EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Outside Workertrant and

Newsom B #9E Meter/Line ID - 94237 RECEIVED NOV - 2 1900

SITE DETAILS

Legals - Twn: 26N

NMOCD Hazard Ranking: 0

Operator: Meridian

Rng: 8W

Sec: 7

Unit:

Land Type: BLM

Pit Closure Date: 9/15/94

COM. DAY.

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. Groundwater was not encountered during excavation of the test pit. The test pit was terminated at 12 feet and a soil sample was collected for field headspace analysis and laboratory analysis of TPH. The test pit was then backfilled and the pit area graded in a manner to divert precipitation away from the pit area. Headspace analysis indicated an organic vapor content of 272 mg/kg; laboratory analysis indicated a TPH concentration of 28,700 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 potential receptors located within 1,000 feet of the site.
- Residual hydrocarbons in the soil at the bottom of the excavation 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

REVISEDFIELD PIT SITE ASSESSMENT FORM

| GENERAL | Operator #: Operator Name: Coordinates: Letter: P Section 7 Or Latitude Long | gitude rip: Line Drip: Other: | | | | | |
|------------|---|--|--|--|--|--|--|
| | NMOCD Zone: | Land Type: BLM (1) | | | | | |
| | (From NMOCD | $\begin{array}{ccc} \text{State} & (2) \\ \text{(1)} & \text{Fee} & (3) \end{array}$ | | | | | |
| | Maps) Inside | | | | | | |
| | Outside | \boxtimes (2) Indian | | | | | |
| | Depth to Groundwater | (1) | | | | | |
| | Less Than 50 Feet (20 points) | (1) | | | | | |
| | 50 Ft to 99 Ft (10 points) | $ \begin{array}{c} (1) \\ (2) \\ (3) \end{array} $ | | | | | |
| | Greater Than 100 Ft (0 points) | | | | | | |
| E | Wellhead Protection Area | | | | | | |
| ASSESSMENT | Is it less than 1000 ft from wells, springs of extraction?, or; Is it less than 200 ft from a | a private domestic water source? | | | | | |
| ES | (1) Y | ES (20 points) \times (2) NO (0 points) | | | | | |
| \SS\ | Horizontal Distance to Surface Water F | · - | | | | | |
| SITE A | Less Than 200 Ft (20 points) | (1) | | | | | |
| | 200 Ft to 1000 Ft (10 points) | (2) | | | | | |
| | Greater Than 1000 Ft (0 points) | $\overline{\chi}$ (3) | | | | | |
| | Name of Surface Water Body | | | | | | |
| | (Surface Water Body: Perennial Rivers, St Ditches, Lakes, Ponds) | | | | | | |
| | Distance to Nearest Ephemeral Stream | (1) < 100' (Navajo Pits Only) | | | | | |
| 1 | | (2) > 100' | | | | | |
| | TOTAL HAZARD RANKING SCORE: | M | | | | | |
| SS | | due to initial assessment including washes | | | | | |
| REMARKS | as a Surface Water Body. Site is | >100 vertical From center | | | | | |
| l M M | of Blanco Canan | of Blanco Canyon | | | | | |
| | | | | | | | |

FIELD PIT SITE ASSESSMENT FORM

| GENERAL | Meter: 94237 Location: Newsom B No. 9 E Operator #: 2999 Operator Name: Meridian P/L District: Ballard Coordinates: Letter: P Section 7 Township: 26 Range: 8 Or Latitude Longitude Pit Type: Dehydrator Location Drip: Line Drip: Other: Site Assessment Date: 6-16-94 Area: 11 Run: 62 | | | | |
|------------|---|--|--|--|--|
| | NMOCD Zone: (From NMOCD Maps) Inside Outside Land Type: BLM State (2) Fee (3) Indian 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) ☐ (3) | | | | |
| ASSESSMENT | 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) ☒ (2) NO (0 points) | | | | |
| SITE ASS | 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) (3) Name of Surface Water Body | | | | |
| | (Surface Water Body : Perennial Rivers,Major Wash,Streams,Creeks, Irrigation Canals,Ditches,Lakes,Ponds) Distance to Nearest Ephemeral Stream ☐ (1) < 100'(Navajo Pits Only) ☐ (2) > 100' | | | | |
| | TOTAL HAZARD RANKING SCORE: POINTS | | | | |
| RKS | Remarks: Two pits on location. One with liner | | | | |
| REMARKS | outside V.Z. on Redline & Topo | | | | |
| X | Post 10 | | | | |

| | ORIGINAL PIT LOCATION Original Pit: a) Degrees from North 12.1 Footage from Wellhead 109 |
|-----------------------|---|
| ORIGINAL PIT LOCATION | b) Length: 16 Width: 14 Depth: 4 |
| REMARKS | Remarks: Photos -1527 Bobtail |
| | Completed By: |
| | Signature Date |

FIELD PIT REMEDIATION/CLOS_RE FORM

| GENERA | Meter: 94237 Location: Newsom 3 #9E Coordinates: Letter: P Section 7 Township: 26 Range: 8 Or Latitude Longitude Date Started: 9:15-94 Run: 11 6 2 |
|-----------|--|
| OBSERVATI | Sample Number(s): 12^{\prime} Feet Sample Depth: 12^{\prime} Feet Final PID Reading 272 PID Reading Depth 12^{\prime} Feet Yes No Groundwater Encountered \square Approximate Depth Feet |
| CLOSURE | Remediation Method: Excavation |
| REMARKS | Remarks: Zoyds Fill Signature of Specialist: Vale Wilsen |



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CHAIN OF CUSTODY RECORD

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| PROJECT NUMBER PRO | PROJECT NAME | | | | - | 11000 | DECLIERTED ANALYSIS | Ö | CONTRACT LABORATORY P. O. NUMBER |
|--|---------------|------------------------------|---|------------------|----------|---------------------|------------------------------|------------------------|---|
| _ | it Closure | Pit Closure Project # 24324 | 4 | SHE | | | פובה אוגיבו פופ | | |
| BANGE ES: (Spratus) | 1. 1.2. x B | 176/11/0 Je | | MUN JA MIATMO | TYPE H | | | # | |
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| PELINOUISHED BY: (Signatura) | (ann) | G.K.G. 1735 | DATE/TIME SS O RECEIVED BY: (Signature) | ature | | RELINGUIS | RELINDUISHED BY: (Siggalura) | J. Lear | DATE/TIME 31° RECEIVED BY: (Signalities) |
| PELINOUISHED BY: (Signath | (Pune) | DATE/TIME | RECEIVED BY: (Signatura) | vature) | | RELINQUISI | RELINQUISHED BY: (Signature) | | DATE/TIME RECEIVED OF LABORATORY BY: (Signature) |
| MEQUESTED TURNAROUND TIME: DROUTINE DRUSH | ID TIME: | | SAMPLE RECEIPT REMARKS | EMARKS | | | Δ | RESULTS & INVOICES TO: | FIELD SERVICES LABORATORY |
| CLARRIER CO. BRLL NO: | | • | CHARGE CODE | | | | | FDE FOO. 2144 | EL PASO NATURAL GAS COMPANY P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499 |
| | | | | | | | | 003-333-2144 | 17X-202-201 |

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FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

| | SMINILEE | IDENTIFICA | TION | | | | |
|----------------------------|----------|---------------------|---------|-------------|--------------|-------------|---|
| | Field | I ID_ | | Lab ID | | | |
| SAMPLE NUMBER: | yw 24 | 15 | 946 | 135 | | | |
| MTR CODE SITE NAME: | 9423 | | | N/A | | | |
| SAMPLE DATE TIME (Hrs): | 9-15-9 | 4 | 12 | .00 | | | |
| SAMPLED BY: | | | /A | | | | |
| DATE OF TPH EXT. ANAL.: | 9/20 | 194 | 9 | 120/94 | 1 | | |
| DATE OF BTEX EXT. ANAL.: | NIA | • | NIA | t t | | | |
| TYPE DESCRIPTION: | VG | ·· | Grey | CLAY | | | |
| | | | V | , | | | |
| REMARKS: | | | | | | | |
| | | RESULTS | | | | | _ |
| | | | | | | | _ |
| PARAMETER | RESULT | UNITS | DF | QUALIF Q | IERS M(g) | V(ml) | |
| TPH (418.1) | 28,700 | MG/KG | | | .18 | 28 | |
| HEADSPACE PID | 277 | PPM | | | | | |
| PERCENT SOLIDS | 83.1 | % | | | | | |
| | | TPH is by EPA Metho | d 418.1 | | | | |
| Narrative: | | | | | | | |
| DF = Dilution Factor Used | | | | | | | _ |
| Approved By: | | | Date: | :120/ay | | | |
| \mathcal{O} | | | | , | | | |