

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

Marshall A #2
Meter/Line ID - 71416

SITE DETAILS

Legals - Twn: 27N	Rng: 9W	Sec: 14	Unit: A
NMOCD Hazard Ranking: 0		Land Type: BLM	
Operator: Texaco		Pit Closure Date: 9/14/94	

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' 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 128 ppm; laboratory analysis indicated a TPH concentration of 47.4 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 five 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 1000 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>71416</u> Location: <u>Marshall A #2</u> Operator #: _____ Operator Name: _____ P-L District: _____ Coordinates: Letter: <u>A</u> Section <u>14</u> Township: <u>27</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>2/13/98</u> Area: _____ Run: _____		
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)	Land Type: Inside _____ (1) Outside <input checked="" type="checkbox"/> (2)	BLM <input checked="" type="checkbox"/> (1) State _____ (2) Fee _____ (3) Indian _____
REMARKS	Depth to Groundwater Less Than 50 Feet (20 points) _____ (1) 50 Ft to 99 Ft (10 points) _____ (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? <div style="text-align: center;"> <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) </div>		
	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) <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 _____ (1) < 100 (Navajo Pits Only) _____ (2) > 100		
	TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS		

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. There are 2 sites in Letter A. Both are outside & have fairly similar elevation (Within 20 vertical feet). Both sites are > 100 vertical feet & 1000 horizontal feet from a wash or water body.

FIELD PIT SITE ASSESSMENT FORM

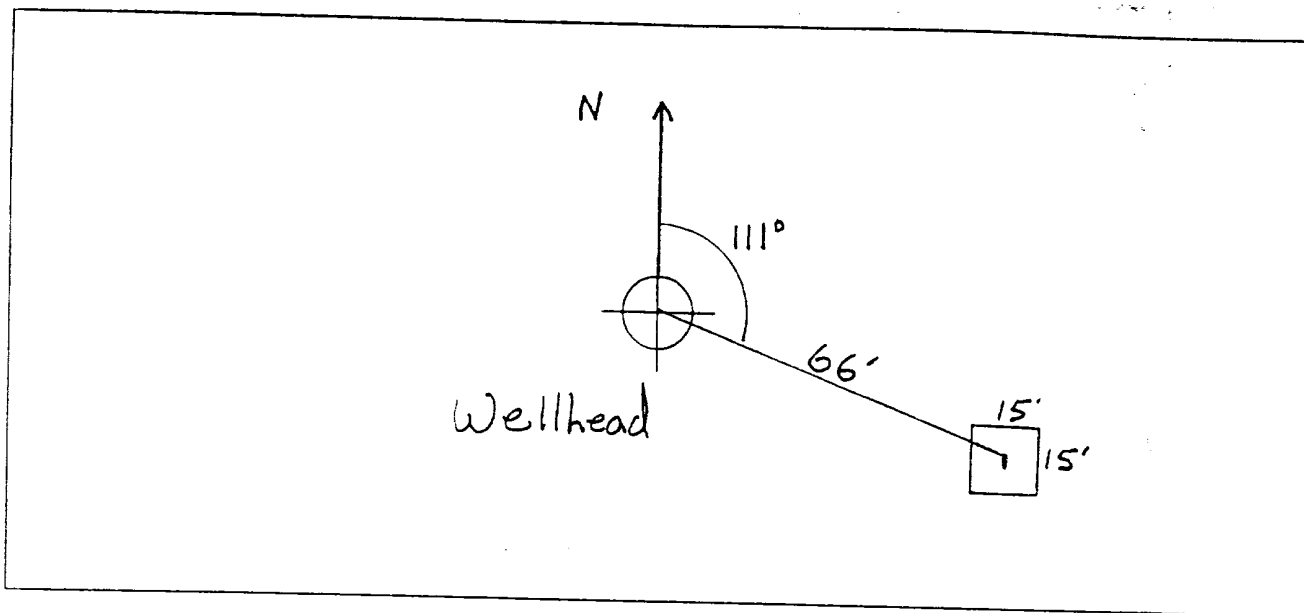
4

GENERAL	<p>Meter: <u>71416</u> Location: <u>Marshall 'A' No. 2</u></p> <p>Operator #: <u>0263</u> Operator Name: <u>Texaco</u> P/L District: <u>Ballard</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>14</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>6-16-94</u> Area: <u>11</u> Run: <u>71</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p>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)</p> <p>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)</p> <p>Name of Surface Water Body _____</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) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</p>
REMARKS	<p>Remarks : <u>one pit, one tank. Pit is dry</u></p> <p><u>Outside V.Z. on Redline of Topo</u></p>

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 111 Footage from Wellhead 66
b) Length : 15 Width : 15 Depth : 4



REMARKS

Remarks :

Photos - 1052 hrs.

Completed By:

Ken Walter
Ken Walter Signature

6-16-94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>71916</u> Location: <u>Marshall A # 2</u> Coordinates: Letter: <u>A</u> Section <u>14</u> Township: <u>27</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Date Started : <u>9-14-94</u> Run: <u>11</u> <u>21</u>
FIELD OBSERVATIONS	Sample Number(s): <u>VW285</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>128</u> PID Reading Depth <u>12'</u> Feet <div style="text-align: center;">Yes No</div> Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div> Excavation Onsite Bioremediation Backfill Pit Without Excavation </div> <div style="text-align: right;"> <input type="checkbox"/> Approx. Cubic Yards _____ <input type="checkbox"/> <input checked="" type="checkbox"/> </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div> Envirotech Other Facility </div> <div style="text-align: right;"> <input type="checkbox"/> <input type="checkbox"/> Tierra <input type="checkbox"/> Name: _____ </div> </div> Pit Closure Date: <u>9-14-94</u> Pit Closed By: <u>BEZ</u>
REMARKS	Remarks : _____ <u>10 yds. E. of</u> _____ _____
	Signature of Specialist: <u>Vale Wilson</u>

Natural Gas Company

FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 227	946145
MTR CODE SITE NAME:	71416	N/A
SAMPLE DATE TIME (Hrs):	9-14-94	135
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-20-94	9-20-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Coarse brown sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1) 47.4	47.3 47.4	9/22/94 MG/KG			2.05	28
HEADSPACE PID	128	PPM				
PERCENT SOLIDS	93.3	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

9/30/94