

Denny R. Faust
DEPUTY OIL & GAS INSPECTOR

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

DEC 21 1998

**VIERSON #1
Meter/Line ID - 72109**

RECEIVED
JUL 2 1998

SITE DETAILS

Approval
Legals - Twn: 30 Rng: 13 Sec: 19
NMOCD Hazard Ranking: 40
Operator: DENVER AMERICAN PETROLEUM

OIL CON. DIV.
Dist. 3
Land Type: 2 - Federal
Pit Closure Date: 01/30/95

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:

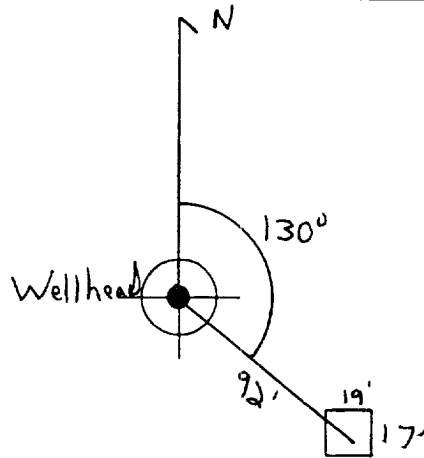
- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All 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>72109</u> Location: <u>VIERSDN #1</u></p> <p>Operator #: <u>0504</u> Operator Name: <u>Denver American</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>19</u> Township: <u>30</u> Range: <u>12</u> ¹²⁷⁵ <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>1/12/95</u> Area: <u>02</u> Run: <u>23</u></p>	
	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p>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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input checked="" type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Conner Arroyo (off LaPlata R.)</u> (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) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>40</u> POINTS</p>	
REMARKS	<p>Remarks : <u>Redline Book: Inside</u> <u>Vulnerable Zone Type: Inside</u></p> <p><u>1 pit. Will close.</u></p> <p><u>DIG + HAUL</u></p>	

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 130° Footage from Wellhead 92'
b) Length : 19' Width : 17' Depth : 4'



REMARKS :

Pictures @ 0911 hr 1-4 roll 1

Completed By:

Cory Chase
Signature

1/12/95
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>72109</u> Location: <u>VIERSON #1</u> Coordinates: Letter: <u>A</u> Section <u>19</u> Township: <u>30</u> Range: <u>13</u> Or Latitude _____ Longitude _____ Date Started : <u>1-30-95</u> Run: <u>02</u> <u>23</u>
FIELD OBSERVATIONS	Sample Number(s): <u>NK 339</u> Sample Depth: <u>4'</u> Feet Final PID Reading <u>591</u> PID Reading Depth <u>4'</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>10</u> Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input type="checkbox"/> Soil Disposition: Envirotech <input type="checkbox"/> <input checked="" type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>1-30-95</u> Pit Closed By: <u>BF I</u>
REMARKS	Remarks : <u>Arrived TOOK Fence Down Dug 1 load out</u> <u>IT ROCK 4' Soil gray Strong HYDRO carbon odor</u>
	Signature of Specialist: <u>Morgan Killian</u>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 339	946606
MTR CODE SITE NAME:	72109	N/A
SAMPLE DATE TIME (Hrs):	1-30-95	0930
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	2/2/95	2/2/95
DATE OF BTEX EXT. ANAL.:	1/31/95	2/1/95
TYPE DESCRIPTION:	VC	Dark Gray clay w/ Brown spots of clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	3.33	MG/KG	0.79681		2.51	20
TOLUENE	57.1	MG/KG	↓		↓	↓
ETHYL BENZENE	11.0	MG/KG	↓		↓	↓
TOTAL XYLENES	98.4	MG/KG	↓		↓	↓
TOTAL BTEX	170	MG/KG				
TPH (418.1)	1360	MG/KG			1.97	28
HEADSPACE PID	591	PPM				
PERCENT SOLIDS	81.5	%				

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

The Surrogate Recovery was at 92.7 % for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By: J.S.

Date: 2/22-95

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

* 95/02/02 12:25

* Sample identification
 * 746606

* Initial mass of sample, g
 * 1.970

* Volume of sample after extraction, ml
 * 26.000

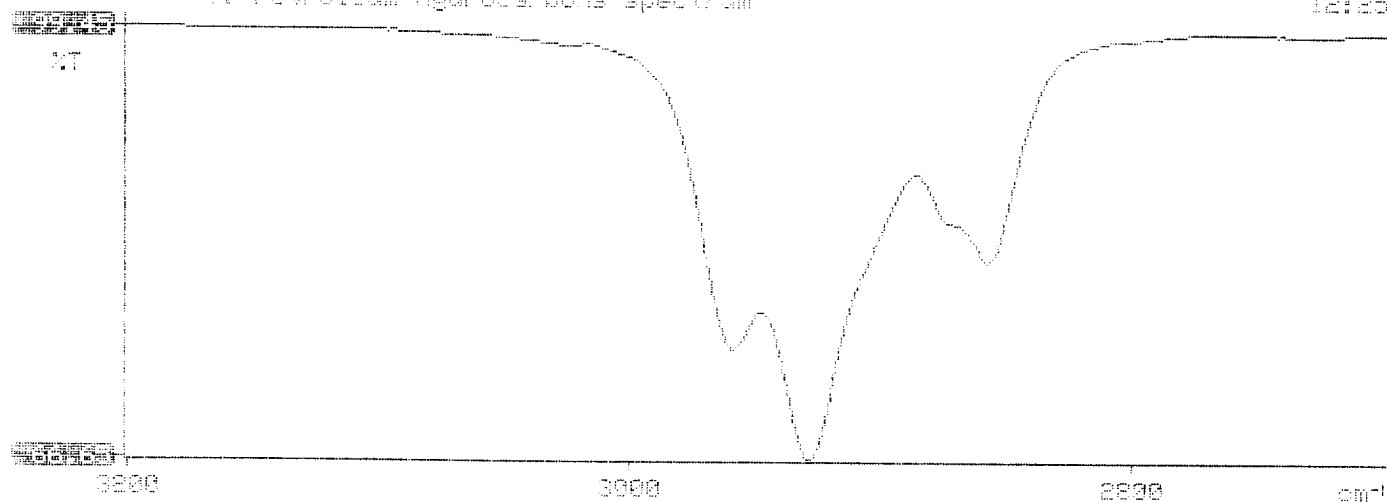
* Petroleum hydrocarbons, ppm
 * 1355.724

* Net absorbance of hydrocarbons (2930 cm-1)
 * 0.173

*
 *
 *

% Petroleum hydrocarbons spectrum

12:25



BTEX SOIL SAMPLE WORKSHEET

File	:	946606A	Date Printed	:	2/1/95
Soil Mass (g)	:	2.51	Multiplier (L/g)	:	0.00199
Extraction vol. (mL)	:	20	DF (Analytical)	:	400
Shot Volume (uL)	:	50	DF (Report)	:	0.79681

			Det. Limit
Benzene (ug/L)	:	4.18	Benzene (mg/Kg): 3.331 3.984
Toluene (ug/L)	:	71.61	Toluene (mg/Kg): 57.060 3.984
Ethylbenzene (ug/L)	:	13.84	Ethylbenzene (mg/Kg): 11.028 3.984
p & m-xylene (ug/L)	:	97.83	p & m-xylene (mg/Kg): 77.952 7.968
o-xylene (ug/L)	:	25.62	o-xylene (mg/Kg): 20.414 3.984
			Total xylenes (mg/Kg): 98.367 11.952
			Total BTEX (mg/Kg): 169.785

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\946606A
 Method : C:\LABQUEST\METHODS\9001.MET
 Sample ID : 946606,2.51G/50uL
 Acquired : Feb 01, 1995 14:31:21
 Printed : Feb 01, 1995 14:57:34
 User : Tony

Channel A Results

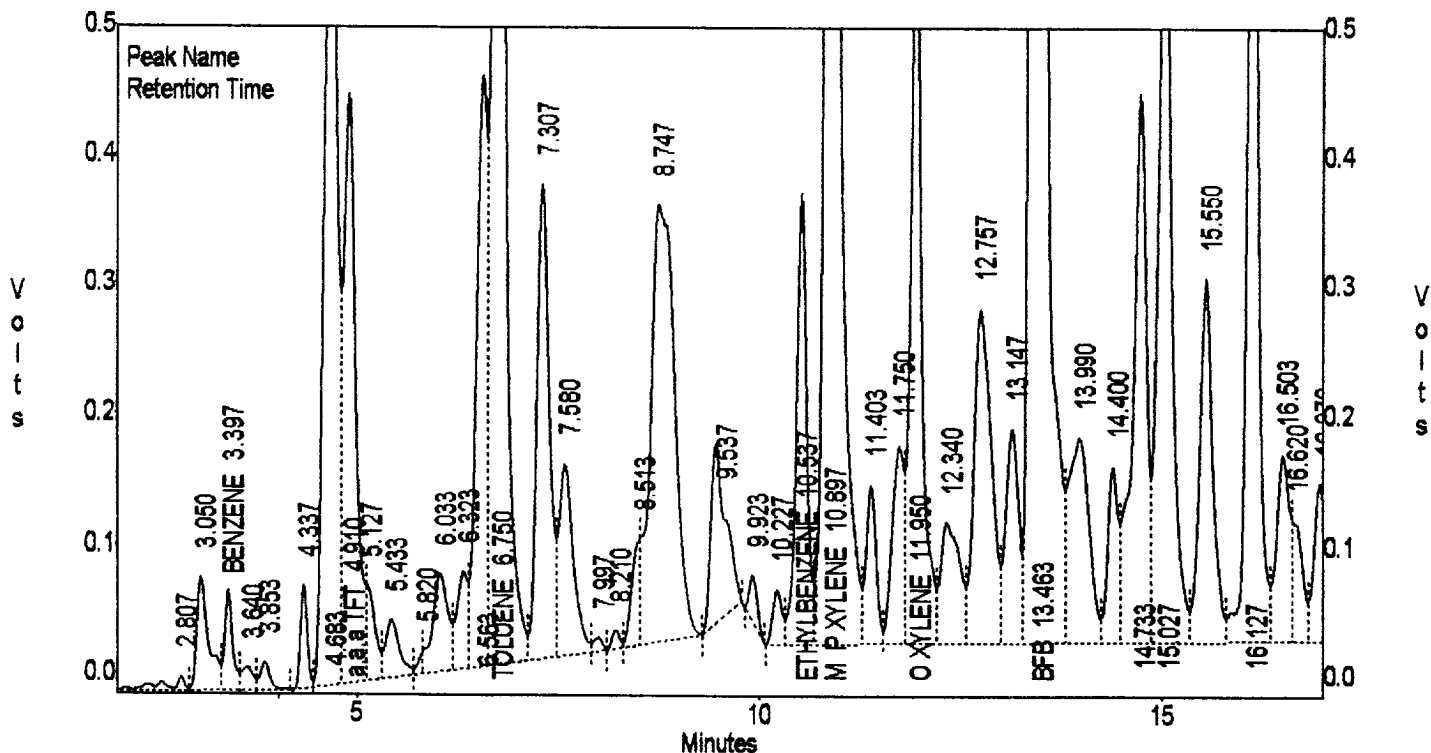
COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	3.397	538458	121531.74219	4.1801
a,a,a TFT	4.910	4805632	32055.68359	147.4870
TOLUENE	6.750	17697494	314479.71875	71.6132
ETHYLBENZENE	10.537	3121229	228573.29688	13.8431
M & P XYLENE	10.897	24629472	316768.40625	97.8331
O XYLENE	11.950	5646868	221087.17188	25.6243
BFB	13.463	88396256	944778.31250	92.6980

Totals :

144835408

453.2788

C:\LABQUEST\CHROM001\946606A - Channel A



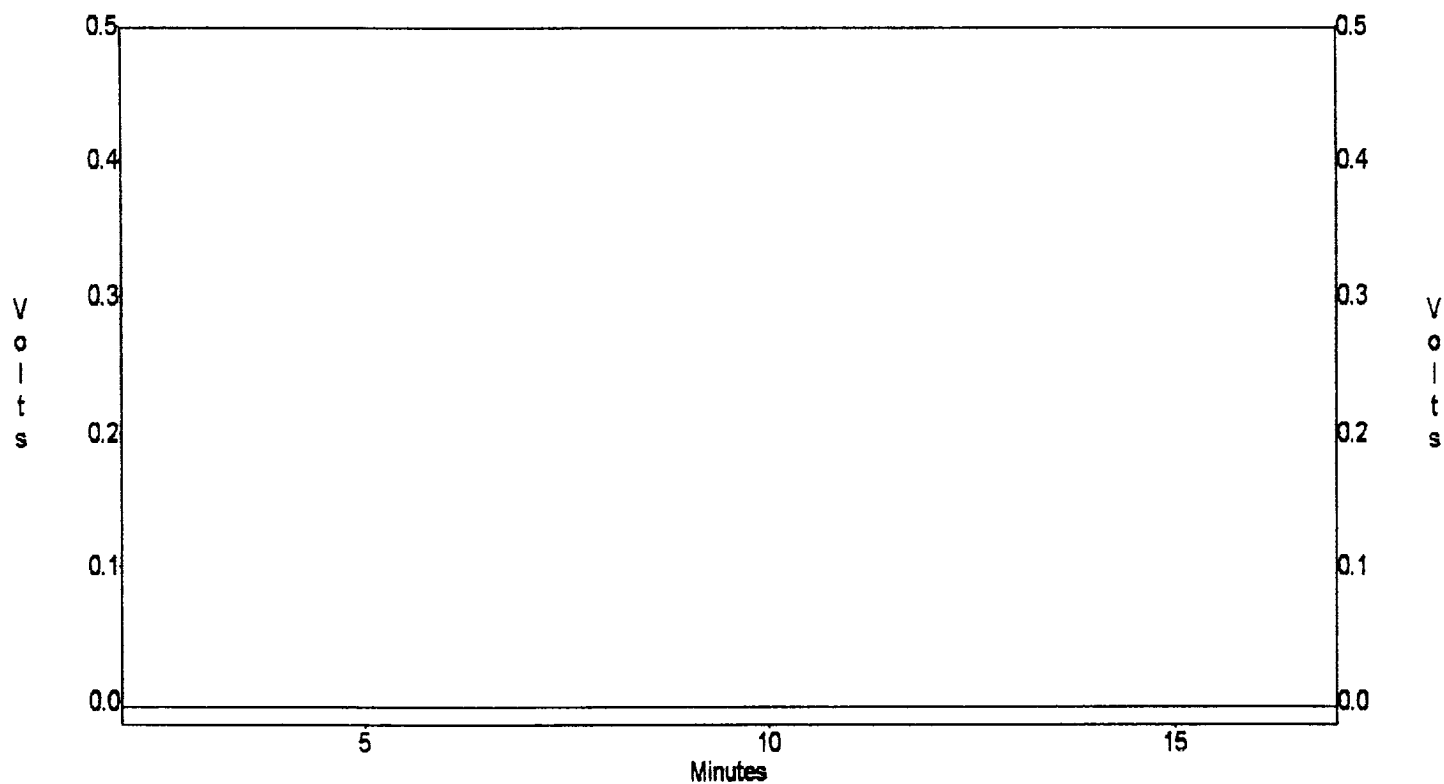
EL PASO NATURAL GAS**EPA METHOD 8020 - BTEX SOILS**

File : C:\LABQUEST\CHROM001\946606A
Method : C:\LABQUEST\METHODS\9001.MET
Sample ID : 946606,2.51G/50uL
Acquired : Feb 01, 1995 14:31:21
Printed : Feb 01, 1995 14:57:40
User : Tony

Channel B Results

COMPONENT	RET TIME	AREA	AVG RF	CONC (ug/L)
BENZENE	3.450	0	0.00000	0.0000
a,a,a TFT	4.950	0	0.00000	0.0000
TOLUENE	6.787	0	0.00000	0.0000
ETHYLBENZENE	10.480	0	0.00000	0.0000
M & P XYLENE	10.833	0	0.00000	0.0000
O XYLENE	11.900	0	0.00000	0.0000
BFB	13.400	0	0.00000	0.0000
Totals :		0		0.0000

C:\LABQUEST\CHROM001\946606A - Channel B



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 VIERSON #1 72109

Elevation _____
Borehole Location T30, R13, S19, A
GWL Depth _____
Logged By Jeff W. Kindley
Drilled By M. Donahue
Date/Time Started 09/27/95 0830
Date/Time Completed 09/27/95 1000

Well Logged By Jeff W. Kindley
Personnel On-Site Milligan, M. Donahue, J. Long
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 Units: PPM			Drilling Conditions & Blow Counts
							BZ	BH	S	
0				Backfill material to 4 feet						
5										
10	1	8-10	18 2.0	CL, GRAY CLAY, dry, hard, hydrocarbon odor				20/ 59		0845 46 blows per Foot
15	2	13-15	17 2.0	S.A.A				43/ 85		0850 31 blows per Foot
20	3	18-20	13 2.0	S.A.A. Boring terminated at 20 Feet.				11/ 9		0900 42 blows per Foot
25										
30										
35										
40										

Comments:

Sample collected from 18 to 20 feet (21K 90). Sample submitted
for analysis of BTEX / TPH. BH grouted to the surface

Geologist Signature

Jeffery Kindley



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JWK90	94 7556
MTR CODE SITE NAME:	72109	Vierson #1
SAMPLE DATE TIME (Hrs):	09-27-95	0900
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL:	9/28/95	
DATE OF BTEX EXT. ANAL:	9/28/95	9/28/95
TYPE DESCRIPTION:	VG	gray sand & clay

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	41	MG/KG			2.05	28
HEADSPACE PID	9	PPM				
PERCENT SOLIDS	93.5 97.8	%				

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

The Surrogate Recovery was at 97% for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By:

JF.

Date:

9-29-95

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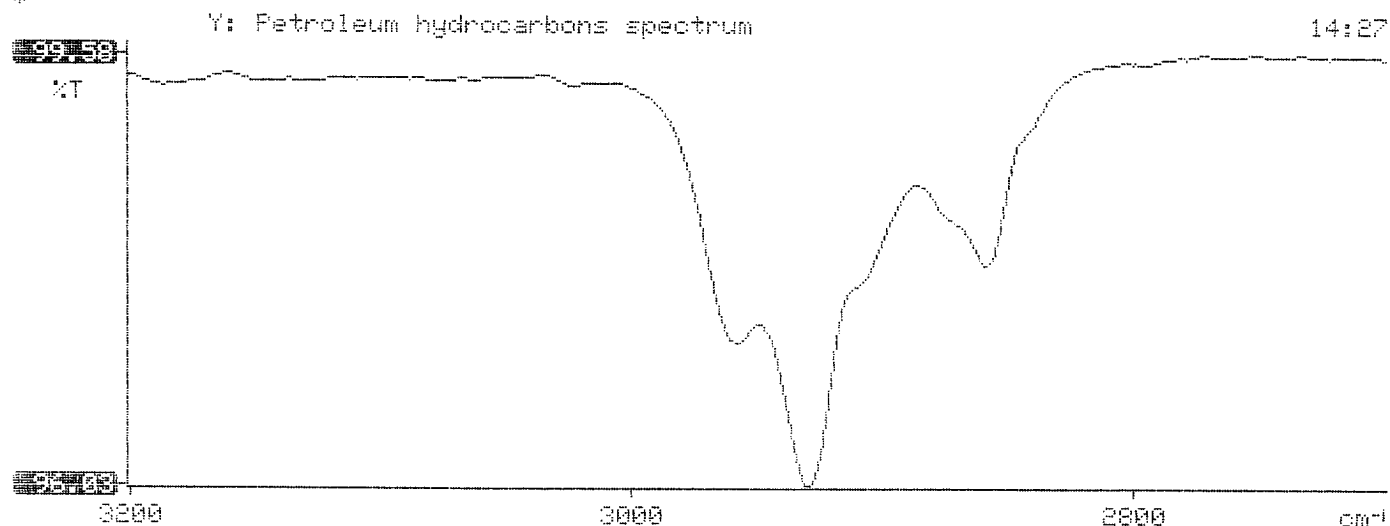
*****
*                               *
*      Test Method for         *
*      Oil and Grease and Petroleum Hydrocarbons      *
*      in Water and Soil      *
*                               *
*      Perkin-Elmer Model 1600 FT-IR                  *
*      Analysis Report                           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

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95/09/28  14:27
*
* Sample identification
947556
*
* Initial mass of sample, g
2.050
*
* Volume of sample after extraction, ml
28.000
*
* Petroleum hydrocarbons, ppm
40.693
* Net absorbance of hydrocarbons (2930 cm-1)
0.015
*
*
*

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BTEX SOIL SAMPLE WORKSHEET

File	:	947556	Date Printed	:	9/29/95
Soil Mass (g)	:	5.04	Multiplier (L/g)	:	0.00099
Extraction vol. (mL)	:	10	DF (Analytical)	:	200
Shot Volume (uL)	:	50	DF (Report)	:	0.19841

				Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000 0.496
Toluene (ug/L)	:	0.00	Toluene (mg/Kg):	0.000 0.496
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000 0.496
p & m-xylene (ug/L)	:	0.36	p & m-xylene (mg/Kg):	0.071 0.992
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000 0.496
			Total xylenes (mg/Kg):	0.071 1.488
			Total BTEX (mg/Kg):	0.071

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\092895-1.010
 Method : C:\LABQUEST\METHODS\9001.MET
 Sample ID : 947556,5.04G,50U
 Acquired : Sep 28, 1995 18:21:13
 Printed : Sep 28, 1995 18:47:37
 User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	4.917	0	0.0000
a,a,a TFT	6.660	4647750	100.6719
TOLUENE	8.737	0	0.0000
ETHYLBENZENE	12.710	0	0.0000
M & P XYLENE	13.077	119685	0.3612
O XYLENE	14.208	0	0.0000
BFB	15.750	70401424	97.1199

