

**EL PASO FIELD SERVICES  
PRODUCTION PIT CLOSURE**

Outside

RISK  
BTEX

TPH

**Ealum G.C. 1A  
Meter/Line ID – 89509**

RECEIVED  
NOV - 2 1999

OIL CON. DIV.  
DIST. 3

**SITE DETAILS**

Legals - Twn: 32N

Rng: 10

Sec: 33

Unit: E

NMOCD Hazard Ranking: 0

Land Type: Fee

Operator: Amoco

Pit Closure Date: 10/4/94

**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 feet and a soil sample was collected for 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 282 ppm; laboratory analysis indicated a TPH concentration of 8,750 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 four years.
- The test pit was backfilled with clean soil and the former pit area graded to direct surface runoff away from the pit area.
- 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.
- The site is greater than 1,000 feet from potential surface water receptors and water supply wells.
- 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

<b>GENERAL</b>	Meter: <u>89509</u> Location: <u>Ealum G.C. 1A</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>E</u> Section <u>33</u> Township: <u>32</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/9/98</u> Area: _____ Run: _____
<b>SITE ASSESSMENT</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <b>NMOCD Zone:</b>            (From NMOCD Maps)         </div> <div style="width: 45%;"> <b>Land Type:</b> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> <input type="checkbox"/> Inside (1)  <input checked="" type="checkbox"/> Outside (2)         </div> <div style="width: 45%;">           BLM <input type="checkbox"/> (1)            State <input type="checkbox"/> (2)            Fee <input checked="" type="checkbox"/> (3)            Indian _____         </div> </div> </div> </div> <div style="margin-top: 10px;"> <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)     </div> <div style="margin-top: 10px;"> <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?  <div style="display: flex; justify-content: center; margin-top: 10px;"> <input type="checkbox"/> (1) YES (20 points)         <input checked="" type="checkbox"/> (2) NO (0 points)       </div> </div> <div style="margin-top: 10px;"> <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)     </div> <div style="margin-top: 10px;">       Name of Surface Water Body _____        (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)     </div> <div style="margin-top: 10px;">       Distance to Nearest Ephemeral Stream       <div style="display: flex; justify-content: center; margin-left: 100px;"> <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)  <input type="checkbox"/> (2) &gt; 100'       </div> </div> <div style="margin-top: 10px;">       TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS     </div>
<b>REMARKS</b>	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is &gt; 100' vertical from center of Cox Canyon</u>

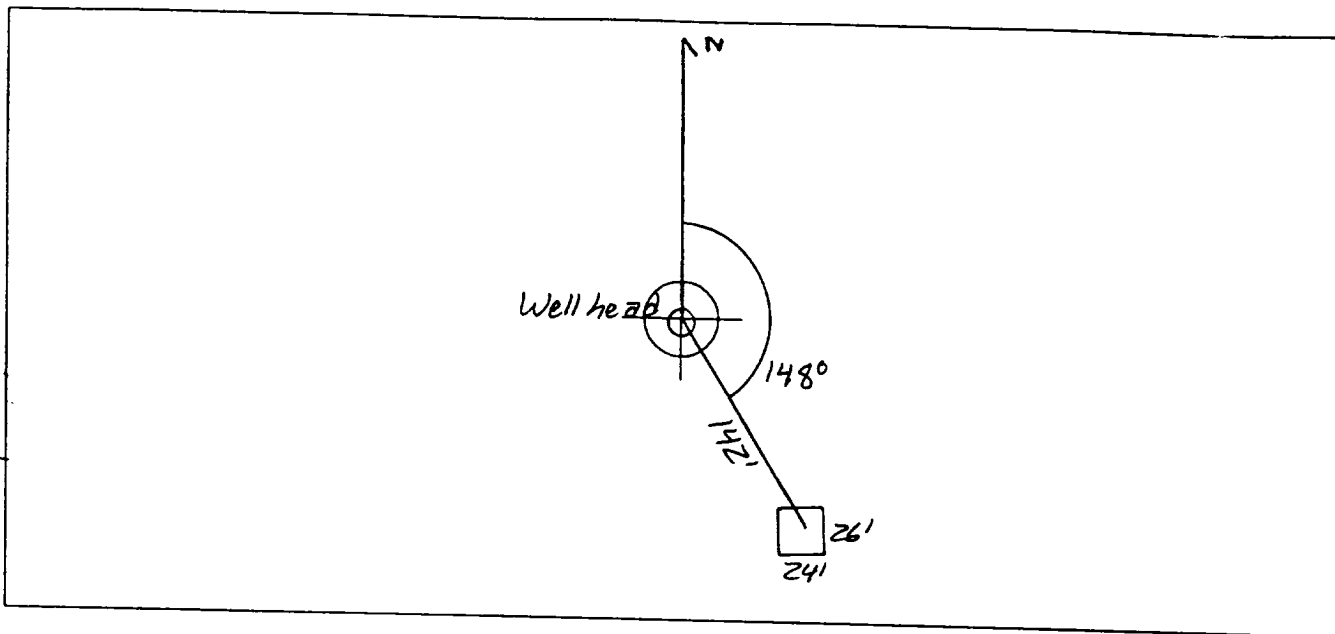
# FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>89-509</u> Location: <u>Ealum G.C. 1A</u>          Operator #: <u>0203</u> Operator Name: <u>Amoco Production</u> P/L District: <u>Artes</u>          Coordinates: Letter: <u>E</u> Section <u>33</u> Township: <u>32</u> Range: <u>10</u>          Or Latitude _____ Longitude _____          Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____          Site Assessment Date: <u>8/3/94</u> Area: <u>04</u> Run: <u>31</u></p>
	<p><b>NMOCD Zone:</b>          (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p><b>Land Type:</b> BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3) Indian _____</p> <p><b>Depth to Groundwater</b>          Less Than 50 Feet (20 points) <input type="checkbox"/> (1)          50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2)          Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)</p> <p><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)</p> <p><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)</p> <p>Name of Surface Water Body <u>Animas River</u>          (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)          Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)  <input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>10</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline Book - Outside</u> <u>Vulnerable Zone Type - Outside</u>  <u>Four pits on site, location drip pit has liquid in it, will close one pit.</u></p> <p style="text-align: right;"><u>PUSH IN</u></p>

## ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 148° Footage from Wellhead 142'  
b) Length : 36' Width : 24' Depth : 4'



## REMARKS

## Remarks :

Pictures @ 1318 (20-23, Roll - 8/2/94)  
Dump Truck

Completed By:

Sarah Kelly  
Signature

8/3/94  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>89509</u> Location: <u>Ealum G.C. 1A</u></p> <p>Coordinates: Letter: <u>E</u> Section <u>33</u> Township: <u>32</u> Range: <u>10</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>10-4-94</u> Run: <u>04</u> <u>31</u></p>
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <u>KP 286</u> <u>KP 287</u> <u>KP 288</u></p> <p>Sample Depth: <u>12</u> Feet</p> <p>Final PID Reading <u>282</u> PID Reading Depth <u>12</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"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>10-4-94</u> Pit Closed By: <u>B.E.F.</u></p>
<b>REMARKS</b>	<p>Remarks : <u>No line markers. soil grey looking with A</u></p> <p><u>smell.</u></p>
	<p>Signature of Specialist: <u>Kelly Padilla</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:	KP 286	946313
MTR CODE   SITE NAME:	89509	N/A
SAMPLE DATE   TIME (Hrs):	10-4-94	1400
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	10-6-94	
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Fine sand & clay

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	8750	MG/KG			1.03	28
HEADSPACE PID	282	PPM				
PERCENT SOLIDS	82.8	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: 

Date: 10/13/94