EL PASO FIELD SERVICES PROBUCTION PIT CLOSURE

DEPUTY OIL & GAS INSPECTOR

DEC 2 1 1998

SAN JUAN 29-6 #58 Meter/Line ID - 72092

SITE DETAILS

Legals - Twn: 29 Rng: 06 NMOCD Hazard Ranking: 30

Operator: PHILLIPS PETROLEUM COMPAN

Sec: 28

Unit: K

Land Type:

Pit Closure Date: 06/20/94

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
- 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
- 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 time with minimal risk the environment. naturally degrade in to

FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 72.092 Location: San Juan 29-6 Whit 58 Operator #: 7035 Operator Name: Phillips P/L District: Bloomfield Coordinates: Letter: K Section 28 Township: 29NRange: 6W Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: 6-6-94
ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside Outside Depth to Groundwater Less Than 50 Feet (20 points) Feet (2) Greater Than 100 Ft (0 points) 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? Horizontal Distance to Surface Water Body (1) State (2) Fee (2) (3) Feet (3) (1) (2) (1) State (2) State (2) Fee (3) (3) Wellhead Protection (3) Wellhead Protection Area: Is it less than 200 ft from a private domestic water source? (1) YES (20 points) (2) NO (0 points)
SITE	Less Than 200 Ft (20 points)
<i>54</i> 3	
REMARKS	Remarks: one pit on location Dry 5000 gal standing
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E C	Die & Hauc.

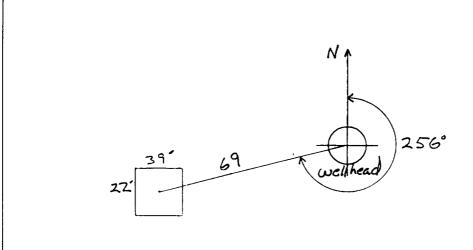
LOCATION
PIT
ORIGINAL

REMARKS

ORIGINAL PIT LOCATION

Original Pit: a) Degrees from North <u>256</u> Footage from Wellhead <u>69</u>

b) Length : 39 Width : 22 - Depth : 3



Remarks :	Photo	5-092				·	
	······						
		· · · · · · · · · · · · · · · · · · ·					
	····		 				
	·			·			

Completed By:

Signature

6-6-94

Date

PHASE I EXCAVATION

MAROH AS 2013/NOITAIDEMEN TIG C TH

GENERAL	Meter: 12092 Location: SAMJUAN 29-6 UNITS8 Coordinates: Letter: K Section 28 Township: 29 Range: 6 Or Latitude Longitude Date Started: 6-20-99 Area: 10 Run: 91
FIELD OBSERVATIONS	Sample Number(s): Kpt 105 Sample Depth: 12' Feet Final PID Reading 320 PID Reading Depth 12' Feet Yes No Groundwater Encountered (1) (1) (2) Approximate Depth Feet
GILDOLD	s I
	Remarks: Some Line markers. Started Remediating to 12. Soil Turned Dark Brown. Smells Real BAD. Pit Size 35x36 Big Pit Sail Still the Same. Signature of Specialist: Left foolile (SP3191) 04/07/



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP10S	945477
MTR CODE SITE NAME:	72092	N/A
SAMPLE DATE TIME (Hrs):	6-20-94	72092 1555
SAMPLED BY:		N/A
DATE OF TPH EXT. ANAL.:	6-21-94	6/2/94
DATE OF BTEX EXT. ANAL.:	6/24/94	6/29/94,
TYPE DESCRIPTION:	VC	TRBLIFINE SAL /C/AY

REMARKS:	

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
(Millian : mi.			DF	Q	M(g)	V(ml)
BENZENE	20.12	MG/KG	5			
TOLUENE	11	MG/KG	5			
ETHYL BENZENE	1.5	MG/KG	5			
TOTAL XYLENES	3.7	MG/KG	5			
TOTAL BTEX	16.3	MG/KG				
TPH (418.1)	150 151	JUN 6/22/94 MG/KG			2.0/	28
HEADSPACE PID	320	PPM				
PERCENT SOLIDS	89,8	%				· · · · · · · · · · · · · · · · · · ·

The Surrogate Recovery was at 95 % for this sample All QA/QC was acceptable.

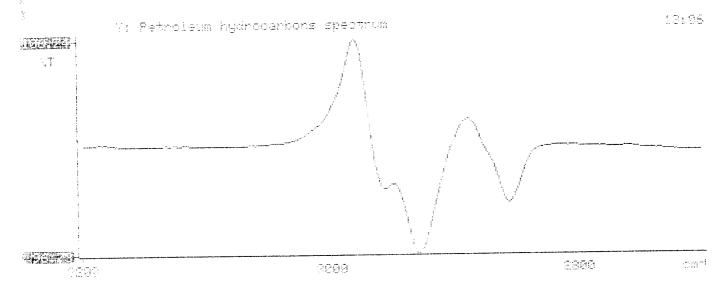
Narrative: ATI results attached.

DF = Dilution Factor Used

JF = Dilution Factor Oseu

Approved By:

Date: 7/17/44





ATI I.D. 406402

July 1, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 06/24/94, 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.

etitia Krakowski, Ph.D.

Froject 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.: 406402

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

11000	J_ 1111111					
SAMPLI ID. #	E CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	945477	NON-AQ	06/20/94	06/24/94	06/29/94	5
0:2	945478	NON-AQ	06/20/94	06/24/94	06/28/94	1
0:3	945496	NON-AQ	06/22/94	06/24/94	06/28/94	5
PARAM	ETER		UNITS	01	02	03
BENZE	NE		MG/KG	<0.12	<0.025	<0.12
TOLUE			MG/KG	11	<0.025	<0.12
	BENZENE		MG/KG	1.5	<0.025	1.1
	XYLENES		MG/KG	3.7	0.035	13
SURRO		(0.)		95	102	145*
BROMO	FLUOROBENZENE	(%)		73	102	

^{*}Outside ATI Quality Control Limits Due to Matrix Interference.

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Philip Environmental Services Corp.

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

Elevation

Borehole Location

GWL Depth
Logged By
Drilled By
Date/Time Started

Borehole # BH-1
Well #
Page of Z

Project Name EPNG Pits

Project Number 14509 Phase 601 6000

Project Location 521 JURN 29-6, #58, 72092

Well Logged By
Personnel On-Site

Contractors On-Site

Client Personnel On-Site

Drilling Method 4/4" ID HSM

Air Monitoring Method CGI, PID

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)		Monitori nits: ND BH		Drilling Conditions & Blow Counts
5				Backfill to 121				·		
10										
20	1	18-	NON	CLAY, dk. grey, 50ft, slightly plastic.		22	3		35,71	1210
25	Z	23- 25	1.00	silty SAND, lightgrey 5-20% silt, fine sand loose, damp.	-	27			<u> 244</u> 315	HZZ6
30	3	Z8- 30	5/20	silty SAND w/trace clay brown, 10-35% silt, fine 50nd, 5-15% clay, loose	_				33 249	1230
35	4	33- 35	51,00	silty SAND witrace clay brown, 10-35% silt, fine 5000, 5-15% clay, loose, damp	-				244 422	1740
40	5	38- 40	6.0	SAA, no clay, med. dense		-			238 349	1254

Comments:	531-55' sample (SEKGI) sent to lab (BTEX9TPH) sample was
Comments.	bagged and iced prior to being put in JEF. BH grouted
	to surface.
	a desired to the second

Geologist Signature

Such Pally

RECORD OF SUBSURFACE EXPLORATION

Philip Environmental Services Corp.

4C00 Monroe Road Farmington, New Mexico 87401 (605) 326-2262 FAX (605) 326-2388

Elevation

Borehole Location

GWL Depth

Logged By S.Kelly

Drilled By

Date/Time Started

Date/Time Completed

Borehole #	BH-1	å
Well #		
Page 7	ック	

Project Name EPNG Pits
Project Number 14509 Phase 601 GOOD
Project Location 371 Juan 28-6, #58, 72.09.7

Well Logged By
Personnel On-Site
Contractors On-Site
Client Personnel On-Site

Drilling Method

Air Monitoring Method CGI, PID

				Sample Type &	Sample Description	uscs	Depth Lithology	Air Monito	ning	Drilling Conditions
	Depth (Feet)	Sample Number	Sample Interval	Recovery	Classification System: USCS	Symbol	Change	Unite: N		& Blow Counts
l	/10			(inches)			(feet) 40	BZ BH	s/	
SX	F-9°					_	70			
				, 1						
	_		47	.65	STIT. tan med donso				309	174
	45	/_	43 45	70	day rong real being				308	1305
AK	 (-10	2.0	SILT, tan, med. dense, dry		46		1000	
	-		48-		silty SAND, with trace			•	40 241	1325
SK	_ 50	7	50		Cay, dk. brown, 10-25%	٠.			247	
-		`			31/4, Fine 32nd, 5-15%				''	
			۔۔	.75	silty SAND, with trace clay, dk. brown, 10-25% silt, Fine sand, 5-15% clay, med. dense. damp. silty SAND, brown, 15-35% silt, fine sand, med dense,		<u>5Z</u>		1,7	1345
	- 55	8	55	501	5/14 SAND, brown 15-35%				16/18	1345
AK	15	8	55	20	silt, fine sand, med dense.				18	
	 				drý					
	 				TOB-55,0'					
	20				100-55.0	İ			Ì	
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	L ⁴⁰					<u> </u>	<u> </u>		<u> </u>	

Comments:					
	Geologist Signature	Darah Pelly			



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	5EX61	947205
	72092	San Juan 29-6, #58
MTR CODE SITE NAME: SAMPLE DATE TIME (Hrs):		13:45
PROJECT:	Phase II Drilling	
	01 /	81,195
DATE OF TPH EXT. ANAL.:		8118195
DATE OF BTEX EXT. ANAL.:		Frown sand & Clay
TYPE DESCRIPTION:	VG	MIDWIT JOHN S CHOOL

Field Remarks:	

RESULTS

DADAMETED	RESULT	UNITS	QUALIFIERS			
PARAMETER			DF	Q	M(g)	V(ml)
BENZENE	L0.025	MG/KG				
TOLUENE	40.025	MG/KG	1			
ETHYL BENZENE	20.025	MG/KG)			
TOTAL XYLENES	20.025	MG/KG)			
TOTAL BTEX	20.10	MG/KG				
TPH (418.1)	41.6	MG/KG			2.12	28
HEADSPACE PID	18	PPM				
PERCENT SOLIDS	93.6	%				

The Surrogate Recovery was at 93 for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

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Test Method for
     Dil and Grease and Petroleum Hydrocarbons
                                                      *
                  in Water and Soil
来
                                                      _{x}
*
            Perkin-Elmer Model 1600 FT-IR
^{*}
                   Analysis Report
******************
          13:50
 95/08/11
*
   Sample identification
_{\#}
 947205
^{*}
  Initial mass of sample, g
   Volume of sample after extraction, ml
 28,000
  Petroleum hydrocarbons, ppm
寨
 41.551
  Net absorbance of hydrocarbons (2930 cm-1)
 0.016
^{*}
*
*
                                                                     13:50
          Y: Petroleum hydrocarbons spectrum
102,35
  XT.
```

3000

3200

 $\circ m^{-1}$

2800



ATI I.D. 508390

August 23, 1995

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

Project Name/Number: PIT CLOSURE/PHASE II & III 24324

Attention: John Lambdin

On **08/16/95**, 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

ZMalall

MR:jt

Enclosure

H. Mitchell Rubenstein, Ph.D. Laboratory Manager





GAS CHROMATOGRAPHY RESULTS

: BTEX (EPA 8020)

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO ATI I.D.: 508390

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE II & III

MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
NON-AQ	08/10/95	08/18/95	08/18/95	1
NON-AQ	08/10/95	08/18/95	08/18/95	1
NON-AQ	08/10/95	08/18/95	08/18/95	1
	UNITS	07	08	09
	MG/KG	<0.025	<0.025	<0.025
	MG/KG	<0.025	<0.025	<0.025
	MG/KG	<0.025	<0.025	<0.025
	MG/KG	<0.025	<0.025	<0.025
		95	93	88
	NON-AQ QA-NON	NON-AQ 08/10/95 NON-AQ 08/10/95 NON-AQ 08/10/95 UNITS MG/KG MG/KG MG/KG	NON-AQ 08/10/95 08/18/95 NON-AQ 08/10/95 08/18/95 NON-AQ 08/10/95 08/18/95 UNITS 07 MG/KG <0.025 MG/KG <0.025 MG/KG <0.025 MG/KG <0.025	NON-AQ 08/10/95 08/18/95 08/18/95 NON-AQ 08/10/95 08/18/95 08/18/95 NON-AQ 08/10/95 08/18/95 08/18/95 UNITS 07 08 MG/KG <0.025 <0.025 MG/KG <0.025 <0.025 MG/KG <0.025 <0.025 MG/KG <0.025 <0.025