

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Keys Gas Com A#1
Meter/Line ID - 70688

SITE DETAILS

Legals - Twn: 32N

Rng: 10W

Sec: 27

Unit: K

NMOCD Hazard Ranking: 0

Land Type: Fee

Operator: Amoco

Pit Closure Date: 10/4/94

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 12 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 284 ppm; laboratory analysis indicated a TPH concentration of 13,800 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 four years.
- 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>70688</u> Location: <u>Keys Gas Com A#1</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>K</u> Section <u>27</u> Township: <u>32</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>12/19/97</u> Area: _____ Run: _____	
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)	
	Inside _____ (1) Outside <input checked="" type="checkbox"/> (2)	Land Type: BLM _____ (1) State _____ (2) Fee <input checked="" type="checkbox"/> (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) <input checked="" 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? _____ (1) YES (20 points) <input checked="" type="checkbox"/> (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) <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 _____ (1) < 100' (Navajo Pits Only) _____ (2) > 100'	
	TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS	
	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Depth to GW measured to center of Animas R. Animas R. is greater than 1000' to site.</u>	
	REMARKS	

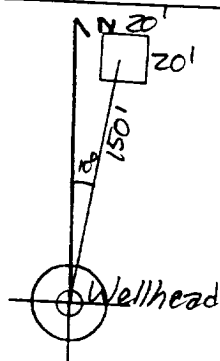
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>70-688</u> Location: <u>Keys Gas Com "A" Well No. 2</u> Operator #: <u>0203</u> Operator Name: <u>Amoco P/L</u> District: <u>Aztec</u> Coordinates: Letter: <u>K</u> Section <u>27</u> Township: <u>32</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>9/7/94</u> Area: <u>04</u> Run: <u>43</u>	
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2) Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3) Indian _____ Depth to Groundwater Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input 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 checked="" type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3) Name of Surface Water Body <u>Animas River</u> (Surface Water Body : Perennial Rivers, Major Wash, 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>40</u> POINTS	
REMARKS	Remarks : <u>Redline Book - Inside Vulnerable Zone Type - Outside</u> <u>Three pits, location drip pit is dry, Will close one pit.</u> <u>PURTH IN</u>	

ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 10° Footage from Wellhead 150'
b) Length : 20' Width : 20' Depth : 3'



REMARKS

Remarks :

Pictures @ 1232 (9-12, Roll 12)

Dump Truck

Completed By:

Garth Kelly
Signature

9/7/94
Date

GENERAL	Meter: <u>70688</u> Location: <u>Keys Gas com "A" well No.1</u> Coordinates: Letter: <u>K</u> Section <u>27</u> Township: <u>32</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Date Started : <u>10-4-94</u> Run: <u>04</u> <u>43</u>
FIELD OBSERVATIONS	Sample Number(s): <u>KP 289</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>284</u> PID Reading Depth <u>12'</u> Feet <div style="display: flex; justify-content: space-around;"> Yes No </div> Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div> Excavation Onsite Bioremediation Backfill Pit Without Excavation </div> <div> <input type="checkbox"/> Approx. Cubic Yards _____ <input type="checkbox"/> <input checked="" type="checkbox"/> </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div> Envirotech <input type="checkbox"/> Other Facility <input type="checkbox"/> </div> <div> <input type="checkbox"/> Tierra Name: _____ </div> </div> Pit Closure Date: <u>10-4-94</u> Pit Closed By: <u>B.EI</u>
REMARKS	Remarks : <u>Some LINE MARKERS. At 12' Soil grey looking</u> <u>with odor</u>
	Signature of Specialist: <u>Kelly Padilla</u>



CHAIN OF CUSTODY RECORD

[illegible]



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 289	946316
MTR CODE SITE NAME:	70688	N/A
SAMPLE DATE TIME (Hrs):	10-4-94	1455
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	10-6-94	
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Grey sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	13800	MG/KG			0.72	28
HEADSPACE PID	284	PPM				
PERCENT SOLIDS	89.9	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

10/13/94