Risk-based

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE Dehy

Allen A#1
Meter/Line ID – 73225

SITE DETAILS

Legals - Twn: 29N **Rng: 12W** **Sec: 01** **Unit: D**
NMOCD Hazard Ranking: 0 **Land Type: Fee**
Operator: Amoco **Pit Closure Date: 5/13/94**

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.

A test pit was excavated to 12' where sandstone was encountered. The excavation was terminated at 12' 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 backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 245 ppm; laboratory analysis indicated a TPH concentration of 2020 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 five years.
- Bedrock was encountered in the test excavation at twelve 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

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73225 Location: Allen A#1

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: D Section 01 Township: 29 Range: 12

Or Latitude _____ Longitude _____

Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____

Site Assessment Date: 4/8/98 Area: _____ Run: _____

SITE ASSESSMENT

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

Land Type: BLM ☐ (1) State ☐ (2) Fee ☒ (3) 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)

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: 0 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is > 100' vertical from center of Hargis Arroyo

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73225 Location: ALLEN A #1

Operator #: 0203 Operator Name: Amoco P/L District: Kutz

Coordinates: Letter: D Section 1 Township: 29 Range: 12

Or Latitude _____ Longitude _____

Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: ___

Site Visit Date: 3.21.94 Run: 02 41

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)

- Inside Vulnerable Zone ☐
- Outside ☒

Land Type:

- BLM ☐
- State ☐
- Fee ☒
- Indian _____

Depth to Groundwater

- Less Than 50 Feet (20 points) ☐
- 50 Ft to 99 Ft (10 points) ☐
- Greater Than 100 Ft (0 points) ☒

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? ☐ YES (20 points) ☒ NO (0 points)

Horizontal Distance to Surface Water Body

- Less Than 200 Ft (20 points) ☐
- 200 Ft to 1000 Ft (10 points) ☐
- Greater Than 1000 Ft (0 points) ☒

Name of Surface Water Body _____

(Surface Water Body : Perennial Rivers,Major Wash,Streams,Creeks, Irrigation Canals,Ditches,Lakes,Poncs)

TOTAL HAZARD RANKING SCORE: 0 **POINTS**

REMARKS

Remarks : 2 PITS ON LOCATION. WILL CLOSE ONLY 1. LOCATION IS NEXT TO BIG WATER TANK.

ORIGINAL PIT LOCATION

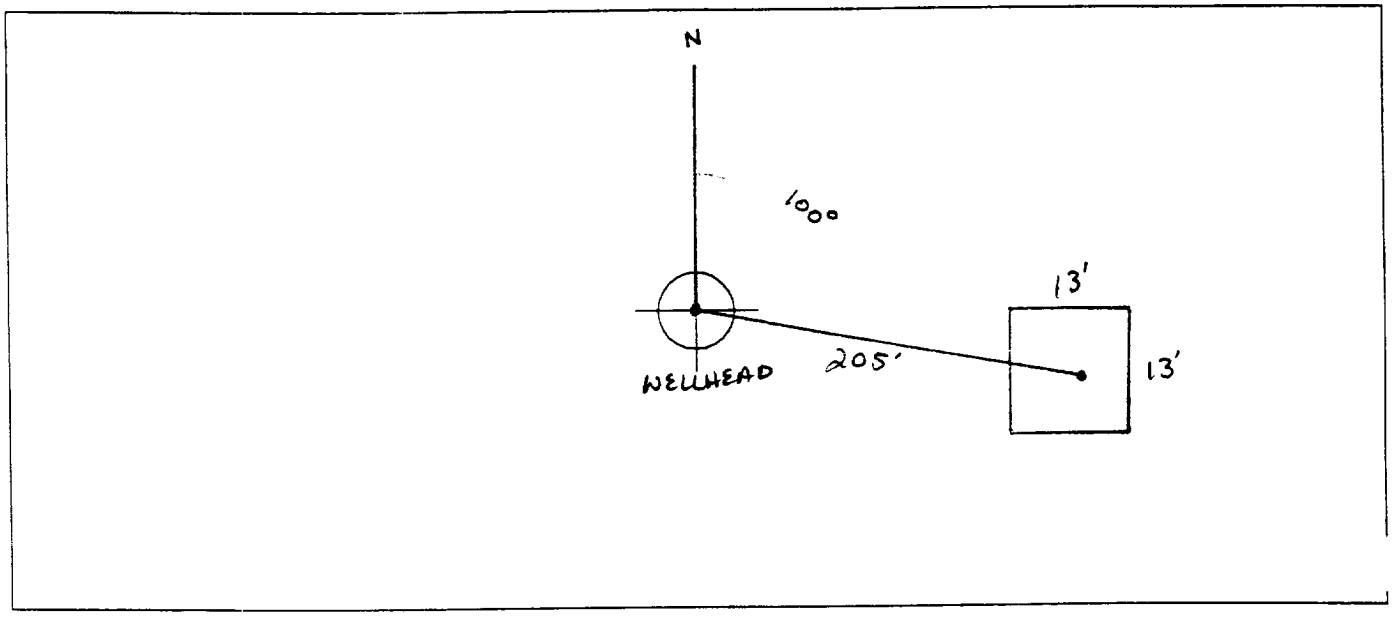
ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 100° Footage to Wellhead 205'

b) Degrees from North _____ Footage to Dogleg _____

Dogleg Name _____

c) Length : 13' Width : 13' Depth : 1'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 12:16 P.M.

END DUMP

Completed By:

Robert Thompson
Signature

3.21.94
Date

ILLEGIBLE

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73225 Location: ALLEN A #1

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: ___ Section ___ Township: ___ Range: ___

Or Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: ___ Line Drip: ___ Other: _____

Site Assessment Date: _____ Area: 02 Run: 41

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)

Inside ☐ (1)

Outside ☐ (2)

Land Type:

BLM ☒ (1)

State ☐ (2)

Fee ☐ (3)

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)

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: 10 POINTS

REMARKS

Remarks : _____

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73225 Location: Allen A #1

Coordinates: Letter: D Section 1 Township: 29 Range: 12

Or Latitude _____ Longitude _____

Date Started : 5-13-94 Area: 02 Run: 41

FIELD OBSERVATIONS

Sample Number(s): VW73 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 245 PID Reading Depth 12' Feet

	Yes	No	
Groundwater Encountered	☐ (1)	☒ (2)	Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation	☐ (1)	Approx. Cubic Yards _____
Onsite Bioremediation	☐ (2)	
Backfill Pit Without Excavation	☒ (3)	

Soil Disposition:

Envirotech	☐ (1)	☐ (3)	Tierra
Other Facility	☐ (2)	Name: _____	

Pit Closure Date: 5-13-94 Pit Closed By: BEI

REMARKS

Remarks : No line markers. Sandstone 12'

Signature of Specialist: Vicki Wilson

(SP3191) 04/07/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW73	945164
MTR CODE | SITE NAME:	73225	N/A
SAMPLE DATE | TIME (Hrs):	5-13-94	1300
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5/17/94	5/17/94
DATE OF BTEX EXT. | ANAL.:	N/A	N/A
TYPE | DESCRIPTION:	VG	Brown Grey Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	2020	MG/KG			2.06	28
HEADSPACE PID	245	PPM				
PERCENT SOLIDS	92.8	%				

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

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

Narrative:

DF = Dilution Factor Used

Approved By: [signature] Date: 6/15/94