

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Risk - bedrock
outside
TPH
RECEIVED
NOV - 2 1995

Rita #1
Meter/Line ID - 94566

SITE DETAILS

Legals - Twn: 23N
NMOCD Hazard Ranking: 0
Operator: Merrion Oil & Gas

Rng: 6W

Sec: 9

Unit: E

Land Type: Navajo

Pit Closure Date: 11/28/95

OIL CON. DIV.
DIST. 3

RATIONALE FOR RISK-BASED CLOSURE:

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines. The primary source, discharge to the pit, has been removed. The pit has been closed for over three years.

Sandstone was encountered in the test pit at a depth of ten feet. The excavation was terminated and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Contaminated soil was removed and transported to an approved landfarm for disposal. The excavation was backfilled with clean soil and graded in a manner to direct surface runoff away from the excavated area. Laboratory analysis indicated a total BTEX concentration of 34.4 mg/kg and a TPH concentration of 6,530 mg/kg.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over three years.
- Bedrock was encountered at 10 feet below ground surface making remediation impracticable.
- The excavation was backfilled with clean soil and graded to direct surface runoff away from the excavation area.
- All source material has been removed from the ground surface, eliminating potential direct contact with livestock and the public.
- Groundwater was not encountered in the initial excavation. In addition, the estimated depth to groundwater is greater than 100 feet; therefore, impact to groundwater is unlikely.
- Soil samples collected from the bottom of the initial excavation were below NMOCD standards for BTEX.
- There are no potential receptors located within 1,000 feet of the site.
- Residual hydrocarbons in the soil at the bottom of the excavation will degrade by natural attenuation with minimal risk to the environment.

ATTACHMENTS

Revised Field Pit Assessment Form
Field Pit Remediation/Closure Form

Field Pit Assessment Form
Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94566</u> Location: <u>RITA #1</u></p> <p>Operator #: _____ Operator Name: <u>MERRON OIL & GAS</u> P/L District: _____</p> <p>Coordinates: Letter: <u>E</u> Section <u>9</u> Township: <u>23</u> Range: <u>6</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>5.15.98</u> Area: _____ Run: _____</p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p style="margin-left: 150px;">Inside <input type="checkbox"/> (1)</p> <p style="margin-left: 150px;">Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type:</p> <p style="margin-left: 100px;">BLM <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 100px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 100px;">Indian <u>NAVAJO</u></p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</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?</p> <p style="text-align: center;"><input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only)</p> <p style="margin-left: 150px;"><input checked="" type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS IN A REMOTE AREA ON TOP OF A MESA.</u></p>

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 94-566 Location: Rita #7
 Operator #: 5997 Operator Name: Merrion Oil & Gas Corp P/L District: Ballard
 Coordinates: Letter: E Section 9 Township: 23 Range: 6
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
 Site Assessment Date: 8/1/94 Area: 07 Run: 61-0/4 F1

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD Maps)

Inside ☐ (1)
 Outside ☒ (2)

Land Type:

BLM ☐ (1)
 State ☐ (2)
 Fee ☐ (3)
 Indian Navajo

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 Haynes 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

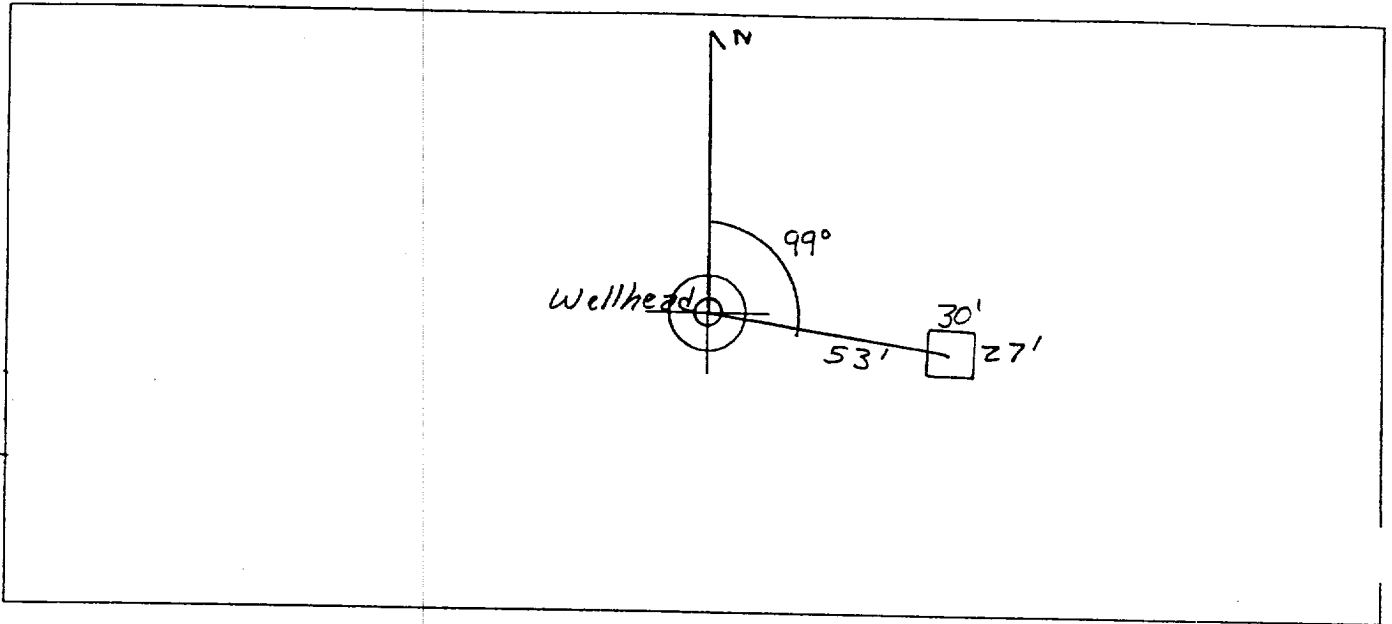
Remarks : Redline Book - Not Given Vulnerable Zone Type - Outside
Three pits on site, location drip pit has liquid in it, will close one pit.

PUSH IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 99° Footage from Wellhead 53'
b) Length : 30' Width : 27' Depth : 4'



REMARKS

Remarks :

Pictures @ 10:38 (19-22, Roll 17) (1/29/94)

Dump Truck

Site has a low flow meter.

Completed By:

Sarah Kelly
Signature

8/1/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>94566</u> Location: <u>Rita #1</u> Coordinates: Letter: <u>E</u> Section <u>9</u> Township: <u>23</u> Range: <u>6</u> Or Latitude _____ Longitude _____ Date Started : <u>11/27/95</u> Run: <u>02</u> <u>61</u>
FIELD OBSERVATIONS	Sample Number(s): <u>JK147</u> Sample Depth: <u>10'</u> Feet Final PID Reading <u>110.2</u> PID Reading Depth <u>10'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div> Excavation Onsite Bioremediation Backfill Pit Without Excavation </div> <div> <input checked="" type="checkbox"/> Approx. Cubic Yards <u>234</u> ^{12/1/95} <input checked="" type="checkbox"/> <u>ALTON James said it was OK</u> <u>To close Pit on 11/28/95</u> <input type="checkbox"/> </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div> Envirotech <input checked="" type="checkbox"/> Other Facility <input type="checkbox"/> </div> <div> <input type="checkbox"/> Tierra Name: _____ </div> </div> Pit Closure Date: <u>11/28/95</u> Pit Closed By: <u>Phil</u>
REMARKS	Remarks : <u>Pit Pit Readings (W-5.7)(S-25.3)(E-12.3)(N-2.4)</u> <u>More than 100' From Elphemeral Stream</u> <u>No Fence - No FILL on site</u> <u>Hit Rock at 10'</u>
	Signature of Specialist: <u>Joe K. King</u>

PHASE I

FIELD PIT REMEDIATION/CLOSURE FORM/PHASE II

RUB

12/12/95

GENERAL

Meter: 94566 Location: Rita #1

Coordinates: Letter: E Section 9 Township: 23 Range: 6

Or Latitude _____ Longitude _____

Date Started : 11/27/95 Area: 07 Run: 61

OBSERVATIONS

Sample Number(s): JK 147

Sample Depth: 10' Feet

Final PID Reading 110.7 PID Reading Depth 10' Feet
Yes No

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

Final Dimensions: Length 27 Width 27 Depth 10

CLOSURE

Remediation Method :

Excavation

☒ (1) Approx. Cubic Yards 234 LT 12/1/95

Onsite Bioremediation

☒ (2) Alton James said it was OK To Close Pit on 11/28/95

Backfill Pit Without Excavation

☐ (3)

Overburden Cubic Yards 20 yds

Soil Disposition:

Envirotech

☐ (1)

☐ (3) Tierra

Other Facility

☐ (2)

Name: _____

Pit Closure Date: 11/28/95

Pit Closed By: Philip

REMARKS

Remarks : Pit Pid Readings (W-5.7)(S-25.3)(E-12.3)(W-2.4)
more than 100' From Effluent Stream
No Fence No EPNB on site
Hit Rock at 10'

Signature of Specialist: James K. Kirby



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JK147	947808
MTR CODE SITE NAME:	94566	Kita #1
SAMPLE DATE TIME (Hrs):	11-27-95	1200
PROJECT:	Phase I Navajo Phase III	RLB 12/5/95
DATE OF TPH EXT. ANAL.:	11/30/95	
DATE OF BTEX EXT. ANAL.:	11/28/95	11/29/95
TYPE DESCRIPTION:	VG	fine sand

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	5.4	MG/KG				
TOTAL XYLENES	29.0	MG/KG				
TOTAL BTEX	34.4	MG/KG				
TPH (418.1)	6530	MG/KG			0.92	28
HEADSPACE PID	110.7	PPM				
PERCENT SOLIDS	96.0	%				

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

The Surrogate Recovery was at
Narrative:

101%

for this sample All QA/QC was acceptable.

DF = Dilution Factor Used

Approved By:

Date:

12/4/95

BTEX SOIL SAMPLE WORKSHEET

File	:	947808	Date Printed	:	11/30/95
Soil Mass (g)	:	5.08	Multiplier (L/g)	:	0.00098
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical):		400
Shot Volume (uL)	:	25	CAL FACTOR (Report):		0.39370

		DILUTION FACTOR:	2	Det. Limit
Benzene (ug/L)	:	0.30	Benzene (mg/Kg):	0.118 0.984
Toluene (ug/L)	:	0.00	Toluene (mg/Kg):	0.000 0.984
Ethylbenzene (ug/L)	:	13.91	Ethylbenzene (mg/Kg):	5.476 0.984
p & m-xylene (ug/L)	:	61.02	p & m-xylene (mg/Kg):	24.024 1.969
o-xylene (ug/L)	:	13.43	o-xylene (mg/Kg):	5.287 0.984
			Total xylenes (mg/Kg):	29.311 2.953
			Total BTEX (mg/Kg):	34.906



Wang Dits

CHAIN OF CUSTODY RECORD

[illegible]

