EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

OK

Leslie Kay #1
Meter/Line ID – 90178

SITE DETAILS

Legals - Twn: 29N	**Rng: 12W**	**Sec: 7**	**Unit: F**
NMOCD Hazard Ranking: 20		**Land Type: FEE**	
Operator: Norman L. Gilbreath		**Pit Closure Date: 08/02/95**	

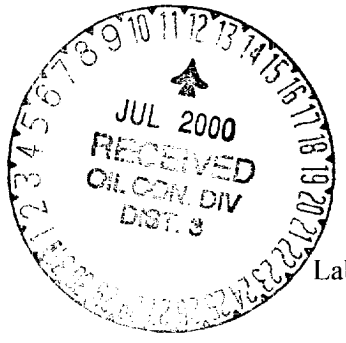
RATIONALE FOR CLOSURE

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.

The pit was excavated to 4 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit and bedrock was encountered at 4 feet below ground surface. Approximately 20 cubic yards of excavated material was removed for landfarming and sent to an OCD approved centralized site. 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 1 ppm; laboratory analysis indicated a benzene concentration of <0.025 mg/kg, total BTEX concentration of <0.1 mg/kg, and a TPH concentration of 41.7 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 almost five years.
- Bedrock was encountered in the test excavation at 4 feet below ground surface making further remediation impractical.
- 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.
- Based on the Hazard Ranking Score, benzene, total BTEX, and TPH were below required remediation levels.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.



ATTACHMENT
Field Pit Assessment Form
Field Pit Remediation/Closure Form
Laboratory Analytical Results.

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 90178 Location: LESLIE KAY #1
Operator #: 4510 Operator Name: NORMAN L. GILBREATH P/L District: KUTZ
Coordinates: Letter: F Section 7 Township: 29 Range: 12
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 8.2.95 Area: 02 Run: 22

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☐ (1)
Outside ☒ (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 _____
(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: 20 **POINTS**

REMARKS

Remarks : REDLINE & TOPO SHOW LOCATION OUTSIDE U.Z. WILL DIG & HAUL SINCE PIT IS IN A RESIDENTIAL NEIGHBORHOOD IN A LANDOWNERS DRIVEWAY AS PER RICKY COSBY W/ EPNG. PIT HAD BEEN COVERED UP BY LANDOWNER. DUG TEST HOLE TO DETERMINE

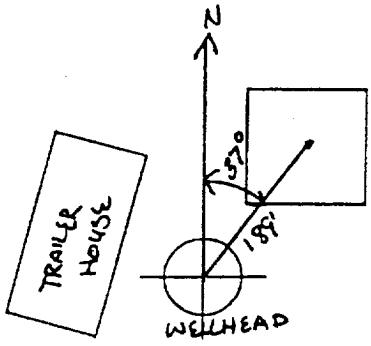
(CONT. ON BACK)

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 37° Footage from Wellhead 189'

b) Length : UNKNOWN Width : UNKNOWN Depth : UNKNOWN



REMARKS

Remarks :

WHERE PIT WAS. PIT BELONGS TO EPNG AND PHILIP ENVIR WILL CLOSE IT. ONE OTHER PIT AT THIS LOCATION THAT BELONGS TO THE OPERATOR.

Completed By:

Robert Thompson
Signature

8-2-95
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 90178 Location: LESLIE KAY #1

Coordinates: Letter: F Section 7 Township: 29 Range: 12

Or Latitude _____ Longitude _____

Date Started : 8-2-95 Run: 02 22

FIELD OBSERVATIONS

Sample Number(s): MK458 _____ _____ _____

Sample Depth: 4' Feet

Final PID Reading 1 ppm PID Reading Depth 4' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☒ Approx. Cubic Yards 20

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☐

Soil Disposition:

Envirotech ☐ ☒ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 8-2-95 Pit Closed By: Philips

REMARKS

Remarks : Arrived Aug Sample Hole Pit was FULL OF Wire and T Post Excavated TWO TRUCK load of soil TOOK Composite Sample Because it was IN land owners FRONT Yard Rick Cosby was on site Hit Sandstone 4'

Signature of Specialist: Morgan Killion

(SP3191) 03/16/94

El Paso Natural Gas Company

Phase I

FIELD SERVICES LABORATORY Leslie Kay #1

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK458	947137
MTR CODE | SITE NAME:	90178	N/A
SAMPLE DATE | TIME (Hrs):	8-2-95	09:05
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	8-4-95	8-4-95
DATE OF BTEX EXT. | ANAL.:	8-9-95	8-9-95
TYPE | DESCRIPTION:	VC	Dk brown sand & clay

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.025	MG/KG	1			
TOLUENE	<0.025	MG/KG	1			
ETHYL BENZENE	<0.025	MG/KG	1			
TOTAL XYLENES	<0.025	MG/KG	1			
TOTAL BTEX	<0.10	MG/KG				
TPH (418.1)	41.7	MG/KG			2.03	28
HEADSPACE PID	1	PPM				
PERCENT SOLIDS	85.7	%				

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

The Surrogate Recovery was at 108 % for this sample All QA/QC was acceptable.

Narrative: Att Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 8/22/95

Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **508342**

August 11, 1995

El Paso Natural Gas Co.
P.O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE/PHASE I & II 24324

Attention: John Lambdin

On **08/08/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

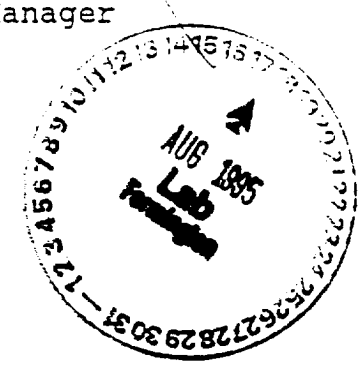
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 508342

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE/PHASE I & II

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	947134	NON-AQ	08/02/95	08/09/95	08/10/95	1
02	947135	NON-AQ	08/02/95	08/09/95	08/09/95	1
03	947137	NON-AQ	08/02/95	08/09/95	08/09/95	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	0.57	<0.025	<0.025
TOLUENE	MG/KG	0.47	<0.025	0.052
ETHYLBENZENE	MG/KG	<0.025	<0.025	<0.025
TOTAL XYLENES	MG/KG	0.18	<0.025	<0.025
SURROGATE:				
BROMOFLUOROBENZENE (%)		99	104	108

EL PASO Natural Gas Company

CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER	PROJECT NAME
# 24324	Pit Closure Project

SAMPLERS: (Signature) Morgan Killion — DATE: 8-2-95

LAB ID	DATE	TIME	MATRIX	FIELD ID	TOTAL NUMBER OF CONTAINERS	SAMPLE TYPE	TPH EPA 418.1	BTEX EPA 8020	25 ~~LAB~~ PID			SEQUENCE #	REMARKS
947137	8-2-95	9:05	Soil	MK 458	1	VC	X	X	1			412	Grey Soil No Hydrocarbon odor

CONTRACT LABORATORY P. O. NUMBER

REQUESTED ANALYSIS

RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)
Morgan Killion	8-2-95 11:05	Kelly Stwall	Kelly Stwall	8/3/95 10:45	
RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED OF LABORATORY BY: (Signature)

REQUESTED TURNAROUND TIME:
☐ ROUTINE ☐ RUSH

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 FAX: 505-599-2261

White - *Testing Laboratory* Canary - *EPNG Lab* Pink - *Field Sampler*

FM-08-0565 A (Rev. 05-94)