

# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

OK

Marron # 29  
Meter/Line ID – 71614

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## SITE DETAILS

Legals - Twn: 27N	Rng: 8W	Sec: 22	Unit: F
NMOCD Hazard Ranking: 0		Land Type: BLM	
Operator: R&G Drilling		Pit Closure Date: 09/26/94	

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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 10 ppm; laboratory analysis indicated a TPH concentration of 25.2 mg/kg. This site was re-assessed on December 19, 1997, 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. 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 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>71614</u> Location: <u>Marron #29</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>F</u> Section <u>22</u> Township: <u>27</u> Range: <u>8</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>12/19/97</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><b>Land Type:</b></p> <p style="margin-left: 100px;">BLM <input checked="" type="checkbox"/> (1)</p> <p style="margin-left: 100px;">State <input type="checkbox"/> (2)</p> <p style="margin-left: 100px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 100px;">Indian _____</p> <p><b>Depth to Groundwater</b></p> <p style="margin-left: 50px;">Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p style="margin-left: 50px;">50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p style="margin-left: 50px;">Greater Than 100 Ft (0 points) <input checked="" 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 style="margin-left: 50px;">Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p style="margin-left: 50px;">200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p style="margin-left: 50px;">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: 150px;"><input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>0</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. Depth to GW measured to the center of Largo Wash</u></p>

# FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>7164</u> Location: <u>Marron #29</u>          Operator #: <u>7335</u> Operator Name: <u>R+G Drilling</u> P/L District: <u>Ballard</u>          Coordinates: Letter: <u>F</u> Section <u>22</u> Township: <u>27</u> Range: <u>8</u>          Or Latitude _____ Longitude _____          Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____          Site Assessment Date: <u>6/11/94</u> Area: <u>07</u> Run: <u>32</u></p>
SITE ASSESSMENT	<p><b>NMOCD Zone:</b>          (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1)          Outside <input checked="" type="checkbox"/> (2)</p> <p><b>Land Type:</b> BLM <input checked="" type="checkbox"/> (1)          State <input type="checkbox"/> (2)          Fee <input type="checkbox"/> (3)          Indian _____</p> <p><b>Depth to Groundwater</b>          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><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>          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>Onofre Jaquez Canyon (off of Largo)</u>          (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)          Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)  <input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>30</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline Book - Inside, Vulnerable Zone Topo - Outside</u>  <u>1 pit. Will close. Pit Dry</u></p> <p style="text-align: right;"><u>PUSH-IN</u></p>

ORIGINAL PIT LOCATION	<div data-bbox="640 302 1093 347" data-label="Section-Header"><p>ORIGINAL PIT LOCATION</p></div> <div data-bbox="206 364 1544 470" data-label="Text"><p>Original Pit : a) Degrees from North <u>116°</u> Footage from Wellhead <u>257'</u> b) Length : <u>16'</u> Width : <u>9'</u> Depth : <u>1'</u></p></div> <div data-bbox="214 518 1544 1086" data-label="Diagram"></div>
REMARKS	<div data-bbox="206 1156 784 1296" data-label="Text"><p>Remarks : <u>Pictures @ 0902 (24-26)</u> <u>Dump Truck</u></p></div>
	<div data-bbox="223 1758 482 1803" data-label="Text"><p>Completed By:</p></div> <div data-bbox="313 1828 842 1962" data-label="Text"><p><u>Cory Chance</u> Signature</p></div> <div data-bbox="1098 1828 1272 1962" data-label="Text"><p><u>6/11/94</u> Date</p></div>

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>71614</u> Location: <u>MARION #29</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>22</u> Township: <u>27</u> Range: <u>8</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-26-94</u> Run: <u>07</u> <u>32</u></p>
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <u>VW341</u> _____</p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>10</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-align: center;">Yes      No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
<b>CLOSURE</b>	<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"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>9-26-94</u> Pit Closed By: <u>BET</u></p>
<b>REMARKS</b>	<p><b>Remarks :</b> _____</p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>W. Wilson</u></p>



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FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 341	941.226
MTR CODE   SITE NAME:	71614	N/A
SAMPLE DATE   TIME (Hrs):	9/26/94	1630
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	9/27/94	9/27/94
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Brown Sand + Char

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	25.2	MG/KG			2.04	28
HEADSPACE PID	10	PPM				
PERCENT SOLIDS	94.7	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

10/6/94