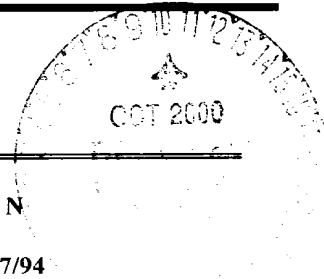


EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Inside Risk
BTEX
TPH

Huerfanito Well No. 10
Meter/Line ID – 75392



SITE DETAILS

Legals - Twn: 27N
NMOCD Hazard Ranking: 10
Operator: Meridian

Rng: 9W

Sec: 21
Land Type: BLM
Pit Closure Date: 09/07/94

RATIONALE FOR RISK-BASED CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A Phase I excavation was conducted on September 7, 1994, to 12 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 90 cubic yards of excavated material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 371 ppm; laboratory analysis indicated a benzene concentration of 0.73 mg/kg, a total BTEX concentration of 160 mg/kg, and a TPH concentration of 1040 mg/kg. TPH and total BTEX were above required remediation levels for the Hazard Ranking Score. This site was re-assessed on August 30, 2000 because the initial assessment incorrectly included washes as a surface water body and incorrectly measured depth from site surface to groundwater.

On August 8, 1995, a Phase II borehole was conducted to 65 feet below ground surface where bedrock was encountered. Groundwater was not encountered in the borehole. The borehole was grouted to the surface in a manner to direct surface runoff away from the pit area.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for almost six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the excavations or borehole.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Bedrock was encountered at 65 feet below ground surface; consequently, impact to groundwater is unlikely.
- Excavated material has been removed from the pit eliminating potential direct contact with livestock and the public.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- The pit was excavated to the practical extent of the equipment, according to EPNG's pit closure plan.

REVISED FIELD PIT SITE ASSESSMENT FORM

ULINE

Meter: 75392 Location: HUERFANITO WELL NO.10
 Operator #: 2999 Operator Name: MERIDIAN P/L District: BALLARD
 Coordinates: Letter: N Section 21 Township: 27 Range: 9
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
 Site Assessment Date: 8/30/00 Area: 11 Run: 31

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 _____
 (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)
 Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 10 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. And incorrectly measured depth from surface to groundwater.

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 75392 Location: Huerfano Well No. 10
 Operator #: 2999 Operator Name: Meridian P/L District: Ballard
 Coordinates: Letter: N Section 21 Township: 27N Range: 9W
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: ☒ Line Drip: _____ Other: _____
 Site Assessment Date: 6-13-94 Area: 11 Run: 31

NMOCD Zone:

(From NMOCD
Maps)

Inside
Outside

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 Jaquez 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 : Two pits. Drip pit is dry

Inside V.Z. on Redline & Topo

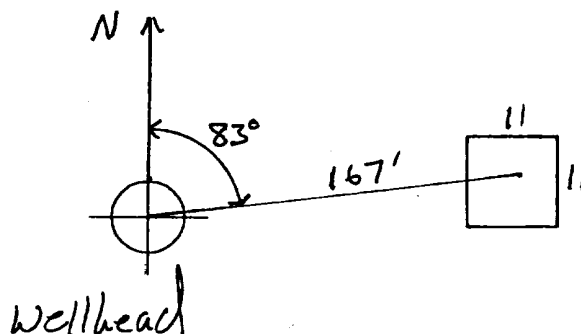
SITE ASSESSMENT

REMARKS

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 83 Footage from Wellhead 167
b) Length : 11 Width : 11 Depth : 1



REMARKS

Remarks :

Photos - 1301

Completed By:

A handwritten signature in black ink, appearing to be 'Lupat', is written over a horizontal line.

Signature

6-13-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>75392</u> Location: <u>Huerfano #10</u></p> <p>Coordinates: Letter: <u>N</u> Section <u>21</u> Township: <u>22</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-7-94</u> Run: <u>11</u> <u>31</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW247 VW248 VW249</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>371</u> PID Reading Depth <u>12'</u> 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> <div style="display: flex; justify-content: space-between;"> <div> <p>Excavation <input checked="" type="checkbox"/></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input type="checkbox"/></p> </div> <div> <p>Approx. Cubic Yards <u>90</u></p> </div> </div> <p>Soil Disposition:</p> <div style="display: flex; justify-content: space-between;"> <div> <p>Envirotech <input checked="" type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> </div> <div> <p>Tierra <input type="checkbox"/></p> </div> </div> <p>Pit Closure Date: <u>9-7-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>9 trucks contaminated & clean</u></p> <p><u>9-7-94</u></p>
	<p>Signature of Specialist: <u>Val Wilson</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 247	946063
MTR CODE SITE NAME:	75392	N/A
SAMPLE DATE TIME (Hrs):	9-7-94	1330
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-8-94	9-8-94
DATE OF BTEX EXT. ANAL.:	9/11/94	9/12/94
TYPE DESCRIPTION:	VC	BROWN GRAY SAND + CLAY

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.73	MG/KG	20			
TOLUENE	44	MG/KG	20			
ETHYL BENZENE	5.7	MG/KG	20			
TOTAL XYLENES	110	MG/KG	20			
TOTAL BTEX	160	MG/KG				
TPH (418.1)	1040	MG/KG			1.99	28
HEADSPACE PID	371	PPM				
PERCENT SOLIDS	92.0	%				

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

The Surrogate Recovery was at 138 % for this sample All QA/QC was acceptable.
N/A

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

DF = Dilution Factor Used

Approved By: AS-

Date: 9/30/94

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 409334
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	946063	NON-AQ	09/07/94	09/11/94	09/12/94	20
08	946064	NON-AQ	09/07/94	09/11/94	09/12/94	20
09	946065	NON-AQ	09/07/94	09/11/94	09/11/94	1

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	0.73	0.84	<0.025
TOLUENE	MG/KG	44	58	0.093
ETHYLBENZENE	MG/KG	5.7	7.3	<0.025
TOTAL XYLENES	MG/KG	110	140	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%)	138*	104	98
------------------------	------	-----	----

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE



Analytical**Technologies**, Inc.

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

ATI I.D. 409334

September 15, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 09/09/94, 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.

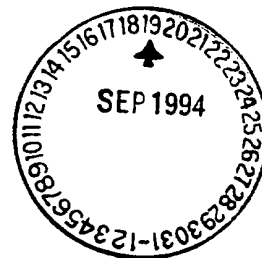
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure





CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER # 24324		PROJECT NAME Pit Closure Project		DATE:		CONTRACT LABORATORY P. O. NUMBER					
SAMPLERS: (Signature) <i>Vale Wilson</i>											
LAB ID	DATE	TIME	MATRIX	FIELD ID	TOTAL NUMBERS OF CONTAINERS	SAMPLE TYPE	REQUESTED ANALYSIS				
							TPH EPA 418.1	BTEX EPA 8020	LAB PID	SEQUENCE #	REMARKS
946063	9-7-94	1330	Soil	VW247	1	VC	X	X		221	
946064	9-7-94	1330	Soil	VW248	1	D	X	X			
946065	9-7-94	1335	Soil	VW249	1	B	X	X			
946066	9-7-94	1615	Soil	VW250	1	VC	X			222	
[The following rows are crossed out with a large diagonal line.]											
RELINQUISHED BY: (Signature) <i>Vale Wilson</i> DATE/TIME 9-7-94 1315 RECEIVED BY: (Signature) <i>Brenda Lincee</i> DATE/TIME 9-7-94 1315											
RELINQUISHED BY: (Signature) _____ DATE/TIME _____ RECEIVED BY: (Signature) _____ DATE/TIME _____											
REQUESTED TURNAROUND TIME: <input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH											
CARRIER CO. _____											
BILL NO.: _____											
SAMPLE RECEIPT REMARKS											
RESULTS & INVOICES TO: FIELD SERVICES LABORATORY EL PASO NATURAL GAS COMPANY P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499 FAX: 505-599-2261											
CHARGE CODE											

RECORD OF SUBSURFACE EXPLORATION

PHILIP ENVIRONMENTAL

4000 Monroe Road
Farmington, New Mexico 87401
(606) 326-2262 FAX (606) 326-2388

Borehole # BH-1

Well #

Page 1 of 2

Project Name EPNG Pits

Project Number 14509 Phase 6000.77

Project Location Huerfano Well No 10

75392

Well Logged By Jeff W. Kindley

Personnel On-Site P. Roberts, G. Sudduth

Contractors On-Site

Client Personnel On-Site

Drilling Method 4 1/4 ID HSA

Air Monitoring Method PID, CGI

Elevation

Borehole Location T 27N, R 9W, S 21, N

GWL Depth

Logged By Jeff W. Kindley

Drilled By G. Sudduth

Date/Time Started 08/08/95 0725

Date/Time Completed 08/08/95 1110

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	BH	S/N	
0				backfill material to 12'						
5										
10										
15										
20	1	18-20'	1.0 1.5	SAND, gray, medium grained, loose, moist				850/ 810		0735
25	2	23-25'	1.0 1.5	clayey sand (20% clay), gray, moist				720/ 800		0745
30	3	28-30'	.8 1.5	SAND, gray/brown, medium grained, moist				872/ 920		0752
35	4	33-35'	.4 1.5	S, A, A.				890/ 940		0759
40	5	38-40'	.6 1.5	clayey sand (10% clay) gray/brown, moist				650/ 750		0809

Comments:

Geologist Signature

Jeff W. Kindley

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 2 of 2

Project Name EPNG Pits
Project Number 14509 Phase 6000.77
Project Location Huerfano Well No. 10
75 392
Well Logged By Jeff W. Kindley
Personnel On-Site G. Sudduth, D. Roberts
Contractors On-Site _____
Client Personnel On-Site _____

Elevation _____
Borehole Location T27N, R9W, S21, N
GWL Depth _____
Logged By Jeff W. Kindley
Drilled By G. Sudduth
Date/Time Started 08/08/95 0725
Date/Time Completed 08/08/95 1110

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	BH	S/AS	
45										
48	6	48-50	1.3 1.5	Silty clay (20% silt) gray, hard, dry					480 790	0821
53	7	53-55	1.3 1.5	S.A.A					250 270	0837
58	8	58-60	1.5 1.5	S.A.A					500 500	0853
63	9	63-65	1.6 1.5	S.A.A. with micaceous sandstones Boring terminated at 65' at refusal.					91 170	0924
25										
30										
35										
40										

Comments:

Refusal at 65'. No sample collected. BH grouted
to surface

Geologist Signature

Jeffrey Kindley