

*Denny & Sons*  
**EL PASO FIELD SERVICES**  
**DEPUTY OIL PRODUCTION PIT CLOSURE**

DEC 21 1998

*Approved*  
**DJ SIMMONS ET AL #5**  
**Meter/Line ID - 75517**

**RECEIVED**  
JUL 2 1998

**SITE DETAILS**

**Legals - Twn: 29 Rng: 09**  
**NMOCD Hazard Ranking: 10**  
**Operator: D J SIMMONS, ET AL**

**Sec: 24 Unit: E**  
**Land Type: 2 - Federal**  
**Pit Closure Date: 05/24/94**

**OIL CON. DIV.**

**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:

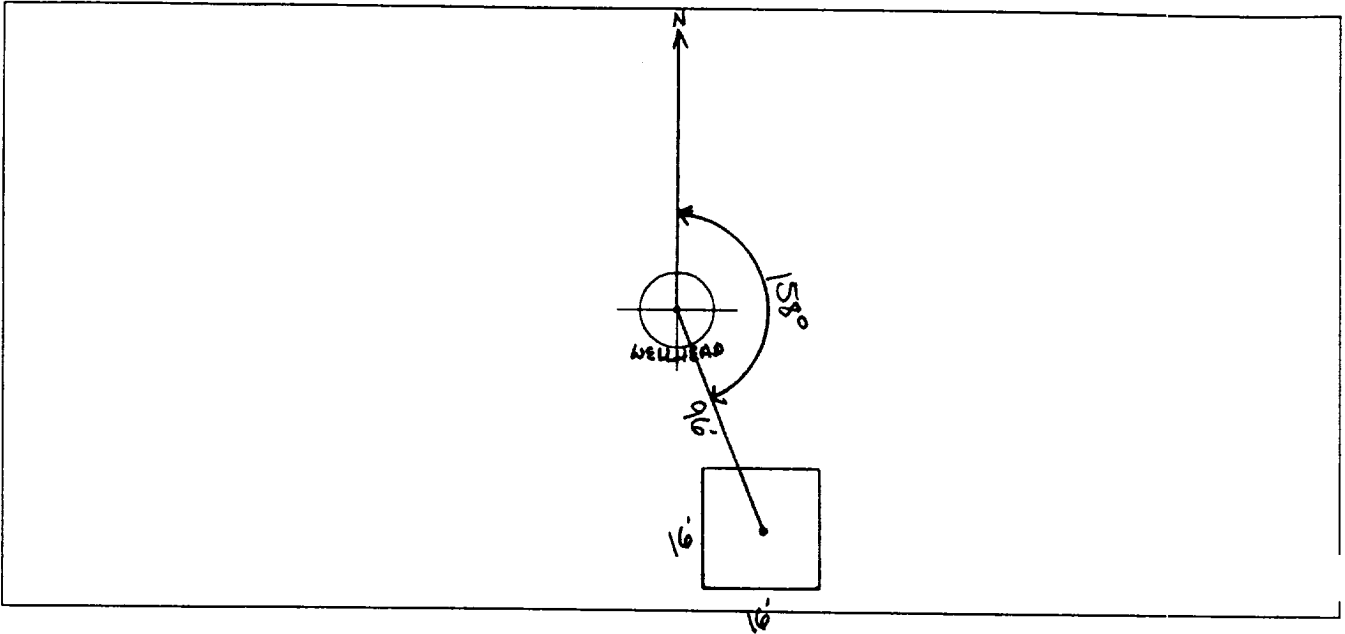
- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All 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	<p>Meter: <u>75517</u> Location: <u>DJ SIMMONS ET AL #5</u></p> <p>Operator #: <u>8043</u> Operator Name: <u>DJ SIMMONS</u> P/L District: <u>BLANCO</u></p> <p>Coordinates: Letter: <u>E</u> Section <u>24</u> Township: <u>29</u> Range: <u>9</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>5.13.94</u> Area: <u>13</u> Run: <u>22</u></p>																
SITE ASSESSMENT	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p><b>Land Type:</b></p> <table border="0"> <tr> <td>Inside</td><td><input checked="" type="checkbox"/> (1)</td> <td>BLM</td><td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>Outside</td><td><input type="checkbox"/> (2)</td> <td>State</td><td><input type="checkbox"/> (2)</td> </tr> <tr> <td></td><td></td> <td>Fee</td><td><input type="checkbox"/> (3)</td> </tr> <tr> <td></td><td></td> <td>Indian</td><td>_____</td> </tr> </table> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area :</b></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><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____</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) &lt; 100' (Navajo Pits Only)</p> <p><input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>10</u> POINTS</p>	Inside	<input checked="" type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)	Outside	<input type="checkbox"/> (2)	State	<input type="checkbox"/> (2)			Fee	<input type="checkbox"/> (3)			Indian	_____
Inside	<input checked="" type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)														
Outside	<input type="checkbox"/> (2)	State	<input type="checkbox"/> (2)														
		Fee	<input type="checkbox"/> (3)														
		Indian	_____														
REMARKS	<p>Remarks : <u>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS ON THE EDGE OF MEDINA CANYON. REDLINE AND TOPO CONFIRMED LOCATION IS IN V.2.</u></p> <p style="text-align: right;"><u>DIG &amp; HART</u></p>																

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 158° Footage from Wellhead 96'  
b) Length : 16' Width : 16' Depth : 2'



REMARKS :

TOOK PICTURES AT 12:20 P.M.  
END DUMP

Blank lines for additional remarks.

Completed By:

Pat Thompson  
Signature

5-13-94  
Date

# **PHASE I EXCAVATION**

# FIEI PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>75517</u> Location: <u>DJ Simmons ETAL #5</u></p> <p>Coordinates: Letter: <u>E</u> Section <u>24</u> Township: <u>29</u> Range: <u>9</u></p> <p style="padding-left: 40px;">Or Latitude _____ Longitude _____</p> <p>Date Started : <u>5-24-94</u> Area: <u>13</u> Run: <u>22</u></p>
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <u>KP#69</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>336</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-align: center;">Yes      No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
<b>CLOSURE</b>	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>50</u></p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>5-24-94</u> Pit Closed By: <u>B.E.I</u></p>
<b>REMARKS</b>	<p><b>Remarks :</b> <u>No Line Markers Started Remediating to 12'</u></p> <p><u>Soil turned DARK gray SANDY looking. At 12' Soil Turned</u></p> <p><u>Black. PID 336.</u></p>
	<p>Signature of Specialist: <u>Kelly Padgett</u></p>



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FIELD SERVICES LABORATORY  
ANALYTICAL REPORT  
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP69	945287
MTR CODE   SITE NAME:	75517	N/A
SAMPLE DATE   TIME (Hrs):	5-24-94	1120
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	5/26/94	5/26/94
DATE OF BTEX EXT.   ANAL.:	5/31/94	6/2/94
TYPE   DESCRIPTION:	VC	Brown/grey coarse sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	2.6	MG/KG	50			
TOLUENE	1.5	MG/KG	50			
ETHYL BENZENE	5.8	MG/KG	50			
TOTAL XYLENES	63	MG/KG	50			
TOTAL BTEX	73	MG/KG				
TPH (418.1)	<del>190</del> 192	MG/KG			2.17	28
HEADSPACE PID	336	PPM				
PERCENT SOLIDS	92.8	%				

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

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

Narrative:  
ATI results attached. Surrogate recovery was not obtainable due to sample dilution.

DF = Dilution Factor Used

Approved By: John Linder

Date: \_\_\_\_\_

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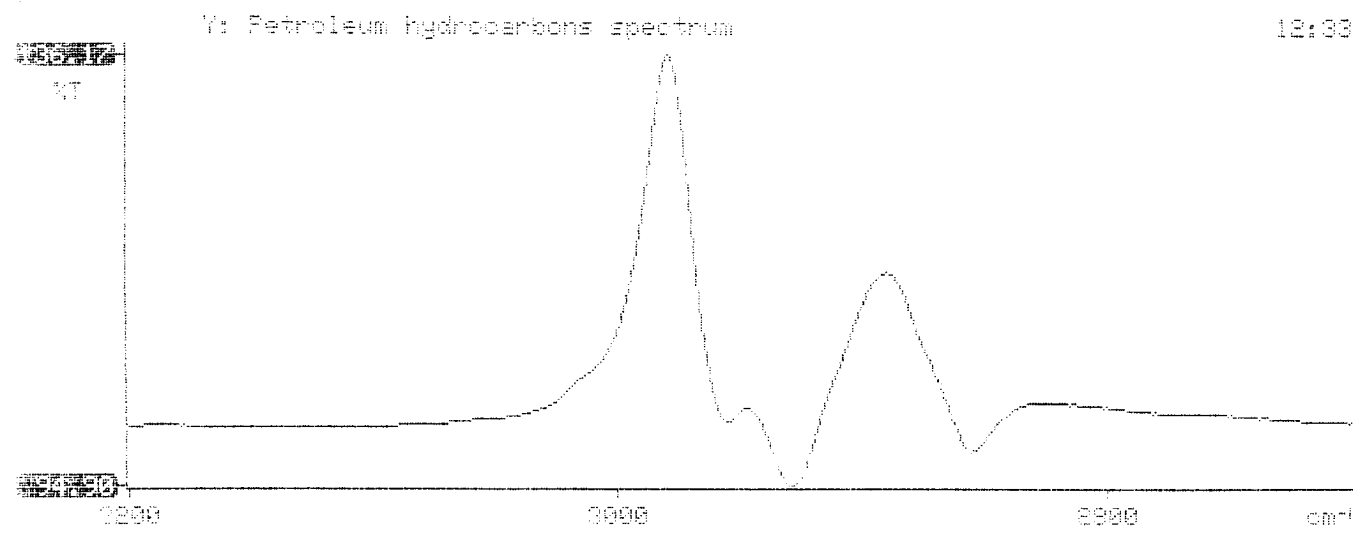
*****
*                                     *
*      Test Method for               *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil.           *
*                                     *
*      Perkin-Elmer Model 1400 FT-IR      *
*      Analysis Report               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

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X  94/05/26  12:33
X
X  Sample Identification
X  9402E7
X
X  Initial mass of sample, g
X  2.170
X
X  Volume of sample after extraction, ml
X  25.000
X
X  Petroleum hydrocarbons, ppm
X  192.093
X  Net absorbance of hydrocarbons (2930 cm-1)
X  0.026
X
X
X

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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. **405420**

June 8, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 05/27/94, 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:jd

Enclosure



## GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)  
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405420  
PROJECT # : 24324  
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	945286	NON-AQ	05/24/94	05/31/94	06/01/94	50
05	945287	NON-AQ	05/24/94	05/31/94	06/02/94	50
06	945288	NON-AQ	05/24/94	05/31/94	06/02/94	5

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	<1.2	2.6	9.7
TOLUENE	MG/KG	<1.2	1.5	43
ETHYLBENZENE	MG/KG	<1.2	5.8	2.5
TOTAL XYLENES	MG/KG	270	63	24

## SURROGATE:

BROMOFLUOROBENZENE (%)	NA**	NA**	77
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\*\*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

# 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 D.J. Simmons ETAL #5 75517

Elevation \_\_\_\_\_  
Borehole Location QE-S24-T29-R9  
GWL Depth \_\_\_\_\_  
Logged By CM CHANCE  
Drilled By K Padilla  
Date/Time Started 8/21/95-1145  
Date/Time Completed 8/21/95-1345

Well Logged By CM Chance  
Personnel On-Site K Padilla, F. Rivera, D. Charlie  
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			
							BZ	BH	HS	
0				Backfill to 12'						
5										
10										
15	1	15-17	14"	Blk silty SAND, f-med sand, loose, dry, odor			0	48	117 92	-1156
20	2	20-22	12"	Grn silty SAND, vf sand, tr f sand, med dense, dry, odor			2	58	109 122	-1204
25	3	25-27	8"	Brn silty SAND, vf-f sand, tr med, med dense, sl moist			7	36	114 119	-sacrifice stuck -1228
30	4	30-32	12"	Reddish Br silty SAND, vf-f sand, tr med, loose-med dense, sl moist			0	38	86 72	-1224
35	5	35-37	10	lt Br/Reddish br silty SAND, med sand, tr f sand, med dense, sl moist			4	42	81 65	-1250
40	6	40-42	5"	Gray xln SANDSTONE, hard, xln			0	30	6 6	-1202
				TDB 42'						

Comments: CMC 87 (40-42') sent to lab (BTEX, TPH). BH grouted to surface

Geologist Signature CM Chance



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	CMC 87	947295
MTR CODE   SITE NAME:	75517	DJ Simmons ETAL #5
SAMPLE DATE   TIME (Hrs):	08-21-95	13:02
PROJECT:	Phase II Drilling	
DATE OF TPH EXT.   ANAL.:	8/22/95	8/22/95
DATE OF BTEX EXT.   ANAL.:	8/24/95	
TYPE   DESCRIPTION:	VG	Fry Sand & sand stones

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< .5	MG/KG				
TOLUENE	< .5	MG/KG				
ETHYL BENZENE	< .5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	28.0	MG/KG			2.01	28
HEADSPACE PID	6	PPM				
PERCENT SOLIDS	92.0	%				

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

The Surrogate Recovery was at 105% for this sample All QA/QC was acceptable.  
Narrative:

DF = Dilution Factor Used

Approved By:

AP

Date:

8/28/01

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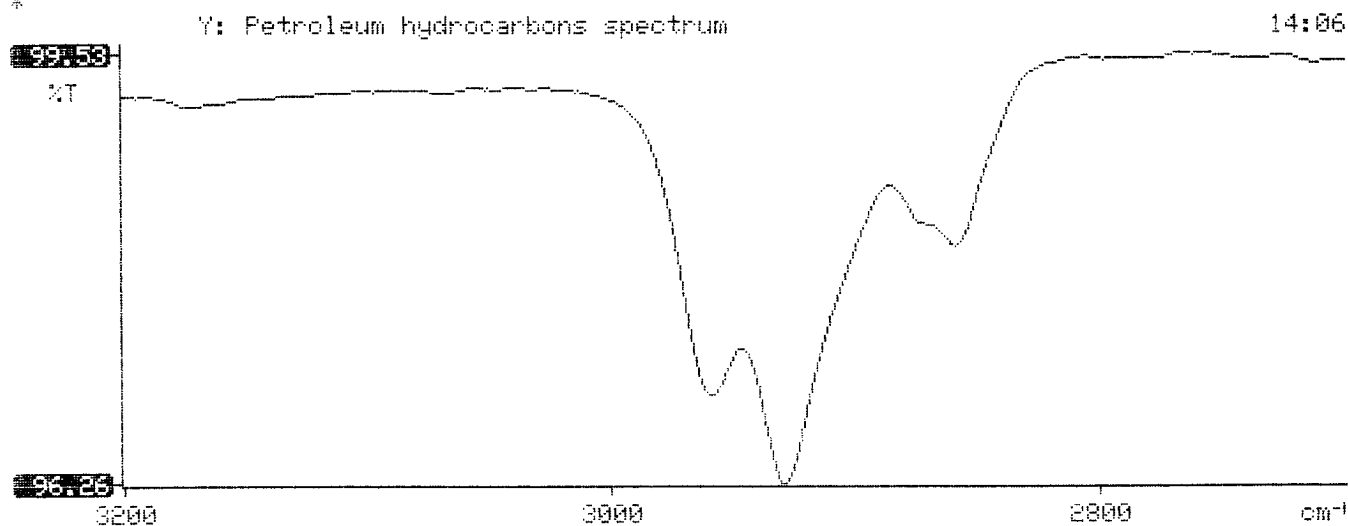
*****
*                               *
*      Test Method for         *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil      *
*                               *
*      Perkin-Elmer Model 1600 FT-IR                  *
*      Analysis Report                                *
*****

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* 95/08/22  14:06
*
* Sample identification
* 947295
*
* Initial mass of sample, g
* 2.010
*
* Volume of sample after extraction, ml
* 28.000
*
* Petroleum hydrocarbons, ppm
* 27.950
* Net absorbance of hydrocarbons (2930 cm-1)
* 0.014
*
*
*

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BTEX SOIL SAMPLE WORKSHEET

File	:	947295	Date Printed	:	8/26/95
Soil Mass (g)	:	4.99	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	20	DF (Analytical)	:	200
Shot Volume (uL)	:	100	DF (Report)	:	0.20040

				Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000 0.501
Toluene (ug/L)	:	0.00	Toluene (mg/Kg):	0.000 0.501
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000 0.501
p & m-xylene (ug/L)	:	0.00	p & m-xylene (mg/Kg):	0.000 1.002
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000 0.501
			Total xylenes (mg/Kg):	0.000 1.503
			Total BTEX (mg/Kg):	0.000

EL PASO NATURAL GAS  
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\082495-1.011  
Method : C:\LABQUEST\METHODS\9001.MET  
Sample ID : 947295,4.99G,100U  
Acquired : Aug 24, 1995 21:02:49  
Printed : Aug 24, 1995 21:29:11  
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	3.450	0	0.0000
a,a,a TFT	4.957	4894369	94.1049
TOLUENE	6.787	176355	-0.2591
ETHYLBENZENE	10.560	0	0.0000
M & P XYLENE	10.903	52272	-5.0233
O XYLENE	11.970	0	0.0000
BFB	13.443	75364680	104.6242

