EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

San Juan 28-6 Unit #81 Meter/Line ID - 72181

SITE DETAILS

Legals - Twn: 27N

NMOCD Hazard Ranking: 0

Operator: Meridian

Rng: 6W

Sec: 12

Unit: MO

(G(0))

Land Type: BLM

Pit Closure Date: 3/20/95

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.

A test pit was excavated to 9' where sandstone was encountered. The excavation was terminated at 9° and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 428 ppm; laboratory analysis indicated a TPH concentration of 1040 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 four years.
- Bedrock was encountered in the test excavation at nine feet below ground surface making remediation impractical.
- 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.
- There are no water supply wells or potential surface water receptors within 1,000 feet of the
- 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

REVISEDFIELD PIT SITE ASSESSMENT FORM

AL	Meter: 72181 Location: San Juan					
GENERAL	Operator #: Operator Name:_	P/L]	District:			
	Coordinates: Letter: M Section 12 Township: 27 Range: 6					
	Or Latitude Longitude					
	Pit Type: Dehydrator Location Dri	p: Line Dri	p: Other:			
	Site Assessment Date: 4/2/98	_ Area: Ru	ın:			
	NMOCD Zone:	Land Type:	BLM \boxtimes (1)			
	(From NMOCD		State \square (2)			
	Maps) Inside	(1)	Fee \square (3)			
	Outside	\sum (2)	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)	\boxtimes (3)				
<u>[</u> —	Wellhead Protection Area					
		other sources of fre	ich woter			
SM	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?					
SITE ASSESSMENT			(2) NO (0 points)			
SS	Horizontal Distance to Surface Water Bo	-	3 (=) 110 (0 points)			
V 3	Less Than 200 Ft (20 points)	(1)				
	200 Ft to 1000 Ft (10 points)	$=$ $\stackrel{(2)}{(2)}$				
∞	Greater Than 1000 Ft (0 points)	\overline{X} (3)				
	Name of Surface Water Body					
	(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals,					
	Ditches, Lakes, Ponds)	inis, Creeks, Irrigati	on Canais,			
	Distance to Nearest Ephemeral Stream	(1) < 10	0' (Navajo Pits Only)			
	•	(2) > 10				
	TOTAL HAZARR RANKRIG GOORF	\sim				
50	TOTAL HAZARD RANKING SCORE:	F	POINTS			
REMARKS	Remarks: Site has been re-assessed, du					
171	as a Surface Water Body. Site is > 100' vertical from center of					
EP	Cereza Canyon Wush	> 100' vertical from center of				
\simeq	<u> </u>					

(assess) 12/16/97

FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 72181 Location: San Juan 28-6 unit #181799 Operator #: Operator Name: Meridian P/L District: Bloomfield Coordinates: Letter: M Section 12 Township: 27 Range: 06 Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: 3110195 Area: 10 Run: 52					
	NMOCD Zone: (From NMOCD Maps) Inside Outside Land Type: BLM ☒ (1) State ☐ (2) Fee ☐ (3) Indian					
SITE ASSESSMENT	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) 200 Ft to 1000 Ft (10 points) Greater Than 1000 Ft (0 points) (3)					
	Name of Surface Water Body Ephemeral Drain to Cerza Canyon Wash (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: POINTS					
Remarks: Red Line shows Inside Topo shows outside I 2 pits on Loc, I has Dehy in service, Old Dehy is s Site, not in service. Wilh close pit. EPNG needs to Push In						

ORIGINAL PIT LOCATION	ORIGINAL PIT LOCATION Original Pit : a) Degrees from North 75° Footage from 'ellhead' 3' b) Length : /3' Width : //' Depth : 2'
REMARKS	Remarks: Photo's: //27
	Completed By: James 7 Tenros 3/10/55 Signature Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 72181 Location: SAN JUAN 28-6 UNIF*81 Coordinates: Letter: M Section 12 Township: 27 Range: 06 Or Latitude Longitude Date Started: 3-20-95 Run: 10 52
FIELD OBSERVATIONS	Sample Number(s): KP452 Sample Depth: 9' Feet Final PID Reading 428 PID Reading Depth 9' Feet Yes No Groundwater Encountered \(\Bar{\text{No}} \) Approximate Depth Feet
CLOSURE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation Soil Disposition: Envirotech Other Facility Name: Pit Closure Date: 3-20-95 Pit Closed By: BET
DEWADKS	



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	- OAM E	L IDEITINIO	1101			
	Fie	id ID		Lab iD		
SAMPLE NUMBER:	KP 4.	KP 452		946746		
MTR CODE SITE NAME:	72181		N/A			
SAMPLE DATE TIME (Hrs):	3-20-	3-20-95		0950		
SAMPLED BY:	N//		Α			
DATE OF TPH EXT. ANAL.:	3/23		3/23)95			
DATE OF BTEX EXT. ANAL.:	NG		Brown clay and sund			
TYPE DESCRIPTION:						
REMARKS:						
		RESULTS				
PARAMETER	RESULT UNITS			QUALIFI	ER S	
			DF	Q	M(g)	V(ml)
TPH (418.1)	1040	MG/KG			1.98	28
HEADSPACE PID	428	РРМ				
PERCENT SOLIDS	91.5	 %			2.444 2.444	
		TPH is by EPA Metho	od 418.1		·	
arrative:						
F = Dilution Factor Used						
approved By:			Date:	3-24-9	5	
1	 					