

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Risk
to EX

**Florance No. 2A FT
Meter/Line ID – 95257**

SITE DETAILS

Legals - Twn: 30N	Rng: 9W	Sec: 20	Unit: O
NMOCD Hazard Ranking: 10		Land Type: BLM	
Operator: Amoco		Pit Closure Date: 05/17/94	

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 twelve feet 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 170 ppm; laboratory analysis indicated a TPH concentration of 868 mg/kg. This site was re-assessed on April 9, 1998, because the initial assessment incorrectly included washes as a surface water body.

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 six years.
- 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.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- 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.

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>95257</u> Location: <u>Florance #2A FT</u>
	Operator #: _____ Operator Name: _____ P/L District: _____
	Coordinates: Letter: <u>0</u> Section <u>20</u> Township: <u>30</u> Range: <u>9</u>
	Or Latitude _____ Longitude _____
Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____	
Site Assessment Date: <u>4/9/98</u> Area: _____ Run: _____	

SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)	Land Type:	BLM <input checked="" type="checkbox"/> (1)
	Inside <input type="checkbox"/> (1)	State <input type="checkbox"/> (2)	Fee <input type="checkbox"/> (3)
	Outside <input checked="" type="checkbox"/> (2)	Indian _____	
	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)		
	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)			
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>10</u> POINTS			

REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is <100' vertical from center of Pemada Canyon.</u>

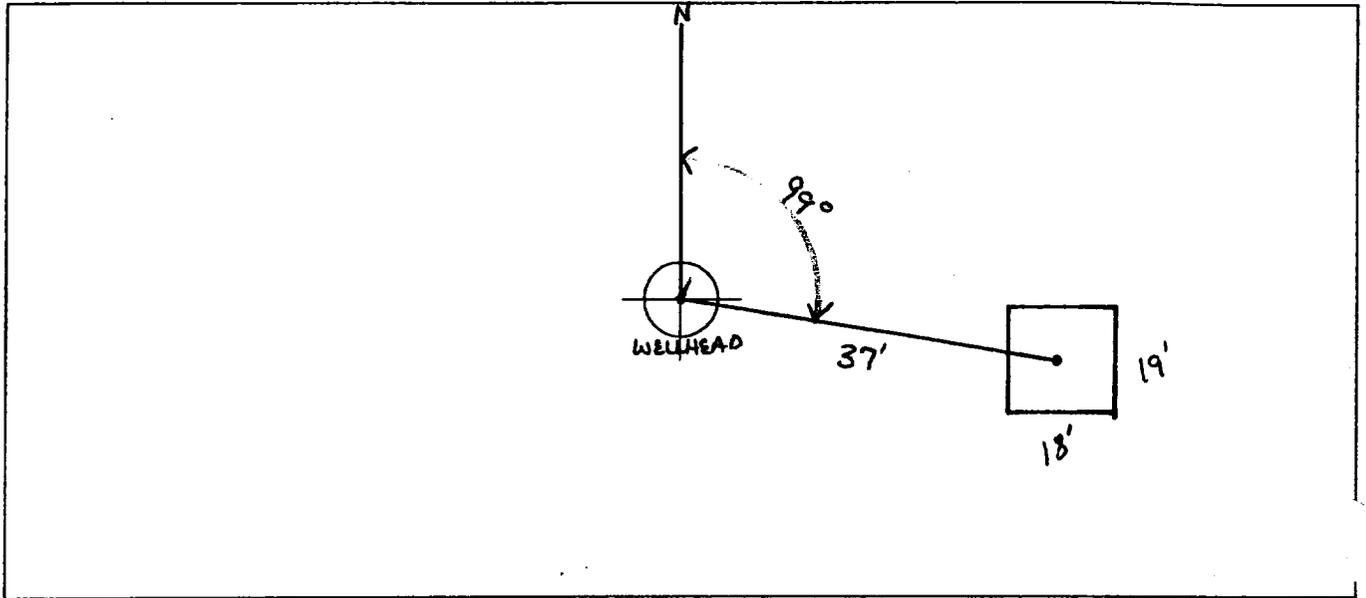
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>95257</u> Location: <u>FLORENCE #2A FT</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>Amoco</u> P/L District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>0</u> Section <u>20</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>4.19.94</u> Area: <u>10</u> Run: <u>43-33</u> ^{4.24.94} _{RT}</p>								
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p style="margin-left: 40px;"> <input type="checkbox"/> Inside <input type="checkbox"/> Outside </p> <p>Land Type:</p> <table style="margin-left: 40px; border: none;"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (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? <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)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>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)</p> <p style="margin-left: 100px;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>	BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian	_____
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian	_____								
REMARKS	<p>Remarks : <u>FOUR PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY. DO NOT KNOW WHY LOCATION IS IN THE WATER VULNERABLE ZONE.</u></p>								

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 99° Footage from Wellhead 37'
b) Length : 19' Width : 18' Depth : 4'

ORIGINAL PIT LOCATION



REMARKS

Remarks :

STARTED TAKING PICTURES AT 12:20 P.M.

END DUMP

Completed By:

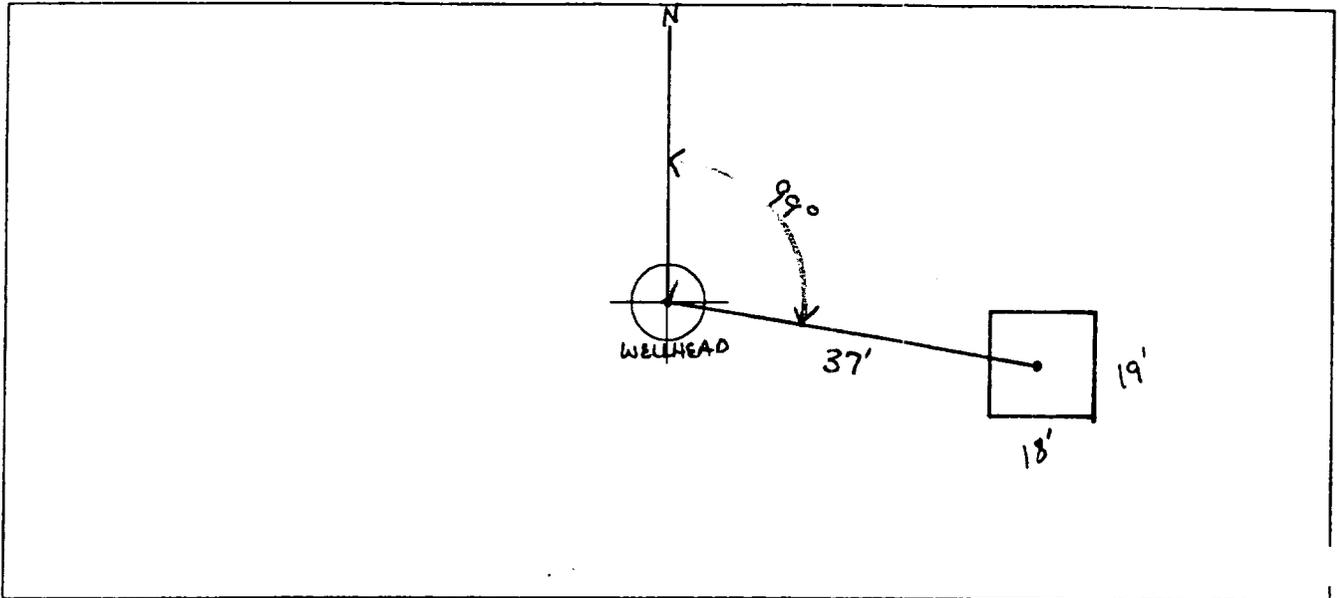
Robert Champion
Signature

4.19.94
Date

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 99° Footage from Wellhead 37'
b) Length : 19' Width : 18' Depth : 4'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 12:20 P.M.

END DUMP

Completed By:

Robert Thompson

Signature

4.19.94

Date

4-29-94
RT

FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>95252</u> Location: <u>FLORENCE #2A FT</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: _____ Section: _____ Township: _____ Range: _____</p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: _____ Area: <u>10</u> Run: <u>43</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p style="margin-left: 100px;">Inside <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type:</p> <p style="margin-left: 100px;">BLM <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 100px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 100px;">Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input type="checkbox"/> (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? <input type="checkbox"/> (1) YES (20 points) <input 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)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input 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)</p> <p style="margin-left: 100px;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</p>
REMARKS	<p>Remarks : _____</p>

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 95257 Location: Florence #2A FT

Coordinates: Letter: 0 Section 20 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Date Started : 5-17-94 Area: 10 Run: 33

FIELD OBSERVATIONS

Sample Number(s): VW88

Sample Depth: 12' Feet

Final PID Reading 170 PID Reading Depth 12' Feet

Yes No

Groundwater Encountered (1) (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation (1) Approx. Cubic Yards _____

Onsite Bioremediation (2)

Backfill Pit Without Excavation (3)

Soil Disposition:

Envirotech (1) (3) Tierra

Other Facility (2) Name: _____

Pit Closure Date: 5-17-94 Pit Closed By: BEI

REMARKS

Remarks : Line marks.

Signature of Specialist: Vale Wilson



**FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil**

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW88	945205
MTR CODE SITE NAME:	95257	N/A
SAMPLE DATE TIME (Hrs):	5-17-94	1020
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	5-18-94	5/18/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/grey coarse 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)	870 868 5/17/94	MG/KG			1.98	2.8
HEADSPACE PID	170	PPM				
PERCENT SOLIDS	94.7	%				

-- 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.
Negative: _____

DF = Dilution Factor Used

Approved By: John Savelli

Date: 5/21/94



CHAIN OF CUSTODY RECORD

PROJECT NUMBER		PROJECT NAME		CONTINACT LABORATORY P. O. NUMBER	
24324		Pit Closure Project # 24324			
SAMPLERS: (Signature)		DATE:		REMARKS	
Vale Wilson		5/17/94			
LAB ID	DATE	TIME	MATRIX	SAMPLE NUMBER	
S202	5-17-94	840	Soil	VW85	76
S203	5-17-94	930	Soil	VW86	77
S204	5-17-94	955	Soil	VW87	78
S205	5-17-94	1020	Soil	VW88	79
S206	5-17-94	1100	Soil	VW89	80
S207	5-17-94	1115	Soil	VW90	81
S208	5-17-94	1115	Soil	VW91	
S209	5-17-94	1120	Soil	VW92	
S210	5-17-94	1200	Soil	VW93	82
S211	5-17-94	1300	Soil	VW94	83
S212	5-17-94	1330	Soil	VW95	84
S213	5-17-94	1415	Soil	VW96	85

TPH EPA 418.1	BTEX EPA 8020	REQUESTED ANALYSIS	SAMPLE TYPE	TOTAL NUMBERS OF CONTAINERS	RECEIVED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	DATE/TIME
X			VG	1		32		
X			VG	1		5/18/94		8953
X			VG	1				
X			VG	1				
X			VG	1				
X			D	1				
X			B	1				
X			VG	1				
X			VG	1				
X			VG	1				
X			VG	1				

RECEIVED BY: (Signature)	RECEIVED BY: (Signature)
Vale Wilson	Brenda Lull
DATE/TIME	DATE/TIME
5-17-94 1755	5/18/94 8953
RECEIVED BY: (Signature)	RECEIVED BY: (Signature)
	Kim B...

REQUESTED TURNAROUND TIME:	RESULTS & INVOICES TO:
<input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH	FIELD SERVICES LABORATORY
CARRIER CO.	EL PASO NATURAL GAS COMPANY
BILL NO.:	P.O. BOX 4990
	FARMINGTON, NEW MEXICO 87499
	FAX: 505-599-2261