

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Drip

Risk-bedrock
RECEIVED
DEC 21 1999
OIL CON. DIV.
DIST. 3

**Hubbell #2
Meter/Line ID - 72007**

SITE DETAILS

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

Rng: 10W

**Sec: 17 Unit: C
Land Type: ~~BLM~~
Pit Closure Date: 6/20/94**

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 6' where sandstone was encountered. The excavation was terminated at 6' 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 337 ppm; laboratory analysis indicated a TPH concentration of 204 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 six 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 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

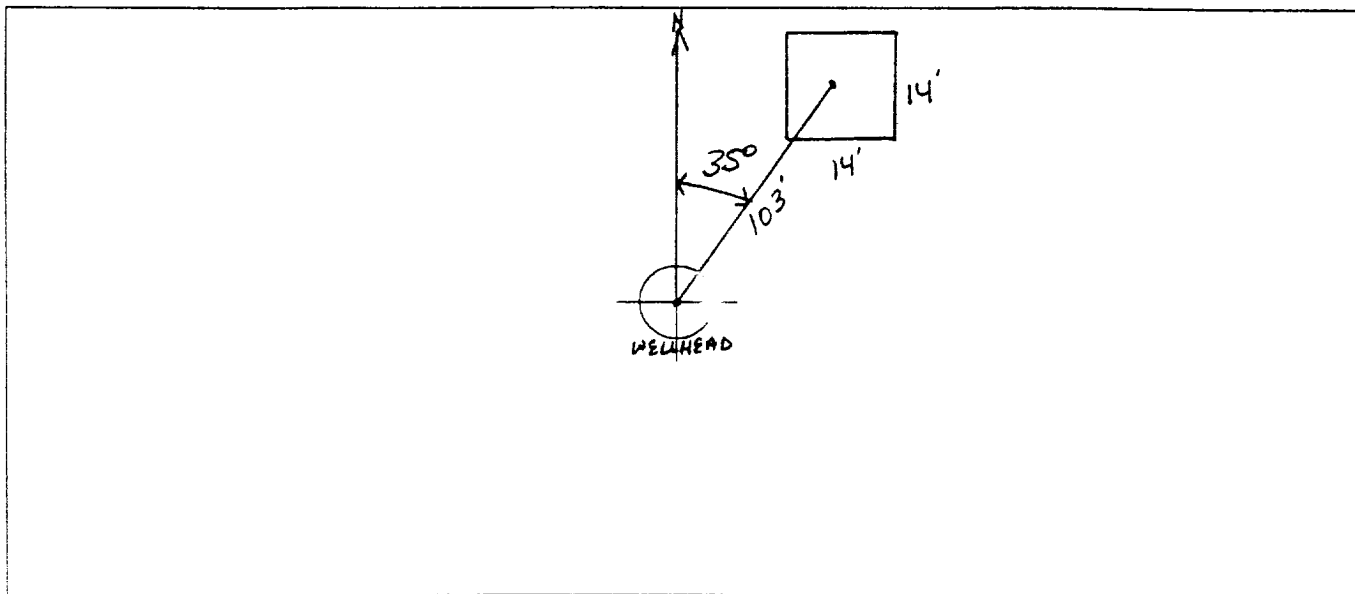
| | |
|------------------------|--|
| GENERAL | Meter: <u>72007</u> Location: <u>Hubbell #2</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>C</u> Section <u>17</u> Township: <u>29</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>2/13/98</u> Area: _____ Run: _____ |
| 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: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> <input type="checkbox"/> Inside (1) <input checked="" type="checkbox"/> Outside (2) </div> <div style="width: 45%;"> BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ </div> </div> </div> </div> <div style="margin-top: 10px;"> 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="margin-top: 10px;"> 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: 5px;"> <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) </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 <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100' </div> </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. Site is > 1 mile from San Juan R.</u> |

FIELD PIT SITE ASSESSMENT FORM

| | |
|-----------------|---|
| GENERAL | <p>Meter: <u>72007</u> Location: <u>HUBBELL #2</u></p> <p>Operator #: <u>2999</u> Operator Name: <u>MERIDIAN</u> P/L District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>C</u> Section <u>17</u> Township: <u>29</u> Range: <u>10</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>5.20.94</u> Area: <u>10</u> Run: <u>93</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>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS WEST OF VALDES CANYON. REDLINE SHOWS LOCATION INSIDE V.Z. BUT TOPO SHOWS LOCATION IS OUTSIDE V.Z.</u></p> |

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North: 35° Footage from Wellhead 103'
b) Length : 14' Width : 14' Depth : 2'



REMARKS :

TOOK PICTURES AT 2:17 P.M.

END DUMP

Completed By:

Paul Thompson
Signature

5.20.94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

| | |
|--------------------|--|
| GENERAL | <p>Meter: <u>72007</u> Location: <u>Holbeck #2</u></p> <p>Coordinates: Letter: <u>C</u> Section <u>12</u> Township: <u>29</u> Range: <u>10</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6-20-94</u> Area: <u>10</u> Run: <u>93</u></p> |
| FIELD OBSERVATIONS | <p>Sample Number(s): <u>116221</u></p> <p>Sample Depth: <u>6'</u> Feet</p> <p>Final PID Reading <u>337</u> PID Reading Depth <u>6'</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>6-20-94</u> Pit Closed By: <u>BEJ</u></p> |
| REMARKS | <p>Remarks : <u>No line markers 6' sandstone</u></p> |
| | <p>Signature of Specialist: <u>W. H. H. H. H.</u></p> |



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

| | Field ID | Lab ID |
|----------------------------|----------|-----------------------|
| SAMPLE NUMBER: | VW 221 | 945480 |
| MTR CODE SITE NAME: | 72007 | N/A |
| SAMPLE DATE TIME (Hrs): | 6-20-94 | 1025 |
| SAMPLED BY: | N/A | |
| DATE OF TPH EXT. ANAL.: | 6-21-94 | 6/21/94 |
| DATE OF BTEX EXT. ANAL.: | N/A | N/A |
| TYPE DESCRIPTION: | VG | Gray 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) | 204 | MG/KG | | | 2.04 | 28 |
| HEADSPACE PID | 337 | PPM | | | | |
| PERCENT SOLIDS | 88.7 | % | | | | |

— 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

Approved By:

[Signature]

Date:

7/14/94