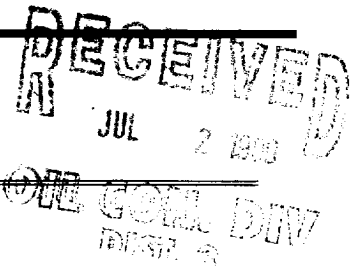


**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Denny L. Faust
DEPUTY OIL & GAS INSPECTOR

**STATE COM AK #35E
Meter/Line ID - 93291**

DEC 21 1993



SITE DETAILS

Legals - Twn: 32

Rng: 12

Sec: 36

Unit: P

NMOCD Hazard Ranking: 10

Land Type: 1 - State

Operator: CONOCO - MESA OPERATING L

Pit Closure Date: 05/03/94

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:

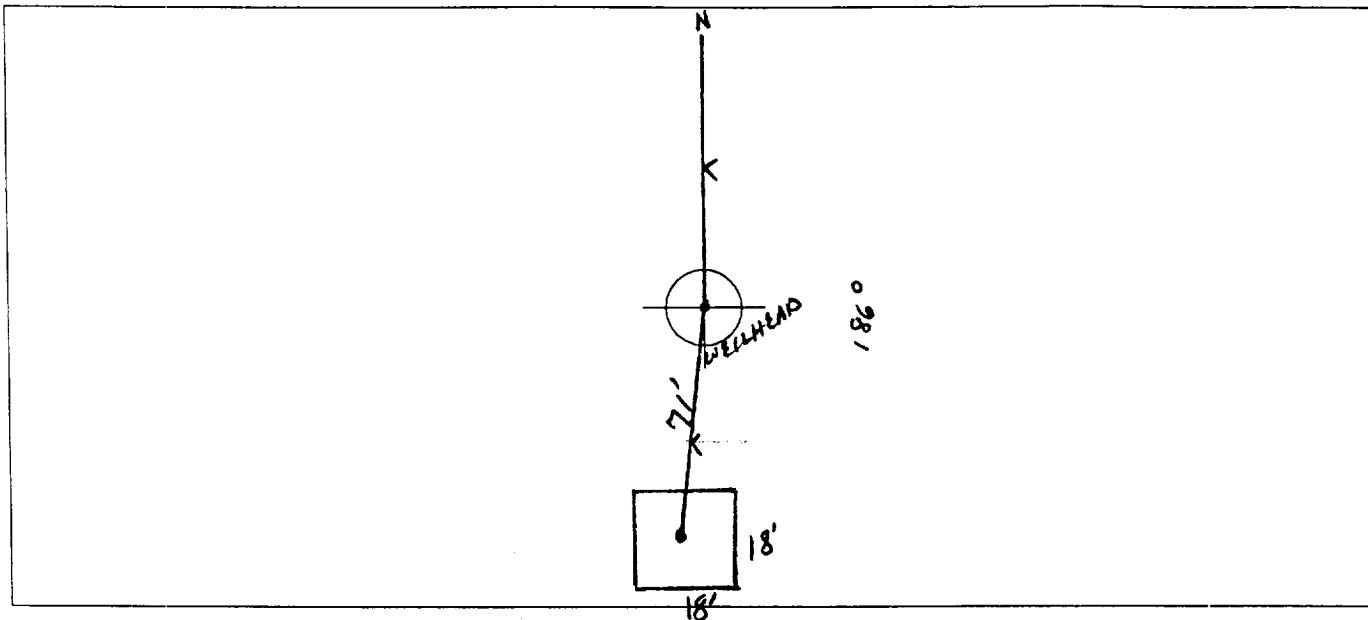
- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All 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	<p>Meter: <u>93291</u> Location: <u>STATE COM AK #35E</u></p> <p>Operator #: <u>0286</u> Operator Name: <u>CONOCO</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>P</u> Section <u>36</u> Township: <u>32</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <u>X</u> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>3.30.94</u> Run: <u>02</u> <u>73</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: Inside _____ Land Type: BLM <input type="checkbox"/> (From NMOCD Vulnerable _____ State <input checked="" type="checkbox"/> Maps) Zone <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Outside <input type="checkbox"/> Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/></p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/></p> <p>Wellhead Protection Area :</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"/> YES (20 points) <input checked="" type="checkbox"/> NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/></p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/></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>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>TWO PITS ON LOCATION. WILL CLOSE ONLY ONE PIT IS DRY.</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 186° Footage to Wellhead 71'
 b) Degrees from North _____ Footage to Dogleg _____
 Dogleg Name _____
 c) Length : 18' Width : 18' Depth : 3'



REMARKS :

STARTED TAKING PICTURES AT 3:31 P.M.
END DUMP

Completed By:

Edith Thompson
 Signature

3.30.94

Date

RT

GENERAL

SITE ASSESSMENT

REMARKS

PHASE I EXCAVATION

FIELD T REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>93291</u> Location: <u>STATE Com AK #35 E</u></p> <p>Coordinates: Letter: <u>P</u> Section <u>36</u> Township: <u>32</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>5/3/94</u> Area: <u>02</u> Run: <u>73</u></p>
FIELD OBSERVATIONS	<p style="text-align: center;">945063</p> <p>Sample Number(s): <u>4P14</u></p> <p>Sample Depth: <u>10</u> Feet</p> <p>Final PID Reading <u>482 ppm</u> PID Reading Depth <u>10</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>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>40</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>5/3/94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Started Remediating pit, took it to 10', hit hard shell layer took PID Reading it was 482 ppm at 76" closed pit. To hard to dig.</u></p>
	<p>Signature of Specialist: <u>James J. Fournier</u></p>

FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	SP14	945063
MTR CODE SITE NAME:	93291	N/A
SAMPLE DATE TIME (Hrs):	5/3/94	1500
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL:	5/5/94	5/5/94
DATE OF BTEX EXT. ANAL:	5/9/94	5/13/94
TYPE DESCRIPTION:	VC	Brown Clay & Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.62	MG/KG	25			
TOLUENE	1.8	MG/KG	25			
ETHYL BENZENE	1.4	MG/KG	25			
TOTAL XYLENES	24	MG/KG	25			
TOTAL BTEX	28	MG/KG				
TPH (418.1)	1338 1340	MG/KG			2.01	28
HEADSPACE PID	482	PPM				
PERCENT SOLIDS	88.8	%				

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

The Surrogate Recovery was at 48 % for this sample All QA/QC was acceptable.

Narrative:

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

DF = Dilution Factor Used

Approved By:

John Lard

Date:

7/14/94

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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
*****

```

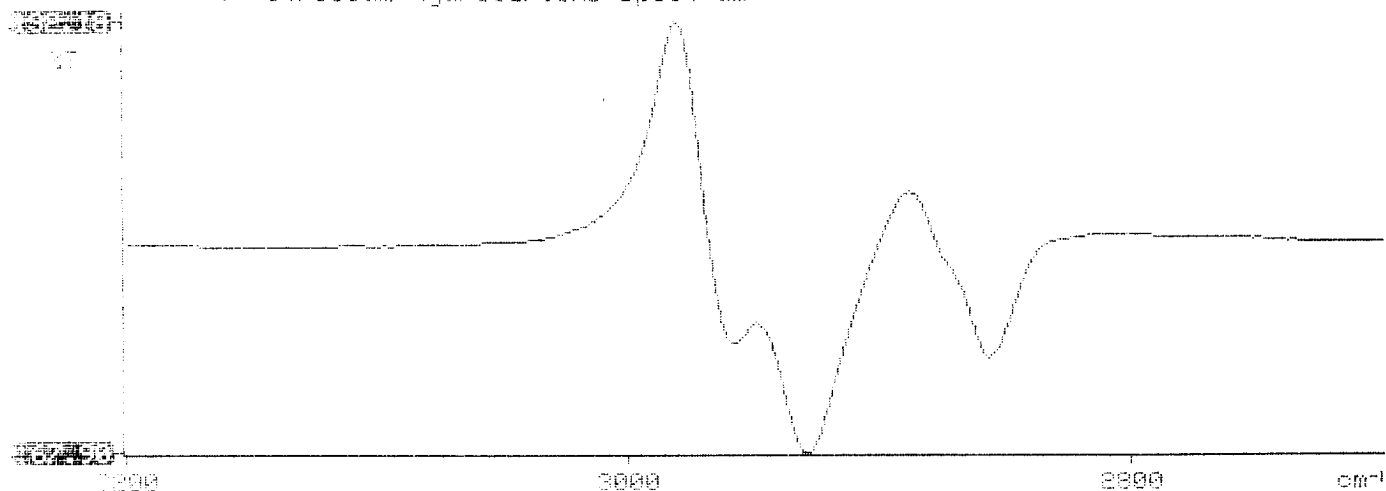
```

# 04/18/87 13:11
#
# Sample Identification
# 45043
#
# Initial mass of sample, g
# 0.010
#
# Volume of sample after extraction, ml
# 35.000
#
# Petroleum hydrocarbons, ppm
# 1315.790
#
# 1-HI absorbance of hydrocarbons (2930 cm-1)
# 0.145
#
#
#

```

1: Petroleum hydrocarbons spectrum

13:11





Analytical **Technologies**, Inc.

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

ATI I.D. 405331

May 19, 1994

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

Project Name/Number: PIT PROJECT 24324

Attention: John Lambdin

On **05/06/94**, 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.

Upon arrival, it was noted that sample 945055 contained headspace. The client was notified and the sample was analyzed "as is."

The laboratory was instructed to correct the sampling data for sample 945075 to 05/04/94.

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

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.: 405331
 PROJECT # : 24324
 PROJECT NAME : PIT PROJECT

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
14	945062	NON-AQ	05/03/94	05/09/94	05/13/94	25
15	945063	NON-AQ	05/03/94	05/09/94	05/13/94	25
16	945064	NON-AQ	05/03/94	05/09/94	05/13/94	5
PARAMETER			UNITS	14	15	16
BENZENE			MG/KG	2.4	<0.62	<0.12
TOLUENE			MG/KG	81	1.8	<0.12
ETHYLBENZENE			MG/KG	12	1.4	0.86
TOTAL XYLENES			MG/KG	160	24	9.1

SURROGATE:

BROMOFLUOROBENZENE (%)	37*	48*	73
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*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

PHASE II

RECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well # _____
Page 1 of 1

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 State Com AK#35E 93291

Elevation _____
Borehole Location QP - S36 - T32 - R12
GWL Depth _____
Logged By CM CHANCE
Drilled By K Padilla
Date/Time Started 10/9/95 - 0918
Date/Time Completed 10/9/95 - 1020

Well Logged By CM Chance
Personnel On-Site K Padilla, 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 Units: PPM			Drilling Conditions & Blow Counts
							BZ	BH	HS	
0				Backfill to 10'						
5										
10										
15	1	15-17	12"	Gray mottled CLAY, stiff, non-plastic, dry			0	3	70 7	-09284
20	2	20-22	20"	Gray sandy CLAY, w/ sand, stiff, low plastic, dry			0	24	0 1	-0939
25				TDB 22'						
30										
35										
40										

Comments: CMC138 (20-22') sent to lab (RTAX, 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 138	947613
MTR CODE SITE NAME:	93291	State Com AK #35E
SAMPLE DATE TIME (Hrs):	10-09-95	0939
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. ANAL.:	10/11/95	
DATE OF BTEX EXT. ANAL.:	10/10/95	10/10/95
TYPE DESCRIPTION:	VG	Light Green 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)	< 10	MG/KG			2.05	28
HEADSPACE PID	1	PPM				
PERCENT SOLIDS	88.1	%				

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

The Surrogate Recovery was at 96% for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By: JSP

Date: 10-13-95

```

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

```

15/10/11 14:12

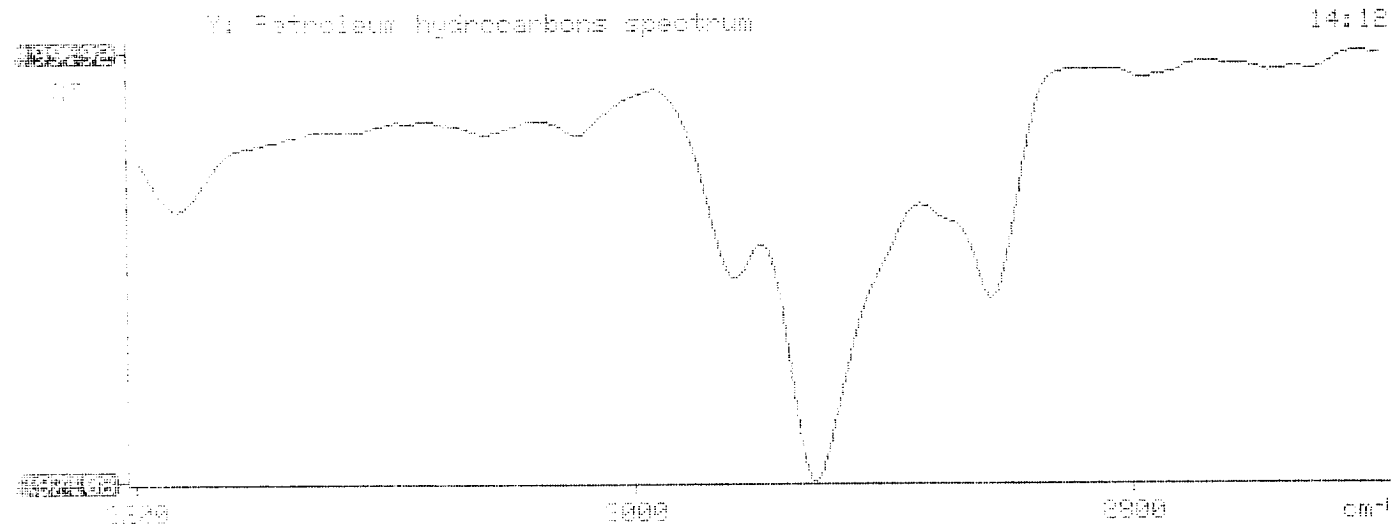
Sample Identification
#47713

Initial mass of sample, g
0.190

Volume of sample after extraction, ml
23.000

Petroleum hydrocarbons, ppm
8.409

Net absorbance of hydrocarbons (2930 cm^{-1})
0.011



BTEX SOIL SAMPLE WORKSHEET

File	:	947613	Date Printed	:	10/11/95
Soil Mass (g)	:	4.95	Multiplier (L/g)	:	0.00101
Extraction vol. (mL)	:	10	DF (Analytical)	:	200
Shot Volume (uL)	:	50	DF (Report)	:	0.20202

				Det. Limit
Benzene (ug/L)	:	0.18	Benzene (mg/Kg):	0.036 0.505
Toluene (ug/L)	:	0.25	Toluene (mg/Kg):	0.051 0.505
Ethylbenzene (ug/L)	:	0.12	Ethylbenzene (mg/Kg):	0.024 0.505
p & m-xylene (ug/L)	:	0.40	p & m-xylene (mg/Kg):	0.081 1.010
o-xylene (ug/L)	:	0.18	o-xylene (mg/Kg):	0.036 0.505
			Total xylenes (mg/Kg):	0.117 1.515
			Total BTEX (mg/Kg):	0.228

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\101095-0.015
 Method : C:\LABQUEST\METHODS\0-092095.MET
 Sample ID : 947613,4.95G,50U
 Acquired : Oct 10, 1995 21:15:33
 Printed : Oct 10, 1995 21:45:59
 User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.187	67516	0.1804
a,a,a-TFT	10.547	9118705	104.2307
TOLUENE	12.970	89846	0.2469
ETHYLBENZENE	17.313	40316	0.1198
M,P-XYLENES	17.693	159967	0.3987
O-XYLENE	18.863	59942	0.1831
BFB	19.867	52100856	95.5837

