

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Drif
**Elliot Gas Com C#1
Meter/Line ID – 70165**

Bedrock
WARNING
DO NOT ENTER

SITE DETAILS

**Legals - Twn: 30N
NMOCD Hazard Ranking: 0
Operator: Amoco Prod**

Rng: 9W

**Sec: 9 Unit: G
Land Type: BLM
Pit Closure Date: 5/17/94**

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 11' where sandstone was encountered. The excavation was terminated at 11' 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 204 ppm; laboratory analysis indicated a TPH concentration of 3280 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 eleven 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

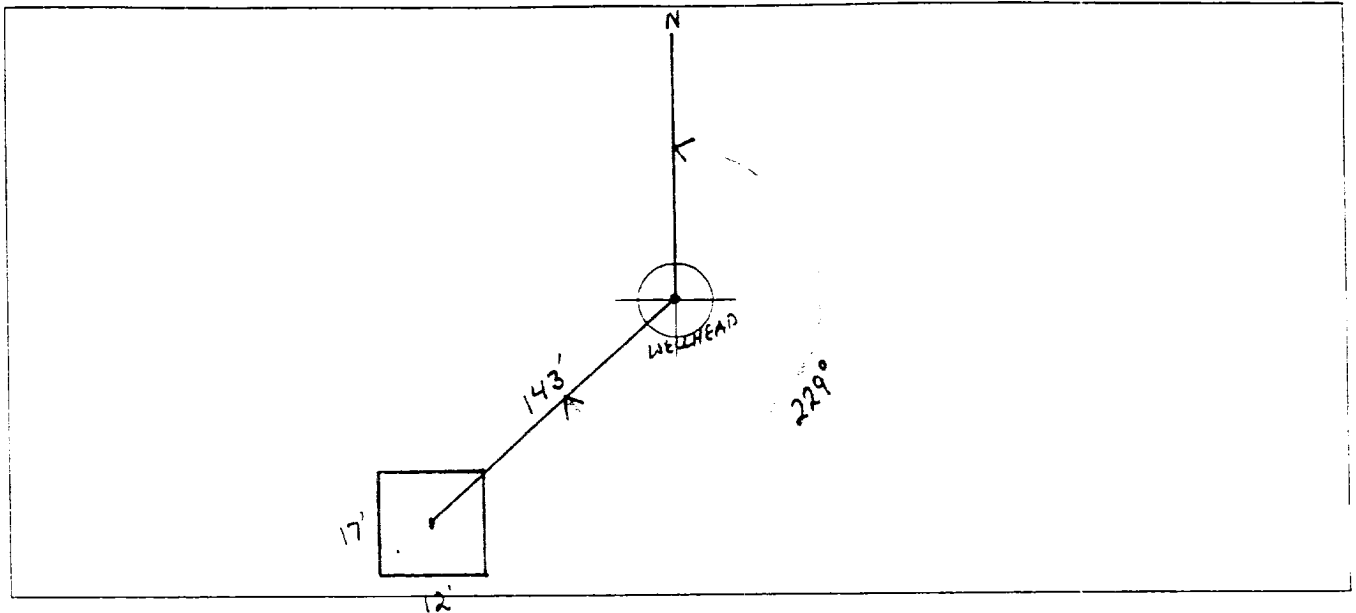
GENERAL	<p>Meter: <u>70.16S</u> Location: <u>ELLIOT GAS COM C #1</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>Amoco Prod.</u> P/L District: _____</p> <p>Coordinates: Letter: <u>G</u> Section <u>9</u> Township: <u>30</u> Range: <u>9</u></p> <p style="padding-left: 40px;">Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4.23.98</u> Area: <u>10</u> Run: <u>33</u></p>
SITE ASSESSMENT	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>NMOCD Zone:</p> <p>(From NMOCD Maps)</p> <p style="padding-left: 40px;">Inside _____ (1)</p> <p style="padding-left: 40px;">Outside <u>X</u> (2)</p> </div> <div style="width: 45%;"> <p>Land Type:</p> <p>BLM <u>X</u> (1)</p> <p>State _____ (2)</p> <p>Fee _____ (3)</p> <p>Indian _____</p> </div> </div> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) _____ (1)</p> <p>50 Ft to 99 Ft (10 points) _____ (2)</p> <p>Greater Than 100 Ft (0 points) <u>X</u> (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;">_____ (1) YES (20 points) <u>X</u> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) _____ (1)</p> <p>200 Ft to 1000 Ft (10 points) _____ (2)</p> <p>Greater Than 1000 Ft (0 points) <u>X</u> (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 _____ (1) < 100' (Navajo Pits Only)</p> <p style="padding-left: 100px;">_____ (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS NESTED AT THE BASE OF A SAND-STONE LEDGE AND IS APPROX. 4700* FEET FROM CABALLO SPRING.</u></p>

FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>70165</u> Location: <u>ELLIOT GAS COM C#1</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>9</u> Township: <u>30</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4.20.94</u> Area: <u>10</u> Run: <u>33</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input 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</p> <p>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)</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</p> <p>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>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>THREE PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY. DO NOT KNOW WHY THIS LOCATION IS IN THE WATER VULNERABLE ZONE.</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 229° Footage from Wellhead 143'
 b) Length : 17' Width : 12' Depth : 2'



REMARKS :

STARTED TAKING PICTURES AT 9:25 A.M.
END DUMP

Completed By:

Paul Thompson
 Signature

4.20.94
 Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>20165</u> Location: <u>Elliott Guy Cam C#1</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>9</u> Township: <u>30</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>5-17-94</u> Area: <u>10</u> Run: <u>33</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW 95</u></p> <p>Sample Depth: <u>11'</u> Feet</p> <p>Final PID Reading <u>204</u> PID Reading Depth <u>11'</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>5-17-94</u> Pit Closed By: <u>BLZ</u></p>
REMARKS	<p>Remarks : <u>Line Markers Sandstone 11'</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW95	945212
MTR CODE SITE NAME:	70165	N/A
SAMPLE DATE TIME (Hrs):	5-17-94	1230
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	5-18-94	5/18/94
DATE OF BTEX EXT. ANAL.:	N/A 5/18/94	5/18/94 N/A
TYPE DESCRIPTION:	VG	Coarse Grey Sand

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)	3280	MG/KG			1.98	28
HEADSPACE PID	204	PPM				
PERCENT SOLIDS	89.1	%				

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

The Surrogate Recovery was at _____ % for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By: [Signature]

Date: 5/21/94