

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Sample doesn't agree with lab analysis — *Questions*
RISK-BTEX

San Juan 27-5 #46
Meter/Line ID - 72431

RECEIVED
DEC 21 1999

SITE DETAILS

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

Rng: 5W

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

U.S. OIL CON. DIV.
DEPT. 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.

A test pit was excavated to 5' where sandstone was encountered. The excavation was terminated at 5' 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 313 ppm; laboratory analysis indicated a TPH concentration of 2960 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 five 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 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

✓

GENERAL	Meter: <u>72431</u> Location: <u>San Juan 27-5 #46</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>M</u> Section <u>7</u> Township: <u>27</u> Range: <u>5</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/14/95</u> Area: _____ Run: _____	
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)	
	Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)	Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____
	Depth to Groundwater 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)	
	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)	
	Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)	
	Name of Surface Water Body _____ (Surface Water Body: Perennial Rivers, 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'	
REMARKS	TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS	
	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 Camine</u>	

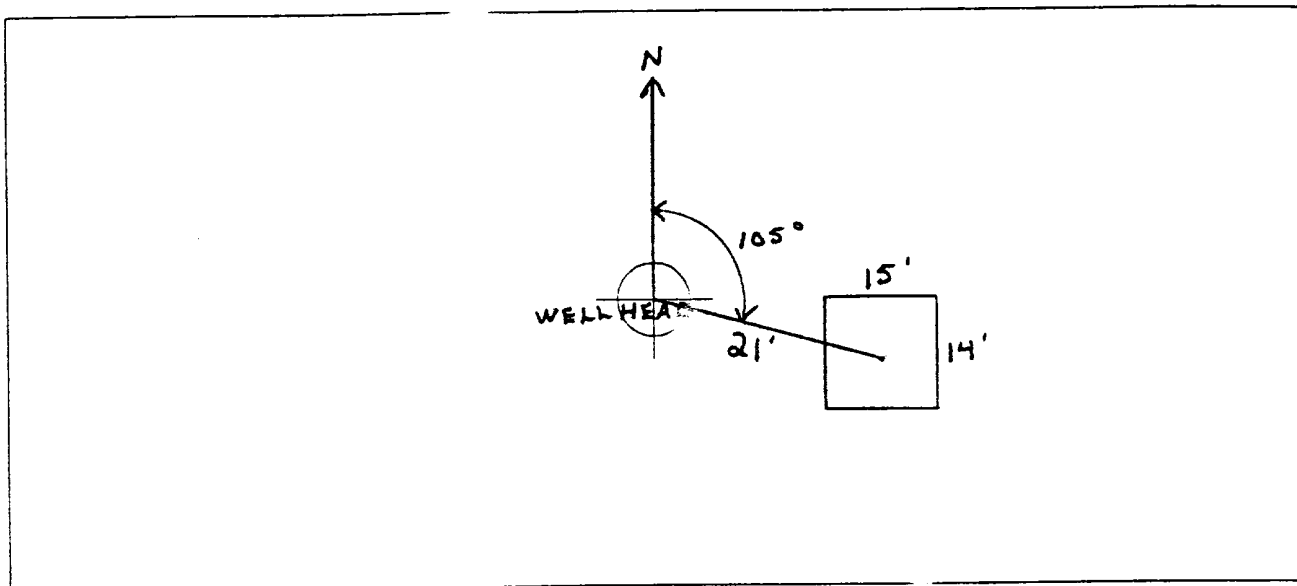
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>72431</u> Location: <u>Sanduan 27-5 # 46 mV</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 <u>X</u> Location Drip: _____ 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>Inside <input type="checkbox"/> (1)</p> <p>Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type:</p> <p>BLM <input checked="" type="checkbox"/> (1)</p> <p>State <input type="checkbox"/> (2)</p> <p>Fee <input type="checkbox"/> (3)</p> <p>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 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>
REMARK	<p>Remarks : <u>Redline shows Inside Topo shows outside VZ</u></p> <p><u>2 pits on loc 1 is old Delhy pit, other is loc Drip with</u></p> <p><u>close old Delhy pit.</u></p> <p><u>Arch In</u></p>

ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 105° Footage from Wellhead 21'
b) Length : 15' Width : 14' Depth : 2'



REMARKS

Remarks :

Photos: 1225

Completed By:

James L. Penner

Signature

3/10/75

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>72431</u> Location: <u>SAN JUAN 27.5[#] 46 M V</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>Date Started : <u>3-20-95</u> Run: <u>10</u> <u>52</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): ⁴⁵⁶<u>KP 457</u></p> <p>Sample Depth: <u>3 1/3</u> ^{5'} Feet</p> <p>Final PID Reading <u>313</u> PID Reading Depth <u>5'</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>3-20-95</u> Pit Closed By: <u>B.E.I</u></p>
REMARKS	<p>Remarks : <u>No Line markers. dug A test hole To 5' hit SAND stone</u></p> <p><u>closed Pit.</u></p>
	<p>Signature of Specialist: <u>Kelly Padilla</u></p>

**SPLIT****FIELD SERVICES LABORATORY
ANALYTICAL REPORT****PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone****SAMPLE IDENTIFICATION**

	Field ID	Lab ID
SAMPLE NUMBER:	KP 456	946750
MTR CODE SITE NAME:	72431	N/A
SAMPLE DATE TIME (Hrs):	3-20-95	1445
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	Brown fine sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS				ATI Results
			DF	Q	M(g)	V(ml)	
TPH (418.1)	2960	MG/KG			2.00	28	1900
HEADSPACE PID	313	PPM					
PERCENT SOLIDS	89.5	%					

-- TPH is by EPA Method 418.1

Narrative: _____

ATI Results attached

DF = Dilution Factor Used

Approved By: _____

Date: _____

4/18/95



GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS	ATI I.D.	: 503392
PROJECT #	: 24324	DATE RECEIVED	: 03/28/95
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 03/28/95

PARAMETER	UNITS	01
PETROLEUM HYDROCARBONS, IR	MG/KG	1900