

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Canyon Largo Unit 305
Meter/Line ID - 93918

Deavor - 11/2/99
outside BTEX - TPH

RECEIVED
NOV - 2 1999

OIL CON. DIV.
DIST. 3

SITE DETAILS

Legals - Twn: 24N Rng: 6
NMOCD Hazard Ranking: 0
Operator: Merrion Oil & Gas

Sec: 11 Unit: A
Land Type: BLM
Pit Closure Date: 8/30/94

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 four years.

Sandstone was encountered in the test pit at a depth of four feet. The excavation was terminated and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit. The test pit was then backfilled and the pit area graded in a manner to direct surface runoff from the pit area. Headspace analysis indicated an organic vapor content of 126 mg/kg; laboratory analysis indicated a TPH concentration of 25,700 mg/kg.

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

- The primary source, discharge to the pit, has been removed for over four years.
- Bedrock was encountered at four feet below ground surface making remediation impracticable.
- The test pit was backfilled with clean soil and the former pit area graded to direct surface runoff away from the former pit.
- Source material has been removed from the ground surface, eliminating potential direct contact with livestock and the public.
- Groundwater was not encountered in the test excavation. In addition, the estimated depth to groundwater is greater than 100 feet; therefore, impact to groundwater is unlikely.
- The site is greater than 1,000 feet from potential surface water receptors and water supply wells.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.

ATTACHMENT

Revised Field Pit Assessment Form
Field Pit Remediation/Closure Form

Field Pit Assessment Form
Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 93918 Location: Canyon Largo Unit 305
 Operator #: _____ Operator Name: _____ P/L District: _____
 Coordinates: Letter: A Section 11 Township: 24 Range: 6
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 4/9/98 Area: _____ Run: _____

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

Land Type:

☐ (1)

☒ (2)

BLM

State

Fee

Indian

☒ (1)

☐ (2)

☐ (3)

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 _____

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

Distance to Nearest Ephemeral Stream

☐ (1) < 100' (Navajo Pits Only)

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. No wells shown on map in Ltr A. Site is >100' vertical from center of Largo Wash based on most conservative location.

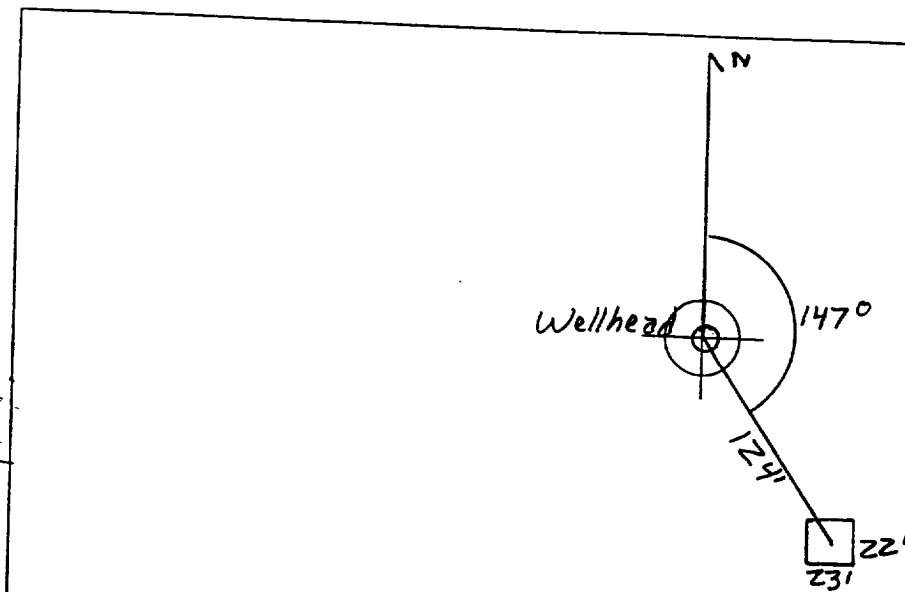
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>93-918</u> Location: <u>Canyon Largo Unit 305</u> Operator #: <u>5997</u> Operator Name: <u>Merrion Oil & Gas</u> P/L District: <u>Ballard</u> Coordinates: Letter: <u>A</u> Section <u>11</u> Township: <u>24</u> Range: <u>6</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____ Site Assessment Date: <u>07/08/94</u> Area: <u>07</u> Run: <u>72</u></p>								
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Land Type:</p> <table border="0"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input checked="" 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</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Largo Wash</u> (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) 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>10</u> POINTS</p>	BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian	_____
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian	_____								
REMARKS	<p>Remarks : <u>Redline Book - Outside</u> <u>Vulnerable Zone Type - Outside</u> <u>Three pits on site, location drip pit has liquid in it,</u> <u>Will close one pit.</u></p> <p style="text-align: right;"><u>PUSH IN</u></p>								

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 147° Footage from Wellhead 124'
b) Length : 23' Width : 22' Depth : 2'



REMARKS

Remarks :

Pictures @ 10:26 (1-4, Roll 1)

Dump Truck

Notified Ballard Dist. of liquid in pit (7/11/94)

Completed By:

Sam Helly

Signature

7/8/94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 93918 Location: Canyon Largo Unit 305
 Coordinates: Letter: A Section 11 Township: 24 Range: 6
 Or Latitude _____ Longitude _____
 Date Started : 8-30-94 Area: 02 Run: 22

FIELD OBSERVATIONS

Sample Number(s): VW234
 Sample Depth: 4' Feet
 Final PID Reading 126 PID Reading Depth 4' Feet
 Yes No
 Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :
 Excavation ☐ (1) Approx. Cubic Yards _____
 Onsite Bioremediation ☐ (2)
 Backfill Pit Without Excavation ☒ (3)
 Soil Disposition:
 Envirotech ☐ (1) ☐ (3) Tierra
 Other Facility ☐ (2) Name: _____
 Pit Closure Date: 8-30-94 Pit Closed By: BEI

REMARKS

Remarks : 4' Sandstone

Signature of Specialist: Vale Wilson

CHAIN OF CUSTODY RECORD

[illegible]



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 234	946039
MTR CODE SITE NAME:	93918	N/A
SAMPLE DATE TIME (Hrs):	8.30.94	1400
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-1-94	9/1/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown Clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	25700	MG/KG			.15	28
HEADSPACE PID	126	PPM				
PERCENT SOLIDS	88.9	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

proved By:

J.S.

Date:

9/30/94