

DEC 21 1996

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

RECEIVED

SITE DETAILS

Legals - Twn: 27 Rng: 09
NMOCD Hazard Ranking: 40
Operator: BRECK OPERATING CORP.

Sec: 14 Unit: 1
Land Type: 2 - Federal
Pit Closure Date: 08/22/94

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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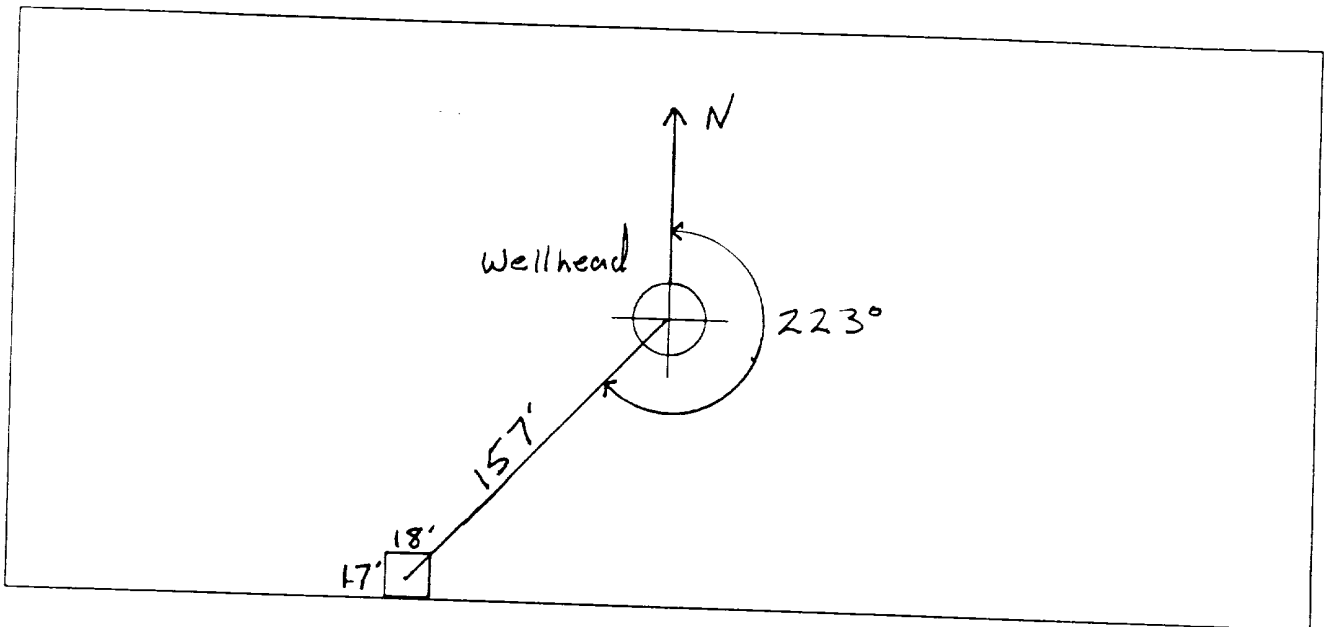
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GENERAL	<p>Meter: <u>71990</u> Location: <u>Marshall 'B' #1</u></p> <p>Operator #: _____ Operator Name: <u>Breck</u> P/L District: <u>Baird</u></p> <p>Coordinates: Letter: <u>I</u> Section <u>14</u> Township: <u>27N</u> Range: <u>9W</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ 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 checked="" type="checkbox"/> (1) Outside <input 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 checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) 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 checked="" type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) 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) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>40</u> POINTS</p>
REMARKS	<p>Remarks : <u>Two pits on location. This drip pit is near Meter run</u></p> <p><u>Don't know</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North _____ Footage from Wellhead 157
 b) Length : 18 Width : 17 Depth : 5

ORIGINAL PIT LOCATION



Remarks :

Photos - 1134

Bobtail

REMARKS

Completed By:

[Signature]

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 #2)</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>8/22/94</u> Run: <u>11</u> <u>71</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD 231</u></p> <p>Sample Depth: <u>6'</u> Feet</p> <p>Final PID Reading <u>290 ppm</u> PID Reading Depth <u>6'</u> Feet</p> <p>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 checked="" type="checkbox"/> Approx. Cubic Yards <u>10</u></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>8/22/94</u> Pit Closed By: <u>BET</u></p>
REMARKS	<p>Remarks : <u>Excavated pit to 6', Hit Sandstone, TOOK PID Sample, Closed pit</u></p>
<p>Signature of Specialist: <u>[Signature]</u></p>	



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD231	945988
MTR CODE SITE NAME:	71990	N/A
SAMPLE DATE TIME (Hrs):	8-22-94	1230
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-24-94	8-24-94
DATE OF BTEX EXT. ANAL.:	8/25/94	8/25/94
TYPE DESCRIPTION:	vc	Grey Sand & Clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.5	MG/KG	20			
TOLUENE	2.9	MG/KG	20			
ETHYL BENZENE	0.77	MG/KG	20			
TOTAL XYLENES	6.0	MG/KG	20			
TOTAL BTEX	10.2	MG/KG				
TPH (418.1)	468 462	MG/KG			2.13	28
HEADSPACE PID	290	PPM				
PERCENT SOLIDS	92.5	%				

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

The Surrogate Recovery was at 121 % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached. Surrogate recovery was outside
ATI QC limits due to matrix interference.

DF = Dilution Factor Used

Approved By:

A.F.

Date:

9/30/94

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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. 408397

August 29, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 08/25/94, 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.

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 408337
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
16	945982	NON-AQ	08/19/94	08/25/94	08/26/94	20
17	945987	NON-AQ	08/22/94	08/25/94	08/26/94	1
18	945983	NON-AQ	08/22/94	08/25/94	08/26/94	20
PARAMETER			UNITS	16	17	13
BENZENE			MG/KG	<0.5	<0.025	<0.5
TOLUENE			MG/KG	24	<0.025	2.9
ETHYLBENZENE			MG/KG	1.8	<0.025	0.77
TOTAL XYLENES			MG/KG	29	<0.025	6.0

SURROGATE:

BROMOFLUOROBENZENE (%) 66 87 121*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE