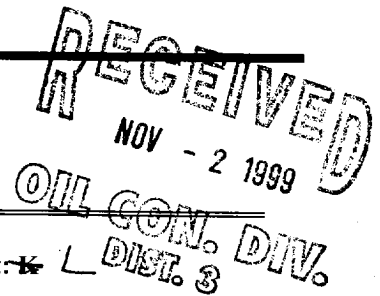


**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Outside - No vertical extent
TPH

OH Randel #1
Meter/Line ID - 83055



SITE DETAILS

Legals - Twn: 26N
NMOCD Hazard Ranking: 0
Operator: Cross Timbers

Rng: 11

Sec: 9
Land Type: Navajo
Pit Closure Date: 9/28/94

Unit: ~~K~~ L

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 12 feet and a soil sample was collected for field headspace analysis and laboratory analysis for TPH and BTEX. 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 222 ppm; laboratory analysis indicated a TPH concentration of 34,800 mg/kg and a total BTEX concentration 17.8 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.
- 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	Meter: <u>830SS</u> Location: <u>OH RANDEL #1</u> Operator #: _____ Operator Name: <u>CROSS TIMBERS P/L</u> District: <u>BALLARD</u> Coordinates: Letter: <u>K</u> Section <u>9</u> Township: <u>26</u> Range: <u>11</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>4.21.98</u> Area: <u>11</u> Run: <u>61</u>
SITE ASSESSMENT	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> NMOCD Zone: (From NMOCD Maps) </div> <div style="width: 45%;"> Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>NAVAJO INDIAN</u> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> 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) </div> <div style="width: 45%;"> 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? <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) </div> </div> </div> <div style="margin-top: 10px;"> 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) </div> <div style="margin-top: 10px;"> Name of Surface Water Body _____ (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) </div> <div style="margin-top: 10px;"> Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input checked="" type="checkbox"/> (2) > 100' </div> <div style="margin-top: 10px;"> TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS </div>
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. THERE ARE SOME HOUSES DUE NORTH OF THIS LOC. THEY ARE LESS THAN A 1,000 FEET BUT ARE GREATER THAN 200 FEET.</u>

Need Toadale BLM map

FIELD PIT SITE ASSESSMENT FORM

4

GENERAL

Meter: 83-055 Location: OH Randell A Lease
 Operator #: _____ Operator Name: BHP P/L District: Ballard
 Coordinates: Letter: K Section 9 Township: 26 Range: 11
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
 Site Assessment Date: 6-28-94 Area: 11 Run: 61

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside
Outside

Land Type:

BLM ☐ (1)
 State ☐ (2)
 Fee ☐ (3)
 Indian Eastern

Navajo
Agency

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 _____

(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: 20 POINTS

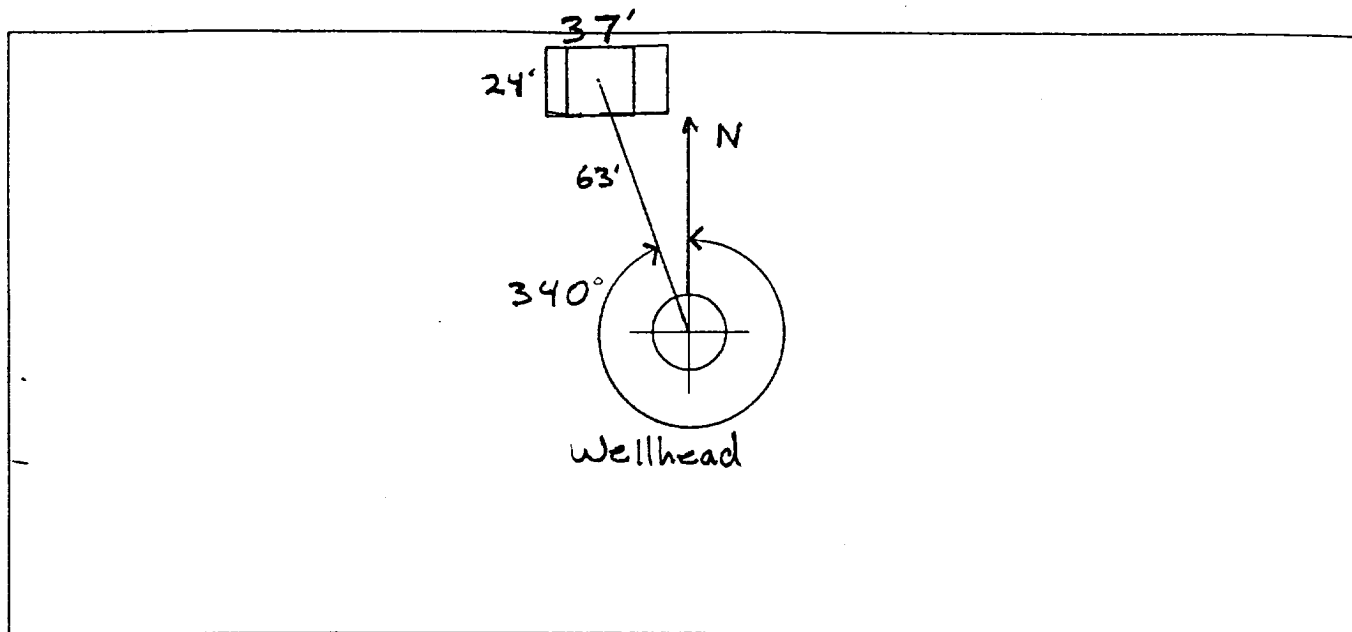
REMARKS

Remarks : One pit on location. Pit has oil & water in it.
No meter run - unknown operator - Allotted well
Outside V.Z. on Redline & Topo.

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 340 Footage from Wellhead 63
b) Length : 37 Width : 24 Depth : 6



REMARKS

Remarks :

Photos - 1300End dumpLarge amount of oil & water in pitAllotted well - unknown operator

Completed By:

Signature

6-28-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>83055</u> ^{OH KDK 10/14/94} Location: <u>OT+ Randell A Lease</u></p> <p>Coordinates: Letter: <u>K</u> Section <u>9</u> Township: <u>26</u> Range: <u>11</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-28-94</u> Run: <u>11</u> <u>61</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KP 256</u></p> <p>Sample Depth: <u>12</u> Feet</p> <p>Final PID Reading <u>222</u> PID Reading Depth <u>12</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> <div style="display: flex; justify-content: space-between;"> <div> <p>Excavation</p> <p>Onsite Bioremediation</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> </div> <div> <p><input type="checkbox"/> Approx. Cubic Yards _____</p> <p><input type="checkbox"/></p> </div> </div> <p>Soil Disposition:</p> <div style="display: flex; justify-content: space-between;"> <div> <p>Envirotech <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> </div> <div> <p><input type="checkbox"/> Tierra</p> </div> </div> <p>Pit Closure Date: <u>9-28-94</u> Pit Closed By: _____</p>
REMARKS	<p>Remarks : <u>Some Line markers Pit HAS oil & water.</u></p> <p><u>dig Attest Hole to 12' closed Pit</u></p>
	<p>Signature of Specialist: <u>Kelly Padilla</u></p>



Page _____ of _____

White • Testing Laboratory Canary • EPNG Lab Pink • Field Sampler



outside

FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 256	946242
MTR CODE SITE NAME:	83055	N/A
SAMPLE DATE TIME (Hrs):	9-28-94	0930
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-29-94	9-29-94
DATE OF BTEX EXT. ANAL.:	10-3-94	10-6-94
TYPE DESCRIPTION:	VG	Brown fine sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.85	MG/KG	S			
TOLUENE	8.7	MG/KG	S			
ETHYL BENZENE	0.13	MG/KG	S			
TOTAL XYLENES	8.1	MG/KG	S			
TOTAL BTEX	17.8	MG/KG				
TPH (418.1)	34800	MG/KG			2.27	28
HEADSPACE PID	222	PPM				
PERCENT SOLIDS	89.3	%				

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

The Surrogate Recovery was at 95 % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached

DF = Dilution Factor Used

Approved By: 

Date: 10/23/94



Analytical **Technologies**, Inc.

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

ATI I.D. **409445**

October 13, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **09/30/94**, 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.

Letitia Krakowski, Ph.D.
Project Manager

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.: 409445
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	946242	NON-AQ	09/28/94	10/03/94	10/06/94	5
05	946243	NON-AQ	09/28/94	10/03/94	10/06/94	20
06	946244	NON-AQ	09/28/94	10/03/94	10/06/94	5

PARAMETER	UNITS	04	05	06
BENZENE	MG/KG	0.85	<0.50	0.39
TOLUENE	MG/KG	8.7	27	9.6
ETHYLBENZENE	MG/KG	0.13	3.0	1.2
TOTAL XYLENES	MG/KG	8.1	77	43

SURROGATE:

BROMOFLUOROBENZENE (%)	95	81	80
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