Jerry G. Faust
DEPUTY OIL & GAS INSPECTOR
DEC 21 1998

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

MARRON WN FED #7
Meter/Line ID - 87061

RECEIVED
JUL 2 1999
OIL CON. DIV.

SITE DETAILS

Legals - Twn: 27 **Rng:** 08 **Sec:** 22 **Unit:** G
NMOCD Hazard Ranking: 40 **Land Type:** 2 - Federal
Operator: CONOCO - MESA OPERATING L **Pit Closure Date: 08/02/94**

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.

6 of

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 87061 Location: Marcon WN Fed. No. 7
Operator #: 0286 Operator Name: Conoco P/L District: Ballard
Coordinates: Letter: G Section 22 Township: 27 Range: 8
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: √ Line Drip: ___ Other: _____
Site Assessment Date: 6/11/94 Area: 07 Run: 32

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 Largo 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 & Vulnerable Zone Topo - Inside Pit. Willclose. Pit dry

DIG & HAUL

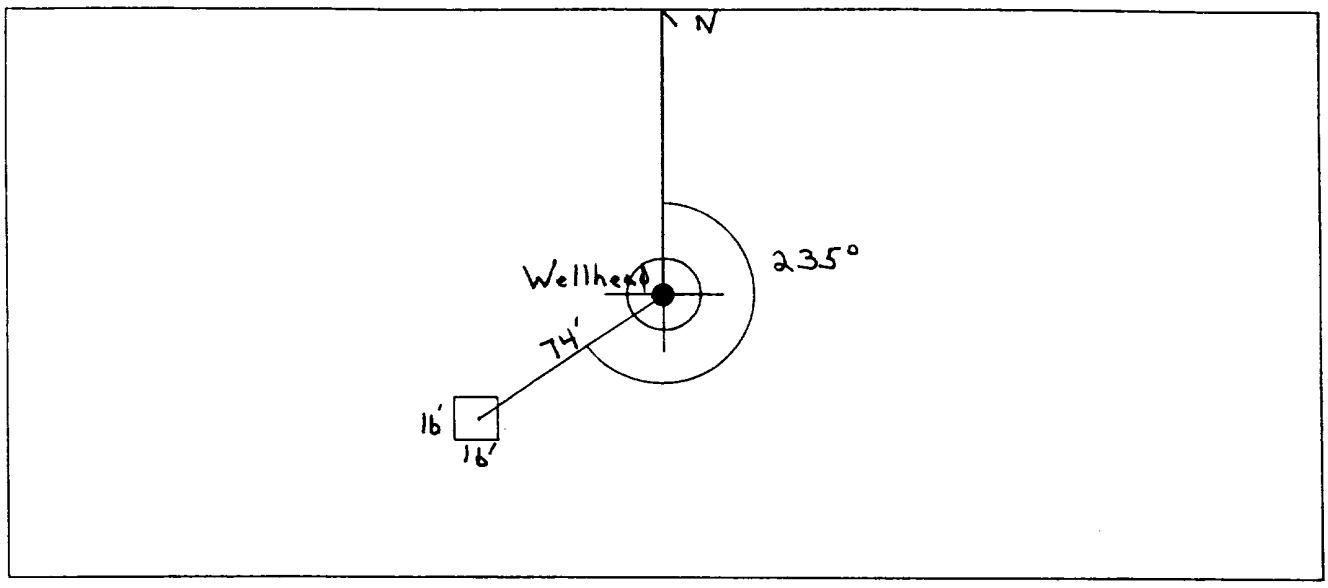
(SP3190) 04/08/94

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 235° Footage from Wellhead 74'

b) Length : 16' Width : 16' Depth : 1'



REMARKS

Remarks :

Pictures @ 1249 (17-20)

End Dump

Completed By:

Cory Chase
Signature

6/11/94
Date

PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 87061 Location: Marron WN Fed No. 7

Coordinates: Letter: G Section 22 Township: 27 Range: 8

Or Latitude _____ Longitude _____

Date Started : 8-2-94 Run: 07 32

FIELD OBSERVATIONS

Sample Number(s): KP162 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 374 PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 50

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☒ ☐ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 8-2-94 Pit Closed By: ~~8-2-94~~ KP 8-2-94 BET

REMARKS

Remarks : Some LINE MARKERS. STARTED REMEDIATING TO 12' SOIL TURNED DARK GRAY. AT 12' SOIL STILL THE SAME. CLOSED PIT.

Signature of Specialist: Kelly Padilla

(SP3181) 03/16/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 162	945815
MTR CODE | SITE NAME:	87061	N/A
SAMPLE DATE | TIME (Hrs):	8-2-94	1102
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8/4/94	8/4/94
DATE OF BTEX EXT. | ANAL.:	8/8/94	8/9/94
TYPE | DESCRIPTION:	VC	Brown sand/clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	6.3	MG/KG	1			
TOTAL BTEX	6.4	MG/KG				
TPH (418.1)	395	MG/KG			1.97	28
HEADSPACE PID	374	PPM				
PERCENT SOLIDS	86.1	%				

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

The Surrogate Recovery was at 110 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

DF = Dilution Factor Used

Approved By: J.P. Date: 9/3/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

11:27

Sample identification

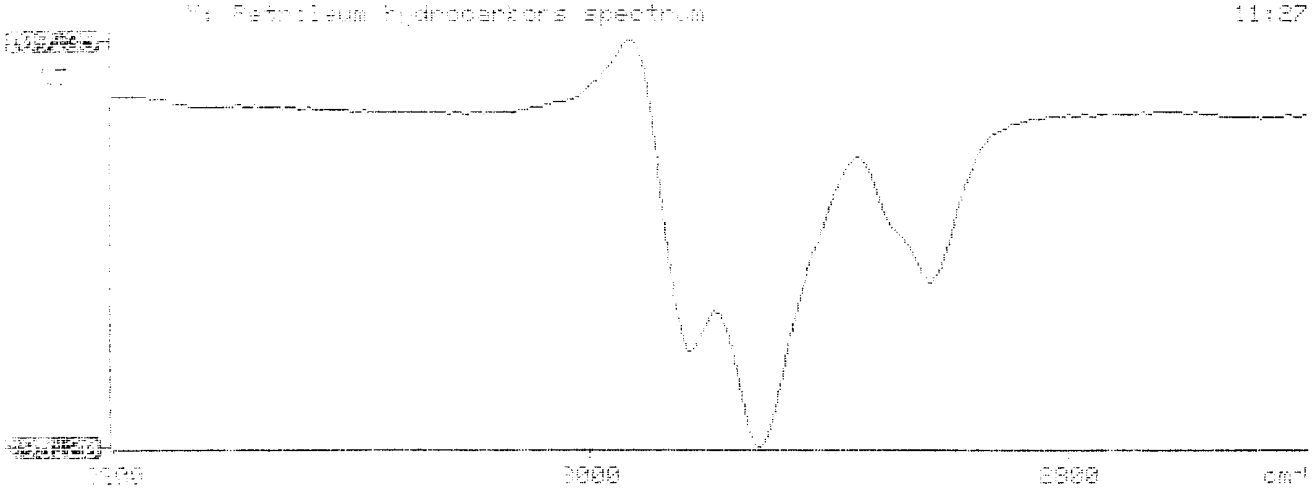
Initial mass of sample, g

Volume of sample after extraction, ml

Petroleum hydrocarbons, ppm

Net absorbance of hydrocarbons (2930 cm-1)

M: Petroleum hydrocarbons spectrum 11:27



Analytical **Technologies,** Inc.

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

ATI I.D. **408328**

August 11, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **08/05/94**, 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.

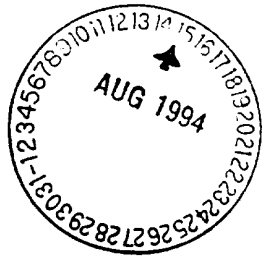
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

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 CO. ATI I.D.: 408328

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	945815	NON-AQ	08/02/94	08/08/94	08/09/94	1
05	945816	NON-AQ	08/02/94	08/08/94	08/10/94	1
06	945817	NON-AQ	08/02/94	08/08/94	08/08/94	1

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	<0.25
TOLUENE	MG/KG	<0.025	<0.025	16
ETHYLBENZENE	MG/KG	<0.025	<0.025	1.7
TOTAL XYLENES	MG/KG	6.3	0.049	21
SURROGATE:				
BROMOFLUOROBENZENE (%)		110	86	167*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH1
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 Morrow Wk2 Fed #7 87061

Elevation
Borehole Location Letter G-S22-T27-R8
GWL Depth
Logged By John LaBarbera
Drilled By Mike Donahue
Date/Time Started 7/29/95 - 1092
Date/Time Completed -1200

Well Logged By John LaBarbera
Personnel On-Site M. Donahue, D. Otte, D. Chavez
Contractors On-Site
Client Personnel On-Site

Drilling Method 4.25" HSA
Air Monitoring Method PID/FID

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~~ PPM ~~NDU~~ NU BZ	BH	S	Drilling Conditions & Blow Counts
0										
5				Fill						
10										
15										
20	1	18-19	12	Brown, loose, silty, f sand, damp, odor discolored at bottom of sample	SM		0	7	1055 / 329	1052
25	2	23-24	12	Gray, loose, silty, fine to coarse, SAND, to 23.25 23.25 - Brown AA, slight odor	SM		1	134	223 / 202	1057
30	3	28-29	16	AA, no odors noted TOB at 29.33'	SM		16	43	185 / 10	1106
35										
40										

Comments: Sample JFL 13 sent to lab for BTEX/TPH analysis.

Geologist Signature John LaBarbera

El Paso Natural Gas Company

Phase II Drilling
Marron WN Fed #7
(28-29.33')

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JFL 13	947037
MTR CODE | SITE NAME:	87061	N/A
SAMPLE DATE | TIME (Hrs):	07-19-95	RB 7/24/95 +2 11:02
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	07-20-95	07-20-95
DATE OF BTEX EXT. | ANAL.:	07-21-95	07-22-95
TYPE | DESCRIPTION:	VG	G. org/Brown fine sand & clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	48.1	MG/KG			1.97	28
HEADSPACE PID	25	PPM				
PERCENT SOLIDS	91.9	%				

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

The Surrogate Recovery was at 106 % for this sample All QA/QC was acceptable.

Narrative: ATI Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 8/3/95

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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                     *
**********************************************************
*
 95/07/20  14:30
*
*  Sample identification
 947037
*
*  Initial mass of sample, g
 1.970
*
*  Volume of sample after extraction, ml
 28.000
*
*  Petroleum hydrocarbons, ppm
 48.093
*  Net absorbance of hydrocarbons (2930 cm-1)
 0.016
*
*
*
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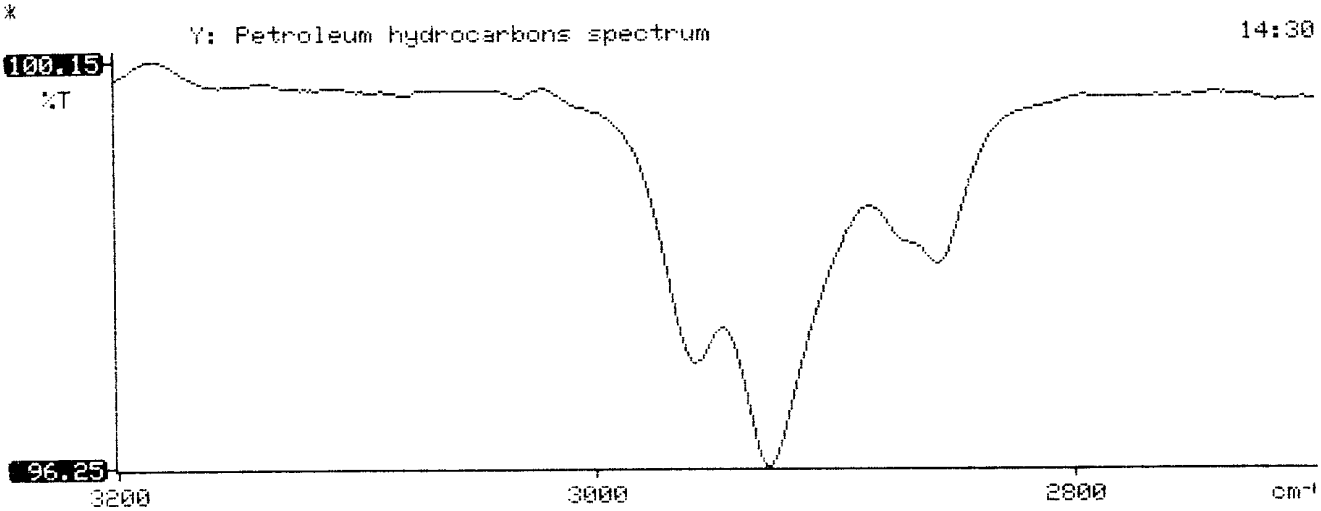


Analytical **Technologies,** Inc.

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

ATI I.D. **507388**

July 26, 1995

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

Project Name/Number: PIT CLOSURE/PHII DRILL I 24324

Attention: John Lambdin

On **07/21/95**, 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.

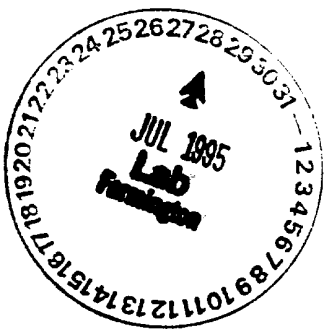
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:gsm

Enclosure



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507388

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHII DRILL I

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	947037	NON-AQ	07/19/95	07/21/95	07/22/95	1
05	947038	NON-AQ	07/19/95	07/21/95	07/23/95	1
06	947039	NON-AQ	07/19/95	07/21/95	07/22/95	50

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<0.025	<0.025	<1.3
TOLUENE	MG/KG	<0.025	<0.025	28
ETHYLBENZENE	MG/KG	<0.025	<0.025	9.0
TOTAL XYLENES	MG/KG	<0.025	<0.025	79
SURROGATE:				
BROMOFLUOROBENZENE (%)		106	98	NA*