#### **EL PASO FIELD SERVICES** PRODUCTION PIT CLOSURE

Gentle B#1 Meter/Line ID - 71524

SITE DETAILS

Legals - Twn: 27N

NMOCD Hazard Ranking: 0

Operator: Breck

Rng: 9W

Sec: 15

Land Type: BLM Pit Closure Date: 9/13/94

Carta St.

#### 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
- 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: 71524 Location: Gentle Operator #: Operator Name Coordinates: Letter: M Section 1 Or Latitude Lo Pit Type: Dehydrator Location 1 Site Assessment Date: 2/13/98	e: P/L  5 Township: 27  ngitude  Drip: Line D	District: Range: 9_			
	NMOCD Zone:	Land Type:	BLM $\times$ (1)			
	(From NMOCD		State (2)			
	Maps) Inside	(1)	Fee (3)			
	Outside	(2)	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)	$\overline{X}$ (3)				
. —	Wellhead Protection Area					
SITE ASSESSMENT	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?					
SES	(1) Y	TES (20 points)	$\times$ (2) NO (0 points)			
4S5	Horizontal Distance to Surface Water	` • • · · · · · · · · · · · · · · · · ·				
E /	Less Than 200 Ft (20 points)	(1)				
TIS	200 Ft to 1000 Ft (10 points)	(2)				
	Greater Than 1000 Ft (0 points)	$\overline{X}$ (3)				
	Name of Surface Water Body	,				
	(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)					
	Distance to Nearest Ephemeral Stream	(1) < 1	100' (Navajo Pits Only)			
	(2) > 100'					
	TOTAL HAZARD RANKING SCORE:	<b>D</b>	POINTS			
S						
REMARKS	Remarks: Site has been re-assessed,		· · · · · · · · · · · · · · · · · · ·			
<u> </u>	as a Surface Water Body. Site is > 1000' From Jaguez Canyon.					
E						

(assess) 12:16/97

## FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 71524 Location: Gentle 'B' #1  Operator #: Operator Name: Breck P/L District: Ballard  Coordinates: Letter: M Section 15 Township: 27 Range: 9 W  Or Latitude Longitude  Pit Type: Dehydrator Location Drip: X Line Drip: Other:  Site Assessment Date: 6-16-94 Area: 11 Run: 71					
	NMOCD Zone: Land Type: BLM 💢 (1)					
	(From NMOCD State (2)					
	Maps) Inside (1) Fee (3)					
	Outside 💢 (2) Indian					
	Depth to Groundwater					
	Less Than 50 Feet (20 points) (1)					
	50 Ft to 99 Ft (10 points)					
	Wellhead Protection Area:					
INT	Is it less than 1000 ft from wells, springs, or other sources of					
SME	fresh water extraction? , or ; Is it less than 200 for from a private					
ASSESSMENT	domestic water source? (1) YES (20 points) (2) NO (0 points)					
ASS	Horizontal Distance to Surface Water Body					
	Less Than 200 Ft (20 points) 🔲 (1)					
SITE	200 Ft to 1000 Ft (10 points) 🛛 (2) Greater Than 1000 Ft (0 points) 🗌 (3)					
	Name of Surface Water Body <u>Joquez</u> Canyon					
	(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks,					
	Irrigation Canals,Ditches,Lakes,Ponds)					
	Distance to Nearest Ephemeral Stream (1) < 100'(Navajo Pits Only)					
	$\square (2) > 100'$					
	TOTAL HAZARD RANKING SCORE: 10 POINTS					
REMARKS	Remarks: One pit on location. Dry					
[WA]	Outside V.Z. on Redline & Topo					
RE	Aus kinth					

Original Pit: a) Degrees from North <u>165</u> Footage from Wellinead <u>77</u> b) Length: <u>18</u> Width: <u>13</u> Depth: <u>4</u>
Wellhead 165°
Remarks: Photos - 0921 hrs Boktai
DOMTO:
Signature Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 71524 Location: Gentle B #/  Coordinates: Letter: M Section 15 Township: 27 Range: 9  Or Latitude Longitude  Date Started: 9-13-94 Run: 11 7/
FIELD OBSERVATIONS	Sample Number(s): $280$ Sample Depth: $5'$ Feet  Final PID Reading $231$ PID Reading Depth $5'$ Feet  Yes No  Groundwater Encountered $\square$ Approximate Depth $\square$ Feet
CLOSURE	Remediation Method:  Excavation
REMARKS	Remarks: 5 sandstone 10 yels Fill
	Signature of Specialist: <u>Vale Wilsey</u> (SP3181) 03/16/84



# CHAIN OF CUSTODY RECORD

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White - Testing Laboratory Canary - EPNG Lab Pink - Field Sampler



#### FIELD SERVICES LABORATORY ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

	SAIVIPLE	IDENTIFICA	TION			
_	Field	1 ID		Lab ID		
SAMPLE NUMBER: VW 280			946/21			Í
MTR CODE   SITE NAME:	71524		N/A			
SAMPLE DATE   TIME (Hrs):	9-13-94		1545			
SAMPLED BY:		N.	/A			
DATE OF TPH EXT.   ANAL.:	9-15-9		9-15.	94		
DATE OF BTEX EXT.   ANAL.:		NA	NJ/	1		
TYPE   DESCRIPTION:	V (-		Dark Gie	y Sand	& clay	
REMARKS: _			<u> </u>			<del></del> -
		RESULTS				
PARAMETER	RESULT	UNITS	QUALIFIERS  DF Q M(g)			V(ml)
TPH (418.1)	5610	MG/KG			1,40	28
HEADSPACE PID	23/	PPM				i niyaka
PERCENT SOLIDS	92.5	%				n japona. Ny farantana
		TPH is by EPA Method	418.1			<del></del>
Narrative:						
OF = Dilution Factor Used		<del></del>				
Approved By:			Date:	9/30/0	ry	