

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Outside

NEK - b-1-2

BTEX - TPH

San Juan 28-7 Unit #152
Meter/Line ID - 87348

RECEIVED
NOV - 2 1999

OIL CON. DIV.
DIST. 3

SITE DETAILS

Legals - Twn: 27N
NMOCD Hazard Ranking: 0
Operator: Amoco

Rng: 7

Sec: 21 Unit: K
Land Type: BLM
Pit Closure Date: 8/11/94

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.

Sandstone was encountered in the test excavation at depth of three feet. The excavation was terminated 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 then backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 225 ppm; laboratory analysis indicated a TPH concentration of 132,000 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.
- Bedrock was encountered at three feet below ground surface making remediation impracticable.
- 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

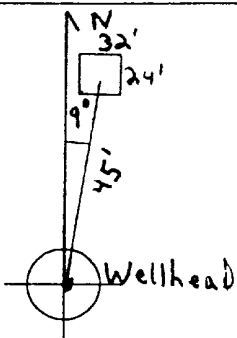
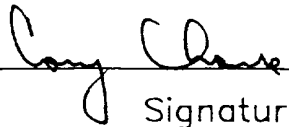
Field Pit Assessment Form
Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>87348</u> Location: <u>San Juan 28-7 Unit #152</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>K</u> Section <u>21</u> Township: <u>27</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/8/98</u> Area: _____ Run: _____
SITE ASSESSMENT	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> NMOCD Zone: (From NMOCD Maps) </div> <div style="width: 45%;"> Land Type: </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2) </div> <div style="width: 45%;"> BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ </div> </div> <div style="margin-top: 10px;"> Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3) </div> <div style="margin-top: 10px;"> 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? <div style="display: flex; justify-content: center; margin-top: 5px;"> <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) </div> </div> <div style="margin-top: 10px;"> Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3) </div> <div style="margin-top: 10px;"> Name of Surface Water Body _____ (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) </div> <div style="margin-top: 10px;"> Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100' </div> <div style="margin-top: 10px;"> TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS </div>
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is on Encinada Mesa & is >100' vertical from center of Cuervo Canyon</u>

FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>87348</u> Location: <u>San Juan 28-7 Unit 152</u> Operator #: <u>0203</u> Operator Name: <u>Ameco</u> P/L District: <u>Blanco</u> Coordinates: Letter: <u>K</u> Section <u>21</u> Township: <u>22</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>6/7/94</u> Area: <u>03</u> Run: <u>32</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>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)</p> <p>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)</p> <p>Name of Surface Water Body <u>Cuervo 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'</p> <p>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline & Voln - Outside</u> <u>2 pits. Close. Pit Dry</u></p> <p style="text-align: right;"><u>PUSH-IN</u></p>

ORIGINAL PIT LOCATION	<p style="text-align: center;">ORIGINAL PIT LOCATION</p> <p>Original Pit : a) Degrees from North <u>9°</u> Footage from Wellhead <u>45'</u> b) Length : <u>32'</u> Width : <u>24'</u> Depth : <u>4'</u></p> <div style="text-align: center;">  </div>
REMARKS	<p>Remarks :</p> <p><u>Pictures @ 1100 (14-17)</u></p> <p><u>Dump Truck</u></p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
	<p>Completed By:</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;">  Signature </div> <div style="text-align: center;"> <u>6/7/94</u> Date </div> </div>

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>87348</u> Location: <u>SAN Juan 28-7 #152</u></p> <p>Coordinates: Letter: <u>K</u> Section <u>21</u> Township: <u>27</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : _____ Run: <u>03</u> <u>32</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>AK 259</u></p> <p>Sample Depth: <u>3'</u> Feet</p> <p>Final PID Reading <u>225</u> PID Reading Depth <u>3'</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>8-11-94</u> Pit Closed By: <u>BET</u></p>
REMARKS	<p>Remarks : <u>EPNG LINES marked soil GRAY slight HYDROCARBON</u></p> <p><u>odor Hit Sandstone 3'</u></p>
	<p>Signature of Specialist: <u>Moya Lillian</u></p>



CHAIN OF CUSTODY RECORD

Page _____ of _____

PROJECT NUMBER		PROJECT NAME		PROJECT # 24324		PROJECT ANALYSIS		REQUESTED ANALYSIS		CONTRACT LABORATORY P. O. NUMBER	
SAMPLERS: (Signature)		DATE		DATE		DATE		DATE		DATE	
LAB ID		DATE		TIME		MATRIX		SAMPLE NUMBER		REMARKS	
94	5925	8-14-94	10:25	Soil	MK 254	1	UG	X			228 Gray Soil Slight Hydrocarbon odor
94	5926	8-14-94	12:05	Soil	MK 255	1	UG	X			229 Grayish Brown Strong Hydrocarbon odor
94	5927	8-14-94	13:34	Soil	MK 256	1	UG	X			230 Brown soil Strong odor
94	5928	8-14-94	14:30	Soil	MK 257	1	UG	X			231 Brownish Black Strong Hydrocarbon odor
94	5929	8-14-94	15:17	Soil	MK 258	1	UG	X			232 Gray soil Strong Hydrocarbon odor
94	5930	8-14-94	16:26	Soil	MK 259	1	UG	X			233 Gray soil slight Hydrocarbon odor
[Signature Line]											
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME	
Morgan Killian		8-14-94 18:00		Brenda L. Liss		8-16-94 11:30					
RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RELINQUISHED BY: (Signature)		DATE/TIME	
										K. V. J.	
REQUESTED TURNAROUND TIME:				SAMPLE RECEIPT REMARKS				RESULTS & INVOICES TO:			
<input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH								FIELD SERVICES LABORATORY			
CARRIER CO.								EL PASO NATURAL GAS COMPANY			
BILL NO.:				CHARGE CODE				P. O. BOX 4990			
								FARMINGTON, NEW MEXICO 87499			
								FAX: 505-599-2261			



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 259	945930
MTR CODE SITE NAME:	87348	N/A
SAMPLE DATE TIME (Hrs):	8-11-94	1620
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-16-94	8-16-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/Grey Fine Sand/clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	132,000	MG/KG			0.06	28
HEADSPACE PID	225	PPM				
PERCENT SOLIDS	88.9	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

J.P.

Date:

9/2/94