District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Risk
Bedrock

Submit 1 copy to appropriate District Office and 1 copy to the Santa Fe Office

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

30-045-26130

Operator: Robert L. Bayless by EPFS Telephone

Address:

Facility Or Well Name T.L. Rhodes B#1E, Meter 95309

Location: Unit or Qtr/Qtr Sec M Sec 20 T 28 R 11 County San Juan

Pit Type: Separator ____ Dehydrator X Other

Land Type: BLM X, State ____, Fee ____ Other

Pit Location: Pit dimensions: length 32', width 25', depth 7'
(Attach diagram)

Reference: wellhead X, other

Footage from reference: 126'

Direction from reference: 261 Degrees X East North ____ of ____ West South ____

Depth To Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water.)	Less than 50 feet	(20 points)
	50 feet to 99 feet	(10 points)
	Greater than 100 feet	(0 points) 10
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.)	Yes	(20 points)
	No	(0 points) 0
Distance To Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches.)	Less than 200 feet	(20 points)
	200 feet to 1000 feet	(10 points)
	Greater than 1000 feet	(0 points) 0

RANKING SCORE (TOTAL POINTS): 10

Date Remediation Started: 02/06/95 Date completed: 02/06/95

Remediation Method: (Check all appropriate sections.) Excavation _____ Approx. cubic yards _____

Landfarmed _____ Insitu Bioremediation _____

Other Backfill pit without excavation

Remediation Location: (i.e. landfarmed onsite, name and location of offsite facility) Onsite N/A Offsite N/A

General Description of Remedial Action: Some line markers. Dug a test hole. Hit sandstone at 3'. Closed pit.

Ground Water Encountered: No X Yes _____ Depth _____

Final Pit: Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths)

Sample location Four walls and center of pit composite

Sample depth 3'

Sample Date 02/06/95 Sample time 13:50

Sample Results

Benzene(ppm) Not reported.

Total BTEX(ppm) Not reported.

Field headspace(ppm) 13

TPH 19600

Ground Water Sample: Yes _____ No X (If yes, attach sample results)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Date 1/8/03

Signature Scott T. Pope

Printed Name and Title Scott T. Pope Senior ENV Scientist

elpaso

PIT CLOSURE REQUEST

T.L. Rhodes B#1E
Meter/Line ID 95309

SITE DETAILS

Legals - Twn: 28N	**Rng: 11W**	**Sec: 20**	**Unit: M**
NMOCD Hazard Ranking: 10		**Land Type: BLM**	
Operator: Amoco		**Pit Closure Date: 2/6/95**	

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 3 feet (ft) below ground surface (bgs) where sandstone was encountered and a soil sample was collected for field headspace and laboratory analysis for TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 13 ppm and a TPH concentration of 19,600 mg/kg. The TPH measurement exceeded recommended remediation levels for the Hazard Ranking Score of 10.

No soil was disposed of offsite. The pit was backfilled with site soil, topped with clean soil from the surrounding berms, and graded in a manner to direct surface runoff away from the pit area.

A Phase II boring was completed to 12 ft bgs. No groundwater was encountered in the soil boring. One laboratory sample was collected at 10-12 ft bgs. Headspace analysis indicated an organic vapor content of 0 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3 mg/kg, and a TPH concentration of <20 mg/kg. The benzene, total BTEX, and TPH concentrations were below recommended remediation levels for the Hazard Ranking Score.

No Phase III activities were conducted.

El Paso Field Services requests closure of the above mentioned pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over seven years.
- Bedrock was encountered at 3 feet bgs making further vertical migration unlikely, and additional excavation impractical.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- The clean soil from the berms placed on top of the excavation would limit the potential for direct contact with hazardous constituents by livestock or the public; i.e., current direct contact exposure pathways are unlikely to be completed.
- Groundwater was not encountered in the soil boring at 12 ft bgs; local geologic features indicate the depth to groundwater is greater than 50 ft bgs.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.

- Benzene, total BTEX, and TPH concentrations in the soil sample collected at the base of the Phase II soil boring at 10 ft bgs were non-detect, indicating that no significant downward constituent migration is occurring.
- Residual hydrocarbons, if any, in the soil will likely degrade by natural attenuation with minimal risk to the environment.

ATTACHMENTS

Field Pit Assessment Form
Revised Field Pit Assessment Form
Field Pit Remediation/Closure Form
Phase II Soil Boring Log
Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 95309 Location: T.L. RHODES B #1E

Operator #: _____ Operator Name: ROBERT L. BAYLESS P/L District: _____

Coordinates: Letter: M Section 20 Township: 28 Range: 11

Or Latitude _____ Longitude _____

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

Site Assessment Date: 4·28·98 Area: 01 Run: 63

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: 10 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS IN A REMOTE AREA ON A HILL ABOVE HORN CANYON.

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 4/10	946639
MTR CODE | SITE NAME:	95309	N/A
SAMPLE DATE | TIME (Hrs):	2-6-95	1350
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	2-8-95	2-8-95
DATE OF BTEX EXT. | ANAL.:		
TYPE | DESCRIPTION:	VG	Brown fine sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	19600	MG/KG			0.25	28
HEADSPACE PID	13	PPM				
PERCENT SOLIDS	88.3	%				

-- TPH is by EPA Method 418.1 --

arrative: _____

F = Dilution Factor Used

Approved By: _____ Date: 2-22-95

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 95309 Location: T.L Rhodes B1E

Coordinates: Letter: M Section 20 Township: 28 Range: 11

Or Latitude _____ Longitude _____

Date Started : 2-6-95 Run: 01 63

FIELD OBSERVATIONS

Sample Number(s): RP 410 _____ _____ _____

Sample Depth: 3' Feet

Final PID Reading 0013 PID Reading Depth 3' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

- Excavation ☐ Approx. Cubic Yards _____
- Onsite Bioremediation ☐
- Backfill Pit Without Excavation ☒

Soil Disposition:

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

Pit Closure Date: 2-6-95 Pit Closed By: B.E.I

REMARKS

Remarks : Some LINE markers due a test hole. Hit sand stone at 3' closed pit

Signature of Specialist: Kelly Padilla

(SP3191) 03/16/94

EL PASO FIELD SERVICES

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	HAB85	980851
MTR CODE | SITE NAME:	95309	TL Rhodes B 1E
SAMPLE DATE | TIME (Hrs):	12/2/98	0845
PROJECT:	Phase II Drilling	
DATE OF TPH EXT. | ANAL.:	12/8/98	12/8/98
DATE OF BTEX EXT. | ANAL.:	12/7/98	12/8/98
TYPE | DESCRIPTION:	VG	SOIL

Field Remarks: 10-12'

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 (MOD.8015)	<20	MG/KG				
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	88.8	%				

-- TPH is by EPA Method 8015 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 95.3 % for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: John Fuller Date: 12/21/98

ECORD OF SUBSURFACE EXPLORATION

Borehole # BH-1
Well # NA
Page 1 of 1

ILIP SERVICES CORP.
)0 Monroe Road
mi[redacted] New Mexico 87401
5[redacted]2 FAX (505) 326-2388

Project Number 19643 Phase 1001.77
Project Name EPFS PITS >10
Project Location TL RHODES BIE 95307

evation
orehole Location LTR: M S: 20 T: 28 R: 11
WL Depth NA
rilled By K. PADILLA
ell Logged By H. BRADBURY
ate Started 12/2/98
ate Completed 12/2/98

Drilling Method 4 1/4 ID HSA
Air Monitoring Method PID

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: PPM BZ	BH	S/HS	Drilling Conditions & Blow Counts
0				EXCAVATION SAMPLE COLLECTED AT 3'						BZ=Breathing Zone BH=Borehole S/HS=Sample/Headspace
5	1	5-7	24	LT BR SANDSTONE, FINE SAND, LOW CEMENTATION, DRY			0	0	0 0	837 HRS
10	2	10-12	24	LT BR SANDSTONE, V FINE SAND, LOW CEMENTATION, DRY			0	0	0 0	845 HRS
				TOB 12						
20										
25										
30										
35										
40										

ts: HAB85 (10-12') SENT to lab for TPH, BTEX GW NOT ENCOUNTERED BH grouted to surface

Geologist Signature H. Bradbury