

DEC 21 1998

Approved

STATE COM #46
Meter/Line ID - 90142

RECEIVED

SITE DETAILS

Legals - Twp: 29 Rng: 08 Sec: 16 Unit: H
NMOCD Hazard Ranking: 20 Land Type: 1 - State
Operator: CONOCO - MESA OPERATING L Pit Closure Date: 12/19/94

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

GENERAL

Meter: 90142 Location: STATE COM #46
 Operator #: _____ Operator Name: _____ P/L District: BLOOMFIELD
 Coordinates: Letter: H Section 16 Township: 29 Range: 8
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
 Site Assessment Date: 5-19-93 Area: 10 Run: 72

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 ESCAMBO 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: 20 POINTS

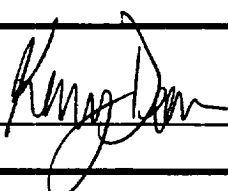
REMARKS

Remarks : TWO PITS ON LOCATION, ONE PIT TO BE CLOSED.
REDLINE + TOPS - INSIDE VULNERABLE ZONE

DIG # NAME

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>90142</u> Location: <u>State Com #46</u> Coordinates: Letter: <u>H</u> Section <u>16</u> Township: <u>29</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Date Started : <u>12/19/94</u> Run: <u>10</u> <u>72</u>
FIELD OBSERVATIONS	Sample Number(s): <u>KD 391</u> Sample Depth: <u>5'</u> Feet Final PID Reading <u>588 ppm</u> PID Reading Depth <u>5'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>60</u> Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input type="checkbox"/> Soil Disposition: Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>12/19/94</u> Pit Closed By: <u>BET</u>
REMARKS	Remarks : <u>Excavated pit to 5', Hit sand stone, took PID sample, closed pit.</u>
	Signature of Specialist: <u></u>



SPLIT

**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 391	946541
MTR CODE SITE NAME:	90142	N/A
SAMPLE DATE TIME (Hrs):	12-19-94	1320
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	12-21-94	12-21-94
DATE OF BTEX EXT. ANAL.:	12/21/94	12/23/94
TYPE DESCRIPTION:	VC	Brown sand

REMARKS: BTEX results from EPNG + ATI

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS				ATI Results
			DF	Q	M(g)	V(ml)	
BENZENE	<0.377	MG/KG	0.07547		5.3	20	0.036
TOLUENE	1.034	MG/KG					0.032
ETHYL BENZENE	<0.377	MG/KG					<0.025
TOTAL XYLENES	<1.13	MG/KG					0.10
TOTAL BTEX	1.03	MG/KG					0.193
TPH (418.1)	123	MG/KG			2.00	28	—
HEADSPACE PID	588	PPM					Surrogate % 96
PERCENT SOLIDS	92.4	%					Dilution Factor 1

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

The Surrogate Recovery was at 99.2 for this samp All QA/QC was acceptable.
Narrative:

ATI results attached

DF = Dilution Factor Used

Approved By: [Signature] Date: 2-22-95

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil
Perkin-Elmer Model 1400 FT-IR
Analysis Report

94/12/21 14:28

Sample identification

946541

Initial mass of sample, g

2.000

Volume of sample after extraction, ml

28.000

Petroleum hydrocarbons, ppm

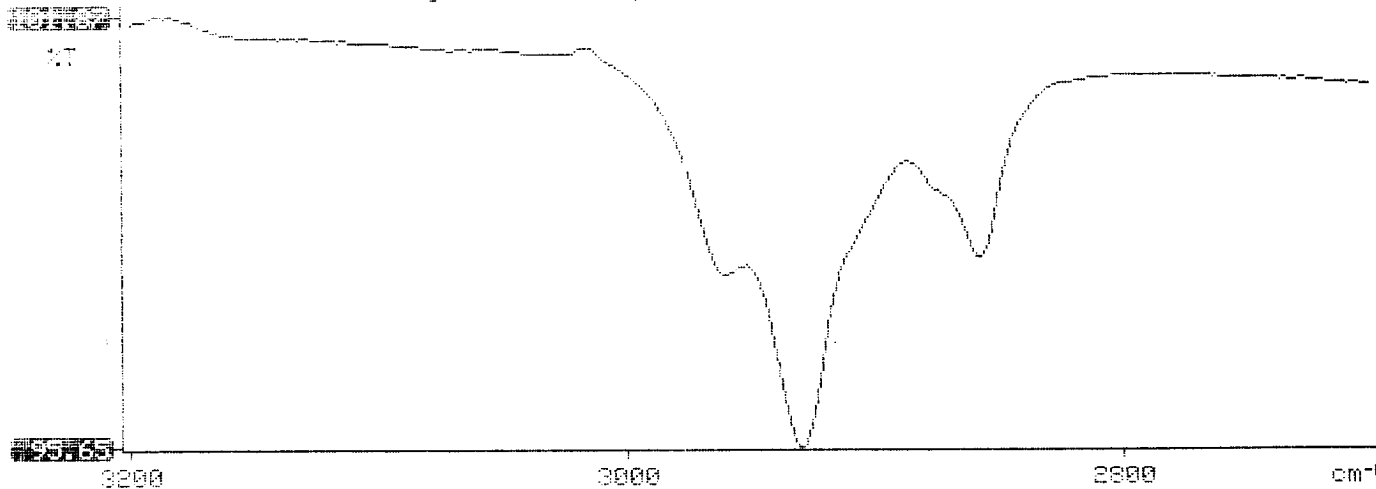
122.554

Net absorbance of hydrocarbons (2930 cm⁻¹)

0.025

Y: Petroleum hydrocarbons spectrum

14:28



ILLEGIBLE

BTEX SOIL SAMPLE WORKSHEET

File	:	946541A	Date Printed	:	12/26/94
Soil Mass (g)	:	5.3	Multiplier (L/g)	:	0.00094
Extraction vol. (mL)	:	20	DF (Analytical)	:	80
Shot Volume (uL)	:	250	DF (Report)	:	0.07547

				Det. Limit	
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000	0.377
Toluene (ug/L)	:	13.70	Toluene (mg/Kg):	1.034	0.377
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000	0.377
p & m-xylene (ug/L)	:	3.11	p & m-xylene (mg/Kg):	0.235	0.755
o-xylene (ug/L)	:	0.76	o-xylene (mg/Kg):	0.057	0.377
			Total xylenes (mg/Kg):	0.292	1.132
			Total BTEX (mg/Kg):	1.326	

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

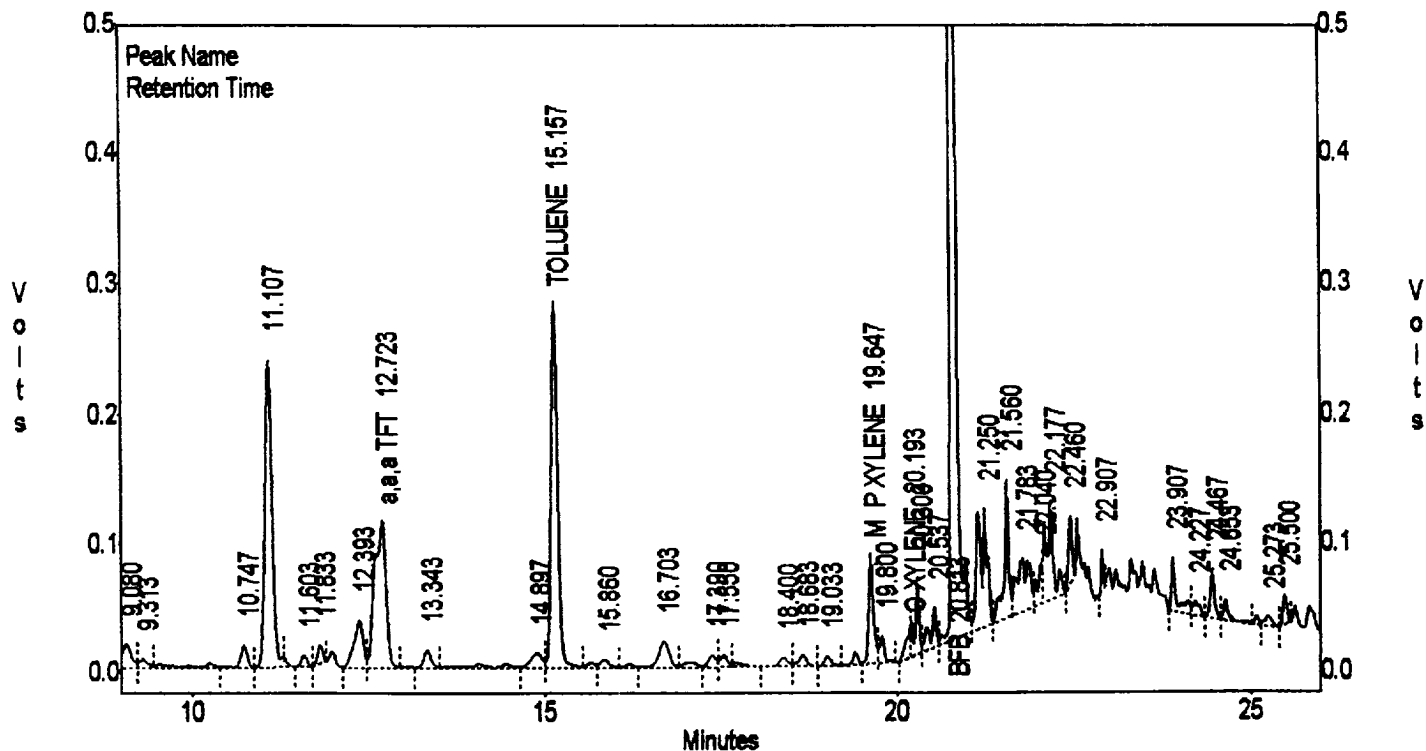
File : C:\LABQUEST\CHROM\946541A
 Method : C:\LABQUEST\METHODS\SOILS.MET
 Sample ID : 946541,5.30G/250uL
 Acquired : Dec 23, 1994 14:10:46
 Printed : Dec 23, 1994 14:37:01
 User : Tony

Channel A Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.280	0	0.00000	0.0000
a,a,a TFT	12.723	1279357	8403.01855	142.6823
TOLUENE	15.157	1836069	148815.51563	13.6991
ETHYLBENZENE	19.430	0	0.00000	0.0000
M & P XYLENE	19.647	403692	193528.29688	3.1102
O XYLENE	20.193	90431	142564.65625	0.7590
BFB	20.813	20231382	199747.54688	99.2109

Totals :
 23840932
 259.4614

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EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

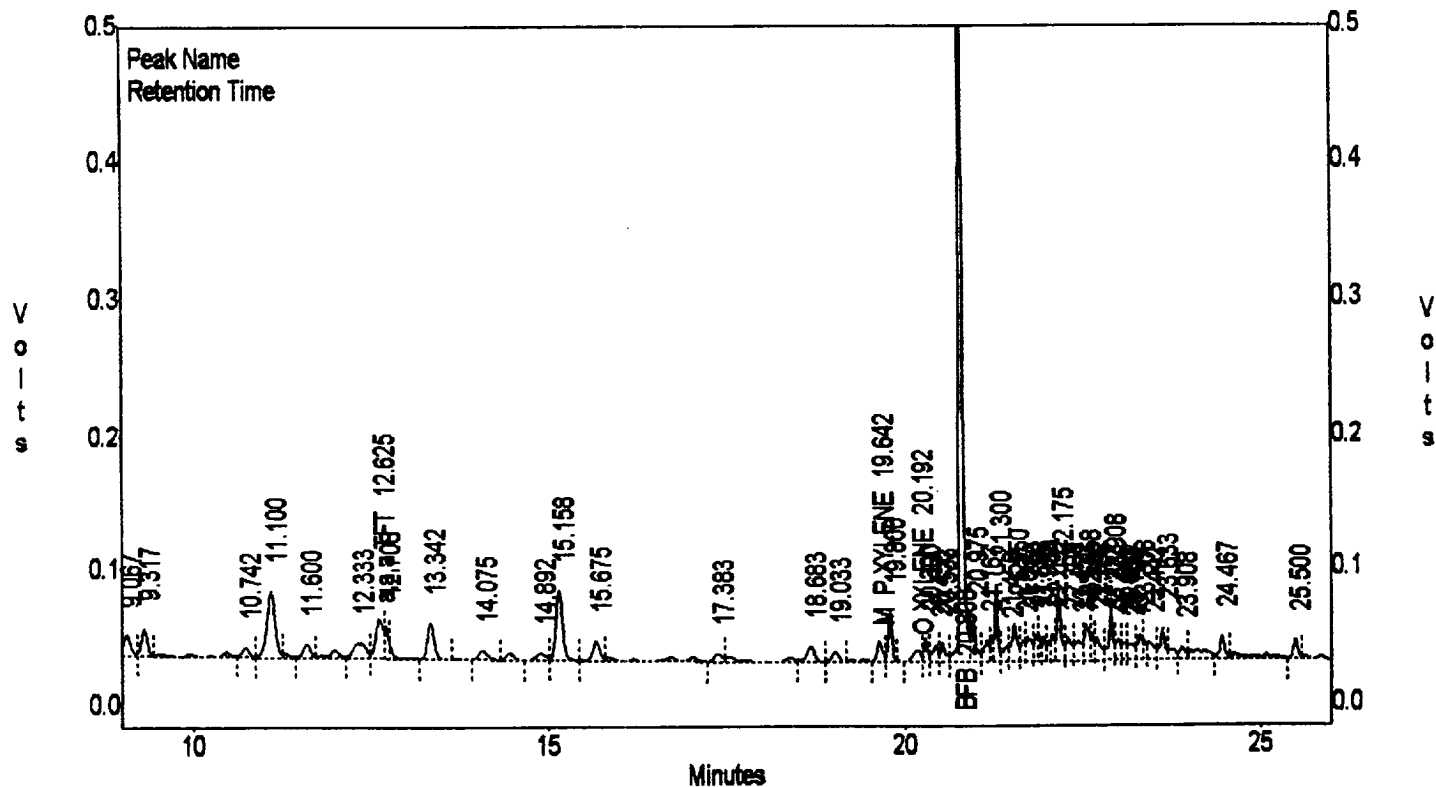
File : C:\LABQUEST\CHROM\946541A
 Method : C:\LABQUEST\METHODS\SOILS.MET
 Sample ID : 946541,5.30G/250uL
 Acquired : Dec 23, 1994 14:10:46
 Printed : Dec 23, 1994 14:37:06
 User : Tony

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	10.275	0	0.00000	0.0000
a,a,a TFT	12.625	222625	2414.15015	87.2352
TOLUENE	15.317	0	0.00000	0.0000
ETHYLBENZENE	19.425	0	0.00000	0.0000
M & P XYLENE	19.642	83687	24867.57227	3.9792
O XYLENE	20.192	65022	23922.60938	3.0584
BFB	20.808	3186074	23067.31836	131.6597

Totals :
 3557409 225.9325

C:\LABQUEST\CHROM\946541A - Channel B





Analytical **Technologies**, Inc.

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

ATI I.D. 412409

January 5, 1995

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


Project Name/Number: PIT CLOSURE 24324


Attention: John Lambdin

On 12/22/94, 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.

Sample 946534 was analyzed within EPA recommended hold time (2A). However, after further examination of the continuing standard, it was determined that xylenes exceeded criteria (117 vs. 115). The sample was then analyzed outside of hold time (2B) to confirm the earlier result and satisfy calibration criteria. Both sets of data are reported.

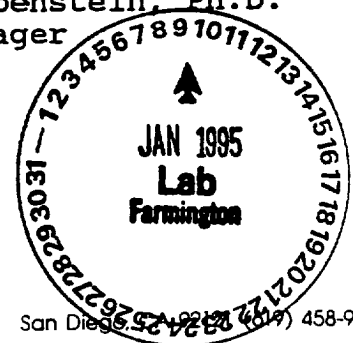
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.


Letitia Krakowski, Ph.D.
Project Manager


H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



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 State Camp #46 90142

Elevation _____
 Borehole Location _____
 GWL Depth _____
 Logged By CM CHANCE
 Drilled By K. Padilla M. Donohue
 Date/Time Started 7/12/95 - 1025
 Date/Time Completed 7/12/95 - 1145

Well Logged By CM Chance
 Personnel On-Site K. Padilla M. Donohue, 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			Drilling Conditions & Blow Counts
							Units: PPM	Σ		
							BZ	BH	HS	
0				Backfill to 5'						
10	109	8-9	8"	Reddish Br CLAY, very stiff, dry med plastic			0	56	888	1030 hr
									4240	
15	2	12-14	12"	Br silty CLAY, + n vf sand, very stiff, low plastic, dry			0	22	112	1037
									1194	
20	3	18-19	10"	AA			0	65	2	1044
									2000	
25	4	22-24	8"	AA			0	39	7	1054
									476	
30	5	28-28.5	6"	Blk shale, v. hard, sl fissile, dry			0	32	7	1105 hr
				TDB 28.5					20	

Comments: Well PTA². No meter base on site. CMC 63 (28-28.5) sent to lab (RTEX/TPH)
CMC 64 - Duplicate. CMC 65 - Field Blank sent to lab also. BH grouted to surface. Coordinates: Unit H, 51b, T29, R8

Geologist Signature _____



Phase II

**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	946985 cnc63	946985
MTR CODE SITE NAME:	90142	N/A
SAMPLE DATE TIME (Hrs):	7-12-95	1105
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	7-13-95	7-13-95
DATE OF BTEX EXT. ANAL.:	07-17-95	07-18-95
TYPE DESCRIPTION:	VG	

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)	99.0 98.0	MG/KG			1.98	28
HEADSPACE PID	20	PPM				
PERCENT SOLIDS	94.7	%				

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

The Surrogate Recovery was at 100 % for this sample All QA/QC was acceptable.

Narrative: ATI Results attached

DF = Dilution Factor Used

Approved By:

Jim Zade

Date:

8/1/95

TEST METHOD 10.
* Oil and Grease and Petroleum Hydrocarbons *
* in Water and Soil *
* *
* Perkin-Elmer Model 1600 FT-IR *
* Analysis Report *

* 95/07/13 13:42

* Sample identification
946985

* Initial mass of sample, g
1.980

* Volume of sample after extraction, ml
28.000

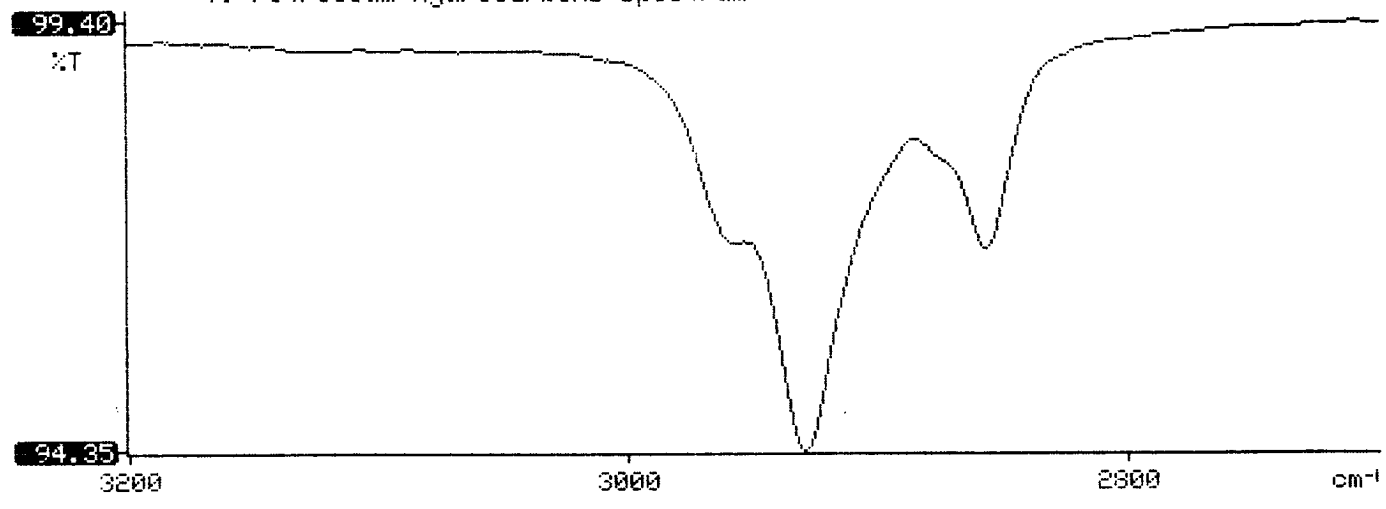
* Petroleum hydrocarbons, ppm
98.976

* Net absorbance of hydrocarbons (2930 cm⁻¹)
0.022

*
*
*

Y: Petroleum hydrocarbons spectrum

13:42





Analytical **Technologies**, Inc.

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

ATI I.D. 507340

July 20, 1995

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

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

Attention: John Lambdin

On 07/14/95, 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:jt

Enclosure

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 507340
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE/PHASE I PHASE II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
14	946983	NON-AQ	07/12/95	07/17/95	07/18/95	1
15	946984	NON-AQ	07/12/95	07/17/95	07/18/95	20
16	946985	NON-AQ	07/12/95	07/17/95	07/18/95	1
PARAMETER			UNITS	14	15	16
BENZENE			MG/KG	<0.025	<0.5	<0.025
TOLUENE			MG/KG	<0.025	6.2	<0.025
ETHYLBENZENE			MG/KG	<0.025	4.1	<0.025
TOTAL XYLENES			MG/KG	<0.025	50	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%) 99 203* 100

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE