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EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE
DEPUTY OIL & GAS INSPECTOR

DEC 21 1998

CANYON LARGO UNIT 311
Meter/Line ID - 94198

RECEIVED
JUL 2 1998

SITE DETAILS

Approved
Legals - Twn: 24 Rng: 06 Sec: 03
NMOCD Hazard Ranking: 40
Operator: MERRION OIL & GAS CORP.

Unit: F
Land Type: 3 - Navajo

Pit Closure Date: 08/29/98

OIL CON. DIV.
DIST. 3

RATIONALE FOR RISK-BASED CLOSURE:

The above mentioned production pit was assessed and ranked according to the criteria in the New Mexico Conservation Division's Unlined Surface Impoundment Closure Guidelines.

The primary source, discharge to the pit, has been removed. There has been no discharge to the production pit for at least five years and the pit has been closed for at least three years.

The production pit has been remediated to the practical extent of the trackhoe or to the top of bedrock. Initial laboratory analysis has indicated that the soil remaining at the bottom of the excavation is above standards based on the hazard ranking score. Contaminated soil was removed and transported to an approved landfarm for disposal. The initial excavation was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching any residual hydrocarbons remaining in the soil. Therefore, further mobility of residual hydrocarbons is unlikely.

Since the soil samples from the initial excavation were above standards, a test boring was drilled and a sample was collected to evaluate the vertical extent of impact to soils. Test boring sample results indicated soils below standards beneath the original excavation.

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

- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All source material has been removed from the ground surface, eliminating potential direct contact with livestock and the general public.
- Groundwater was not encountered in the initial excavation or test boring; therefore, impact to groundwater is unlikely.
- Soil samples collected beneath the initial excavation were below standards.
- No potential receptors are within 1,000 feet of the site.
- Residual hydrocarbons remaining in the soil at the bottom of the initial excavation will naturally degrade in time with minimal risk to the environment.

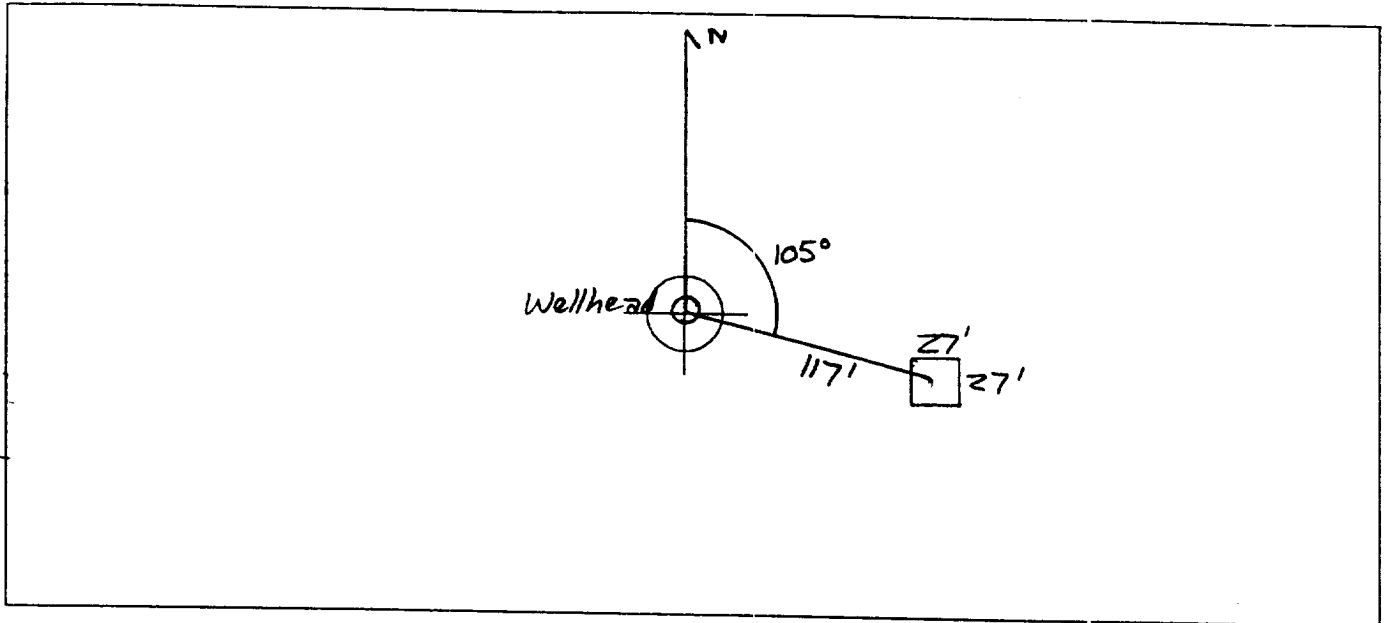
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94-198</u> Location: <u>Canyon Largo Unit 311</u> Operator #: <u>5997</u> Operator Name: <u>Merrion</u> P/L District: <u>Ballard</u> Coordinates: Letter: <u>E</u> Section <u>3</u> Township: <u>24</u> Range: <u>6</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>07/13/94</u> Area: <u>07</u> Run: <u>42</u></p>
	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) <u>11/41</u> Fee <input type="checkbox"/> (3) <u>8m</u> Indian <u>Ticariillo Mesa</u> <u>NAVAJO</u></p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> <p>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)</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 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)</p> <p>Name of Surface Water Body <u>Largo Wash</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>40</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline Book - Inside</u> <u>Vulnerable Zone Type - Inside</u> <u>Four pits on site, location drip pit is dry, Will close one pit</u> <u>DIG & HAUL</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 105° Footage from Wellhead 117'
b) Length : 27' Width : 27 Depth : 3'

ORIGINAL PIT LOCATION



Remarks :

Pictures @ 10:37 (1-4, Roll 1)
Dump Truck

REMARKS

Completed By:

Jack Kelly
Signature

7/13/97
Date

PHASE I EXCAVATION

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>94198</u> Location: <u>Canyon Largo Unit 311</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>3</u> Township: <u>24</u> Range: <u>6</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>8/29/94</u> Run: <u>07</u> <u>42</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD 241</u> <u>KD 242</u> <u>KD 243</u></p> <p>Sample Depth: <u>5'</u> Feet</p> <p>Final PID Reading <u>5 ppm</u> PID Reading Depth <u>5'</u> Feet</p> <p>Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>50</u></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>8/29/94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Excavated pit to 5' Contamination ended at this depth, Took pid Reading, closed pit</u></p>
	<p>Signature of Specialist: <u>Kung Danner</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

SAMPLE NUMBER:	Field ID KD241	Lab ID 946026
MTR CODE SITE NAME:	94198	Canyon Largo Unit 311
SAMPLE DATE TIME (Hrs):	8/29/94	1150
PROJECT:	PHASE I	
DATE OF TPH EXT. ANAL.:	8/30/94	8/30/94
DATE OF BTEX EXT. ANAL.:	8/31/94	9/6/94
TYPE DESCRIPTION:	VC	Brown fine sand

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.03	MG/KG				
TOLUENE	0.04	MG/KG				
ETHYL BENZENE	0.10	MG/KG				
TOTAL XYLENES	0.03	MG/KG				
TOTAL BTEX	0.18	MG/KG				
TPH (418.1)	5,920	MG/KG			0.40	28
HEADSPACE PID	5	PPM				
PERCENT SOLIDS	94.8	%				

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

The Surrogate Recovery was at 93.0 for this sample All QA/QC was acceptable.

Narrative:

ATI Results Attached

DF = Dilution Factor Used

Approved By:

John Seibach

INGVZPIT.XLS

Date:

9/30/94



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 241	946026
MTR CODE SITE NAME:	94198	N/A
SAMPLE DATE TIME (Hrs):	8-29-94	1150
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-30-94	8-30-94
DATE OF BTEX EXT. ANAL.:	8/31/94	9/6/94
TYPE DESCRIPTION:	VC	Brown fine sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.025	MG/KG	1			
TOLUENE	0.038	MG/KG	1			
ETHYL BENZENE	0.096	MG/KG	1			
TOTAL XYLENES	0.025	MG/KG	1			
TOTAL BTEX	0.184	MG/KG			.40	28
TPH (418.1) 5920	5918 8/31/94	MG/KG				
HEADSPACE PID	5	PPM				
PERCENT SOLIDS	94.8	%				

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

The Surrogate Recovery was at 93 % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached.

DF = Dilution Factor Used

Approved By: JS

Date: 9/30/94

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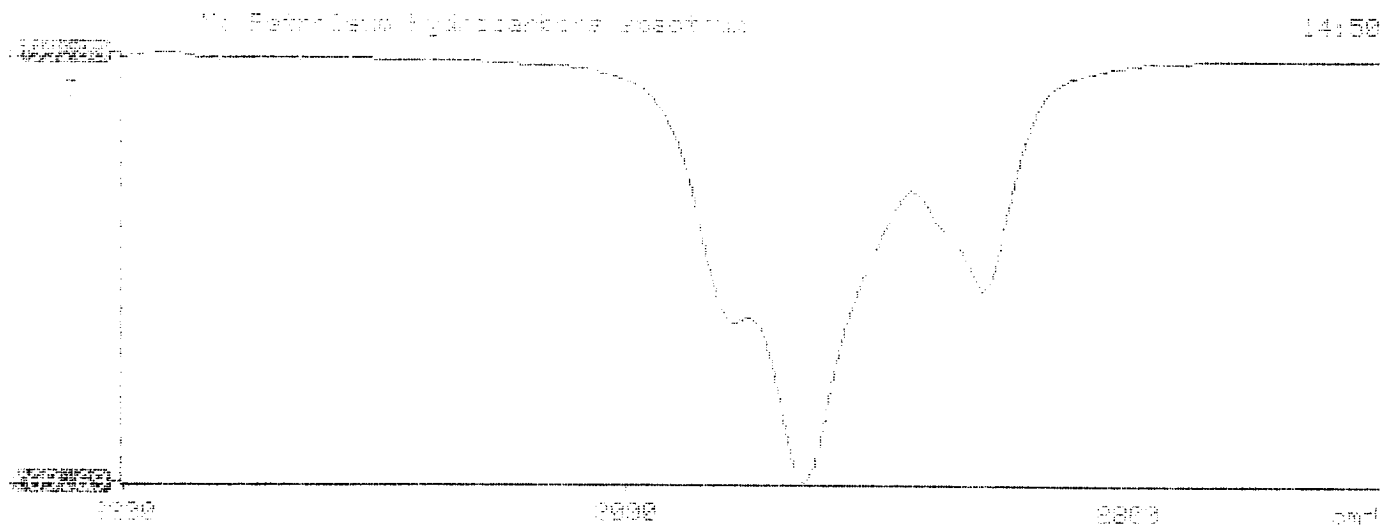
*****
Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil
Per In-Herzfeld Model 1100 FT-IR
Analysis Report
*****

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74/03/30 14:50

Sample Identification
P46024

Initial mass of sample, g
0.400
Volume of sample after extraction, ml
25.000
Petroleum hydrocarbons, ppm
1716.363
Net absorbance of hydrocarbons (2070 cm-1)
0.113





Analytical **Technologies**, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. 408425

September 12, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 08/31/94, 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.

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:jt

Enclosure



GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
 CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 408425
 PROJECT # : 24324
 PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	946018	NON-AQ	08/26/94	08/31/94	09/07/94	20
08	946025	NON-AQ	08/29/94	08/31/94	09/07/94	10
09	946026	NON-AQ	08/29/94	08/31/94	09/06/94	1

PARAMETER	UNITS	07	08	09
BENZENE	MG/KG	8.1	<0.25	<0.025
TOLUENE	MG/KG	86	8.8	0.038
ETHYLBENZENE	MG/KG	22	3.5	0.096
TOTAL XYLENES	MG/KG	240	16	0.025

SURROGATE:

BROMOFLUOROBENZENE (%)	209*	127*	93
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*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE