

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

San Juan 28-5 #93
Meter/Line ID - 89133

SITE DETAILS

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

Rng: 5W

Sec: 15

Unit: G

Land Type: Fee

Pit Closure Date: 7/7/94

RECEIVED
NOV - 2 1999
OIL CON. DIV.
DIST. 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 12 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 then backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 409 ppm; laboratory analysis indicated a TPH concentration of 15,500 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

GENERAL	Meter: <u>89133</u> Location: <u>San Juan 28-5 #93</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>G</u> Section <u>15</u> Township: <u>28</u> Range: <u>5</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/13/98</u> Area: _____ Run: _____												
SITE ASSESSMENT	<table style="width: 100%;"> <tr> <td style="width: 40%;">NMOCD Zone:</td><td style="width: 20%;">Land Type:</td><td style="width: 40%;">BLM <input type="checkbox"/> (1)</td></tr> <tr> <td>(From NMOCD</td><td></td><td>State <input type="checkbox"/> (2)</td></tr> <tr> <td>Maps)</td><td>Inside <input type="checkbox"/> (1)</td><td>Fee <input checked="" type="checkbox"/> (3)</td></tr> <tr> <td></td><td>Outside <input checked="" type="checkbox"/> (2)</td><td>Indian _____</td></tr> </table> <p>Depth to Groundwater</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>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) <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) < 100' (Navajo Pits Only)</p> <p style="text-align: center;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>	NMOCD Zone:	Land Type:	BLM <input type="checkbox"/> (1)	(From NMOCD		State <input type="checkbox"/> (2)	Maps)	Inside <input type="checkbox"/> (1)	Fee <input checked="" type="checkbox"/> (3)		Outside <input checked="" type="checkbox"/> (2)	Indian _____
NMOCD Zone:	Land Type:	BLM <input type="checkbox"/> (1)											
(From NMOCD		State <input type="checkbox"/> (2)											
Maps)	Inside <input type="checkbox"/> (1)	Fee <input checked="" type="checkbox"/> (3)											
	Outside <input checked="" type="checkbox"/> (2)	Indian _____											
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is >100' vertical from center of Gobernador Canyon.</u>												

FIELD PIT SITE ASSESSMENT FORM

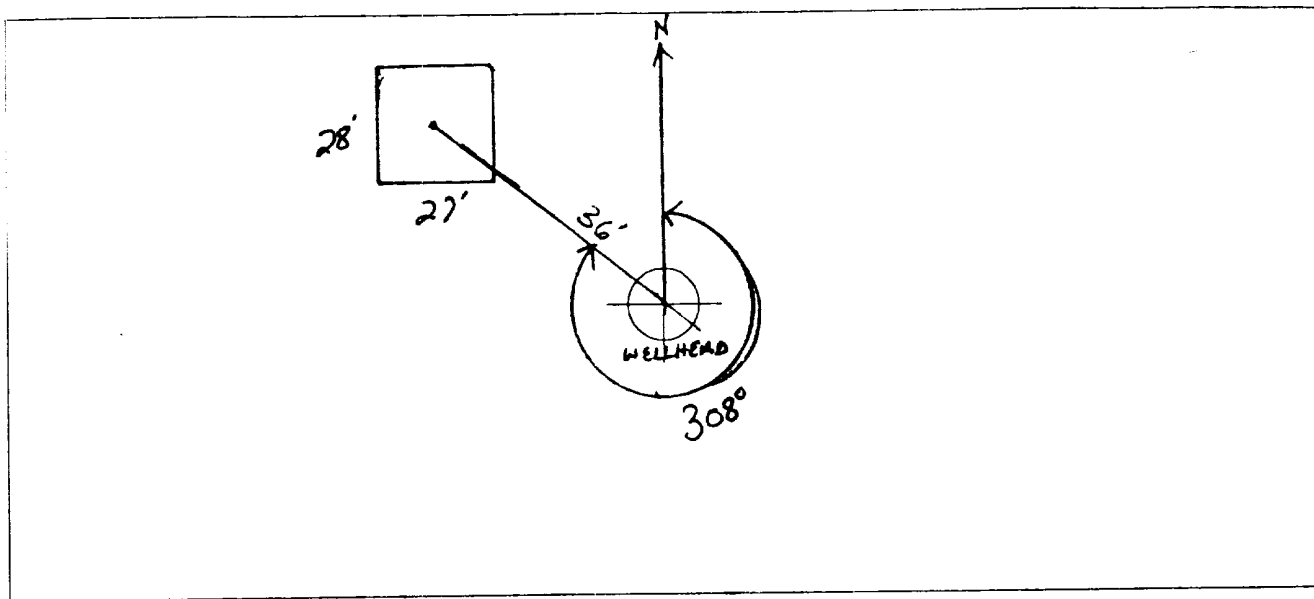
GENERAL	<p>Meter: <u>89-133</u> Location: <u>San Juan 28-5 #93</u></p> <p>Operator #: <u>2999</u> Operator Name: <u>Meridian</u> P/L District: <u>Bloomfield</u></p> <p>Coordinates: Letter: <u>G</u> Section <u>15</u> Township: <u>28N</u> Range: <u>5W</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>6-2-94</u> Area: <u>10</u> Run: <u>71</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input checked="" type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input 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 type="checkbox"/> (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, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>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>20</u> POINTS</p>
REMARKS	<p>Remarks : <u>TWO PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY.</u> <u>LOCATION IS EAST OF GENERAL AMERICAN RD. REDLINE AND TOPO</u> <u>CONFIRMED LOCATION TO BE OUTSIDE U.Z.</u></p>

~~PUSH~~

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 308° Footage from Wellhead 36'
b) Length : 28' Width : 27' Depth : 3'



REMARKS

Remarks :

TOOK PICTURES AT 2:03 P.M.END DUMP

Completed By:

Robert Thompson

Signature

6.2.94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>89-133</u> Location: <u>SAN JUAN 28-5 # 93</u></p> <p>Coordinates: Letter: <u>G</u> Section <u>15</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>71</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK 97</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>409</u> PID Reading Depth <u>12'</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 Brown Strong Hydrocarbon odor</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Morgan Killian</u></p>



CHAIN OF CUSTODY RECORD

[illegible]



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FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 97	945610
MTR CODE SITE NAME:	89133	N/A
SAMPLE DATE TIME (Hrs):	7/7/94	1001
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 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)	15,500	MG/KG			0.49	28
HEADSPACE PID	409 7/8/94	PPM				
PERCENT SOLIDS	84.6	%				

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

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

DF = Dilution Factor Used

Approved By:

Date:

7/27/94