EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE

OK

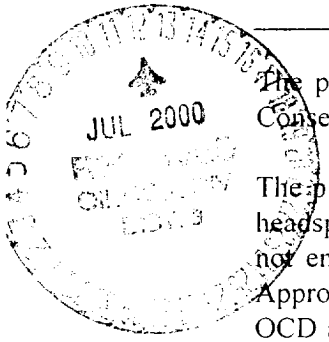
T.L. Rhodes C 1E
Meter/Line ID – 95265

SITE DETAILS

Legals - Twn: 28N	**Rng: 11W**	**Sec: 30**	**Unit: E**
NMOCD Hazard Ranking: 20		**Land Type: Navajo**	
Operator: Amoco		**Pit Closure Date: 11/03/95**	

Fed. / Indian

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.

The pit was excavated to 12 feet below ground surface 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 test pit and bedrock was encountered at 12 feet below ground surface. Approximately 218 cubic yards of excavated 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 12.5 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, total BTEX concentration of <3 mg/kg, and a TPH concentration of 41.8 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 almost five years.
- Bedrock was encountered in the test excavation at 12 feet below ground surface making further remediation impractical; therefore, impact to groundwater is unlikely.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the test excavation. In addition, the estimated depth to groundwater is greater than 100 feet.
- Based on the Hazard Ranking Score, benzene, total BTEX, and TPH were below required remediation levels.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.

ATTACHMENT

Field Pit Remediation/Closure Form
Field Pit Assessment Form
Laboratory Analytical Results

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 95265 Location: T. L. Rhodes C 1E
Operator #: 0203 Operator Name: Amoco P/L District: Angel Peak
Coordinates: Letter: E Section 30 Township: 28 Range: 11
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ✓ Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 1/20/95 Area: 01 Run: 82

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☐ (1)
Outside ☒ (2)

Land Type:
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, 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: 20 POINTS

REMARKS

Remarks : Redline Book: Outside Vulnerable Zone Topo: Outside
32 pits. Closed.

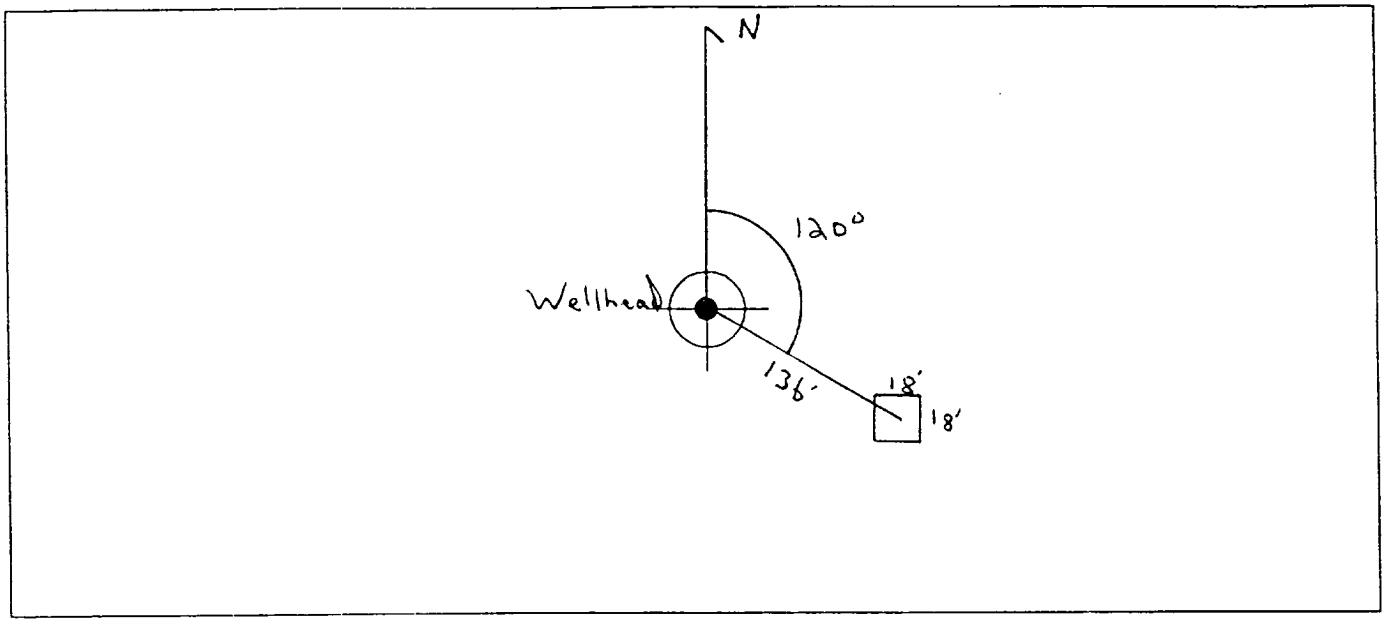
PUSH-IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 120° Footage from Wellhead 136'

b) Length : 18' Width : 18' Depth : 6'



REMARKS

Remarks :

Pictures @1235 hr 1-4 roll 1

Completed By:

Cory Chase
Signature

1/20/95
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 95265 Location: J.L. Rhodes c# 1E

Coordinates: Letter: E Section 30 Township: 28 Range: 11

Or Latitude _____ Longitude _____

Date Started : 10/30/95 Run: 01 82

FIELD OBSERVATIONS

Sample Number(s): JK114 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 12.5 PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

- Excavation ☒ Approx. Cubic Yards 218 cy 11/6/95
- Onsite Bioremediation ☐ Approved for Closure by
- Backfill Pit Without Excavation ☐ Jim Walker 11-1-95

Soil Disposition:

- Envirotech ☒ ☐ Tierra
- Other Facility ☐ Name: _____

Pit Closure Date: 11-~~10~~-3-95 MLH 11-6-95 Pit Closed By: Philip

REMARKS

Remarks : Pit Pid Readings (W-5.4)(S-15.0)(E-0.2)(W-0.2)
Pit size 20x20x12 Hit Rock at 12'
Fence size 21x21x3 Wet yes
More Than 100' From Ephemral Stream

Signature of Specialist: Jo K. Kin

El Paso 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:	JK114	947708
MTR CODE | SITE NAME:	95265	T.L. Rhodes C #1E
SAMPLE DATE | TIME (Hrs):	10-30-95 11/2/95	0944
PROJECT:	~~Pits~~ RLP Phase I Navajo	
DATE OF TPH EXT. | ANAL.:	10/31/95	
DATE OF BTEX EXT. | ANAL.:	10/31/95	10/31/95
TYPE | DESCRIPTION:	VG	Light Grey Sand & Sandstone

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	Rev 11/1/95 #Z 41.8	MG/KG			2.22	28
HEADSPACE PID	12.5	PPM				
PERCENT SOLIDS	89.2	%				

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

The Surrogate Recovery was at 98% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 11/1/95

BTEX SOIL SAMPLE WORKSHEET

File	947708	**Date Printed**	11/1/95		
Soil Mass (g)	5.11	**Multiplier (L/g)**	0.00098		
Extraction vol. (mL)	10	**CAL FACTOR (Analytical):**	200		
Shot Volume (uL)	50	**CAL FACTOR (Report):**	0.19569		
		DILUTION FACTOR:	**1**	**Det. Limit**	
Benzene (ug/L)	0.27	**Benzene (mg/Kg):**	**0.053**	0.489	
Toluene (ug/L)	0.01	**Toluene (mg/Kg):**	**0.002**	0.489	
Ethylbenzene (ug/L)	0.19	**Ethylbenzene (mg/Kg):**	**0.037**	0.489	
p & m-xylene (ug/L)	0.19	p & m-xylene (mg/Kg):	0.037	0.978	
o-xylene (ug/L)	0.13	o-xylene (mg/Kg):	0.025	0.489	
		Total xylenes (mg/Kg):	**0.063**	1.468	
		Total BTEX (mg/Kg):	**0.155**		