

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

outside

RISK-bedrock

BTEX - TPH

RECEIVED
NOV - 2 1999

**San Juan 29-7 #77E
Meter/Line ID - 95276**

**OIL CON. DIV.
DIST. 3**

SITE DETAILS

**Legals - Twn: 29N
NMOCD Hazard Ranking: 0
Operator: MOI**

Rng: 7W

**Sec: 33 Unit: A
Land Type: BLM
Pit Closure Date: 8/23/94**

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.

Sandstone was encountered in the test pit at a depth of four feet. The boring was terminated and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit. The test pit was then backfilled and the pit area graded in a manner to divert precipitation away from the pit area. Headspace analysis indicated an organic vapor content of 232 ppm; laboratory analysis indicated a TPH concentration of 5,550 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.
- Bedrock was encountered in the test excavation at four feet below ground surface making remediation impractical.
- 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 potential receptors located 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

GENERAL	Meter: <u>95276</u> Location: <u>San Juan 29-7 Unit #775</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>A</u> Section <u>33</u> Township: <u>29</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/14/98</u> Area: _____ Run: _____		
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)	Land Type: Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)	BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____
	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)		
	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)		
	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)		
REMARKS	Name of Surface Water Body _____ (Surface Water Body: Perennial Rivers, 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>0</u> POINTS		
	Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is X ^{cmc} > 100' vertical from center of Pueblo Canyon		

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 95276 Location: San Juan 29-7 Unit 77E
 Operator #: 2999 Operator Name: MOI P/L District: Blanco
 Coordinates: Letter: A Section 33 Township: 29 Range: 7
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 6/9/94 Area: 13 Run: 71

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

☐ (1)

☒ (2)

Land Type:

BLM ☒ (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 Pueblo Canyon

(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: 40 POINTS

REMARKS

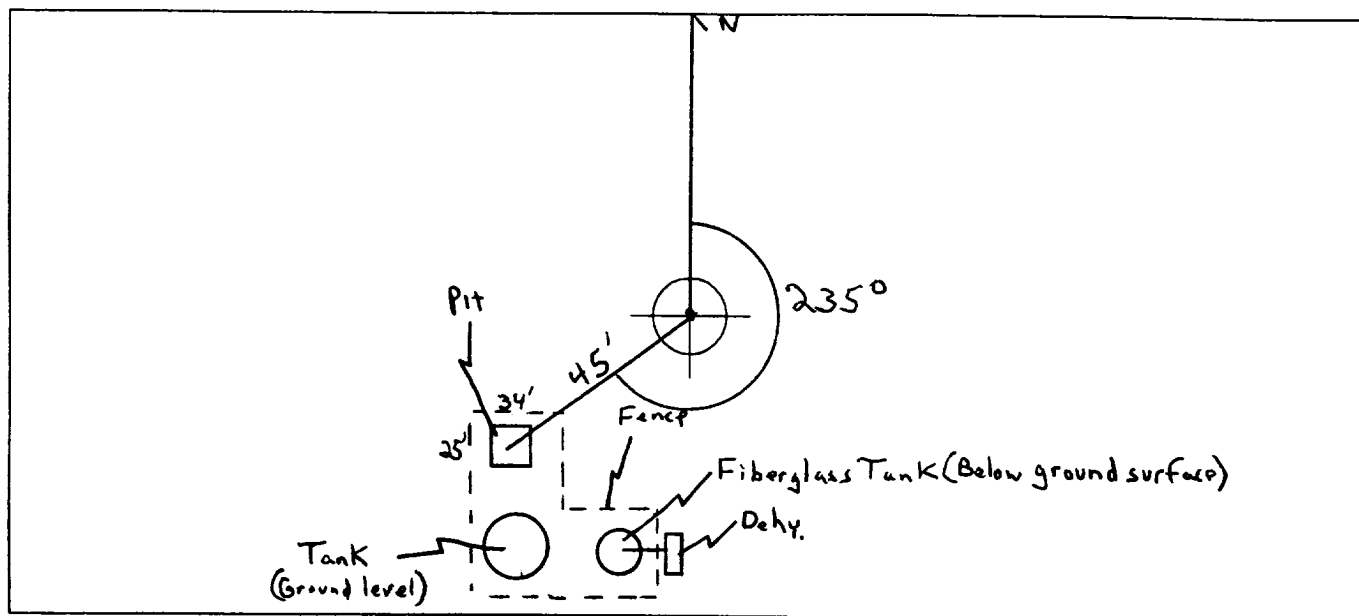
Remarks : Redline-Inside, Vuln-Outside
2 pits will close 1 pit dry

PUSH-IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 235° Footage from Wellhead 45'
b) Length : 34' Width : 25' Depth : 4'



REMARKS

Remarks :

Pictures @ 0856 (23-26)

End Dump

Fiberglass tank, metal tank, + pit are all within same med + fenced area

Completed By:

Cory Chance
Signature

6/9/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>95276</u> Location: <u>SAN JUAN 29-7 # 77E</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>33</u> Township: <u>29</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>8-23-94</u> Run: <u>13</u> <u>71</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK282</u></p> <p>Sample Depth: <u>4'</u> Feet</p> <p>Final PID Reading <u>232</u> PID Reading Depth <u>4'</u> Feet</p> <p>Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>8-23-94</u> Pit Closed By: <u>BER</u></p>
REMARKS	<p>Remarks : <u>EPNG lines marked soil Brown slight</u></p> <p><u>hydrocarbon odor hit sandstone 4'</u></p>
	<p>Signature of Specialist: <u>Morgan Killian</u></p>



CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER		PROJECT NAME		PROJECT ANALYSIS		REQUESTED ANALYSIS		CONTRACT LABORATORY P. O. NUMBER	
SAMPLERS: (Signature)		DATE		DATE		DATE		DATE	
LAB ID		TIME		MATRIX		SAMPLE NUMBER		REMARKS	
5999	8-23-94	10:16	Soil	MK 282	1	UG	X	254	Drown soil slight HYDROCARBON odor
6000	8-23-94	11:42	Soil	MK 283	1	UG	X	255	Gray soil slight HYDROCARBON odor
6001	8-23-94	12:51	Soil	MK 284	1	UG	X	256	Brown soil strong HYDROCARBON odor
6002	8-23-94	14:23	Soil	MK 285	1	UG	X	257	Gray soil slight HYDROCARBON odor
6003	8-23-94	15:14	Soil	MK 286	1	UG	X	258	Gray soil No HYDROCARBON odor
[Signature: Morgan Kellion]									
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)	
Morgan Kellion		8-23-94 18:00		[Signature]		8-24-94 11:30		[Signature]	
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)	
[Signature]				[Signature]				[Signature]	
REQUESTED TURNAROUND TIME:		ROUTINE <input type="checkbox"/> RUSH <input type="checkbox"/>		SAMPLE RECEIPT REMARKS		RESULTS & INVOICES TO:		FIELD SERVICES LABORATORY	
CARRIER CO.		CHARGE CODE						EL PASO NATURAL GAS COMPANY	
BILL NO.:								P. O. BOX 4990	
								FARMINGTON, NEW MEXICO 87499	
								505-599-2144	
								FAX: 505-599-2261	



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 282	945999
MTR CODE SITE NAME:	95276	N/A
SAMPLE DATE TIME (Hrs):	8-23-94	1010
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-25-94	8/25/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown fine sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	5550	MG/KG			0.58	28
HEADSPACE PID	232	PPM				
PERCENT SOLIDS	92.3	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

9/4/94