Denny
DEPUTY OIL & GAS INSPECTOR

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

DEC 21 1995

RECEIVED

FLORANCE #91
Meter/Line ID - 75795

SITE DETAILS

Legals - Twn: 30 **Rng:** 09 **Sec:** 30 **Unit:** H
NMOCD Hazard Ranking: 20 **Land Type:** 2 - Federal
Operator: AMOCO PRODUCTION COMPANY **Pit Closure Date: 05/06/94**

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: 75795 Location: FLORANCE #91

Operator #: 0203 Operator Name: AMOCO P/L District: BLOOMFIELD

Coordinates: Letter: H Section 30 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____

Site Visit Date: 4.14.94 Run: 10 83

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)

- Inside Vulnerable Zone ☒
- Outside ☐

Land Type:

- BLM ☒
- State ☐
- Fee ☐
- Indian _____

Depth to Groundwater

- Less Than 50 Feet (20 points) ☐
- 50 Ft to 99 Ft (10 points) ☐
- 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? ☐ YES (20 points) ☒ NO (0 points)

Horizontal Distance to Surface Water Body

- Less Than 200 Ft (20 points) ☐
- 200 Ft to 1000 Ft (10 points) ☐
- Greater Than 1000 Ft (0 points) ☒

Name of Surface Water Body _____

(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

TOTAL HAZARD RANKING SCORE: 0 **POINTS**

REMARKS

Remarks : ONLY PIT ON LOCATION. PIT IS DRY. DO NOT KNOW WHY LOCATION IS IN THE WATER VULNERABLE ZONE.

(SP3190) 03/1

ORIGINAL PIT LOCATION

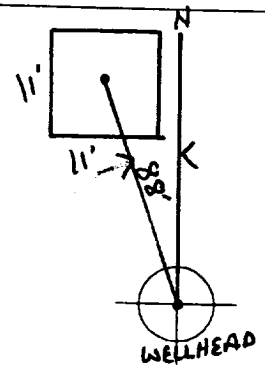
ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 341° Footage to Wellhead 88'

b) Degrees from North _____ Footage to Dogleg _____

Dogleg Name _____

c) Length : 11' Width : 11' Depth : 1'



341°

REMARKS

Remarks :

STARTED TAKING PICTURES AT 1:49 P.M.

END DUMP

Completed By:

Robert Thompson
Signature

4.14.94
Date

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 75795 Location: FLORANCE #91

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: ___ Section ___ Township: ___ Range: ___

Or Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: ___ Line Drip: ___ Other: _____

Site Assessment Date: _____ Area: 10 Run: 83

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 PEMADA CANYON

(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

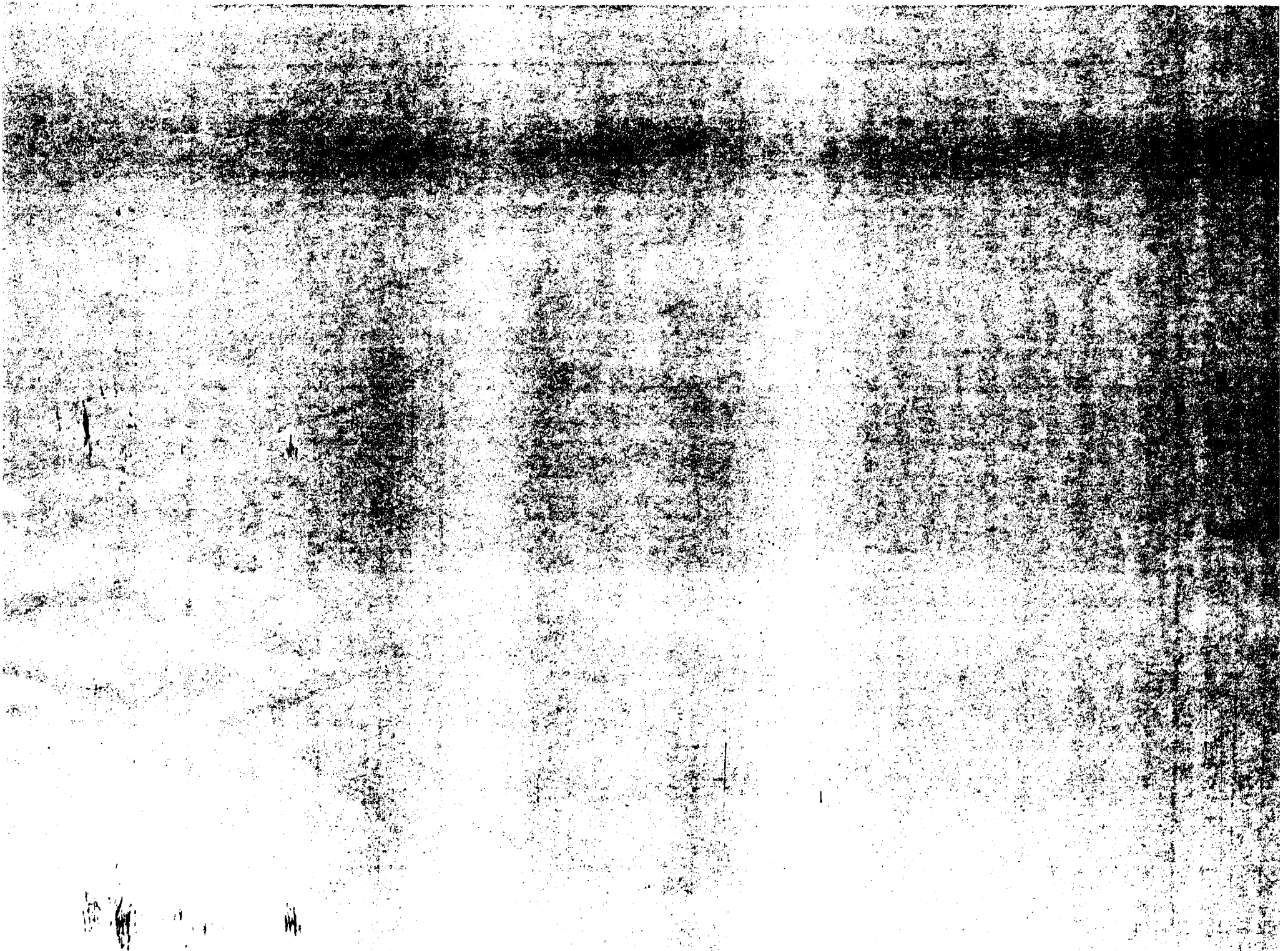
Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 20 **POINTS**

REMARKS

Remarks : _____



PHASE I
EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73795 Location: Florance #91

Coordinates: Letter: H Section 30 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Date Started : 5-6-94 Area: 10 Run: 83

OBSERVATIONS

Sample Number(s): 945095 KD46 _____ _____ _____

Sample Depth: 3' Feet

Final PID Reading 230 ppm PID Reading Depth 3' Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ (1) Approx. Cubic Yards 10

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☐ (3)

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: 5-6-94 Pit Closed By: BEI

REMARKS

Remarks : Excavated Pit to 3'; Hit Sandstone; Took PID Reading Closed Pit

Signature of Specialist: Kenny Dean

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD46	945095
MTR CODE | SITE NAME:	75795	N/A
SAMPLE DATE TIME (Hrs):	5/6/94	1500
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5/10/94	5/10/94
DATE OF BTEX EXT. | ANAL.:	5/13/94	5/15/94
TYPE | DESCRIPTION:	VC	Black Coarse Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	1.4	MG/KG				
TOLUENE	67	MG/KG				
ETHYL BENZENE	24	MG/KG				
TOTAL XYLENES	200	MG/KG				
TOTAL BTEX	292	MG/KG				
TPH (418.1)	4170	MG/KG			1.99	28
HEADSPACE PID	230	PPM				
PERCENT SOLIDS	87.7	%				

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

The Surrogate Recovery was at 246 % for this sample All QA/QC was acceptable.

Narrative:

Surrogate recovery was outside ATI QC limits due to matrix interference. ATI results attached.

DF = Dilution Factor Used

Approved By: John Fabri Date: 6/15/94

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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

****

94/05/10 13:18

Sample identification

C45095

Initial mass of sample, g

2.2290

Volume of sample after extraction, ml

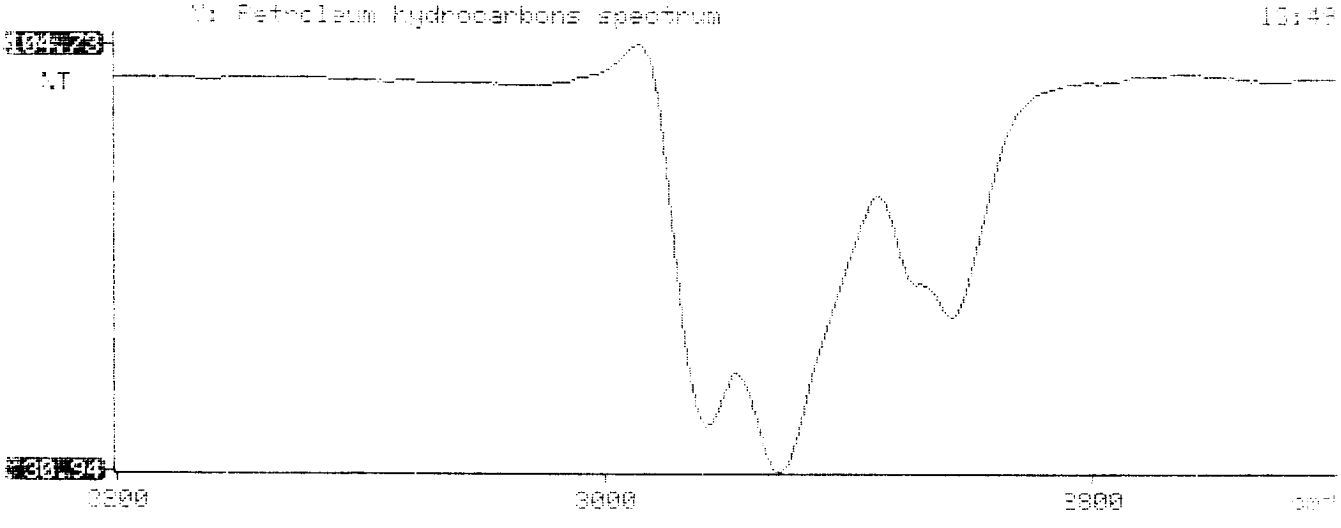
28.000

Petroleum hydrocarbons, ppm

4169.697

Net absorbance of hydrocarbons (2930 cm-1)

0.505



Analytical Technologies, Inc.

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

ATI I.D. **405343**

May 27, 1994

El Paso Natural Gas Company
770 W. Navajo
Farmington, NM 87401

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **05/11/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous** and **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.

Client instructed ATI (verbally) to perform a TRPH (418.1) analysis on field ID 945100 (ATI ID 405343-24).

Client instructed ATI (verbally) to continue analysis on field ID 940831 (ATI ID 405343-25) past hold time, as received.

Client was informed that field ID 945085 (ATI ID 405343-01) was received with headspace. Samples were analyzed "as is."

This report is being reissued to correct sample ID's.

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

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405343
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
17	945093	NON-AQ	05/06/94	05/13/94	05/15/94	20
18	945094	NON-AQ	05/06/94	05/13/94	05/15/94	1
19	945095	NON-AQ	05/09/94	05/13/94	05/15/94	25

PARAMETER	UNITS	17	18	19
BENZENE	MG/KG	<0.50	<0.025	1.4
TOLUENE	MG/KG	3.4	0.068	67
ETHYLBENZENE	MG/KG	5.6	<0.025	24
TOTAL XYLENES	MG/KG	55	0.042	200
SURROGATE:				
BROMOFLUOROBENZENE (%)		125*	103	246*

*OUTSIDE ATI CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EX. JRATION

Borehole # BH-1
Well #
Page of

PHILIP ENVIRONMENTAL
4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262 FAX (505) 326-2388

Project Name EPNG Pits
Project Number 14509 Phase 6000 77
Project Location Florance #91 75795

Elevation
Borehole Location
GWL Depth
Logged By CM Chance
Drilled By M. Donahue
Date/Time Started 5/22/95 - 1435
Date/Time Completed 5/22/95 - 1630

Well Logged By CM Chance
Personnel On-Site M. Donahue, K. Padilla, E. Rivera
Contractors On-Site
Client Personnel On-Site

Drilling Method 4¼ HSA
Air Monitoring Method PID, CGS

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: NDU BZ	Air Monitoring Units: NDU BH	Air Monitoring Units: NDU ½ #S	Drilling Conditions & Blow Counts
0				Backfill to 3'						
5	1	5-7	5"	Lt Br silty SAND, F-med sand, loose, sl moist, odor			0	8	4:59/5:50	-1446
10	2	10-12	5"	AA, odor			0	118	7:8/12	-1456
15	3	15-17	4"	AA, no odor			0	68	9:2/1:55	-1509
20	4	20-22	4"	AA			0	28	13/1:42	-1517
	5	22-24	3"	AA			0	15	07/16	-1526
25				TDB 23'						
30										
35										
40										

Comments: 23-24' sample submitted to lab (BTEX, TPH) CMC 18.
9 Bags (94#) Portland .5-50# bag bentonite

Geologist Signature

Phase II

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	cmc 18	946829
MTR CODE | SITE NAME:	75795	N/A
SAMPLE DATE | TIME (Hrs):	5-22-95	1526
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5-23-95	5-23-95
DATE OF BTEX EXT. | ANAL.:	5-24-95	5-25-95
TYPE | DESCRIPTION:	VG	Brown Course Sand

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)	96.4	MG/KG			2.08	28
HEADSPACE PID	16	PPM				
PERCENT SOLIDS	94.3	%				

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

The Surrogate Recovery was at 92 % for this sample All QA/QC was acceptable.

Narrative:

ATI Results attached

DF = Dilution Factor Used

Approved By: John Leach Date: 6/8/95

Test Method for

Oil and Grease and Petroleum Hydrocarbons

in Water and Soil

Perkin-Elmer Model 1600 FT-IR

Analysis Report

07/03/93 10:44

Sample identification

46629

Initial mass of sample, g

2.000

Volume of sample after extraction, ml

28.000

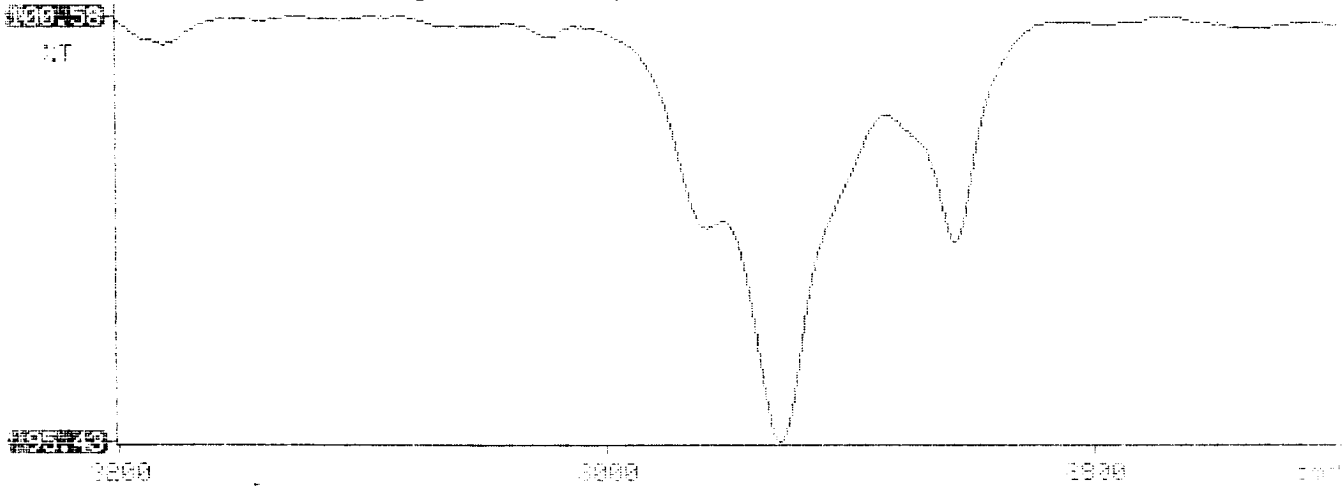
Petroleum hydrocarbons, ppm

76.412

Net absorbance of hydrocarbons (2930 cm-1)

0.022

Y: Petroleum hydrocarbons spectrum 10:44



Analytical Technologies, Inc.

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

ATI I.D. **505387**

June 2, 1995

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **05/24/95**, 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.

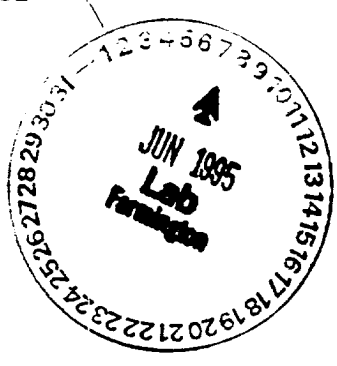
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 505387

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	946829	NON-AQ	05/22/95	05/24/95	05/25/95	1

PARAMETER	UNITS	07
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025

SURROGATE:

BROMOFLUOROBENZENE (%) 92