

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

San Juan 27-5 #46 PC
Meter/Line ID - 72441

SITE DETAILS

Legals - Twn: 27N
NMOCD Hazard Ranking: 0
Operator: Meridian

Rng: 5W

Sec: 7 Unit: M
Land Type: BLM
Pit Closure Date: 3/20/95

*Risk - bedrock
outside BTEX TPH*
RECEIVED
NOV - 2 1999
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.

Sandstone was encountered in the test excavation at three 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 pit was then backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 380 ppm; laboratory analysis indicated a TPH concentration of 13,500 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 at three 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.
- There are no water supply wells or potential surface water receptors within 1,000 feet of the site.
- 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	<p>Meter: <u>72441</u> Location: <u>San Juan 27-5 #46 PC</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>M</u> Section <u>7</u> Township: <u>27</u> Range: <u>5</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4/14/98</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: 150px;">BLM <input checked="" type="checkbox"/> (1)</p> <p style="margin-left: 150px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 150px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 150px;">Indian _____</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 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. Site is >100' vertical from center of Cañon del Camino</u></p>

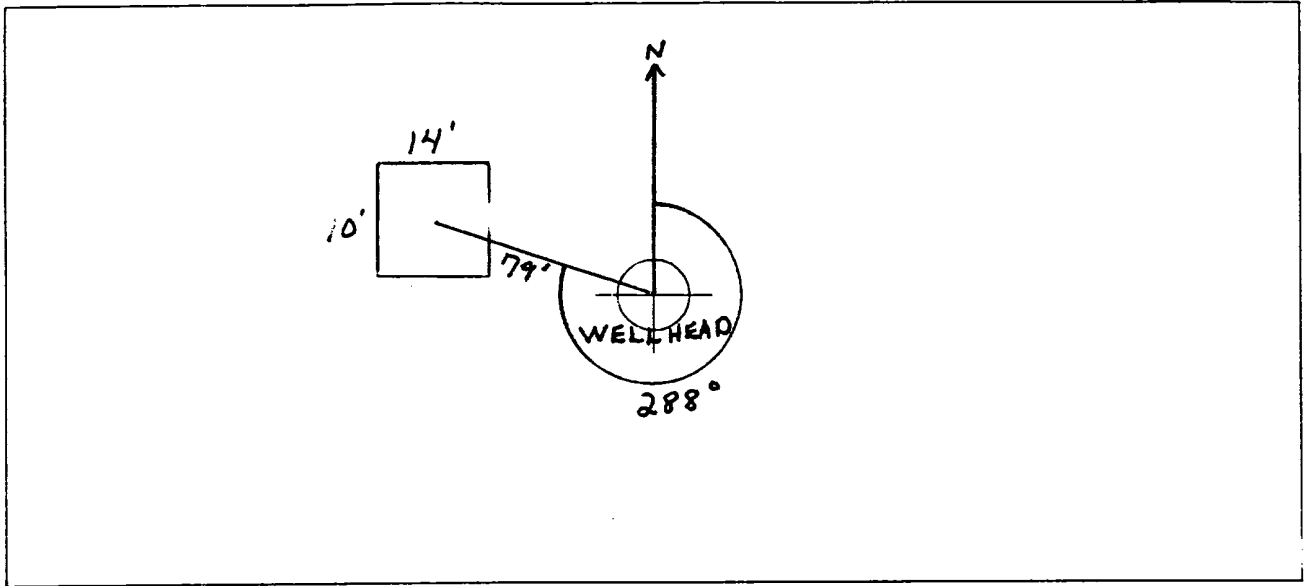
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>72441</u> Location: <u>San Juan 27-5 #46 Pc</u></p> <p>Operator #: _____ Operator Name: <u>Meridian</u> P/L District: <u>Bloomfield</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>07</u> Township: <u>27</u> Range: <u>05</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>3/10/95</u> Area: <u>10</u> Run: <u>52</u></p>																
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Land Type:</p> <table border="0"> <tr> <td>Inside</td> <td><input type="checkbox"/> (1)</td> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>Outside</td> <td><input checked="" type="checkbox"/> (2)</td> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td></td> <td></td> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>_____</td> </tr> </table> <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 checked="" type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input 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? <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 checked="" 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 type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Ephemeral Drain to Del Camino Wash</u></p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only)</p> <p><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>30</u> POINTS</p>	Inside	<input type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)	Outside	<input checked="" type="checkbox"/> (2)	State	<input type="checkbox"/> (2)			Fee	<input type="checkbox"/> (3)			Indian	_____
Inside	<input type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)														
Outside	<input checked="" type="checkbox"/> (2)	State	<input type="checkbox"/> (2)														
		Fee	<input type="checkbox"/> (3)														
		Indian	_____														
REMARK	<p>Remarks : <u>Red line shows Inside Topo shows outside VZ</u></p> <p><u>2 pits on loc 1 is loc, other is old Delhy pit with close</u></p> <p><u>old loc Drip.</u></p> <p style="text-align: right;"><u>Push In</u></p>																

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 288° Footage from Wellhead 79'
 b) Length : 14' Width : 10' Depth : 3'

ORIGINAL PIT LOCATION



Remarks :

Photos: 12:41

REMARKS

Completed By:

James J. Penrose
 Signature

3/10/95
 Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>72441</u> Location: <u>SAN JUAN 27-5th 46 PC</u> Coordinates: Letter: <u>m</u> Section <u>07</u> Township: <u>27</u> Range: <u>05</u> Or Latitude _____ Longitude _____ Date Started : <u>3-20-95</u> Run: <u>10</u> <u>52</u>
FIELD OBSERVATIONS	Sample Number(s): ⁴⁵⁷ <u>KP 456</u> _____ Sample Depth: <u>3'</u> Feet Final PID Reading <u>380</u> PID Reading Depth <u>3'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input type="checkbox"/> Approx. Cubic Yards _____ Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input checked="" type="checkbox"/> Soil Disposition: Envirotech <input type="checkbox"/> <input type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>3-20-95</u> Pit Closed By: <u>B.E.I</u>
REMARKS	Remarks : <u>No line markers dug A test hole TO 3' Hit SAND SHALE</u> <u>closed Pit.</u>
	Signature of Specialist: <u>Kelly Padilla</u>



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:	KP 457	946751
MTR CODE SITE NAME:	72441	N/A
SAMPLE DATE TIME (Hrs):	3-20-95	1515
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	3/23/95	3/23/95
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Dark Gray clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	13500 ³⁻²⁴⁻⁹⁵	MG/KG			0.39	28
HEADSPACE PID	380	PPM				
PERCENT SOLIDS	88.2	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

3-24-95