

# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Gentle B#1  
Meter/Line ID - 71524

## SITE DETAILS

Legals - Twn: 27N

Rng: 9W

Sec: 15

Unit: M

NMOCD Hazard Ranking: 0

Land Type: BLM

Operator: Breck

Pit Closure Date: 9/13/94

## 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.

Sandstone was encountered in the test excavation at five feet. The excavation was terminated 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 then backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 231 ppm; laboratory analysis indicated a TPH concentration of 5,610 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 4 years.
- Bedrock was encountered at 5 feet below ground surface making remediation impracticable.
- The test pit was backfilled with clean soil and the former pit area graded to direct surface
- Bedrock was encountered at five feet below ground surface making remediation impractical.
- 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

GENERAL	Meter: <u>71524</u> Location: <u>Gentle B #1</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>M</u> Section <u>15</u> Township: <u>27</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>2/13/98</u> Area: _____ Run: _____	
SITE ASSESSMENT	<b>NMOCD Zone:</b> (From NMOCD Maps)	
	Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)	<b>Land Type:</b> BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____
	<b>Depth to Groundwater</b> 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)	
	<b>Wellhead Protection Area</b> 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)	
	<b>Horizontal Distance to Surface Water Body</b> 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>0</u> POINTS	
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is &gt;1000' from Jaquez Canyon.</u>	

# FIELD PIT SITE ASSESSMENT FORM

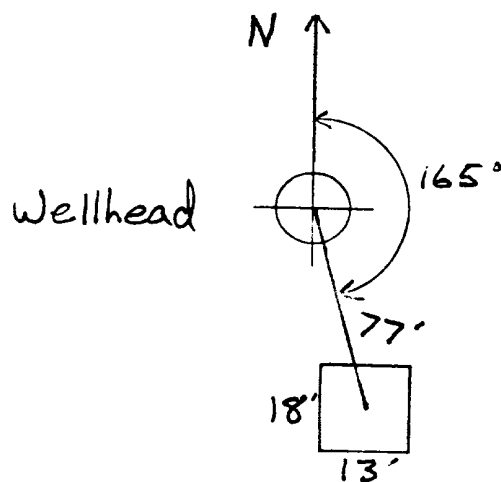
GENERAL	Meter: <u>71524</u> Location: <u>Gentle 'B' #1</u> Operator #: _____ Operator Name: <u>Breck</u> P/L District: <u>Ballard</u> Coordinates: Letter: <u>M</u> Section <u>15</u> Township: <u>27</u> Range: <u>9W</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>6-16-94</u> Area: <u>11</u> Run: <u>71</u>	
SITE ASSESSMENT	<div> <div>NMOCD Zone:</div> <div>(From NMOCD Maps)</div> <div> <div>Inside</div> <div>Outside</div> </div> <div> <input type="checkbox"/> (1)  <input checked="" type="checkbox"/> (2)         </div> </div> <div> <div>Land Type:</div> <div> <div>BLM</div> <div>State</div> <div>Fee</div> <div>Indian</div> </div> <div> <input checked="" type="checkbox"/> (1)  <input type="checkbox"/> (2)  <input type="checkbox"/> (3)         </div> </div>	
	<div> <div>Depth to Groundwater</div> <div> <div>Less Than 50 Feet (20 points)</div> <div>50 Ft to 99 Ft (10 points)</div> <div>Greater Than 100 Ft (0 points)</div> </div> <div> <input type="checkbox"/> (1)  <input type="checkbox"/> (2)  <input checked="" type="checkbox"/> (3)         </div> </div> <div> <div>Wellhead Protection Area :</div> <div>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)</div> </div> <div> <div>Horizontal Distance to Surface Water Body</div> <div> <div>Less Than 200 Ft (20 points)</div> <div>200 Ft to 1000 Ft (10 points)</div> <div>Greater Than 1000 Ft (0 points)</div> </div> <div> <input type="checkbox"/> (1)  <input checked="" type="checkbox"/> (2)  <input type="checkbox"/> (3)         </div> </div> <div> <div>Name of Surface Water Body <u>Jaquez Canyon</u></div> <div>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</div> <div>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)</div> <div><input type="checkbox"/> (2) &gt; 100'</div> </div> <div> <div>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</div> </div>	
REMARKS	Remarks : <u>One pit on location. Dry</u> <u>Outside V.Z. on Redline &amp; Topo</u>	

Push in

## ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 165 Footage from Wellhead 77  
b) Length : 18 Width : 13 Depth : 4



Remarks :

Photos - 0921 hrs

Boktai.

## REMARKS

Completed By:

[Signature]

Signature

6-16-94

Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>71524</u> Location: <u>Gentle B #1</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>15</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-13-94</u> Run: <u>11</u> <u>71</u></p>	
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <u>VW 280</u></p> <p>Sample Depth: <u>5'</u> Feet</p> <p>Final PID Reading <u>231</u> PID Reading Depth <u>5'</u> Feet</p> <p style="text-align: center;">Yes      No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>	
<b>CLOSURE</b>	<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>9-13-94</u> Pit Closed By: <u>BEL</u></p>	
<b>REMARKS</b>	<p>Remarks : <u>5' sandstone</u> <u>10 yds Fill</u></p> <p> </p> <p> </p>	
	<p>Signature of Specialist: <u>Vale Wilson</u></p>	



## 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:	VW 280	946121
MTR CODE   SITE NAME:	71524	N/A
SAMPLE DATE   TIME (Hrs):	9-13-94	1545
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	9-15-94	9-15-94
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Dark Grey Sand & Clay

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	5610	MG/KG			1.40	28
HEADSPACE PID	231	PPM				
PERCENT SOLIDS	92.5	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: 

Date: 9/30/94