

District I
P.O. Box 1980, Hobbs, NM

District II
P.O. Drawer DD, Artesia, NM 88221

District III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

2040 South Pacheco Street
Santa Fe, New Mexico 87505

*Risk
bedrock*
SUBMIT 1 COPY TO
APPROPRIATE
DISTRICT OFFICE
AND 1 COPY TO
SANTA FE OFFICE

PIT REMEDIATION AND CLOSURE REPORT

Operator: <u>PNM Gas Services (Energen)</u>		Telephone: <u>324-3764</u>	
Address: <u>603 W. Elm Street Farmington, NM 87401</u>			
Facility or Well Name: <u>McCord #4</u>			
Location:	Unit <u>G</u>	Sec <u>22</u>	T <u>30N</u> R <u>13W</u> County <u>San Juan</u>
Pit Type:	Separator <input type="checkbox"/>	Dehydrator <input checked="" type="checkbox"/>	Other _____
Land Type:	BLM <input type="checkbox"/>	State <input type="checkbox"/>	Fee <input checked="" type="checkbox"/> Other _____
Pit Location:		Pit dimensions: length <u>15'</u> width <u>15'</u> depth <u>2'</u>	
(Attach diagram)	Reference:	wellhead <input checked="" type="checkbox"/>	other _____
Footage from reference:		<u>170'</u>	
Direction from reference:		<u>74</u> Degrees	<input type="checkbox"/> East North <input checked="" type="checkbox"/>
			of <input checked="" type="checkbox"/> West South <input type="checkbox"/>
Depth to Ground Water:		Less than 50 feet (20 points)	
(Vertical distance from contaminants to seasonal high water elevation of ground water)		50 feet to 99 feet (10 points)	
		Greater than 100 feet (0 points)	<u>0</u>
Wellhead Protection Area:		Yes (20 points)	
(Less than 200 feet from a private domestic water source, or, less than 1,000 feet from all other water sources)		No (0 points)	<u>0</u>
Distance to Surface Water:		Less than 200 feet (20 points)	
(Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)		200 feet to 1,000 feet (10 points)	
		Greater than 1,000 feet (0 points)	<u>0</u>
RANKING SCORE (TOTAL POINTS):			<u>0</u>

REGISTRATION
JAN 5 1 2000
OIL CON. DIV.
DIST. 3

McCord #4

Date Remediation Started: 06/16/1999 Date Completed: 06/16/1999

Remediation Method: Excavation X Approx. Cubic Yard 20

(Check all appropriate sections)

Landfarmed X Amount Landfarmed (cubic yds) 20

Other _____

Remediation Location: Onsite X Offsite _____

(i.e., landfarmed onsite, name and location of offsite facility)

Backfill Material Location: _____

General Description of Remedial Action:

Excavated contaminated soil to a pit size of 15' X 12' X 3' and landfarmed soil onsite within a bermed area at a depth of 6" to 12". Soil was aerated by disking/plowing until soil met regulatory levels.

*** Sandstone encountered at 3'. See attached risk analysis form.

Ground Water Encountered: No Yes Depth _____

Final Pit Closure Sampling:

Sample Location 5 pt composite-bottom

(if multiple samples, attach sample result and diagram of sample locations and depths.)

Sample depth 3'

Sample date 06/16/1999 Sample time 10:35:00 AM

Sample Results

Benzene (ppm) 4

Total BTEX (ppm) 151.4 ***

Field headspace (ppm) _____

TPH (ppm) 95.00 Method 8015B

Vertical Extent (ft) _____ Risk Analysis form attached Yes No

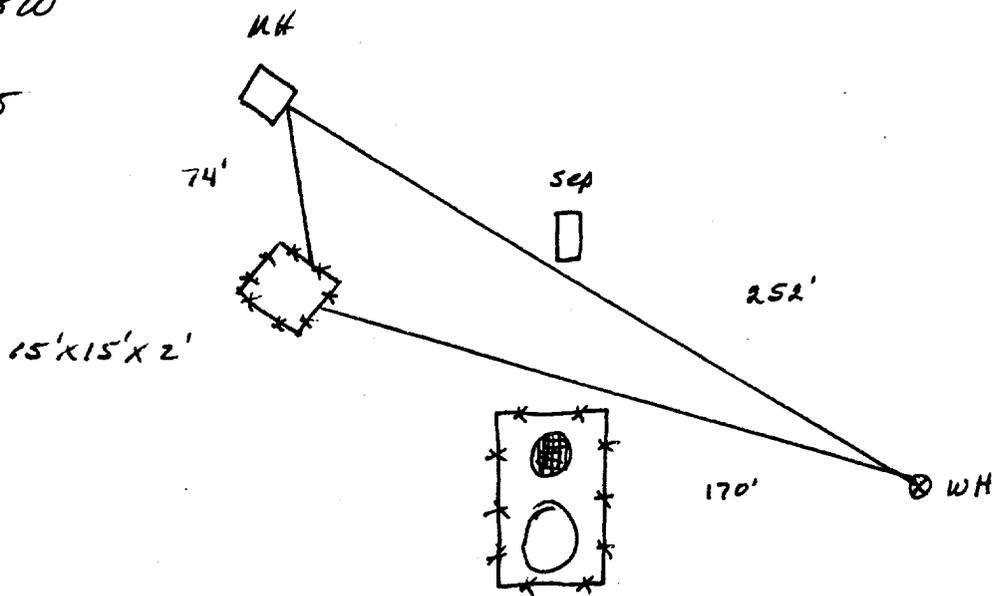
Ground Water Sample: Yes No (If yes, see attached Groundwater Site Summary Report)

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND MY BELIEF

DATE January 24, 2000
SIGNATURE Maureen Gannon

PRINTED NAME **Maureen Gannon**
AND TITLE **Project Manager**

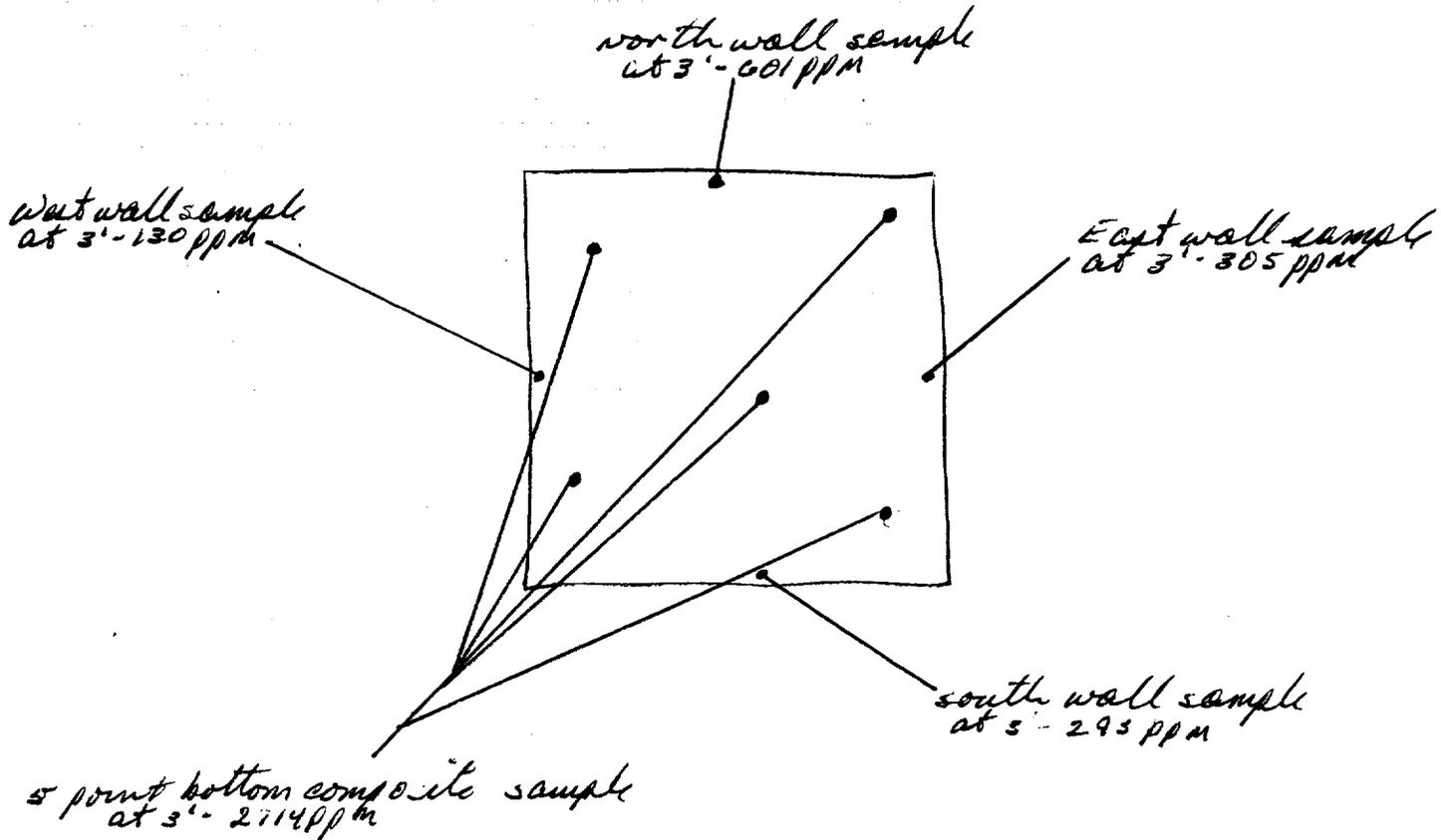
M^o Coord #4
 (G) 22-30N-15W
 Energy
 6-16-99 @ 0915



Excavation Sampling

15' (N+S) x 12' (E+W) x 3'(D)

PI Reading at 3' - 2943 ppm



not to scale

OFF: (505) 325-5667



LAB: (505) 325-1556

On Site Technologies, LTD.

Date: 30-Jun-99

CLIENT: PNM - Public Service Company of NM
Project: PNM Pit Remediation
Lab Order: 9906059

CASE NARRATIVE

Samples were analyzed using the methods outlined in the following references:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, 3rd Edition

All method blanks, laboratory spikes, and/or matrix spikes met quality assurance objectives.

RH

OFF: (505) 325-5667

LAB: (505) 325-1556



ANALYTICAL REPORT

Date: 30-Jun-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	McCord #4
Work Order:	9906059	Client Sample ID:	9906161035; 5pt. Bottom Comp
Lab ID:	9906059-03A	Matrix:	SOIL
Project:	PNM Pit Remediation	Collection Date:	6/16/99 10:35:00 AM
		COC Record:	7640

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS						
T/R Hydrocarbons: C10-C28	95	25		mg/Kg	1	6/29/99
						Analyst: DC
AROMATIC VOLATILES BY GC/PID						
Benzene	4000	500		µg/Kg	500	6/24/99
Toluene	56000	1000		µg/Kg	500	6/24/99
Ethylbenzene	8400	500		µg/Kg	500	6/24/99
m,p-Xylene	67000	1000		µg/Kg	500	6/24/99
o-Xylene	16000	500		µg/Kg	500	6/24/99

151400
151.40ppm

Qualifiers:

PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
B - Analyte detected in the associated Method Blank	Sur: - Surrogate



ANALYTICAL REPORT

Date: 30-Jun-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	McCord #4
Work Order:	9906059	Client Sample ID:	9906161040; 4pt. Wall Comp
Lab ID:	9906059-04A	Matrix:	SOIL
Project:	PNM Pit Remediation	Collection Date:	6/16/99 10:40:00 AM
		COC Record:	7640

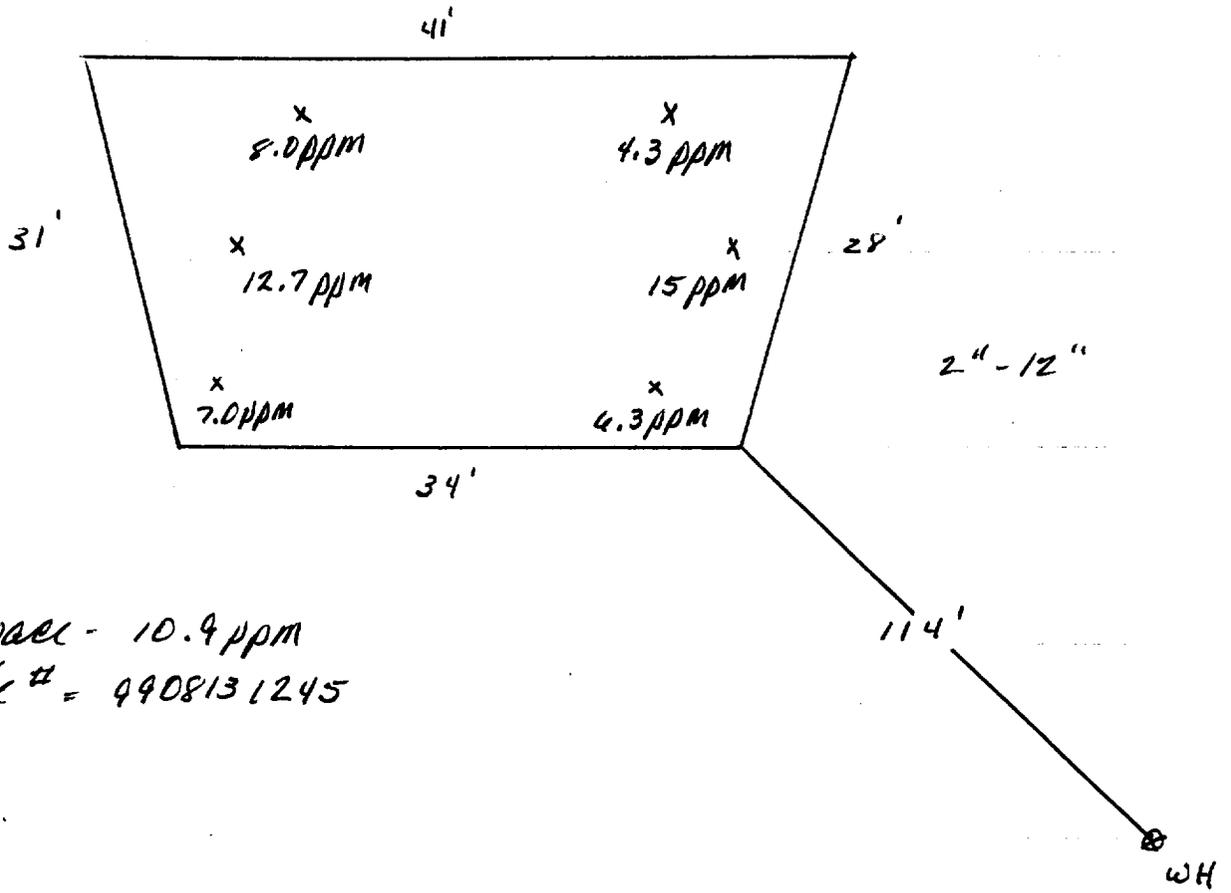
Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		SW8015B				Analyst: DC
T/R Hydrocarbons: C10-C28	ND	25		mg/Kg	1	6/29/99
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: DC
Benzene	ND	1		µg/Kg	1	6/23/99
Toluene	ND	2		µg/Kg	1	6/23/99
Ethylbenzene	2.3	1		µg/Kg	1	6/23/99
m,p-Xylene	19	2		µg/Kg	1	6/23/99
o-Xylene	77	1		µg/Kg	1	6/23/99

98.3
 .0983 ppm

Qualifiers: PQL - Practical Quantitation Limit S - Spike Recovery outside accepted recovery limits
 ND - Not Detected at Practical Quantitation Limit R - RPD outside accepted recovery limits
 J - Analyte detected below Practical Quantitation Limit E - Value above quantitation range
 B - Analyte detected in the associated Method Blank Surr: - Surrogate

P.O. BOX 2606 • FARMINGTON, NM 87499

Land Farm Drawing



Head space - 10.9 ppm
Sample # = 9908131245

not to scale

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

On Site Technologies, LTD.

Date: 20-Aug-99

CLIENT: PNM - Public Service Company of NM
Project: PNM Pit Remediation Landfarms
Lab Order: 9908037

CASE NARRATIVE

Samples were analyzed using the methods outlined in the following references:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, 3rd Edition

All method blanks, laboratory spikes, and/or matrix spikes met quality assurance objectives.

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 20-Aug-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	McCord #4 LF
Work Order:	9908037	Client Sample ID:	9908131245; 6pt. Composite
Lab ID:	9908037-03A	Matrix:	SOIL
Project:	PNM Pit Remediation Landfarms	Collection Date:	08/13/1999 12:45:00 PM
		COC Record:	7654

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		SW8015B				Analyst: DC
T/R Hydrocarbons: C10-C28	ND	25		mg/Kg	1	08/17/1999

Qualifiers:

PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
B - Analyte detected in the associated Method Blank	Surr: - Surrogate



Environmental Services

Well Name:	McCord #4
Well Legals:	Sec 22, T30N, R13W, Unit G
Pit Type:	Dehydrator
Horizontal Distance to Surface Water:	Greater than 1,000 feet
Groundwater Depth:	Greater than 100 feet

RISK ANALYSIS

PNM requests closure of their former pit on the McCord #4 well site using a limited risk analysis based on the following conditions:

1. Groundwater is estimated to be at a depth of 317 feet based upon the elevation of the site and the elevation of the nearest "listed" or "named" wash. (Reference: Farmington North, NM series 7.5 minute topographic map.)
2. PNM excavated 20 cubic yards of soil from the former pit. Subsurface lateral contamination has been remediated (see attached map and analytical results for the side wall profiles). Source removal minimizes the possibility of surface water contamination.
3. Sandstone was encountered at 3 feet below ground surface. Bedrock/sandstone provides a barrier between remaining contamination and groundwater. Vertical migration through bedrock or sandstone to groundwater is unlikely.
4. PNM excavated and performed remediation to the maximum depth and horizontal extent practicable.

PNM believes that their former pit on the McCord #4 well site poses minimal threat to groundwater, human health and the environment based upon our past experience in excavating over 1,000 pits.