

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

ASK
BTEX

San Juan 29-7 No. 64
Meter/Line ID – 72217

SITE DETAILS

Legals - Twn: 29N	Rng: 7W	Sec: 11	Unit: H
NMOCD Hazard Ranking: 0		Land Type: BLM	
Operator: Meridian		Pit Closure Date: 06/30/94	

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 twelve 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 backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 265 ppm; laboratory analysis indicated a TPH concentration of 566 mg/kg. This site was re-assessed on April 2, 1998, because the initial assessment included 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 almost six 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 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 other sources of fresh water extraction within 1,000 feet of the site.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Based on the Hazard Ranking Score, TPH concentrations were below required remediation levels.

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	<p>Meter: <u>72217</u> Location: <u>San Juan 29-7 #64</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>H</u> Section: <u>11</u> Township: <u>29</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4/2/98</u> Area: _____ Run: _____</p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p style="margin-left: 150px;">Inside <input type="checkbox"/> (1)</p> <p style="margin-left: 150px;">Outside <input checked="" type="checkbox"/> (2)</p> <p style="margin-left: 150px;">Land Type:</p> <p style="margin-left: 150px;">BLM <input checked="" type="checkbox"/> (1)</p> <p style="margin-left: 150px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 150px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 150px;">Indian _____</p> <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 type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input checked="" 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?</p> <p style="text-align: center;"><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, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only)</p> <p style="margin-left: 150px;"><input type="checkbox"/> (2) > 100'</p> <p style="text-align: center;">0 POINTS</p> <p>TOTAL HAZARD RANKING SCORE: _____</p>
REMARKS	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is > 100' vertical from center of Gobernador Canyon</u></p>

FIELD PIT SITE ASSESSMENT FORM

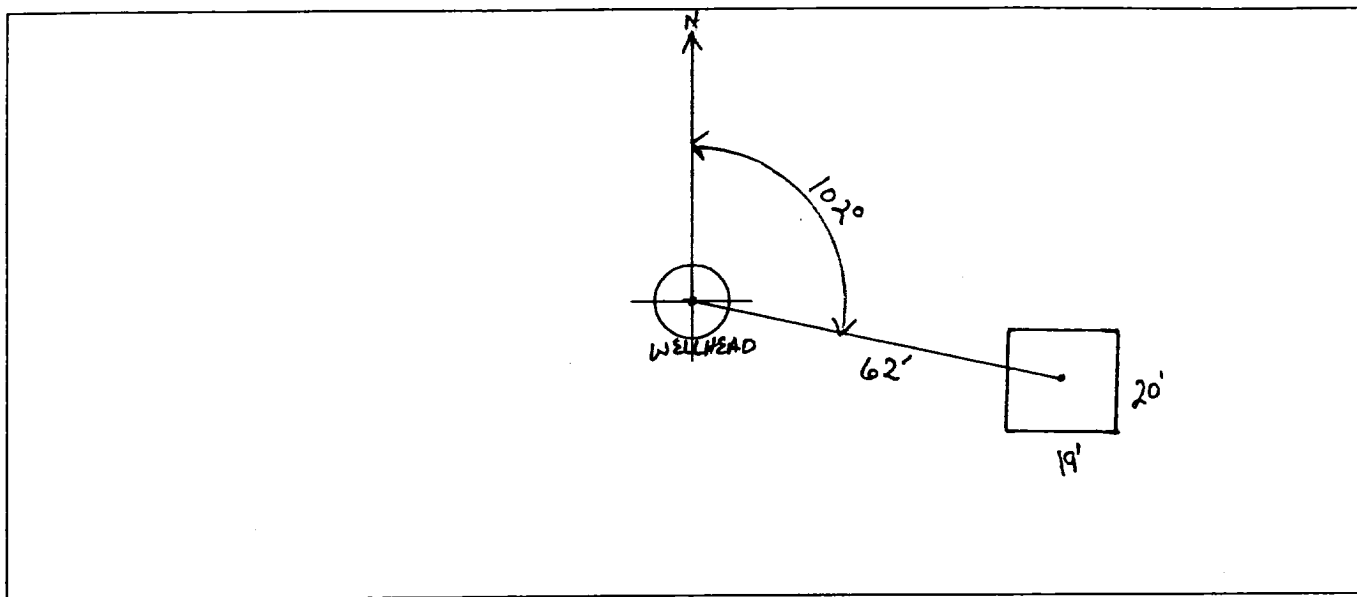
GENERAL	Meter: <u>72217</u> Location: <u>SAN JUAN 29-7 #64</u> Operator #: <u>5-2999</u> Operator Name: <u>MERIDIAN P/L</u> District: <u>BLOOMFIELD</u> Coordinates: Letter: <u>H</u> Section <u>11</u> Township: <u>29</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>5-26-94</u> Area: <u>10</u> Run: <u>61</u>								
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)								
	Land Type: <table border="0"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table>		BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian	_____								
REMARKS	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)								
	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)								
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Name of Surface Water Body _____ (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)									
Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'									
TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS									
Remarks : <u>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS WEST OF ROMINE CANYON. REDLINE SHOWS LOCATION INSIDE V.Z. BUT TOPO SHOWS LOCATION IS OUTSIDE V.Z.</u>									

PUSH-IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 102° Footage from Wellhead 62'
b) Length : 20' Width : 19' Depth : 4'



REMARKS

Remarks :

TOOK PICTURES AT 1:56 P.M.

END DUMP

Completed By:

Robert Thompson

Signature

5-26-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>12217</u> Location: <u>SAN JUAN 29-7 #64</u></p> <p>Coordinates: Letter: <u>H</u> Section <u>11</u> Township: <u>29</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6-30-94</u> Area: <u>10</u> Run: <u>61</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK 74</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>265</u> PID Reading Depth <u>12'</u> Feet</p> <p>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>6-30-94</u> Pit Closed By: <u>BET</u></p>
REMARKS	<p>Remarks : <u>EPNG LINES ^{MK 6-30-94} not marked soil Brown slight Hydrocarbon odor</u></p> <p>Signature of Specialist: <u>Morgan Killion</u></p>



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 74	945570
MTR CODE SITE NAME:	72217	N/A
SAMPLE DATE TIME (Hrs):	6-30-94	1444
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	7/7/94	7/7/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	DK Brown Fine Sand/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)	566	MG/KG			2.02	28
HEADSPACE PID	265	PPM				
PERCENT SOLIDS	89.2	%				

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

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

DF = Dilution Factor Used

Date:

7/14/94



CHAIN OF CUSTODY RECORD

[illegible]