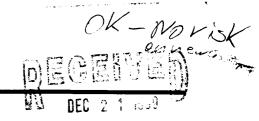
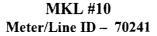
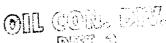
PRODUCTION PIT CLOSURE Loc. Dry







SITE DETAILS

Legals - Twn: 26N

Rng: 7W

Sec: 7

Unit: D

NMOCD Hazard Ranking: 0 Operator: Louis Dreyfus 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 1 ppm; laboratory analysis indicated a TPH concentration of 20.6 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

REVISEDFIELD PIT SITE ASSESSMENT FORM

GENERAI		Meter: 7024 Location: MKL #10 Operator #: Operator Name: P/L District:					
GEN		Coordinates: Letter: D Section 7 Township: 26 Range: 7					
	, 	Or Latitude Longitude Pit Type: Dehydrator Location Drip: Line Drip: Other:					
		Site Assessment Date: \\ \lambda \lambda \rangle \rangle \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \					
-	_	Null.					
		NMOCD Zone: Land Type: BLM (1)					
		(From NMOCD State (2)					
		Maps) Inside (1) Fee (3)					
		Outside (2) 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)					
L		Wellhead Protection Area					
ASSESSMENT		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 care?					
SE		(1) YES (20 points) (2) NO (0 points)					
AS		Horizontal Distance to Surface Water Body					
П		Less Than 200 Ft (20 points) (1)					
SIT		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)					
	1.	TOTAL HAZADD DANKDIG GGODT					
∞	十	TOHITS					
REMARKS		Remarks: Site has been re-assessed, due to initial assessment including washes					
AA	1-	as a surface Water Body. Site is at base of meson > 1000/fra					
EN	‡	teiter Canyon					
\simeq							

FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 70241 Location:MKL # 10 Operator #: 0448 Operator Name: Louis Drivers P/L District: BALLARD Coordinates: Letter: _D Section Township: _26 Range: Or				
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside Outside Outside Outside Outside Outside (1) Fee (3) Indian Depth to Groundwater Less Than 50 Feet (20 points) For to 99 Ft (10 points) Greater Than 100 Ft (0 points) 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? Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) Cyon Ft to 1000 Ft (10 points) Cyon Ft to 1000 Ft (10 points) Cyon Ft to 1000 Ft (0 points) Cyon Ft to 1000 Ft (0 points) Cyon Ft to 1000 Ft (10 points) Cyon Ft to 1000 Ft (10 points) Cyon Ft to 1000 Ft (10 points) Cyon Ft Con Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream (1) < 100'(Navajo Pits Only Cotal Cotal Con Cotal Cot				
REMARKS	Remarks: ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS JUST EAST OF HEIFER CANYON, REDLINE SHOWS LOCATION IS INSIDE V.Z. BUT TOPO SHOWS LOCATION IS INSIDE V.Z. BUT TOPO				
民	Passer				

NO	ORIGINAL PIT LOCATION Original Pit: a) Degrees from North 344° Footage from Wellhead 9' b) Length: 18' Width: 17' Depth: 2'						
ORIGINAL PIT LOCATION	18' 17' R						
REMARKS	Remarks: TDOKS PICTURES AT 1:28 P.M. END DUMP						
	Completed By: 6.15.94 Signature Date						

FIELD -PIT-REMEDIATION/CLOSURE FORM

GENERAL	Meter: 7024 Location: MKL # 10 Coordinates: Letter: D Section 7 Township: 26 Range: 7 Or Latitude Longitude Date Started: 9-20-94 Run: 07 51
FIELD OBSERVATIONS	Sample Number(s): VW310 Sample Depth: 12' Feet Final PID Reading Depth 12' Feet Yes No Groundwater Encountered \(\) \(\) Approximate Depth \(\) Feet
CLOSURE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation Soil Disposition: Envirotech Other Facility Name: Pit Closure Date: 4-29-94 Pit Closed By: BET
PEMARKS	Remarks :
PEM	
	Signature of Specialist: Vale Wilsey



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

	SAMPLE	IDENTIFICA	ION			
	Field	ID		Lab ID		
SAMPLE NUMBER:	VW 3/	D .	946	174		
MTR CODE SITE NAME:	7024			N/A		
SAMPLE DATE TIME (Hrs):	9-20-9	4	1430	0		
SAMPLED BY:		N/A				
DATE OF TPH EXT. ANAL.:	0.22.92		٥.	22-94		
DATE OF BTEX EXT. ANAL.:	N 14		ه ا در	7.		
TYPE DESCRIPTION:	٧G		Brown fine And			
· · · · · · · · · · · · · · · · · · ·						
REMARKS:				 		
1121111						<u></u>
		RESULTS				
						
DADAMETED	RESULT	UNITS	:	QUALIFI		
PARAMETER	MESOE:		DE	0	M(a)	V(ml)

	RESULT	UNITS	QUALIFIERS			
PARAMETER			DF	Q	M(g)	V(ml)
TPH (418.1)	20.6	MG/KG			2.01	28
HEADSPACE PID	1	PPM				
PERCENT SOLIDS	94.1	%				

-- TPH is by EPA Method 418.1 --

Narrative:	
DF = Dilution Factor Used	
	Date:9/30/40/
Approved By:	