

**EL PASO FIELD SERVICES  
PRODUCTION PIT CLOSURE**

*Outside*

*RISK*  
*BTEX* *TPH*

State Gas Com BC #1E  
Meter/Line ID - 94710

SITE DETAILS

Legals - Twn: 31N  
NMOCD Hazard Ranking: 0  
Operator: Amoco

Rng: 12W

Sec: 32  
Land Type: State  
Pit Closure Date: 4/21/94

**RECEIVED**  
NOV - 2 1999  
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 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 divert precipitation away from the pit area. Headspace analysis indicated an organic vapor content of 479 ppm; laboratory analysis indicated a TPH concentration of 7,890 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 pit area was graded to divert precipitation 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 at the bottom of the former pit 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>	<p>Meter: <u>94710</u> Location: <u>STATE GAS COM BC #1E</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>AZTEC</u></p> <p>Coordinates: Letter: <u>G</u> Section <u>32</u> Township: <u>31</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4.20.98</u> Area: <u>02</u> Run: <u>31</u></p>
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> _____ <b>Land Type:</b> BLM _____ (1)</p> <p>(From NMOCD State <input checked="" type="checkbox"/> (2)</p> <p>Maps) Inside _____ (1) Fee _____ (3)</p> <p>Outside <input checked="" type="checkbox"/> (2) Indian _____</p> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) _____ (1)</p> <p>50 Ft to 99 Ft (10 points) _____ (2)</p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area</b></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?</p> <p align="center">_____ (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) _____ (1)</p> <p>200 Ft to 1000 Ft (10 points) _____ (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream _____ (1) &lt; 100' (Navajo Pits Only)</p> <p align="right">_____ (2) &gt; 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
<b>REMARKS</b>	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS IN A REMOTE AREA UP ON A PLATEAU.</u></p>

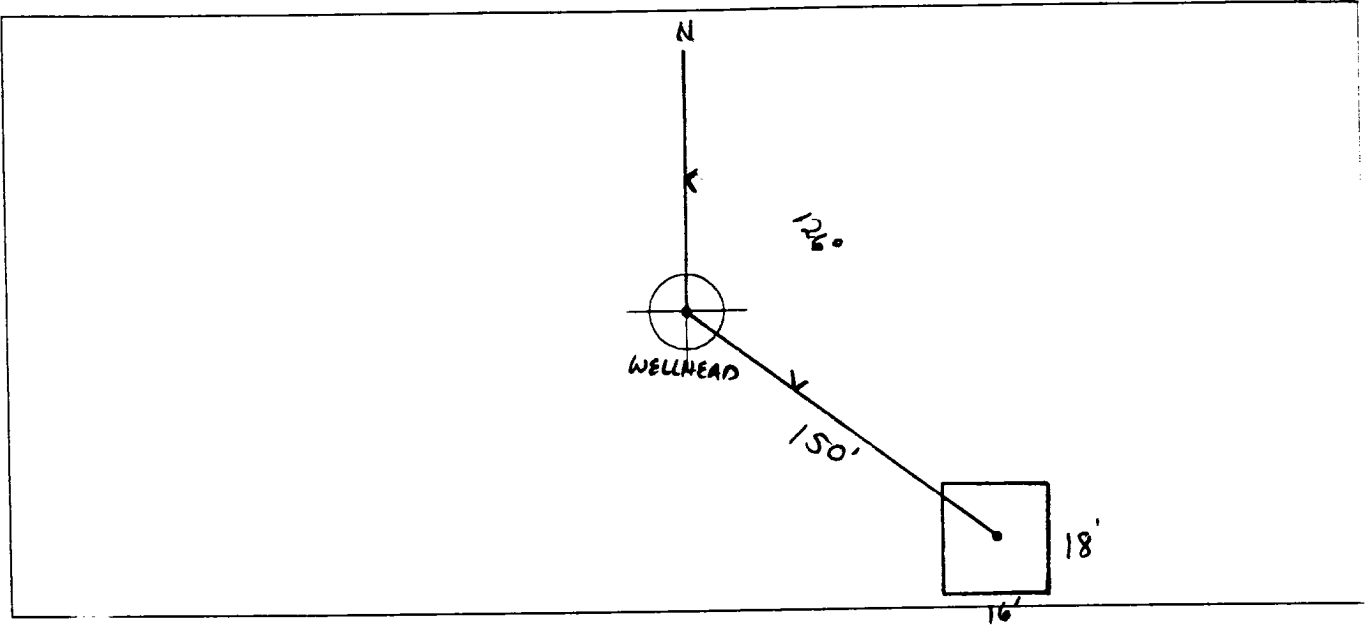
**FIELD PIT SITE ASSESSMENT FORM**

<b>GENERAL</b>	<p>Meter: <u>94710</u> Location: <u>STATE GAS COM BC #1E</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>Amoco</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>32</u> Township: <u>31</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>3.24.94</u> Run: <u>02</u> <u>31</u></p>
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> Inside <input type="checkbox"/> Land Type: BLM <input type="checkbox"/>          (From NMOCD Vulnerable <input type="checkbox"/> State <input checked="" type="checkbox"/>          Maps) Zone <input type="checkbox"/> Fee <input type="checkbox"/>          Outside <input checked="" type="checkbox"/> Indian _____</p> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/></p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/></p> <p><b>Wellhead Protection Area :</b></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"/> YES (20 points) <input checked="" type="checkbox"/> NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/></p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/></p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p><b>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</b></p>
<b>REMARKS</b>	<p>Remarks : <u>THREE PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS OILY.</u></p>

### ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 126° Footage to Wellhead 150'  
b) Degrees from North \_\_\_\_\_ Footage to Dogleg \_\_\_\_\_  
Dogleg Name \_\_\_\_\_  
c) Length : 18' Width : 16' Depth : 2'

ORIGINAL PIT LOCATION



### REMARKS :

STARTED TAKING PICTURES AT 12:28 P.M.  
END JUMP

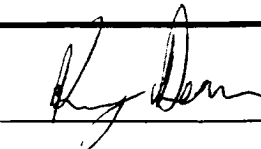
REMARKS

Completed By:

Robert Thompson  
Signature

3.24.94  
Date

**FILL PIT REMEDIATION/CLOSURE FORM**

<b>GENERAL</b>	Meter: <u>94710</u> Location: <u>STATE GAS Com BC #1E</u> Coordinates: Letter: <u>G</u> Section <u>32</u> Township: <u>31</u> Range: <u>12</u> Or Latitude _____ Longitude _____ Date Started : <u>4-21-94</u> Area: <u>02</u> Run: <u>31</u>
<b>FIELD OBSERVATIONS</b>	Sample Number(s): <sup>940856</sup> <u>KD20</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>479 ppm</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet
<b>CLOSURE</b>	Remediation Method : Excavation <input type="checkbox"/> (1) Approx. Cubic Yards <u>0</u> Onsite Bioremediation <input type="checkbox"/> (2) Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3) Soil Disposition: Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra Other Facility <input type="checkbox"/> (2) Name: _____ Pit Closure Date: <u>4-21-94</u> Pit Closed By: <u>BEI</u>
<b>REMARKS</b>	Remarks : <u>Pit was highly Contaminated with CH. Dug test</u> <u>Hole to 12'. TOOK PID Reading. Closed pit.</u>
	Signature of Specialist: <u></u>



CHAIN OF CUSTODY RECORD

PROJECT NUMBER		PROJECT NAME		PROJECT ANALYSIS		REQUESTED ANALYSIS		CONTACT LABORATORY P. O. NUMBER					
SAMPLERS: (Signature) <i>Kenny Deann</i>		DATE: 4-21-94		TPH EPA 418.1		BTEX EPA 8020							
LAB ID	DATE	TIME	MATRIX	SAMPLE NUMBER	TOTAL NUMBERS OF CONTAINERS	SAMPLE TYPE	EPA 418.1	EPA 8020	REMARKS				
940852	4-21-94	0850	Soil	KD 16	1	VG	X						
940853	4-21-94	0930	Soil	KD 17	1	VG	X						
940854	4-21-94	1015	Soil	KD 18	1	VG	X						
940855	4-21-94	1120	Soil	KD 19	1	VG	X						
940856	4-21-94	1255	Soil	KD 20	1	VG	X		At 12' soil was solid Black from Contamination				
940857	4-21-94	1435	Soil	KD 21	1	VG	X						
940858	4-21-94	1435	Soil	KD 22	1	D	X						
940859	4-21-94	1440	Soil	KD 23	1	B	X						
940860	4-21-94	1550	Soil	KD 24	1	VG	X						
RELINQUISHED BY: (Signature) <i>Kenny Deann</i>		DATE/TIME 3:35		RECEIVED BY: (Signature) <i>Joe T. Payne</i>		DATE/TIME 4:21-94 1740		RELINQUISHED BY: (Signature) <i>Joe T. Payne</i>		DATE/TIME 4/22/94 0912		RECEIVED BY: (Signature) <i>[Signature]</i>	
RELINQUISHED BY: (Signature) <i>[Signature]</i>		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)	
REQUESTED TURNAROUND TIME: <input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH				SAMPLE RECEIPT REMARKS				RESULTS & INVOICES TO:					
CARRIER CO.				CHARGE CODE				FIELD SERVICES LABORATORY EL PASO NATURAL GAS COMPANY P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499					
BILL NO.:				505-599-2144				FAX: 505-599-2261					



**FIELD SERVICES LABORATORY  
ANALYTICAL REPORT  
PIT CLOSURE PROJECT - Soil**

**SAMPLE IDENTIFICATION**

	Field ID	Lab ID
SAMPLE NUMBER:	KD20	940856
MTR CODE   SITE NAME:	94710	N/A
SAMPLE DATE   TIME (Hrs):	4/21/94	1255
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	4-22-94	4-22-94
DATE OF BTEX EXT.   ANAL.:	N/A	
TYPE   DESCRIPTION:	VG	Black-Grey Coarse 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	7890 <i>5/14/94</i>	MG/KG				
TPH (418.1)	7890	MG/KG			2.03	28
HEADSPACE PID	479	PPM				
PERCENT SOLIDS	96	%				

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

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

DF = Dilution Factor Used

Approved By: John Latta

Date: 5/17/94