

**EL PASO FIELD SERVICES  
PRODUCTION PIT CLOSURE**

*Dehy*  
San Juan 28-6 #167  
Meter/Line ID - 87439

*Risk - BTEX*  
*on test*  
**RECEIVED**  
DEC 21 1999  
**OIL CON. DIV.**  
**DIST. 3**

**SITE DETAILS**

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

Rng: 6W

Sec: 4 Unit: K  
Land Type: BLM  
Pit Closure Date: 3/27/95

**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 10' where sandstone was encountered. The excavation was terminated at 10' 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 616 ppm; laboratory analysis indicated a TPH concentration of 3140 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 ten 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

**REVISED**  
**FIELD PIT SITE ASSESSMENT FORM**

<b>GENERAL</b>	<p>Meter: <u>87439</u> Location: <u>San Juan 28-6 #167</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>K</u> Section <u>4</u> Township: <u>27</u> Range: <u>6</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4/8/98</u> Area: _____ Run: _____</p>
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p style="margin-left: 150px;">Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p><b>Land Type:</b></p> <p style="margin-left: 150px;">BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p><b>Depth to Groundwater</b></p> <p style="margin-left: 50px;">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><b>Wellhead Protection Area</b></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="margin-left: 150px;"><input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p style="margin-left: 50px;">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)</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) &lt; 100' (Navajo Pits Only) <input type="checkbox"/> (2) &gt; 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
<b>REMARKS</b>	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is on Mesa &amp; is &gt;100' vertical from Cereza Canyon.</u></p>

# FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 87439 Location: Sandwich 28-6 #167  
 Operator #: \_\_\_\_\_ Operator Name: Meridian P/L District: Bloomfield  
 Coordinates: Letter: R Section 04 Township: 27 Range: 06  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Pit Type: Dehydrator ☒ Location Drip: \_\_\_\_\_ Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
 Site Assessment Date: 3/8/95 Area: 10 Run: 91

SITE ASSESSMENT

NMOCD Zone:  
 (From NMOCD  
 Maps)

Inside  
 Outside

Land Type:

☐ (1)  
☒ (2)

BLM ☒ (1)  
 State ☐ (2)  
 Fee ☐ (3)  
 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) ☒ (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 Cereza Canyon wash (River)

(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: 10 POINTS

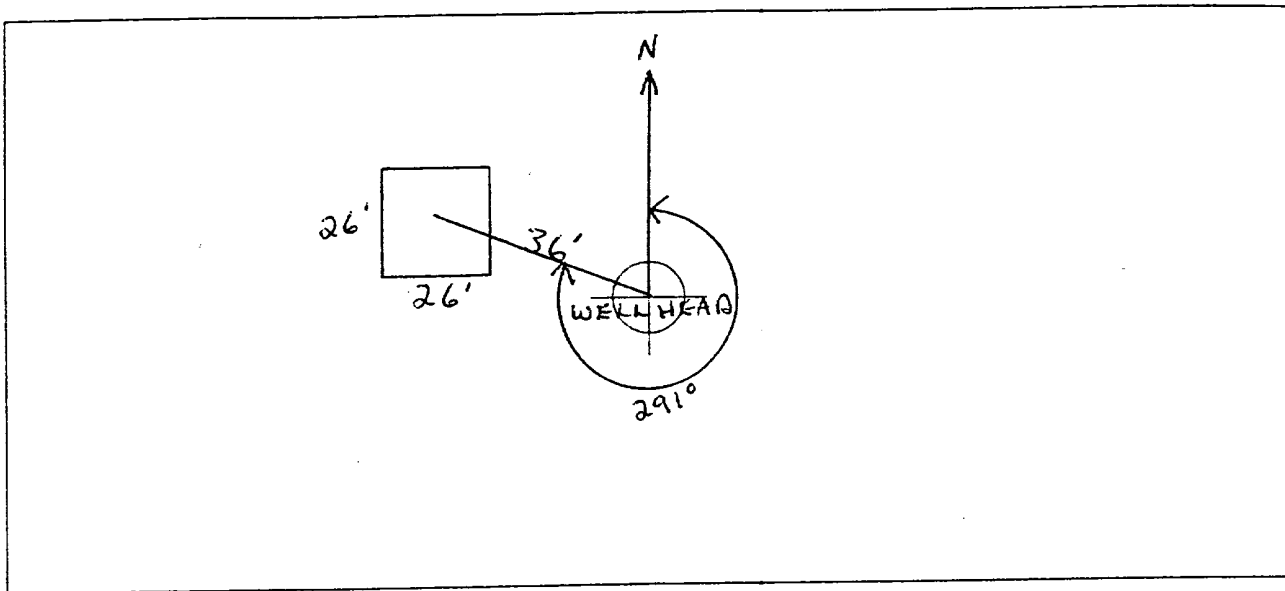
REMARKS

Remarks : Red line shows inside ToPo shows outside of VZ  
2 pits on box One has Dehy in service. Old Dehy pit  
belongs to EPNG with close old Dehy pit  
Dish In

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 291° Footage from Wellhead 36'  
b) Length : 26' Width : 26' Depth : 3'

ORIGINAL PIT LOCATION



Remarks :

Photos: 1238

REMARKS

Completed By:

James J. Pears  
Signature

3/8/95  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 87439 Location: SAN JUAN 28-6 #167  
 Coordinates: Letter: K Section 04 Township: 27 Range: 06  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Date Started : 3-27-95 Run: 10 91

FIELD OBSERVATIONS

Sample Number(s): KP 467 \_\_\_\_\_  
 Sample Depth: 10' Feet  
 Final PID Reading 616 PID Reading Depth 10' Feet  
 Yes No  
 Groundwater Encountered ☐ ☒ Approximate Depth \_\_\_\_\_ Feet

CLOSURE

Remediation Method :  
 Excavation ☐ Approx. Cubic Yards \_\_\_\_\_  
 Onsite Bioremediation ☐  
 Backfill Pit Without Excavation ☒  
 Soil Disposition:  
 Envirotech ☐ Tierra ☐  
 Other Facility ☐ Name: \_\_\_\_\_  
 Pit Closure Date: 3-27-95 Pit Closed By: B.EI

REMARKS

Remarks : No Line markers. dug A test hole to 10' Hit SAND str  
Sampled Closed Pit

Signature of Specialist: Kelly Padilla



# FIELD SERVICES LABORATORY

## ANALYTICAL REPORT

### PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

#### SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 467	946761
MTR CODE   SITE NAME:	87439	N/A
SAMPLE DATE   TIME (Hrs):	3-27-95	1145
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	3/28/95	3/28/95
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Dark brown clay & sand

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	3140 3138	MG/KG			1.92	28
HEADSPACE PID	616	PPM				
PERCENT SOLIDS	84.4	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

J.P.

Date:

4/6/95