction, ml
 28.000

* Petroleum hydrocarbons, ppm
 2261.089

* Net absorbance of hydrocarbons (2930 cm⁻¹)
 0.302



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 #

Page 1 of 1

Project Name EPNG Pits

Project Number 14509 Phase 6000.77

Project Location Marshall B #1 71990

Elevation

Borehole Location T 27N, R 9W, S 14, E

GWL Depth

Logged By Jeff W. Kindley

Drilled By M. Donahue

Date/Time Started 08/14/95 1415

Date/Time Completed 08/14/95 1553

Well Logged By Jeff W. Kindley

Personnel On-Site M. Donahue, J. O'Keefe

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			Drilling Conditions & Blow Counts
							BZ	6H	SAS	
0				Backfill to 6'						
5										
10										
15	1	15-17	1 1/2 2.0	SAND, Tan/brown, medium to coarse grained, dry					22 53	1448
20	2	20-22	1 1/4 2.0	S.A.A					50 63	1455
25	3	25-27	1 1/2 2.0	S.A.A Boring terminated at 27'					3 3	1508
30										
35										
40										

Comments:

Sample collected at 25 to 27'. Sample submitted for ATEX, and TPH.
BH grouted to surface

Geologist Signature

Jeffery Kindley



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JWK 11	947227
MTR CODE SITE NAME:	71990	Marshall 'B' #1
SAMPLE DATE TIME (Hrs):	08-14-95	15.08
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL:	8/15/95	8/15/95
DATE OF BTEX EXT. ANAL:	8/19/95	8/19/95
TYPE DESCRIPTION:	VG	Grey sand & clay

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	20.025	MG/KG	1			
TOLUENE	20.025	MG/KG	1			
ETHYL BENZENE	20.025	MG/KG	1			
TOTAL XYLENES	20.025	MG/KG	1			
TOTAL BTEX	20.10	MG/KG				
TPH (418.1)	29.2 ²⁵ 8/25/95	MG/KG			2.0	25
HEADSPACE PID	3	PPM				
PERCENT SOLIDS	91.9	%				

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

The Surrogate Recovery was at 105 for this sample All QA/QC was acceptable.

Narrative:

ATI Results attached

DF = Dilution Factor Used

Approved By:

[Signature]

Date:

8/28/95

 * Test Method for *
 * Oil and Grease and Petroleum Hydrocarbons *
 * in Water and Soil *
 * Perkin-Elmer Model 1600 FT-IR *
 * Analysis Report *

95/08/15 14:00

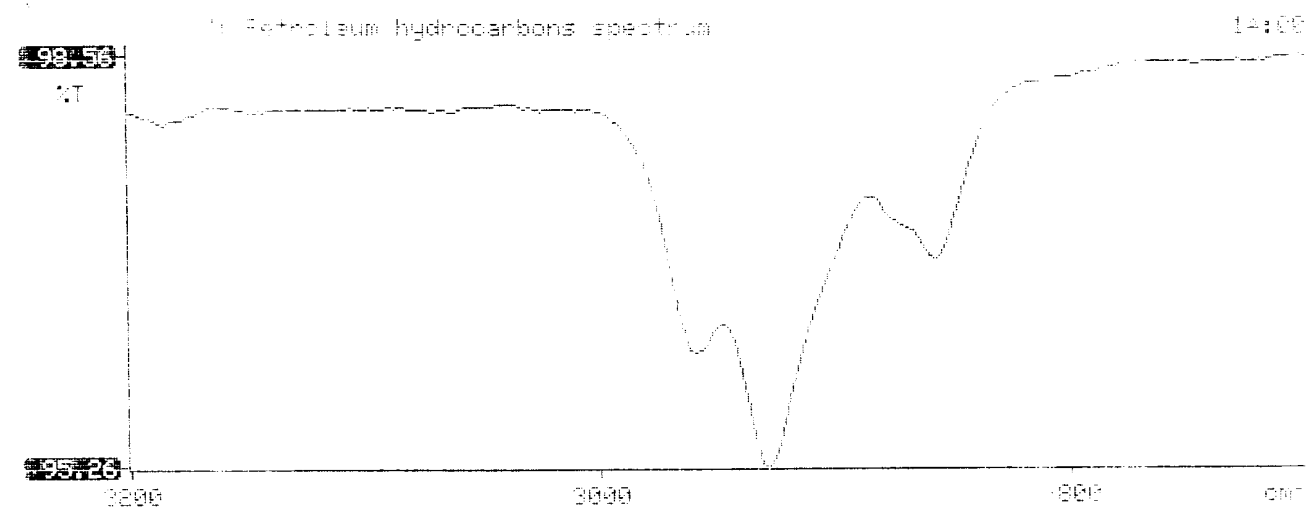
* Sample identification
 947227

* Initial mass of sample, g
 2.010

* Volume of sample after extraction, ml
 28.000

* Petroleum hydrocarbons, ppm
 29.193

* Net absorbance of hydrocarbons (2930 cm⁻¹)
 0.014





Analytical Technologies, Inc.

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

ATI I.D. 508403

August 22, 1995

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

Project Name/Number: PIT CLOSURE/PHASE I, II, III 24324

Attention: John Lambdin

On 08/17/95, 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.

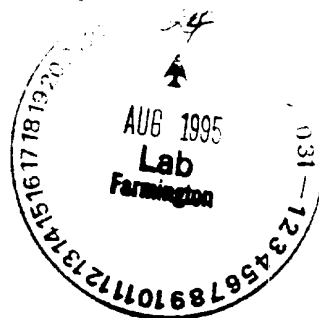
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

MR:jt

Enclosure

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager



GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 508403
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE/PHASE I, II, III

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	947213	NON-AQ	08/11/95	08/19/95	08/19/95	1
02	947226	NON-AQ	08/14/95	08/19/95	08/19/95	1
03	947227	NON-AQ	08/14/95	08/19/95	08/19/95	1
PARAMETER			UNITS	C1	02	03
BENZENE			MG/KG	<0.025	<0.025	<0.025
TOLUENE			MG/KG	<0.025	<0.025	<0.025
ETHYLBENZENE			MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES			MG/KG	<0.025	<0.025	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%) 110 105 105