

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

RISK-BTEX

San Juan 28-5 Unit #16
Meter/Line ID -- 71957

RECEIVED
DEC 21 1999

SITE DETAILS

Legals - Twn: 28N
NMOCD Hazard Ranking: 0
Operator: Meridian

Rng: 5W

Sec: 16
Land Type: Fee
Pit Closure Date: 7/7/94

OIL CON. DIV.
FORM 3

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 4' where sandstone was encountered. The excavation was terminated at 4' 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 170 ppm; laboratory analysis indicated a TPH concentration of 1810 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.
- Bedrock was encountered in the test excavation at four feet below ground surface making remediation impractical.
- 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	<p>Meter: <u>71957</u> Location: <u>San Juan 28-5 Unit #16</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>A</u> Section <u>16</u> Township: <u>28</u> Range: <u>5</u> <small>cm</small></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>2/13/98</u> Area: _____ Run: _____</p>
SITE ASSESSMENT	<p>NMOCD Zone: _____ Land Type: BLM _____ (1) (From NMOCD State _____ (2) Maps) Inside _____ (1) Fee <input checked="" type="checkbox"/> (3) Outside <input checked="" type="checkbox"/> (2) Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) _____ (1) 50 Ft to 99 Ft (10 points) _____ (2) Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Wellhead Protection Area</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>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) _____ (1) 200 Ft to 1000 Ft (10 points) _____ (2) 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 _____ (1) < 100' (Navajo Pits Only) _____ (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is > 1000' from center of</u> <u>Jasis Wash Gobernador Canyon.</u></p>

FIELD PIT SITE ASSESSMENT FORM

8

GENERAL

Meter: 71957 Location: San Juan 28-5 unit 16
 Operator #: 2999 Operator Name: Mecidian P/L District: Bloomfield
 Coordinates: Letter: A Section 16 Township: 28 Range: 5
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 6-3-94 Area: 10 Run: 71

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside
Outside

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, Major Wash, 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

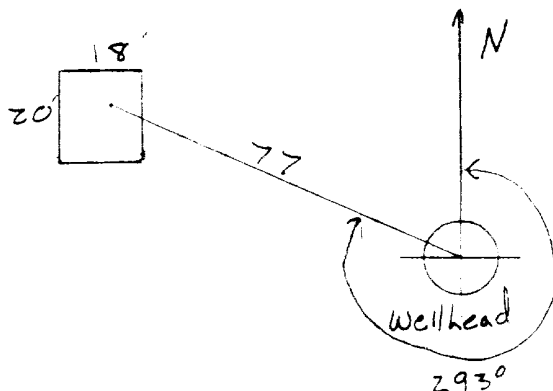
Remarks : one pit on location. pit is dry. Most likely Dehy
pit (well not in use)
location outside V.Z. on Redline and Topo map

PUSH IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 293 Footage from Wellhead 77
b) Length : 20 Width : 18 -Depth : 3



REMARKS

Remarks :

#5-8

Photos - Roll Z-6394 @ ~1635 hrs

End Dump

Completed By:

Ken Walter
Ken Walter Signature

6-3-94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>71957</u> Location: <u>SAN JUAN 28-5 Unit #16</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>16</u> Township: <u>28</u> Range: <u>5</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>7-7-94</u> Area: <u>10</u> Run: <u>21</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK 96</u></p> <p>Sample Depth: <u>4'</u> Feet</p> <p>Final PID Reading <u>170</u> PID Reading Depth <u>4'</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> (1) Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>7-7-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>EPNG lines marked soil gray strong</u></p> <p><u>H2O carbon odor - hit sand stone 4'</u></p>
	<p>Signature of Specialist: <u>Morgan Killion</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 96	945609
MTR CODE SITE NAME:	71957	N/A
SAMPLE DATE TIME (Hrs):	7/7/94	0910
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	7-12-94	7/12/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/grey sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	1810	MG/KG			2.06	28
HEADSPACE PID	170	PPM				
PERCENT SOLIDS	88.3	%				

— TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 —

ne Surrogate Recovery was at N/A % for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By: [Signature]

Date: 7/17/94