EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

RISK below

Naw-Di-Des-Wood No. 1 Meter/Line ID – 74218 OCT 2000

SITE DETAILS

Rng: 8

Legals - Twn: 26

NMOCD Hazard Ranking: 20

Operator: Meridian

Sec: 30

c: 30 💢 Unit: F

Land Type: Eastern Navajo Agency

Pit Closure Date: 08/05/94

RATIONALE FOR 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 pit was excavated to three feet, where bedrock was encountered, and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 10 cubic yards of material was removed for landfarming and sent to an OCD approved centralized site. 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 558 ppm; laboratory analysis indicated a benzene concentration of <0.25 mg/kg, a total BTEX concentration of 25 mg/kg, and a TPH concentration of 3530 mg/kg. This site was re-assessed on August 28, 2000 because the initial assessment incorrectly identified washes as a surface water body.

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 six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.
- Groundwater was not encountered in the excavation.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Bedrock was encountered in the excavation at three feet below ground surface, making vertical contamination migration unlikely and further remediation impractical.

REVISEDFIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 74218 Location: NAW-DI-DES-WOOD NO.1 Operator #: 2999 Operator Name: MERIDIAN P/L District: BALLARD Coordinates: Letter: F Section 30 Township: 26 Range: 8 Or Latitude Longitude Pit Type: Dehydrator Location Drip: X Line Drip: Other: Site Assessment Date: 8/29/00 Area: // Run: 62
	NMOCD Zone: Land Type: BLM (1) (From NMOCD State (2) Maps) Inside (1) Fee (3) Outside (2) Indian EASTERN NAVAJO AGENCY Less Than 50 Feet (20 points) (1) 50 Ft to 99 Ft (10 points) (2) Greater Than 100 Ft (0 points) (3)
ASSESSMENT	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)
SITE AS	Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points)
	Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream $ \Box (1) < 100' (Navajo Pits Only) $ $ \Box (2) > 100' $
REMARINS	TOTAL HAZARD RANKING SCORE: POINTS Remarks: Site has been re-assessed, due to initial assessment including washes as a Surface Water Body.

FIELD PIT SITE ASSESSMENT FORM

3	
GENERAL	Meter: 74218 Location: Naw-Di-Des-Wood No.1 Operator #: 2999 Operator Name: Meridian P/L District: Ballard Coordinates: Letter: E Section 30 Township: Z6NRange: 8W Or Latitude Longitude Pit Type: Dehydrator Location Drip: X Line Drip: Other: Site Assessment Date: 6-20-94 Area: 11 Run: 62
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside Outside Outside (2) Indian Easten Navali Agency Less Than 50 Feet (20 points) Store (2) Greater Than 100 Ft (0 points) 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? Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) (3) Horizontal Distance to Surface Water Body Less Than 200 Ft (10 points) (3) Kate (2) Indian Easten Navali Agency Agency Agency (2) Greater Than 100 Ft (0 points) (3) Wellhead Protection Area: Is it less than 200 ft from a private domestic water source? (1) YES (20 points) (2) NO (0 points) (3) Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) (3) Name of Surface Water Body Slanco 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 HAZAPD PANKING GRAPP
S)	TOTAL HAZARD RANKING SCORE: 40 POINTS
REMARKS	Remarks: One pit on location. Dry Inside V.Z. on Redline & Topo
REI	Designation of the second of t

▼	
NOT	ORIGINAL PIT LOCATION Original Pit: a) Degrees from North 106 Footage from Wellhead 106 b) Length: 21 Width: 16 Depth: 2
ORIGINAL PIT LOCATION	Wellhead Wellhead
` 	
REMARKS	Remarks: Photos-1058 hrs. Bobtail
	Completed By: 4

FIELD PIT REMEDIATION/CLOSURE FORM

RAL	Meter: 74218 Location: NAW-Di-Des-Wood #1
GENERAL	Coordinates: Letter: <u>F</u> Section <u>30</u> Township: <u>26 N</u> Range: <u>8 W</u> Or Latitude Longitude Date Started : <u>8/5/94</u> Run: <u>1/ 62</u>
FIELD OBSERVATIONS	Sample Number(s): KD 190 Sample Depth: 3' Feet Final PID Reading 558 Yes No Groundwater Encountered Approximate Depth Feet
CLOSURE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation Soil Disposition: Envirotech Other Facility Name:
KEMARKS	Pit Closure Date: 8/5/94 Pit Closed By: BEI Remarks: Excavated pit to 3' hit Sandstone, fook PiD Sample, Closed pit.' Signature of Specialist: My Dam



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

	SAMPLE	IDENTIFICA	TION				_
	Field	CH 1		Lab ID			
SAMPLE NUMBER:	KD 199)	945	851			
MTR CODE SITE NAME:	74218			N/A		1	
SAMPLE DATE TIME (Hrs):	8-5-9L		04	330			
SAMPLED BY:	,	N	I/A				
DATE OF TPH EXT. ANAL.:	8191	94	2	3 9 94			
DATE OF BTEX EXT. ANAL.:	8	1194	8	1194			
TYPE DESCRIPTION:	٧٧		Jack Gr	nerse 53	end		
REMARKS:		RESULTS					<u> </u>
	· · · · · · · · · · · · · · · · · · ·	NESOL 13		··			
PARAMETER	RESULT	UNITS		QUALIF			
			DF	<u> </u>	M(g)	V(ml)	
BENZENE	L0.25	MG/KG	10				
TOLUENE	< 0.25	MG/KG	10				
ETHYL BENZENE	0,32	MG/KG	10				
TOTAL XYLENES	24	MG/KG	10				
TOTAL BTEX	25	MG/KG					
TPH (418.1)	3530	MG/KG			2.15	28	
HEADSPACE PID	558	PPM					
PERCENT SOLIDS	92.5	<u></u> %		·			
he Surrogate Recovery was at	- TPH is by EPA Method 41	8.° and BTEX is by EPA I % for this sample		was accept			
ATI result	s attache	Er . Shu	vgate,	recover	ng u	Jas ou	<u>tz'</u> ,
F = Dilution Factor Used	5 due 9	(I) matri	xu in	terteren	to.		
approved By:			Date:	9/2/44	l .		



GAS CHROMATOGRAPHY RESULTS

TEST

: BTEX (EPA 8020)

CLIENT

: EL PASO NATURAL GAS CO. ATI I.D.: 408339

PROJECT #

: 2-324

PROJECT NAME : PIT CLOSURE

SAMPL ID. #		MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945850	NON-AQ	08/C /94	08/11/94	08/11/94	1
08	945851	NON-AQ	08/05/94	08/11/94	08/11/94	10
09	945852	NON-AQ	08/05/94	08/11/94	08/11/94	10
PARAM	ETER	······································	UNITS	07	08	09
BENZE	NE		MG/KG	<0.025	<0.25	<0.25
DLUE	NE		MG/KG	<0.025	<0.25	<0.25
ETHYL	BENZENE		MG/KG	<0.025	0.32	1.9
TOTAL	XYLENES		MG/KG	<0.025	24	42
SURRO	GATE:					
BROMO	FLUOROBENZENE (%)			90	240*	116

^{*}OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

2709-D Pan American Freeway, NE Albuquerque, NM 87107 Phone (505) 344-3777 FAX (505) 344-4413



ATI I.D. 408339 '

August 25, 1994

El Paso Natural Gas Co. P.O. Box 4990 Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 08/10/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze non-aqueous samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

H. Mitchell Rubenstein, Ph.D.

Laboratory Manager

MR:jt

Enclosure



CHAIN OF CUSTODY RECORD

PROJECT NUMBER PROJECT NAME	AME			+				CONTRACT I TOOLIGE CONTRACT
	Sure	Pit Closure Project # 24324	EHS			REQUESTED ANALYSIS		CONT. ACI LABORA I ORY P. O. NUMBER
SAMPLERS: (Signatura)	~ N	anc DATE: 8/5/94	MUN JA MIATNO:	39YT		8020	Ħæ	
LABID DATE TIME	TIME MATRIX	SAMPLE NUMBER	7.0T 3 40		443 743	178 1 A93	7,	REMARKS
5850 8/5/94 0845.	/ i aS	Ko 189		16	X		121	
5851 8/5/4/0930 Soil	- Š	KD 190	1	Q	×	>	271	
58528/8/9/1155	50:1	KD 191	-	10)	X	×	173	
58538/5/4123050	1,05	KD 192		(6)	_ 	\sqrt{\chi}	174	
5854 B/5/94 1340 Soi	-i8	KD 193		7	X	X	175	
		/						
				 	-/			
		0			_			
HELINGUISHEYET (Signatura)		994 1530 1/2 M. L.	meture)	(1)	1	RELINDUISHED BY: (Signatura)		DATECTINE 26 & RECEIVED BY: (Signature)
RELINQUISHED BY: (Signeture)		u – 1	vature)		3	RELINOUISHED BY: (Signature	1	1/COX) T
								ートーングンシ
PECVESTED TURNAROUND TIME:		SAMPLE RECEIPT REMARKS	EMARKS				RESULTS & INVOICES TO:	ū
CARRIER CO.								EL PASO NATURAL GAS COMPANY P.O. BOX 4990
BILL NO.:		CHARGE CODE					505,500,0144	FARMINGTON, NEW MEXICO 87499
White - Testing Laboratory Canar	Canary - EPNG Lab	Lab Pink - Field Sempler					7-880-000	FAX: 505-599-2261

FILINGINGEGA IDAN NO BAN