

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE *Loc. 072*

Turner B Com D#9
Meter/Line ID – 71521

Risk-BTEX

DEC 21 1999

*OIL CON. DEV.
DIST. 3*

SITE DETAILS

Legals - Twn: 27N	Rng: 9W	Sec: 16	Unit: D
NMOCD Hazard Ranking: 0		Land Type: State	
Operator: Meridian		Pit Closure Date: 9/9/94	

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 5' where sandstone was encountered. The excavation was terminated at 5' 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 254 ppm; laboratory analysis indicated a TPH concentration of 768 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 five 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>71521</u> Location: <u>Turner B Com D # 9</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>D</u> Section <u>16</u> Township: <u>27</u> Range: <u>9</u></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: (From NMOCD Maps)</p> <p style="margin-left: 100px;">Inside <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type:</p> <p style="margin-left: 100px;">BLM <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">State <input checked="" type="checkbox"/> (2)</p> <p style="margin-left: 100px;">Fee <input type="checkbox"/> (3)</p> <p style="margin-left: 100px;">Indian _____</p> <p>Depth to Groundwater</p> <p style="margin-left: 100px;">Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p style="margin-left: 100px;">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="margin-left: 100px;"><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 style="margin-left: 100px;">Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p style="margin-left: 100px;">200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p style="margin-left: 100px;">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="margin-left: 100px;"><input type="checkbox"/> (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 Hoot Owl Canyon.</u></p>

FIELD PIT SITE ASSESSMENT FORM

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GENERAL

Meter: 71521 Location: Turner B com D # 9
 Operator #: 2999 Operator Name: EPAG 6-11-94 District: Ballard
 Coordinates: Letter: D Section 16 Township: 27 Range: 9
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: ☒ Line Drip: _____ Other: _____
 Site Assessment Date: 6-11-94 Area: 11 Run: 31

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)

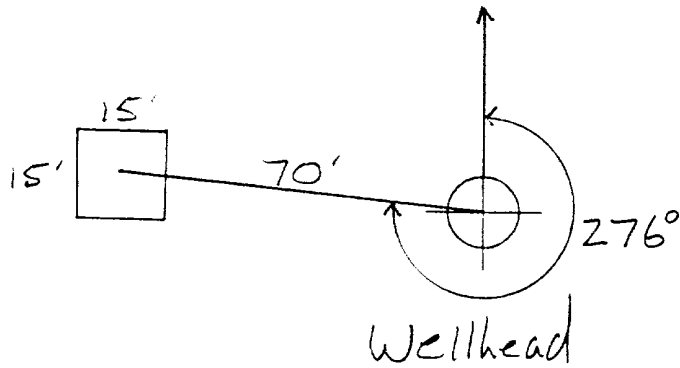
Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 10 POINTS

REMARKS

Remarks : one pit - dry
6-11-94 inside on
Inside V.Z. on Top of Radline
Outside V.Z. on Top of

Push in

ORIGINAL PIT LOCATION	<p style="text-align: center;">ORIGINAL PIT LOCATION</p> <p>Original Pit : a) Degrees from North <u>276</u> Footage from Wellhead <u>70</u> b) Length : <u>15</u> Width : <u>15</u> -Depth : <u>4</u></p> <div style="text-align: center;">  <p>Wellhead</p> </div>
REMARKS	<p>Remarks : <u>Photos 1101 hrs</u></p> <p><u>Bobtail</u></p>
	<p>Completed By: <u>[Signature]</u> <u>6-11-94</u></p> <p style="text-align: center;">Signature Date</p>

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>71521</u> Location: <u>Turner B com ID # 9</u></p> <p>Coordinates: Letter: <u>D</u> Section <u>16</u> Township: <u>27</u> Range: <u>9</u></p> <p>Cr Latitude _____ Longitude _____</p> <p>Date Started : <u>9-9-94</u> Run: <u>11</u> <u>31</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW1262</u></p> <p>Sample Depth: <u>5'</u> Feet</p> <p>Final PID Reading <u>254</u> PID Reading Depth <u>5'</u> Fee</p> <p>Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Fee</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>9-9-94</u> Pit Closed By: <u>BEZ</u></p>
REMARKS	<p>Remarks : <u>9-9-94 5' sandstone</u></p> <p>_____ _____ _____</p> <p>Signature of Specialist: <u>Vale Wilson</u></p>

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 262	946092
MTR CODE SITE NAME:	71521	N/A
SAMPLE DATE TIME (Hrs):	9-9-94	1030
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-13-94	9-13-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/Grey sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	768 768.5	MG/KG			2.15	28
HEADSPACE PID	254	PPM				
PERCENT SOLIDS	91.0	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

9/30/94