

**EL PASO FIELD SERVICES  
PRODUCTION PIT CLOSURE**

*LOC Drp*

**MKL #13  
Meter/Line ID - 70257**

*Risk - BTEX*  
**RECEIVED**  
DEC 21 1999

**SITE DETAILS**

**Legals - Twn: 26N  
NMOCD Hazard Ranking: 0  
Operator: Louis Dreyfus**

**Rng: 7W**

**Sec: 7      Unit: A  
Land Type: BLM  
Pit Closure Date: 9/20/94**

**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' 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 229 ppm; laboratory analysis indicated a TPH concentration of 689 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.
- 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>	<p>Meter: <u>70257</u> Location: <u>MKL #13</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>A</u> Section <u>7</u> Township: <u>26</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>2/25/98</u> Area: _____ Run: _____</p>								
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p style="margin-left: 150px;"> <input type="checkbox"/> Inside (1)  <input checked="" type="checkbox"/> Outside (2)         </p> <p><b>Land Type:</b></p> <table style="width: 100%;"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/> (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 style="text-align: right;"> <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></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (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</p> <p style="text-align: right;"> <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)  <input type="checkbox"/> (2) &gt; 100'         </p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>0</u> <b>POINTS</b></p>	BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian	_____
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian	_____								
<b>REMARKS</b>	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is &gt;1000' from center of Largo Wash</u></p>								

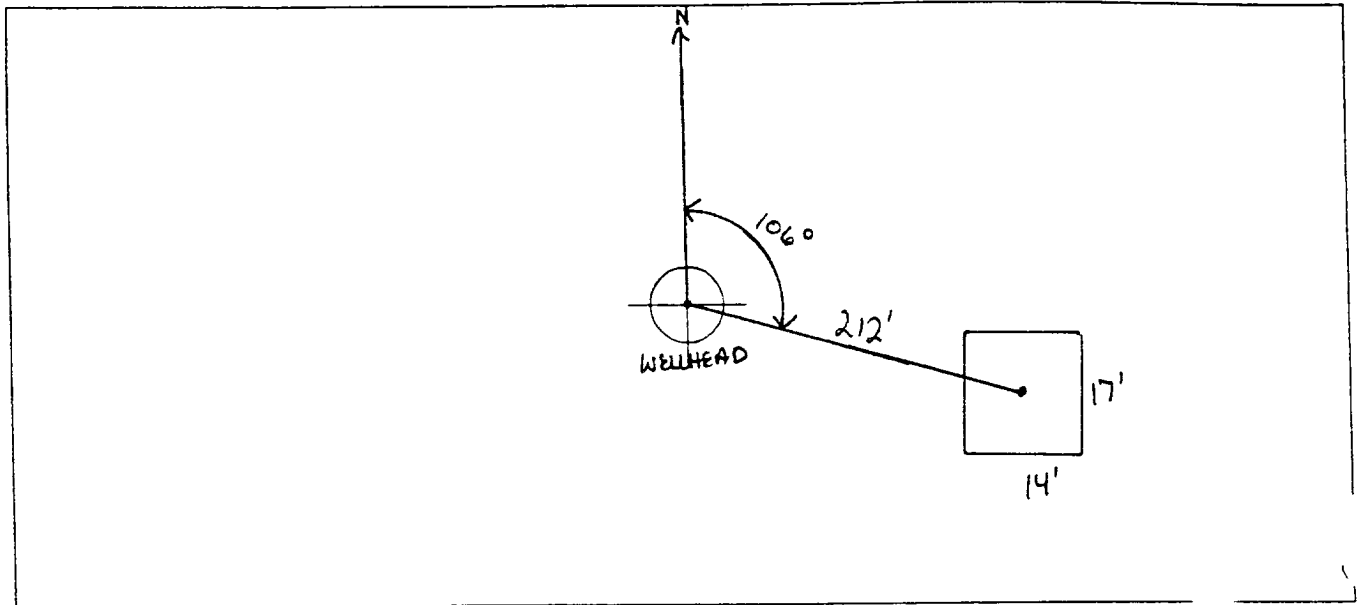
# FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>70257</u> Location: <u>MKL #13</u> Operator #: <u>0448</u> Operator Name: <u>LOUIS DREYFUS P/L</u> District: <u>BALLARD</u> Coordinates: Letter: <u>A</u> Section <u>7</u> Township: <u>26</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>6.16.94</u> Area: <u>07</u> Run: <u>51</u>		
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2) Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ Depth to Groundwater 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) 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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3) Name of Surface Water Body <u>BIG RINCON CANYON</u> (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100' TOTAL HAZARD RANKING SCORE: <u>20</u> POINTS		
REMARKS	Remarks : <u>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS ON THE EDGE OF BIG RINCON CANYON AT THE BASE OF SOME CLIFFS. REDLINE SHOWS LOCATION INSIDE V.Z. BUT TOPO SHOWS LOCATION IS OUTSIDE V.Z.</u>		

# ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 106° Footage from Wellhead 212'  
 b) Length : 17' Width : 14' Depth : 2'

ORIGINAL PIT LOCATION



## Remarks :

TOOK PICTURES AT 1:47 P.M.

END DUMP

REMARKS

Completed By:

Robert Thompson  
 Signature

6.16.94  
 Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>70257</u> Location: <u>MKL #13</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>7</u> Township: <u>26</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-20-94</u> Run: <u>07</u> <u>51</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW308</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>229</u> PID Reading Depth <u>12'</u> Feet</p> <p>Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<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"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>9-20-94</u> Pit Closed By: <u>BEL</u></p>
REMARKS	<p>Remarks : _____ <u>10 yds F 11</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>



## FIELD SERVICES LABORATORY

### ANALYTICAL REPORT

#### PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

#### SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 308	946172
MTR CODE   SITE NAME:	70257	N/A
SAMPLE DATE   TIME (Hrs):	9.20.94	1300
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	9.22.94	9.22.94
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Dark brown fine sand & clay

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	690 <sup>KSC</sup> 689 <sup>9/23/94</sup>	MG/KG			2.05	28
HEADSPACE PID	229	PPM				
PERCENT SOLIDS	88.4	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_

9/30/94