

# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Risk  
BTEX

Nordhaus No.2  
Meter/Line ID – 87048



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## SITE DETAILS

Legals - Twn: 25N	Rng: 7W	Sec: 18	Unit: H
NMOCD Hazard Ranking: 10		Land Type: BLM	
Operator: Dugan		Pit Closure Date: 9/22/94	

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## **RATIONALE FOR RISK-BASED CLOSURE**

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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 twelve 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 backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 237 ppm; laboratory analysis indicated a TPH concentration of 117 mg/kg. This site was re-assessed on April 13, 1998, because the initial assessment incorrectly included washes as a surface water body.

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 almost six years.
- The test pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the test excavation.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Based on the Hazard Ranking Score, TPH concentrations were below required remediation levels.

## 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>87048</u> Location: <u>Nordhaus #2</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>H</u> Section <u>18</u> Township: <u>25</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>4/13/98</u> Area: _____ Run: _____</p>
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p style="margin-left: 150px;">Inside <input type="checkbox"/> (1)</p> <p style="margin-left: 150px;">Outside <input checked="" type="checkbox"/> (2)</p> <p style="margin-left: 350px;">BLM <input checked="" type="checkbox"/> (1)</p> <p style="margin-left: 350px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 350px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 350px;">Indian _____</p> <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 checked="" type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input 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: center;"><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 <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)</p> <p style="margin-left: 350px;"><input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>10</u> <b>POINTS</b></p>
<b>REMARKS</b>	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is &lt;100' vertical from center of Paluche Canyon</u></p>

# FIELD PIT SITE ASSESSMENT FORM

		GENERAL									
		Meter: <u>87-048</u> Location: <u>Nordhaus #2</u> Operator #: <u>1862</u> Operator Name: <u>Dugan</u> P/L District: <u>Ballard</u> Coordinates: Letter: <u>H</u> Section <u>18</u> Township: <u>25</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____ Site Assessment Date: <u>06/30/94</u> Area: <u>07</u> Run: <u>41</u>									
		SITE ASSESSMENT	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p style="text-align: right;"><b>Land Type:</b></p> <table style="width: 100%;"> <tr> <td style="width: 50%;">Inside <input type="checkbox"/> (1)</td> <td style="width: 50%;">BLM <input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>Outside <input checked="" type="checkbox"/> (2)</td> <td>State <input type="checkbox"/> (2)</td> </tr> <tr> <td></td> <td>Fee <input type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td>Indian _____</td> </tr> </table> <p><b>Depth to Groundwater</b></p> <p>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)</p> <p><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? <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) 200 Ft to 1000 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Palluche Canyon</u> (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only) <input type="checkbox"/> (2) &gt; 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>20</u> POINTS</p>	Inside <input type="checkbox"/> (1)	BLM <input checked="" type="checkbox"/> (1)	Outside <input checked="" type="checkbox"/> (2)	State <input type="checkbox"/> (2)		Fee <input type="checkbox"/> (3)		Indian _____
Inside <input type="checkbox"/> (1)	BLM <input checked="" type="checkbox"/> (1)										
Outside <input checked="" type="checkbox"/> (2)	State <input type="checkbox"/> (2)										
	Fee <input type="checkbox"/> (3)										
	Indian _____										
		REMARKS	<p>Remarks : <u>Redline Book - Outside</u> <u>Vulnerable Zone Type - Outside</u> <u>One pit, pit is dry, will close one pit</u></p> <p style="text-align: right;"><u>Push In</u></p>								

## ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 312° Footage from Wellhead 74'

b) Length : 13' Width : 13' Depth : 1'



## REMARKS

## Remarks :

Pictures @ 14:31 (16-19)

Dump Truck

Sign says R12W, location is R7W.

Completed By:

Mark Kelly

Signature

6/30/94

Date

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## REMARKS

## Remarks :

Pictures @ 14:31 (16-19)

Dump Truck

Sign says R12W, location is R7W.

Completed By:

Shush Kelly

Signature

6/30/94

Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>87048</u> Location: <u>Nordhaus #2</u></p> <p>Coordinates: Letter: <u>H</u> Section <u>18</u> Township: <u>25</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-22</u> Run: <u>07</u> <u>41</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW323</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>237</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>9-22-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>10 yds Fill</u></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 323	946196
MTR CODE   SITE NAME:	87048	N/A
SAMPLE DATE   TIME (Hrs):	9-22-94	1030
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	9-27-94	
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Brown sand & clay

REMARKS:

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	117	MG/KG			2.02	28
HEADSPACE PID	237	PPM				
PERCENT SOLIDS	90.0	%				

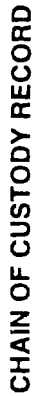
-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: 

Date: 10/6/94



## CHAIN OF CUSTODY RECORD

505-599-2144