

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

OK

Ge-El-Gu-Lith-E #1
Meter/Line ID - 74440

SITE DETAILS

Legals - Twn: 26N
NMOCD Hazard Ranking: 40
Operator: Meridian

Rng: 8W

Sec: 7

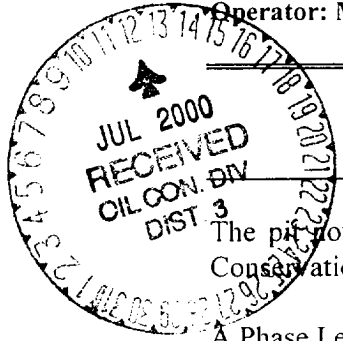
Unit: M

Land Type: Eastern Navajo Agency

Pit Closure Date: 11/14/95

Federal

Fd/F1



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 Phase I excavation was conducted on August 9, 1994, to 12 feet below ground surface 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 60 cubic yards of excavated 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 327 ppm; laboratory analysis indicated a benzene concentration of 5.2 mg/kg, a total BTEX concentration of 99 mg/kg, and a TPH concentration of 1260 mg/kg. TPH was above required remediation levels for the Hazard Ranking Score.

On November 14, 1995, a Phase II excavation was conducted to 18 feet below ground surface 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 256 cubic yards of excavated 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 4.5 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3 mg/kg, and a TPH concentration of <10 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 almost five years.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the excavations.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Based on the Hazard Ranking Score, benzene, total BTEX, and TPH were below required remediation levels for the Hazard Ranking Score.
- Excavated material has been removed from the pit eliminating potential direct contact with livestock and the public.

FIELD PIT SITE ASSESSMENT FORM

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GENERAL	<p style="text-align: right; margin-right: 50px;"><i>RT 6-24-94</i></p> <p>Meter: <u>74440</u> Location: <u>Ge-Ele-Gu-Litl-E No. 1</u></p> <p>Operator #: <u>2999</u> Operator Name: <u>Meridian</u> P/L District: <u>Ballard</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>7</u> Township: <u>26N</u> Range: <u>8W</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>6-23-94</u> Area: <u>11</u> Run: <u>91</u></p>
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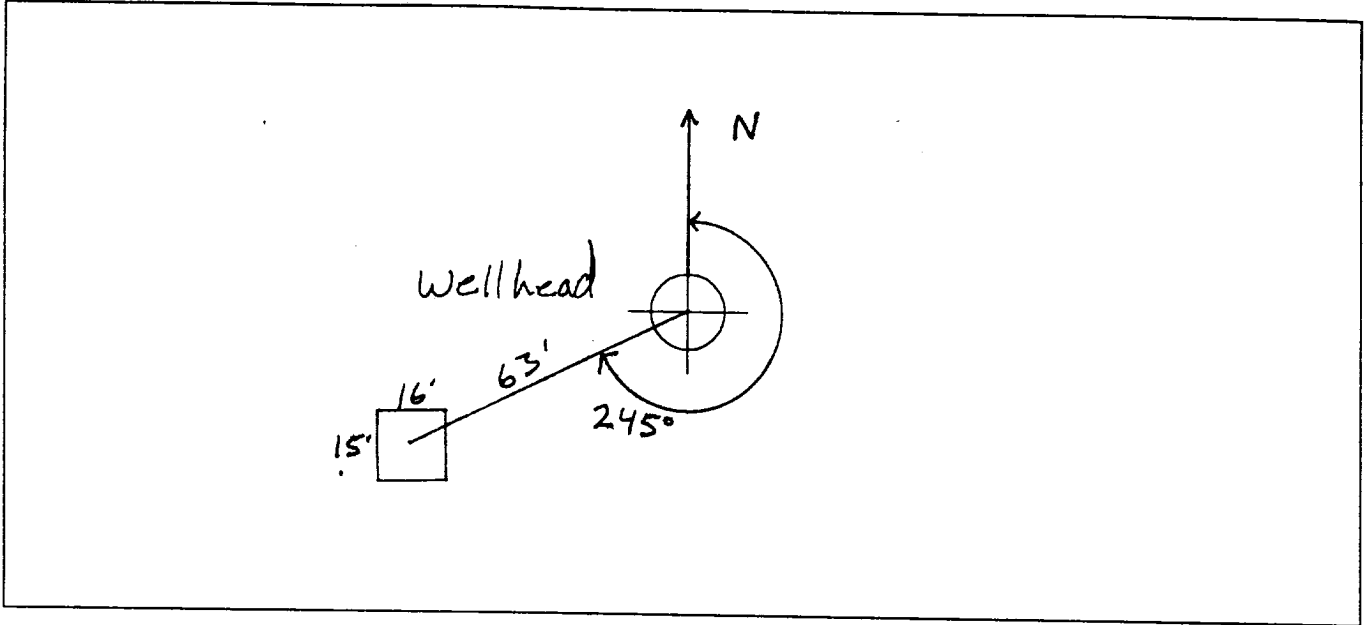
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p style="margin-left: 150px;">Inside <input checked="" type="checkbox"/> (1)</p> <p style="margin-left: 150px;">Outside <input type="checkbox"/> (2)</p> <p>Land Type:</p> <p style="margin-left: 100px;">BLM <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 100px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 100px;">Indian <u>Eastern Navajo Agency</u></p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input checked="" 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 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>Blanco 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 checked="" 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>40</u> POINTS</p>
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REMARKS	<p>Remarks : <u>one pit on location. Dry</u></p> <p><u>Inside V.Z. on Redline & Topo</u></p>
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ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 245 Footage from Wellhead 63
b) Length : 16 Width : 15 Depth : 3



REMARKS

Remarks :

Photos - 0925 hrs.

End dump

Completed By:

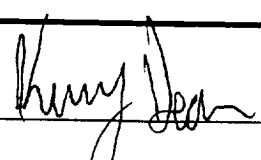
[Signature]

Signature

6-23-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>74440</u> Location: <u>Ge-Ele-GU-Lith-E #1</u> Coordinates: Letter: <u>M</u> Section <u>7</u> Township: <u>26N</u> Range: <u>8W</u> Or Latitude _____ Longitude _____ Date Started : <u>8/9/94</u> Run: <u>11</u> <u>91</u>
FIELD OBSERVATIONS	Sample Number(s): <u>LD 200</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>327 ppm</u> PID Reading Depth <u>12'</u> Feet Groundwater Encountered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>60</u> Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input type="checkbox"/> Soil Disposition: Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>8/9/94</u> Pit Closed By: <u>BET</u>
REMARKS	Remarks : <u>Excavated pit to 12', took pid sample, closed pit.</u>
	Signature of Specialist: <u></u>



**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 200	945879
MTR CODE SITE NAME:	7440	N/A
SAMPLE DATE TIME (Hrs):	8-9-94	1205
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8/11/94	8/11/94
DATE OF BTEX EXT. ANAL.:	8/15/94	8/17/94
TYPE DESCRIPTION:	vc	light brown sand & clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	5.2	MG/KG	10			
TOLUENE	53	MG/KG	10			
ETHYL BENZENE	2.1	MG/KG	10			
TOTAL XYLENES	39	MG/KG	10			
TOTAL BTEX	99	MG/KG				
TPH (418.1)	1260	MG/KG			2.16	28
HEADSPACE PID	327	PPM				
PERCENT SOLIDS	86.1	%				

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

Surrogate Recovery was at 110 % for this sample All QA/QC was acceptable.

Narrative: ATI results attached.

= Dilution Factor Used

Prepared By: J.S.

Date: 9/2/94



Analytical **Technologies**, Inc.

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

ATI I.D. 408346

August 23, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

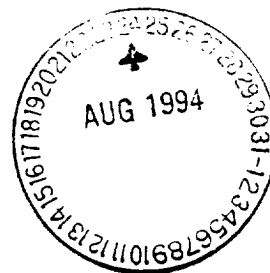
On 08/12/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

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





GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 408346
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	945879	NON-AQ	08/09/94	08/15/94	08/17/94	10
05	945880	NON-AQ	08/09/94	08/15/94	08/17/94	10
06	945881	NON-AQ	08/09/94	08/15/94	08/17/94	1

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	5.2	0.83	<0.025
TOLUENE	MG/KG	53	6.6	0.026
ETHYLBENZENE	MG/KG	2.1	4.6	0.025
TOTAL XYLENES	MG/KG	39	72	0.085

SURROGATE:

BROMOFLUOROBENZENE (%)	110	89	98
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FIELD PIT REMEDIATION/CLOSURE FORM/PHASE I

GENERAL

Meter: 74440 Location: Ge-Ele-Gw-Lith-E #1
 Coordinates: Letter: M Section 7 Township: 26N Range: 8W
 Or Latitude _____ Longitude _____
 Date Started : 11/10/95 Area: 11 Run: 91

FIELD OBSERVATIONS

Sample Number(s): JK131
 Sample Depth: 18' Feet
 Final PID Reading 4.5 PID Reading Depth 18' Feet
 Yes No
 Groundwater Encountered (1) (2) Approximate Depth _____ Feet
 Final Dimensions: Length 21 Width 22 Depth 18'

CLOSURE

Remediation Method :

Excavation (1) Approx. Cubic Yards 256 ^{4/11/95}
 Onsite Bioremediation (2) Approved To close by
 Backfill Pit Without Excavation (3) Alton James 11-12-95
 Overburden Cubic Yards 20 ^{yd}

Soil Disposition:

Envirotech (1) (3) Tierra
 Other Facility (2) Name: _____

Pit Closure Date: 11-14-95 Pit Closed By: Philip

REMARKS

Remarks : More Than 100' From Ephemeral stream
No Fence No E.P.N.G on site
Pit PID readings (W-36.7) (S-2.5) (E-25.2) (W-0.9)

Signature of Specialist: James L. King



**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JK 131	947772
MTR CODE SITE NAME:	74440	Ge-Ele-Gu-Lith-E#1
SAMPLE DATE TIME (Hrs):	11-10-95 <i>RLB 12/12/95</i>	1000
PROJECT:	Phase I Navajo Phase II Excavation	
DATE OF TPH EXT. ANAL.:	11/15/95	
DATE OF BTEX EXT. ANAL.:	11/15/95	11/15/95
TYPE DESCRIPTION:	VG	light grey sand & clay

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	< 10	MG/KG			2.0	28
HEADSPACE PID	4.5	PPM				
PERCENT SOLIDS	81.4	%				

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020

The Surrogate Recovery was at 96% for this sample All QA/QC was acceptable.
Narrative: _____

DF = Dilution Factor Used

Approved By: 

Date: 11/15/95

BTEX SOIL SAMPLE WORKSHEET

File	:	947772	Date Printed	:	11/16/95
Soil Mass (g)	:	4.99	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical)	:	200
Shot Volume (uL)	:	50	CAL FACTOR (Report)	:	0.20040

			DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L)	:	0.12	Benzene (mg/Kg):	0.024	0.501
Toluene (ug/L)	:	0.35	Toluene (mg/Kg):	0.070	0.501
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000	0.501
p & m-xylene (ug/L)	:	0.19	p & m-xylene (mg/Kg):	0.038	1.002
o-xylene (ug/L)	:	0.10	o-xylene (mg/Kg):	0.020	0.501
			Total xylenes (mg/Kg):	0.058	1.503
			Total BTEX (mg/Kg):	0.152	