

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

outside

RISK

BTEX

TPH

San Juan 29-5 #43-22
Meter/Line ID - 72216

RECEIVED
NOV 2 1999

SITE DETAILS

Legals - Twn: 29N
NMOCD Hazard Ranking: 0
Operator: Phillips

Rng: 5W

Sec: 22

Unit: M

Land Type: Fee

Pit Closure Date: 7/11/94

OIL CON. DIV.
DIST. 3

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. 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 229 ppm; laboratory analysis indicated a TPH concentration of 5,850 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: 72216 Location: San Juan 29-5 #43-22
Operator #: _____ Operator Name: _____ P/L District: _____
Coordinates: Letter: M Section: 22 Township: 29 Range: 5
Or Latitude: _____ Longitude: _____
Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 4/2/98 Area: _____ Run: _____

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

Land Type:

(1)

☒ (2)

BLM \square (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 _____

(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: 0 POINTS

SITE ASSESSMENT

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is $> 100'$ vertical from Gobernador Canyon Wash.

FIELD PIT SITE ASSESSMENT FORM

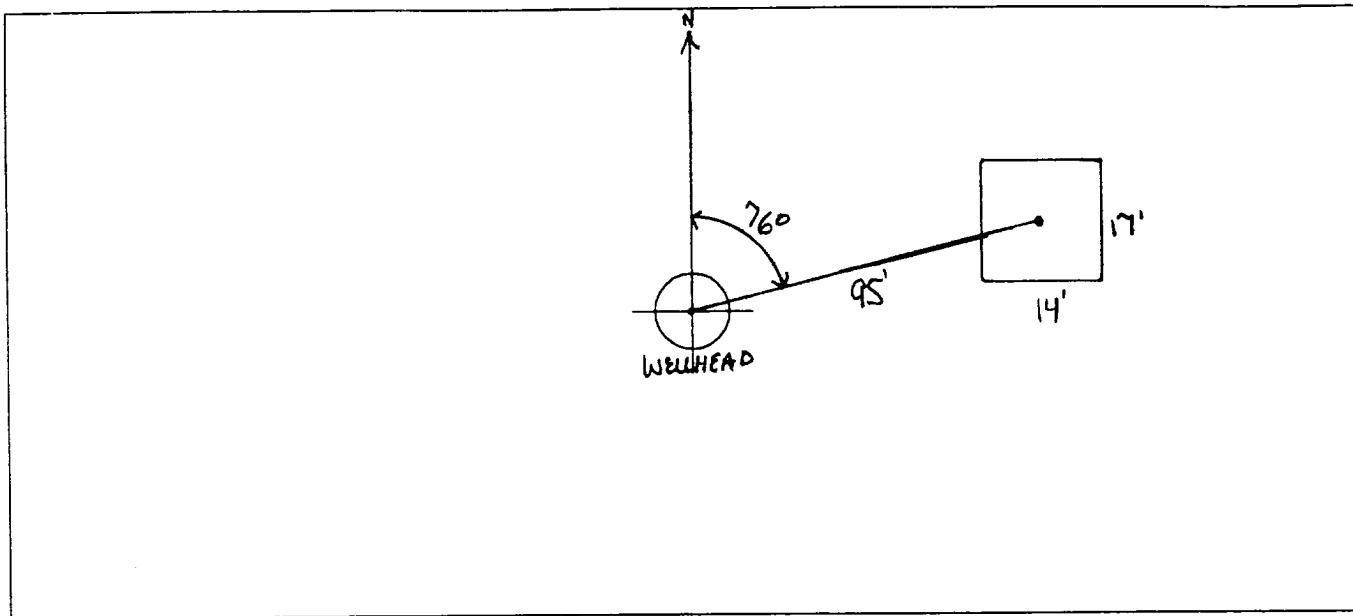
GENERAL	Meter: <u>72216</u> Location: <u>SAN JUAN 29-S #43-22</u> Operator #: <u>7035</u> Operator Name: <u>PHILLIPS</u> P/L District: <u>BLOOMFIELD</u> Coordinates: Letter: <u>M</u> Section <u>22</u> Township: <u>29</u> Range: <u>S</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>6-8-94</u> Area: <u>10</u> Run: <u>71</u>
	<div> <div>NMOCD Zone: (From NMOCD Maps)</div> <div> Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3) Indian _____ </div> <div> Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2) </div> </div> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input checked="" 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 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 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	Remarks : <u>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS S.E. OF HWY. 64 TO DULCE. REDLINE AND TOPO CONFIRMED LOCATION OUTSIDE V.Z.</u>

PUSH-1205

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degree from North 76° Footage from Wellhead 95'
b) Length : 17' Width : 14' Depth : 2'



REMARKS

Remarks :

TOOK PICTURES AT 10:58 A.M.

DUMP TRUCK - BOBTAIL

Completed By:

Robert Thompson

Signature

6-8-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>7-2216</u> Location: <u>SAN JUAN 29-5 # 43-22</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>22</u> Township: <u>29</u> Range: <u>5</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>7-11-94</u> Area: <u>10</u> Run: <u>71</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK110</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>229</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> (1) Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>7-11-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>EPUG lines marked soil black strong Hydrocarbon odor</u></p>
	<p>Signature of Specialist: <u>Morgan Killion</u></p>



CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER		PROJECT NAME		PROJECT ANALYSIS		REQUESTED ANALYSIS		SAMPLE TYPE		TOTAL NUMBERS OF CONTAINERS		TPH		BTEX		EPA 418.1		EPA 8020		REMARKS	
LAB ID		DATE		TIME		MATRIX		SAMPLE NUMBER		DATE		TIME		TIME		TIME		TIME		TIME	
94	SLP 27	7-11-94	09:40	Soil	Soil	108	108	1	UG	1	UG	X	X	X	X	X	X	X	X	Light Gray Soil Strong Hydrocarbon odor	
94	SLP 28	7-11-94	11:16	Soil	Soil	109	109	1	UG	1	UG	X	X	X	X	X	X	X	X	Brown Soil Slight Hydrocarbon odor	
94	SLP 29	7-11-94	11:53	Soil	Soil	110	110	1	UG	1	UG	X	X	X	X	X	X	X	X	Black Soil Strong Hydrocarbon odor	
94	SLP 30	7-11-94	12:43	Soil	Soil	111	111	1	UG	1	UG	X	X	X	X	X	X	X	X	Gray Soil Strong Hydrocarbon odor	
94	SLP 31	7-11-94	13:38	Soil	Soil	112	112	1	UG	1	UG	X	X	X	X	X	X	X	X	Brown Soil Strong Hydrocarbon odor	
94	SLP 32	7-11-94	13:38	Soil	Soil	113	113	1	D	1	D	X	X	X	X	X	X	X	X		
94	SLP 33	7-11-94	13:45	Soil	Soil	114	114	1	B	1	B	X	X	X	X	X	X	X	X		
94	SLP 34	7-11-94	14:13	Soil	Soil	115	115	1	UG	1	UG	X	X	X	X	X	X	X	X	Gray Soil Slight Hydrocarbon odor	
94	SLP 35	7-11-94	15:15	Soil	Soil	116	116	1	UG	1	UG	X	X	X	X	X	X	X	X	Grayish Brown Slight Hydrocarbon odor	
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)	
Morgan Killian		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez	
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)	
Morgan Killian		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez		7-11-94 17:30		Blenda L. L. Hernandez	
REQUESTED TURNAROUND TIME:		ROUTINE <input type="checkbox"/> RUSH <input type="checkbox"/>		SAMPLE RECEIPT REMARKS		CHARGE CODE		RESULTS & INVOICES TO:		FIELD SERVICES LABORATORY		EL PASO NATURAL GAS COMPANY		P.O. BOX 4990		FARMINGTON, NEW MEXICO 87499		505-599-2144		505-599-2261	
CARRIER CO.		BILL NO.:		SAMPLE RECEIPT REMARKS		CHARGE CODE		RESULTS & INVOICES TO:		FIELD SERVICES LABORATORY		EL PASO NATURAL GAS COMPANY		P.O. BOX 4990		FARMINGTON, NEW MEXICO 87499		505-599-2144		505-599-2261	



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	ML 110	945629
MTR CODE SITE NAME:	72216	N/A
SAMPLE DATE TIME (Hrs):	7-11-94	1153
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	7/12/94	7/12/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	DK brown clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	5850	MG/KG			0.54	28
HEADSPACE PID	229	PPM				
PERCENT SOLIDS	85.2	%				

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

Surrogate Recovery was at N/A % for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By:

Date:

7/17/94