

**EL PASO FIELD SERVICES  
PRODUCTION PIT CLOSURE**

*Outside*

*Risk  
BTEX TPH*

Mudge LS #8A  
Meter/Line ID - 90507

**RECEIVED**  
NOV - 2 1999

**SITE DETAILS**

Legals - Twn: 31N

Rng: 11

Sec: 12

Unit: 1

NMOCD Hazard Ranking: 0

Land Type: Fee

Operator: Amoco

Pit Closure Date: 10/4/94

**OIL CON. DIV.**  
DIST. 3

**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 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 613 ppm; laboratory analysis indicated a TPH concentration of 7,570 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 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**

<b>GENERAL</b>	Meter: <u>90507</u> Location: <u>Mudge LS #8A</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>I</u> Section <u>12</u> Township: <u>31</u> Range: <u>11</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"/> (1) Inside  <input checked="" type="checkbox"/> (2) Outside           </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: space-around; margin-top: 5px;"> <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 <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)  <input type="checkbox"/> (2) &gt; 100'     </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. No wells shown on map in Ltr I. Site is &gt;100' vertical from center of Animas R. based on most conservative location in Ltr I</u>

# FIELD PIT SITE ASSESSMENT FORM

## GENERAL

Meter: 90-507 Location: Mudge LS 8A  
 Operator #: 0203 Operator Name: Amoco P/L District: Aztec  
 Coordinates: Letter: I Section 12 Township: 31 Range: 11  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Pit Type: Dehydrator \_\_\_\_\_ Location Drip: X Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
 Site Assessment Date: 9/7/94 Area: 04 Run: 43

## SITE ASSESSMENT

NMOCD Zone:  
 (From NMOCD  
 Maps)

Inside  
 Outside

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 Animas River

(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

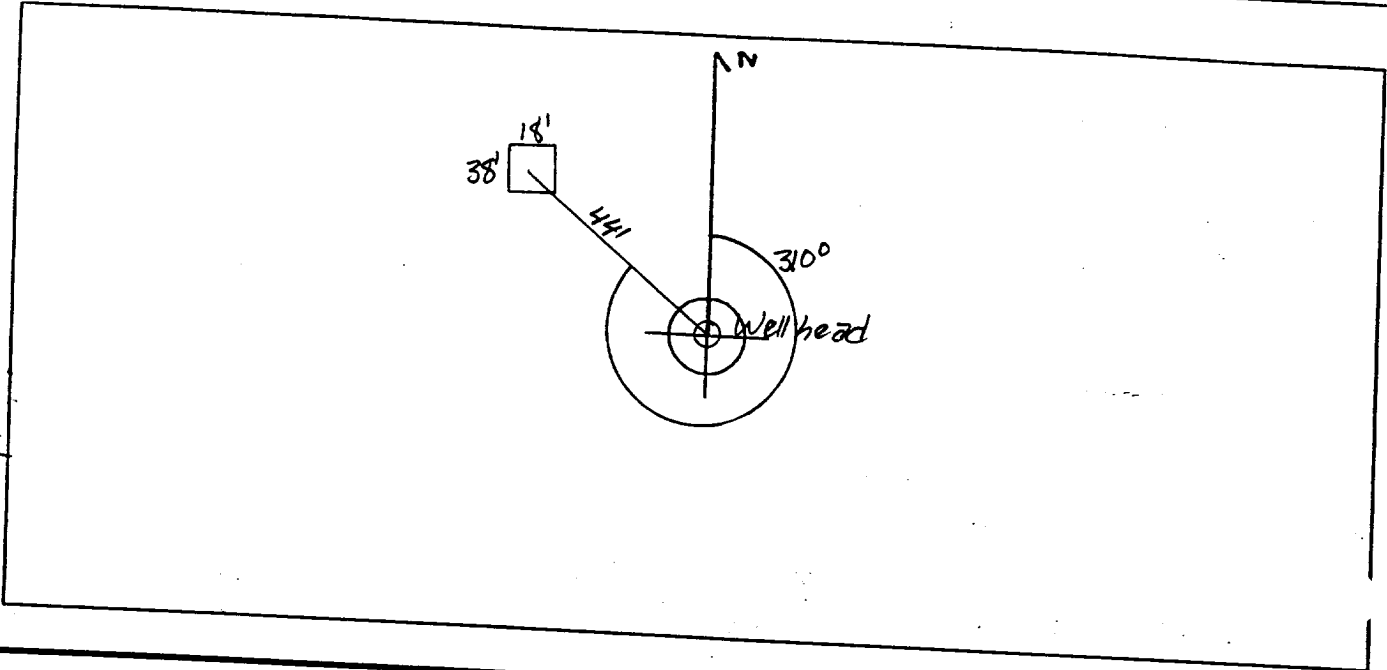
Remarks : Redline Book - Outside Vulnerable Zone Type - Outside  
Three pits, location drip pit is dry. Will close one pit.

PUSH IN

### ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 310° Footage from Wellhead 44'  
b) Length : 38' Width : 18' Depth : 3'

ORIGINAL PIT LOCATION



REMARKS

Remarks :

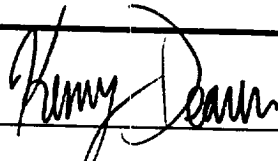
Pictures 00907 (13-16, Roll I)  
Dump Truck

Completed By:

Nash Kelly  
Signature

9/7/94  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	Meter: <u>90507</u> Location: <u>Mudge LS 8A</u> Coordinates: Letter: <u>I</u> Section <u>12</u> Township: <u>31</u> Range: <u>11</u> Or Latitude _____ Longitude _____ Date Started : <u>10/4/94</u> Run: <u>04</u> <u>43</u>
<b>FIELD OBSERVATIONS</b>	Sample Number(s): <u>KD311</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>613 ppm</u> PID Reading Depth <u>12'</u> Feet Groundwater Encountered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Approximate Depth _____ Feet
<b>CLOSURE</b>	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div>           Excavation            Onsite Bioremediation            Backfill Pit Without Excavation         </div> <div style="text-align: right;"> <input type="checkbox"/>  <input type="checkbox"/>  <input checked="" type="checkbox"/> </div> <div>           Approx. Cubic Yards _____            Name: _____         </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div>           Envirotech            Other Facility         </div> <div style="text-align: right;"> <input type="checkbox"/>  <input type="checkbox"/> </div> <div>           Tierra            Name: _____         </div> </div> Pit Closure Date: <u>10/4/94</u> Pit Closed By: <u>BET</u>
<b>REMARKS</b>	Remarks : <u>Dug test Hole to 12', TOOK pid sample, closed pit.</u> _____ _____
	Signature of Specialist: <u></u>

# CHAIN OF CUSTODY RECORD

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

PROJECT NUMBER # 24324		PROJECT NAME Pit Closure Project		DATE 10/4/94		REQUESTED ANALYSIS				CONTRACT LABORATORY P. O. NUMBER	
SAMPLERS: (Signature)		SAMPLERS: (Signature)		SAMPLERS: (Signature)		SAMPLERS: (Signature)		SAMPLERS: (Signature)		SAMPLERS: (Signature)	
LAB ID	DATE	TIME	MATRIX	FIELD ID	TOTAL NUMBER OF CONTAINERS	SAMPLE TYPE	TPH EPA 418.1	BTEX EPA 8020	LAB PID	SEQUENCE #	REMARKS
946317	10/4/94	1030	Soil	KD 305	1	VG	X			277	
946318	10/4/94	1030	Soil	KD 306	1	VG	X			278	
946319	10/4/94	1230	Soil	KD 307	1	VG	X			279	
946320	10/4/94	1230	Soil	KD 308	1	D	X			-	
946321	10/4/94	1235	Soil	KD 309	1	B	X			-	
946322	10/4/94	1320	Soil	KD 310	1	VG	X			280	
946323	10/4/94	1505	Soil	KD 311	1	VG	X			281	
946324	10/4/94	1625	Soil	KD 312	1	VG	X			282	
[Signature]											
RELINQUISHED BY: (Signature)		DATE/TIME 10/4/94 1755		RECEIVED BY: (Signature)		DATE/TIME 10/5/94 1125		RELINQUISHED BY: (Signature)		DATE/TIME 10/5/94 1125	
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME	
REQUESTED TURNAROUND TIME: <input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH				SAMPLE RECEIPT REMARKS				RESULTS & INVOICES TO:			
CARRIER CO.				CHARGE CODE				505-599-2144			
BILL NO.:				FIELD SERVICES LABORATORY				EL PASO NATURAL GAS COMPANY			
				P. O. BOX 4990				FARMINGTON, NEW MEXICO 87499			
				FAX: 505-599-2261							



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 311	946323
MTR CODE   SITE NAME:	90507	N/A
SAMPLE DATE   TIME (Hrs):	10-4-94	1505
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	10-6-94	
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Dark brown sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	7570	MG/KG			1.16	28
HEADSPACE PID	613	PPM				
PERCENT SOLIDS	89.6	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

10/13/94