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 Analysis Bedrock

SUBMIT 1 COPY TO APPROPRIATE DISTRICT OFFICE AND 1 COPY TO SANTA FE OFFICE

PIT REMEDIATION AND CLOSURE REPORT

Operator: PNM Gas Services (Williams) **Telephone:** 324-3764

Address: 603 W. Elm Street Farmington, NM 87401

Facility or Well Name: Ute Indian A #2 Drip

Location: Unit N M Sec 36 T 32 N R 14 W County San Juan

Pit Type: Separator ☐ Dehydrator ☐ Other Drip

Land Type: BLM ☐ State ☐ Fee ☐ Other Ute Mountain Reservation

Pit Location: Pit dimensions: length 20 ' width 20 ' depth 3 '

(Attach diagram) Reference: wellhead ☑ other

Footage from reference: 210'

Direction from reference: 70 Degrees ☑ East North ☐ of ☐ West South ☑

Depth to Ground Water: (Vertical distance from contaminants to seasonal high water elevation of ground water)	Less than 50 feet 50 feet to 99 feet Greater than 100 feet	(20 points) (10 points) (0 points)	0
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or, less than 1,000 feet from all other water sources)	Yes No	(20 points) (0 points)	0
Distance to Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)	Less than 200 feet 200 feet to 1,000 feet Greater than 1,000 feet	(20 points) (10 points) (0 points)	0
	RANKING SCORE (TOTAL POINTS) :		0

RECEIVED
JAN 31 2003
OIL CON. DIV.
DIST. 3

Ute Indian A #2 Drip

Date Remediation Started: 09/14/1999 **Date Completed:** 09/14/1999

Remediation Method: Excavation X Approx. Cubic Yard 79

(Check all appropriate sections) Landfarmed X Amount Landfarmed (cubic yds) 69

Other 10 cu yds overburden

Remediation Location: Onsite _____ Offsite Tierra Environmental

(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 17' X 18' X 7' and transported soil to an offsite commercial landfarm.

*** Sandstone encountered at 7'. See attached risk analysis form.

Ground Water Encountered: No ☑ Yes ☐ Depth _____

Final Pit Closure Sampling:

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

Sample Location 5 pt composite-bottom

Sample depth 7'

Sample date 09/14/1999 Sample time 1:00:00 PM

Sample Results

Benzene (ppm) 9.4

Total BTEX (ppm) 91.2 ***

Field headspace (ppm) _____

TPH (ppm) 26.00 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**

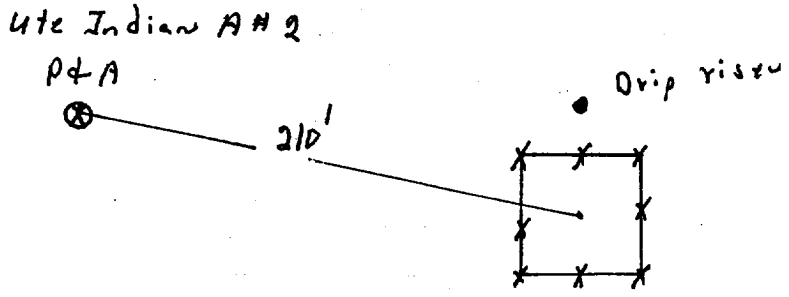
SIGNATURE Maureen Gannon

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

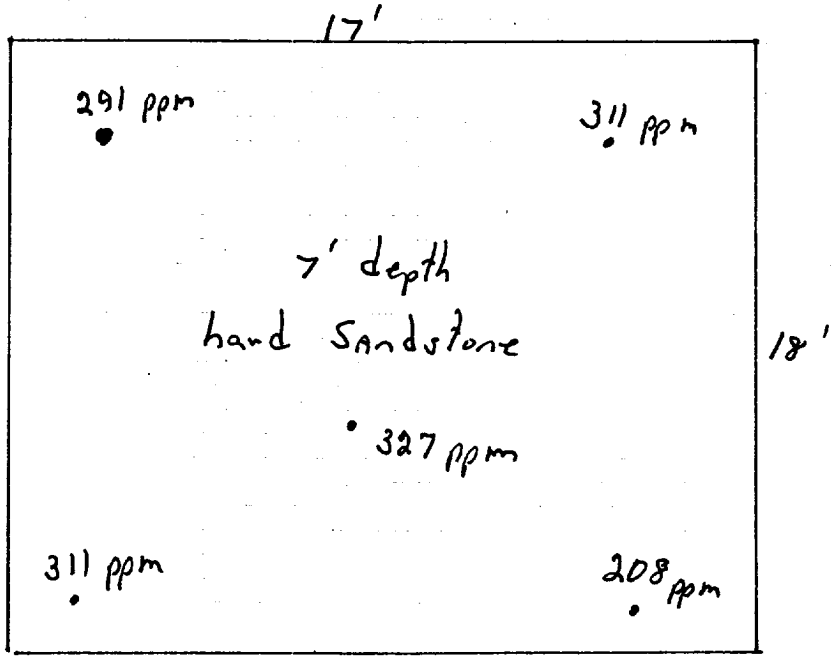
Ute Indian A-2 Drip
WFS
Sec 36, 32 N, 14 W, M

9-14-99

Site diagram:



End of excavation:



Field Headspace (walls): 15.5

OFF: (505) 325-5667

ON SITE TECHNOLOGIES, LTD.

LAB: (505) 325-1556

On Site Technologies, LTD.

Date: *22-Sep-99*

CLIENT: PNM - Public Service Company of NM
Project: Ute Indian A-2 Drip
Lab Order: 9909052

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.

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OFF: (505) 325-5667

ON SITE TECHNOLOGIES, LTD.

LAB: (505) 325-1556

ANALYTICAL REPORT

Date: *22-Sep-99*

Client:	PNM - Public Service Company of NM	**Client Sample Info:**	Ute Indian A-2 Drip
Work Order:	9909052	**Client Sample ID:**	9909141300; Bottom @ 7ft
Lab ID:	9909052-01A **Matrix:** SOIL	**Collection Date:**	9/14/99 1:00:00 PM
Project:	Ute Indian A-2 Drip	**COC Record:**	7757

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		**SW8015B**				Analyst: **HR**
T/R Hydrocarbons: C10-C28	26	25		mg/Kg	1	9/16/99
AROMATIC VOLATILES BY GC/PID		**SW8021B**				Analyst: **DM**
Benzene	9400	1000		µg/Kg	1000	9/15/99
Toluene	42000	2000		µg/Kg	1000	9/15/99
Ethylbenzene	4600	1000		µg/Kg	1000	9/15/99
m,p-Xylene	29000	2000		µg/Kg	1000	9/15/99
o-Xylene	6200	1000		µg/Kg	1000	9/15/99

91200
91.2 ppm

Qualifiers:

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

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OFF: (505) 325-5667

ON SITE TECHNOLOGIES, LTD.

LAB: (505) 325-1556

ANALYTICAL REPORT

Date: *22-Sep-99*

Client:	PNM - Public Service Company of NM	**Client Sample Info:**	Ute Indian A-2 Drip
Work Order:	9909052	**Client Sample ID:**	9909141305; Walls @ 3ft
Lab ID:	9909052-02A **Matrix:** SOIL	**Collection Date:**	9/14/99 1:05:00 PM
Project:	Ute Indian A-2 Drip	**COC Record:**	7757

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		**SW8015B**				Analyst: **HR**
T/R Hydrocarbons: C10-C28	ND	25		mg/Kg	1	9/15/99

Qualifiers:

PQL - Practical Quantitation Limit

ND - Not Detected at Practical Quantitation Limit

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

Surr: - Surrogate

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Environmental Services

Well Name:	Ute Indian A #2 Drip
Well Legals:	Sec 36, T32N, R14W, Unit N
Pit Type:	Drip
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 Ute Indian A #2 Drip well site using a limited risk analysis based on the following conditions:

1. Groundwater is estimated to be at a depth of 482 feet based upon the elevation of the site and the elevation of the nearest "listed" or "named" wash. (Reference: Purgatory Canyon Peak, NM series 7.5 minute topographic map.)

2. PNM excavated 79 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 7 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 Ute Indian A #2 Drip well site poses minimal threat to groundwater, human health and the environment based upon our past experience in excavating over 1,000 pits.