Risk-based

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE Loc. Drip

San Juan 28-7 Unit 263 PC
Meter/Line ID – 95854

SITE DETAILS

Legals - Twn: 28N **Rng: 7W** **Sec: 13** **Unit: B**
NMOCD Hazard Ranking: 0 **Land Type: BLM**
Operator: Amoco **Pit Closure Date: 9/1/94**

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 7' where sandstone was encountered. The excavation was terminated at 7' 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 215 ppm; laboratory analysis indicated a TPH concentration of 1360 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 seven 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

Meter: 95854 Location: San Juan 28-7 Unit 263 PC

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: B Section 13 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____

Site Assessment Date: 2/26/98 Area: _____ Run: _____

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)

Inside ☐ (1)

Outside ☒ (2)

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, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is on Delgadita Mesa. Is >100 Vertical Feet From center of Delgadita Canyon

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 45854 Location: San Juan 28-7 Unit 263 PC
Operator #: 0203 Operator Name: Amoco P/L District: Blanco
Coordinates: Letter: B Section 13 Township: 28 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: ✓ Line Drip: ___ Other: _____
Site Assessment Date: 6/8/94 Area: 13 Run: 41

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside ☐ (1)
Outside ☒ (2)

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 Delgadita Canyon
(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 : Redline - Inside, Vuln. - Outside
2 pits. Closed Pit Only

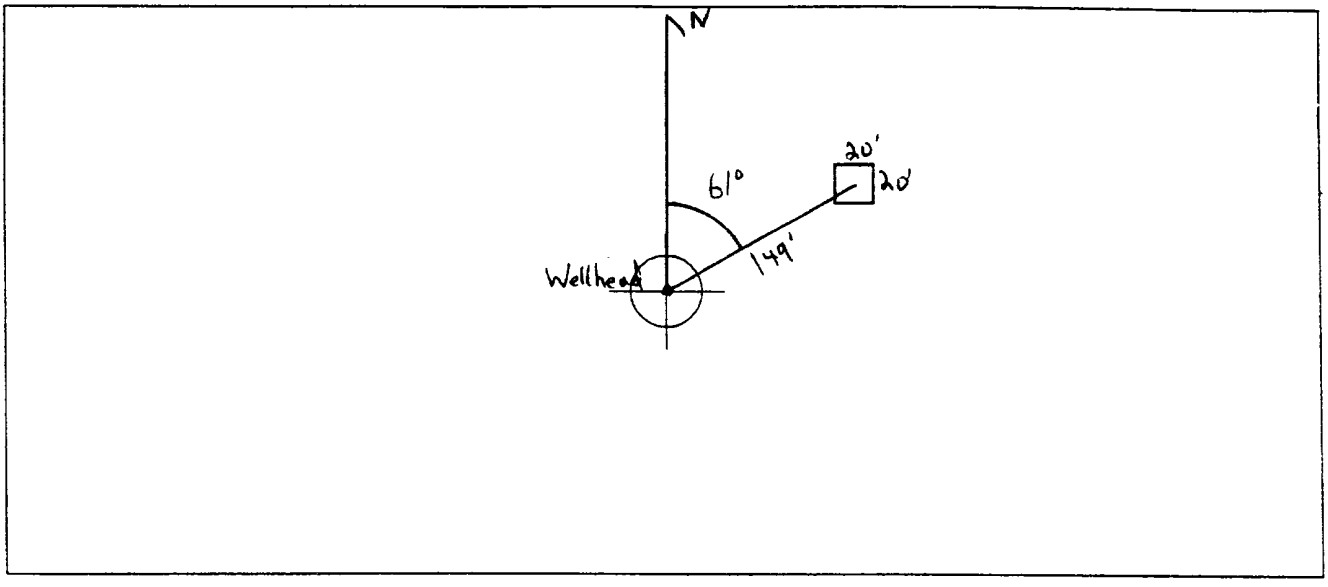
PUSH-IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 61° Footage from Wellhead 149'

b) Length : 20' Width : 20' Depth : 3'



REMARKS

Remarks :

Pictures @ 1214 (19-22)
End Dump

Completed By:

Cory Chase
Signature

6/8/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 95854 Location: San Juan 28-7 Unit 263 PC

Coordinates: Letter: B Section 13 Township: 28 Range: 7

Or Latitude _____ Longitude _____

Date Started : ~~9-1-94~~ 9-1-94 Run: 13 41

FIELD OBSERVATIONS

Sample Number(s): VW240 _____ _____ _____

Sample Depth: 7' Feet

Final PID Reading 215 PID Reading Depth 7' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

- Excavation ☐ Approx. Cubic Yards _____
- Onsite Bioremediation ☐
- Backfill Pit Without Excavation ☒

Soil Disposition:

- Envirotech ☐ ☐ Tierra
- Other Facility ☐ Name: _____

Pit Closure Date: 9-1-94 Pit Closed By: BEI

REMARKS

Remarks : 7' Sand stone

Signature of Specialist: Dale Wilson

(SP3191) 03/16/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 240	946049
MTR CODE | SITE NAME:	95854	N/A
SAMPLE DATE | TIME (Hrs):	9-1-94	1200
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	9-6-94	9/6/94
DATE OF BTEX EXT. | ANAL.:	N/A	N/A
TYPE | DESCRIPTION:	VG	LIGHT BROWN SAND & CLAY

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	1360	MG/KG			2.12	28
HEADSPACE PID	215	PPM				
PERCENT SOLIDS	90.6	%				

-- TPH is by EPA Method 418.1 --

Narrative: _____

DF = Dilution Factor Used

Approved By: _____ Date: 9/30/94