

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Outside

Risk

BTEX - TPH

State Com H 4A MV PC
Meter/Line ID - 89297

RECEIVED
NOV - 2 1999

SITE DETAILS

Legals - Twn: 31N

Rng: 9

Sec: 32

Un

NMOCD Hazard Ranking: 0

Land Type: State

Operator: Conoco

Pit Closure Date: 10/3/94

OIL CON. DIV.
DIST. 3

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 eight feet and a soil sample was collected for headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit. The pit was then backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 482 ppm; laboratory analysis indicated a TPH concentration of 32,700 mg/kg.

El Paso Field Services Company (EPFS) requests closure of the production pit location noted above for the following reasons:

- The primary source, discharge to the pit, has been removed for over four years.
- Bedrock was encountered at eight feet below ground surface making remediation impracticable.
- 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.
- The site is greater than 1,000 feet from potential surface water receptors and water supply wells.
- 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

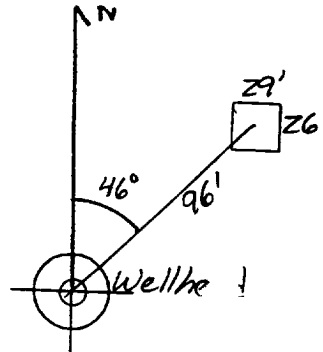
GENERAL				
	Meter: <u>89297</u>	Location: <u>State Com H 4A MV PC</u>		
	Operator #:	Operator Name:		P/L District:
	Coordinates: Letter: <u>F</u>	Section <u>32</u>	Township: <u>31</u>	Range: <u>9</u>
	Or Latitude _____	Longitude _____		
	Pit Type: Dehydrator _____	Location Drip: _____	Line Drip: _____	Other: _____
	Site Assessment Date: <u>4/9/98</u>	Area: _____	Run: _____	
SITE ASSESSMENT	<p>NMOCD Zone:</p> <p>(From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type:</p> <p>BLM <input type="checkbox"/> (1) State <input checked="" 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</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><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, 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>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is >100' vertical from center of Alamo Canyon.</u></p>			

FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>89-298 - MV Meter: 89-297 ^{PC} Location: <u>State COM. H4A MV, PC</u> Operator #: _____ Operator Name: <u>Conoco</u> P/L District: <u>Artec</u> Coordinates: Letter: <u>F</u> Section <u>32</u> Township: <u>31</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>8/30/94</u> Area: <u>04</u> Run: <u>83</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input type="checkbox"/> (1) State <input checked="" type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater 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 Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Alamo Canyon</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'</p> <p>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline Book - Inside</u> <u>Vulnerable Zone Tap - Outside</u> <u>Five pits, location drip pit has liquid and paraffin in it.</u> <u>Will close one pit.</u></p> <p style="text-align: right;"><u>PUSH IN</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 46° Footage from Wellhead 96'
b) Length : 29' Width : 26' Depth : 3'



REMARKS :

Pictures @ 1031 (9-12, Roll 2)
Dump Truck

Completed By:

Samuel Kelley
Signature

8/30/94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>89298-MW</u> Location: <u>State Com H4A MW, PC.</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>32</u> Township: <u>31</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>10/3/94</u> Run: <u>04</u> <u>83</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD 302</u></p> <p>Sample Depth: <u>8'</u> Feet</p> <p>Final PID Reading <u>482 ppm</u> PID Reading Depth <u>8'</u> Feet</p> <p>Groundwater Encountered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>10/3/94</u> Pit Closed By: <u>BET</u></p>
REMARKS	<p>Remarks : <u>EXCAVATED pit to 8', TOOK PID Sample, closed pit.</u></p>
	<p>Signature of Specialist: <u>[Signature]</u></p>



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FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 10/20/94 4074 40202	946307
MTR CODE SITE NAME:	89 298 / 89 297	N/A
SAMPLE DATE TIME (Hrs):	10-3-94	1245
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)	32,700	MG/KG			0.24	28
HEADSPACE PID	182	PPM				
PERCENT SOLIDS	90.2	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

10/13/94