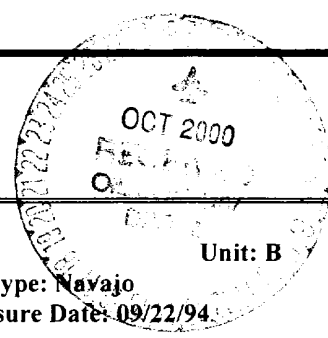


# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

OK

Richardson #7  
Meter/Line ID - 95451



## SITE DETAILS

Legals - Twn: 27  
NMOCD Hazard Ranking: 10  
Operator: Meridian

Rng: 13

Sec: 3

Unit: B

Land Type: Navajo

Pit Closure Date: 09/22/94

## RATIONALE FOR 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 pit was excavated to 10 feet, where bedrock was encountered, and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the pit. Approximately 60 cubic yards of material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 230 ppm; laboratory analysis indicated a benzene concentration of <0.13 mg/kg, a total BTEX concentration of 1.98 mg/kg, and a TPH concentration of 169 mg/kg. This site was re-assessed on August 28, 2000 because the initial assessment incorrectly identified washes as a surface water body and incorrectly measured the distance from the site to groundwater.

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 almost six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.
- Groundwater was not encountered in the excavation.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.
- Bedrock was encountered in the excavation at 10 feet below ground surface, making vertical contamination migration unlikely.
- Based on the Hazard Ranking Score, benzene, BTEX, and TPH were below required remediation levels.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.

**REVISED**  
**FIELD PIT SITE ASSESSMENT FORM**

Meter: 95451 Location: RICHARDSON # 7  
Operator #: 0128 Operator Name: MERIDIAN P/L District: ANGEL PEAK  
Coordinates: Letter: B Section 3 Township: 27 Range: 13  
Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
Pit Type: Dehydrator \_\_\_\_\_ Location Drip: X Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
Site Assessment Date: 8/29/00 Area: 01 Run: 33

**NMOCD Zone:**

(From NMOCD  
Maps)

Inside

Outside

**Land Type:**

☒ (1)

☐ (2)

BLM

☐ (1)

State

☐ (2)

Fee

☐ (3)

Indian

NAVAJO

**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)

**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)

**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, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream

☐ (1) < 100' (Navajo Pits Only)

☒ (2) > 100'

TOTAL HAZARD RANKING SCORE: 10 POINTS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. And incorrectly measured distance from site to groundwater.

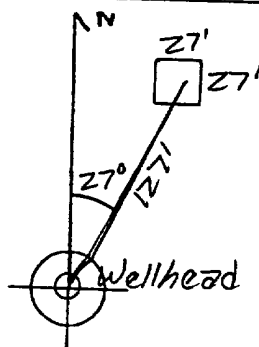
# FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>95-451</u> Location: <u>Richardson #7</u></p> <p>Operator #: <u>0128</u> Operator Name: <u>Meridian</u> P/L District: <u>Angel Peak</u></p> <p>Coordinates: Letter: <u>B</u> Section <u>3</u> Township: <u>27</u> Range: <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>9/13/94</u> Area: <u>01</u> Run: <u>33</u></p>								
	<table border="0"> <tr> <td data-bbox="126 634 226 1776" rowspan="4">SITE ASSESSMENT</td> <td data-bbox="226 634 840 851"> <p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p> </td> <td data-bbox="840 634 1579 851"> <p>Land Type:</p> <p>BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Navajo</u></p> </td> </tr> <tr> <td colspan="2" data-bbox="226 851 1579 1064"> <p>Depth to Groundwater</p> <p>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> </td> </tr> <tr> <td colspan="2" data-bbox="226 1064 1579 1276"> <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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> </td> </tr> <tr> <td colspan="2" data-bbox="226 1276 1579 1489"> <p>Horizontal Distance to Surface Water Body</p> <p>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> </td> </tr> </table> <p>Name of Surface Water Body <u>Amorillo Canyon</u></p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only) <input checked="" type="checkbox"/> (2) &gt; 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>40</u> POINTS</p>	SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p>	<p>Land Type:</p> <p>BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Navajo</u></p>	<p>Depth to Groundwater</p> <p>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 :</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? <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 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>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input checked="" type="checkbox"/> (1) Outside <input type="checkbox"/> (2)</p>		<p>Land Type:</p> <p>BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Navajo</u></p>						
	<p>Depth to Groundwater</p> <p>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 :</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? <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 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>								
REMARKS	<p>Remarks : <u>Redline Book - Inside</u> <u>Vulnerable Zone Type - Inside</u></p> <p><u>Two pits, location drip pit is dry. Will close one pit.</u></p> <p style="text-align: right;"><u>DIG &amp; HALL</u></p>								

## ORIGINAL PIT LOCATION

## ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 27° Footage from Wellhead 127'  
b) Length : 27' Width : 27' Depth : 3'



## REMARKS

## Remarks :

Pictures @ 1623 Roll 1  
Dump Truck

Completed By:

David Kelly  
Signature

9/13/94  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>95451</u> Location: <u>Richardson #7</u></p> <p>Coordinates: Letter: <u>B</u> Section <u>3</u> Township: <u>27</u> Range: <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9/22/94</u> Run: <u>01</u> <u>33</u></p>
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <u>KD 272</u></p> <p>Sample Depth: <u>10'</u> Feet</p> <p>Final PID Reading <u>230 ppm</u> PID Reading Depth <u>10'</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 checked="" type="checkbox"/> Approx. Cubic Yards <u>60</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>9/22/94</u> Pit Closed By: <u>BEI</u></p>
<b>REMARKS</b>	<p>Remarks : <u>Excavated pit to 10', Hit Rock Layer, Took</u></p> <p><u>pid Sample, Closed pit.</u></p>
	<p>Signature of Specialist: <u>Jimmy Deanan</u></p>

# Natural Gas Company

## FIELD SERVICES LABORATORY ANALYTICAL REPORT

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

#### SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 272	9416192
MTR CODE   SITE NAME:	95451	N/A
SAMPLE DATE   TIME (Hrs):	9-22-94	1400
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	9-27-94	9-27-94
DATE OF BTEX EXT.   ANAL.:	9-29-94	10-3-94
TYPE   DESCRIPTION:	VC	Bottom Closure Sand & Clay

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	0.13	MG/KG	5			
TOLUENE	0.41	MG/KG	5			
ETHYL BENZENE	0.14	MG/KG	5			
TOTAL XYLENES	1.3	MG/KG	5			
TOTAL BTEX	1.98	MG/KG				
TPH (418.1)	169	MG/KG			2.03	28
HEADSPACE PID	230	PPM				
PERCENT SOLIDS	83.9	%				

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

The Surrogate Recovery was at 106 % for this sample All QA/QC was acceptable.  
Narrative:

ATI Results attached

DF = Dilution Factor Used

Approved By: J.P.

Date: 10/23/94



Analytical **Technologies**, Inc.

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

ATI I.D. 409425

October 7, 1994

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

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 09/28/94, 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





## Page \_\_\_\_\_ of \_\_\_\_\_

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