

# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

OK

## Valdez Gas Unit A No. 1E DK Meter/Line ID – 94297

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### SITE DETAILS

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Legals - Twn: 29N	Rng: 11W	Sec: 24	Unit: G
NMOCD Hazard Ranking: 40		Land Type: Fee	
Operator: Tenneco		Pit Closure Date: 04/28/94	

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### RATIONALE FOR CLOSURE

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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 Phase I excavation was conducted to 12 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Approximately 60 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 384 ppm; laboratory analysis indicated a benzene concentration of 3.6 mg/kg, a total BTEX concentration of 50.1 mg/kg, and a TPH concentration of <10 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 six years.
- The 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.
- 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.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.

### ATTACHMENT

Field Pit Assessment Form  
Field Pit Remediation/Closure Form

Laboratory Analytical Results

# FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94297</u> Location: <u>VALDEZ GAS UNIT A #1E DK</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>TENNECO</u> P/L District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>24</u> Township: <u>29</u> Range: <u>11</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>4.14.94</u> Run: <u>10</u> <u>81</u></p>
SITE ASSESSMENT	<p><b>NMOCD Zone:</b> Inside _____ Land Type: BLM <input type="checkbox"/>          (From NMOCD Vulnerable _____ State <input type="checkbox"/>          Maps) Zone <input checked="" type="checkbox"/> Fee <input checked="" type="checkbox"/>          Outside <input type="checkbox"/> Indian _____</p> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input checked="" type="checkbox"/>          50 Ft to 99 Ft (10 points) <input type="checkbox"/>          Greater Than 100 Ft (0 points) <input type="checkbox"/></p> <p><b>Wellhead Protection Area :</b></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 checked="" type="checkbox"/> YES (20 points) <input type="checkbox"/> NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/>          200 Ft to 1000 Ft (10 points) <input type="checkbox"/>          Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/></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><b>TOTAL HAZARD RANKING SCORE:</b> <u>40</u> POINTS</p>
REMARKS	<p>Remarks : <u>TWO PITS ON LOCATION. WILL CLOSE BOTH OF THEM. PITS ARE DRY. LOCATION IS RIGHT NEXT TO A HOUSE DOWN ON A FLAT.</u></p>

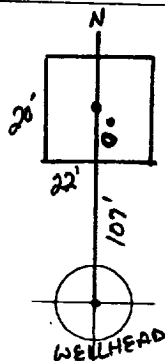
# ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 0° Footage to Wellhead 107'

b) Degrees from North \_\_\_\_\_ Footage to Dogleg \_\_\_\_\_

Dogleg Name \_\_\_\_\_

c) Length : 22' Width : 20' Depth : 4'



Remarks :

STARTED TAKING PICTURES AT 10:30 A.M.

END DUMP

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

Completed By:

Robert Thompson  
Signature

4.14.94  
Date

FIELD REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>94297</u> Location: <u>VALDEZ GAS UNIT A #1E DK</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>24</u> Township: <u>29</u> Range: <u>11</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>4/28/94</u> Area: <u>10</u> Run: <u>81</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <sup>945043</sup> <u>K.P. #6</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>384</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 checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>60</u></p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>4/28/94</u> Pit Closed By: <u>B.E.I</u></p>
REMARKS	<p>Remarks : <u>ON LOCATION SOME LINE MARKERS, TOP OF PIT</u>  <u>LOOKS A LITTLE MOIST, DUG DOWN 5' SOIL TURNED BLACK, WITH</u>  <u>HIGH HC ORDER.</u></p> <p>Signature of Specialist: <u>Kelly Rodilla</u></p>



# FIELD SERVICES LABORATORY

## ANALYTICAL REPORT

### PIT CLOSURE PROJECT - Soil

#### SAMPLE IDENTIFICATION

SAMPLE NUMBER:

Field ID

Lab ID

MTR CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

SAMPLED BY:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

KPLc	945043
94297	N/A
4/28/94	1539
N/A	N/A
5-2-94	5-2-94
5/5/94	5/6/94
VC	Brown Sand/Clay

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.25	MG/KG				
TOLUENE	40.25	MG/KG				
ETHYL BENZENE	3.6	MG/KG				
TOTAL XYLENES	46	MG/KG				
TOTAL BTEX	50.1	MG/KG				
TPH (418.1)	<16	MG/KG			2.24	28
HEADSPACE PID	384	PPM				
PERCENT SOLIDS	77.8	%				

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

The Surrogate Recovery was at

65

% for this sample

All QA/QC was acceptable.

Narrative:

ATI results attached.

DF = Dilution Factor Used

Approved By:

John Fawcett

Date:

5/2/94



Analytical Technologies, Inc.

## GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)  
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405313  
PROJECT # : 24324  
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
28	945041	NON-AQ	04/28/94	05/05/94	05/05/94	20
29	945042	NON-AQ	04/28/94	05/05/94	05/05/94	20
30	945043	NON-AQ	04/28/94	05/05/94	05/06/94	10
PARAMETER			UNITS	28	29	30
BENZENE			MG/KG	13	<0.50	<0.25
TOLUENE			MG/KG	210	5.4	<0.25
METHYLBENZENE			MG/KG	17	7.2	3.6
TOTAL XYLENES			MG/KG	160	76	46
METHYL-t-BUTYL ETHER			MG/KG	<2.4	<2.4	<1.2

### SURROGATE:

BROMOFLUOROBENZENE (%)	179*	88	65
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\*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE



Analytical**Technologies**, Inc.

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Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. 405313

May 13, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 05/03/94, 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.

EPA Method 8015 analysis was added on 05/05/94 for sample 945008 per Stacy Sendler.

The matrix spike/spike duplicate data from the samples extracted on 05/05/94 is reported twice reflecting quantification using both the internal standard and external standard protocols. Both protocols were employed to quantify the samples submitted for this project.

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

Letitia Krakowski, Ph.D.  
Project Manager

H. Mitchell Rubenstein, Ph.D.  
Laboratory Manager

MR:jd

Enclosure





## CHAIN OF CUSTODY RECORD

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