

# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Rel - 10-10-95

Charley Pah # 3  
Meter/Line ID - 97152

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## SITE DETAILS

Legals - Twn: 27  
NMOCD Hazard Ranking: 40  
Operator: Four Star

Rng: 9

Sec: 12  
Land Type: Navajo  
Pit Closure Date: 11/20/95

Unit: M

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## RATIONALE FOR 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 pit was excavated to 11 feet, where bedrock was encountered, and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 198 cubic yards of material was removed for landfarming and sent to an OCD approved centralized site. 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 101 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 37.5 mg/kg, and a TPH concentration of 1065 mg/kg. This site was re-assessed on August 28, 2000 because the initial assessment incorrectly identified 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 five years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.
- Groundwater was not encountered in the excavation.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.
- The pit was excavated to the practical extent of the equipment, according to EPNG's pit closure plan.
- Bedrock was encountered in the excavation at 11 feet below ground surface, making vertical contamination migration unlikely and further remediation impractical.

## ATTACHMENT

Field Pit Assessment Form  
Field Pit Remediation/Closure Form  
Laboratory Analytical Results  
Revised Field Pit Assessment Form

**REVISED**  
**FIELD PIT SITE ASSESSMENT FORM**

GENERAL

Meter: 97152 Location: CHARLEY PAH #3  
Operator #: 0263 Operator Name: 4-STAR P/L District: \_\_\_\_\_  
Coordinates: Letter: M Section 12 Township: 27 Range: 9  
Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
Pit Type: Dehydrator \_\_\_\_\_ Location Drip: X Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
Site Assessment Date: 8/29/00 Area: 11 Run: 71

**NMOCD Zone:**

(From NMOCD  
Maps)

Inside

Outside

**Land Type:**

☒ (1)

☐ (2)

BLM

State

Fee

Indian

☐ (1)

☐ (2)

☐ (3)

NAVAJO

**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)

<sup>8/28/00</sup> ☒ (2) > 100'

TOTAL HAZARD RANKING SCORE: 40 POINTS

SITE ASSESSMENT

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body.

# FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 97152 Location: CHARLEY PAH #3  
 Operator # 0243 Operator Name: Fern Saez P/L District: \_\_\_\_\_  
 Coordinates: Letter: M Section 12 Township: 27 Range: 9W  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Pit Type: Dehydrator \_\_\_\_\_ Location Drip: X Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
 Site Assessment Date: 11-15-95 Area: \_\_\_\_\_ Run: 11 71

SITE ASSESSMENT

NMOCD Zone: \_\_\_\_\_ Land Type: BLM ☐ (1)  
 (From NMOCD State ☐ (2)  
 Map) Inside ☒ (1) Fee ☐ (3)  
 Outside ☐ (2) Indian NAVAJO

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 BLANCO WASH  
 (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: 50 POINTS

REMARKS

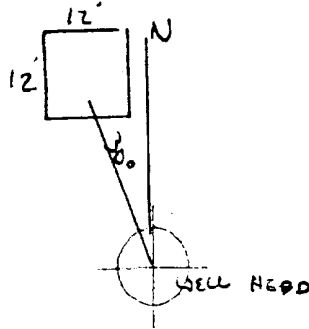
Remarks Red Line AND TUPD LIST Pit INSIDE VULNERABLE ZONE  
Pit is OK

D. S. H. 201

# ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 30 Footage from Wellhead 90  
 b) Length : 12 Width : 12 Depth : 3

ORIGINAL PIT LOCATION



Remarks :

Pictures # 1, 2, 3 IN ROLL

REMARKS

Completed By:

John Schmalke  
 Signature

11-15-95  
 Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>97152</u> Location: <u>Charley Pah #3</u> Coordinates: Letter: <u>M</u> Section <u>12</u> Township: <u>27</u> Range: <u>9W</u> Or Latitude _____ Longitude _____ Date Started : <u>11/16/95</u> Run: <u>11</u> <u>71</u>
FIELD OBSERVATIONS	Sample Number(s): <u>JK144 JK145 JK146</u> Sample Depth: <u>11'</u> Feet Final PID Reading <u>110.0</u> PID Reading Depth <u>11'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>198</u> LT <u>11/21/95</u> Onsite Bioremediation <input type="checkbox"/> <u>Approval for closure</u> Backfill Pit Without Excavation <input type="checkbox"/> <u>per Alton James EPA</u> <u>11-20-95</u> Soil Disposition: Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>11/20/95</u> Pit Closed By: <u>Philip</u>
REMARKS	Remarks : <u>Pit Pit Readings (N-10.1)(S-4.2)(E-21.4)(W-31.2)</u> <u>Fence size 19x18 = 342 No Net H.F. Rock 11</u> <u>Pit size 19x18x11 No EPA on site</u> <u>more than 100' from Ethemal stream</u>
SIGNATURE	Signature of Specialist: <u>[Signature]</u>



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JK 144	94 7800
MTR CODE   SITE NAME:	97152	Charley Pak #3
SAMPLE DATE   TIME (Hrs):	11-20-95	0930
PROJECT:	Phase I Navajo	
DATE OF TPH EXT.   ANAL:	11/27/95	
DATE OF BTEX EXT.   ANAL:	11/21/95	11/21/95
TYPE   DESCRIPTION:	VG	Light brown/grey sand

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	1.8	MG/KG				
ETHYL BENZENE	2.4	MG/KG				
TOTAL XYLENES	33.3	MG/KG				
TOTAL BTEX	37.5	MG/KG				
TPH (418.1)	1065	MG/KG			2.02	28
HEADSPACE PID		PPM				
PERCENT SOLIDS	94.0	%				

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

The Surrogate Recovery was at 105% for this sample All QA/QC was acceptable.  
Narrative:

DF = Dilution Factor Used

Approved By: 

Date: 11/28/95

## BTEX SOIL SAMPLE WORKSHEET

File	:	947800	Date Printed	:	11/22/95
Soil Mass (g)	:	4.99	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical):		200
Shot Volume (uL)	:	50	CAL FACTOR (Report):		0.20040

		DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000 0.501
Toluene (ug/L)	:	8.86	Toluene (mg/Kg):	1.776 0.501
Ethylbenzene (ug/L)	:	11.98	Ethylbenzene (mg/Kg):	2.401 0.501
p & m-xylene (ug/L)	:	128.78	p & m-xylene (mg/Kg):	25.808 1.002
o-xylene (ug/L)	:	37.50	o-xylene (mg/Kg):	7.515 0.501
			Total xylenes (mg/Kg):	33.323 1.503
			Total BTEX (mg/Kg):	37.499

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White - Testing Laboratory      Canary - EPNG Lab      Pink - Field Sampler