

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Outside

Risk

BTEX + TPH

**Hammond #47R
Meter/Line ID - 89899**

RECEIVED
NOV 2 1999

**OIL CON. DIV.
DIST. 3**

SITE DETAILS

Legals - Twn: 27N

Rng: 8W

Sec: 35

Unit: L

NMOCD Hazard Ranking: 0

Land Type: BLM

Operator: EPFS

Pit Closure Date: 6/6/95

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 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 374 ppm; laboratory analysis indicated a TPH concentration of 54,300 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 three 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	<p>Meter: <u>89899</u> Location: <u>Hammond #47R</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: _____</p> <p>Coordinates: Letter: <u>L</u> Section <u>35</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>4/9/98</u> Area: _____ Run: _____</p>																
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Land Type:</p> <table style="width:100%;"> <tr> <td style="width:30%;">Inside</td> <td style="width:10%;"><input type="checkbox"/></td> <td style="width:10%;">(1)</td> <td style="width:10%;"></td> <td style="width:10%;"></td> <td style="width:10%;"></td> <td style="width:10%;"></td> <td style="width:10%;"></td> </tr> <tr> <td>Outside</td> <td><input checked="" type="checkbox"/></td> <td>(2)</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p style="margin-left: 60px;">BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) 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 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) 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, 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>0</u> POINTS</p>	Inside	<input type="checkbox"/>	(1)						Outside	<input checked="" type="checkbox"/>	(2)					
Inside	<input type="checkbox"/>	(1)															
Outside	<input checked="" type="checkbox"/>	(2)															
REMARKS	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is >100' vertical to center of wash (Cottonwood Canyon)</u></p>																

FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>89899</u> Location: <u>HAMMOND # 47R</u> Operator #: _____ Operator Name: _____ P/L District: <u>BLANCO Pt. 95</u> <u>BALLARD</u> Coordinates: Letter: <u>L</u> Section <u>35</u> Township: <u>27</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>1.10.95</u> Area: _____ Run: _____
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SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p style="margin-left: 150px;">Land Type:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 30%;"></td> <td style="width: 20%;"><input checked="" type="checkbox"/> (1)</td> <td style="width: 20%;">BLM</td> <td style="width: 20%;"><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td style="padding-left: 100px;">Inside</td> <td><input type="checkbox"/> (1)</td> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td style="padding-left: 100px;">Outside</td> <td><input checked="" type="checkbox"/> (2)</td> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>_____</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? <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 checked="" type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>COTTONWOOD CANYON</u> <small>ET 1.10.95</small></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)</p> <p style="margin-left: 350px;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS</p>		<input checked="" type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)	Inside	<input type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Outside	<input checked="" type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)			Indian	_____
	<input checked="" type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)														
Inside	<input type="checkbox"/> (1)	State	<input type="checkbox"/> (2)														
Outside	<input checked="" type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)														
		Indian	_____														

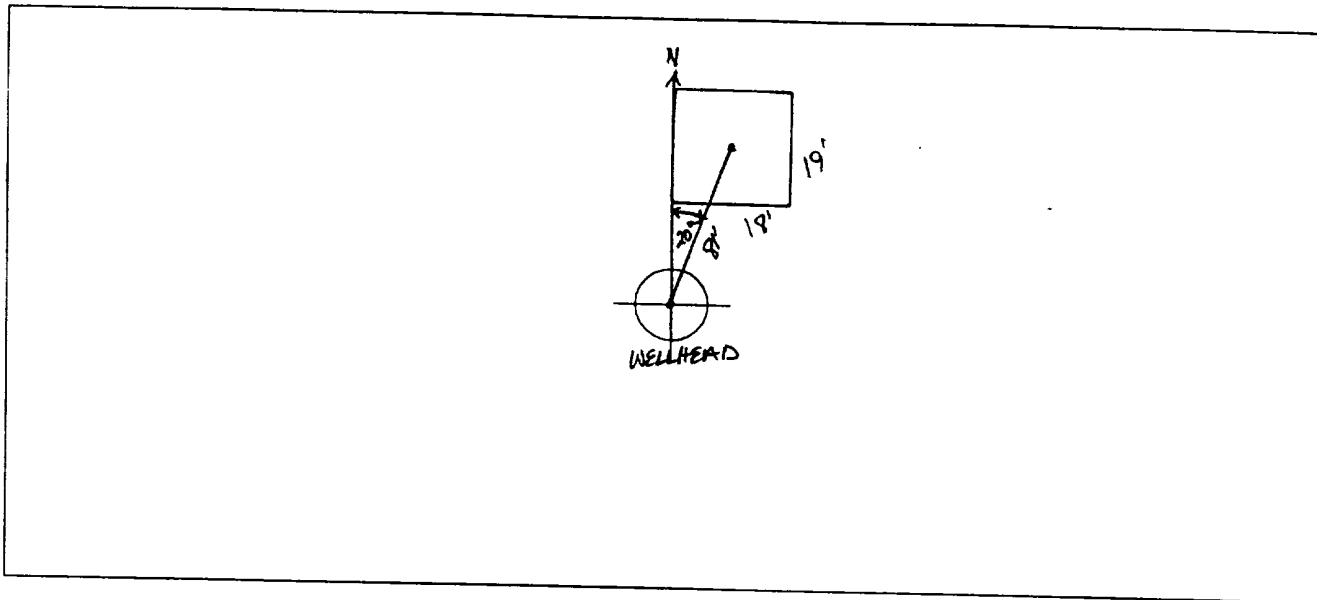
REMARKS	Remarks : <u>REDLINE SHOWS INSIDE BUT TOPO SHOWS LOCATION OUTSIDE U.Z.</u> <u>3 PITS ON LOCATION. DEHY PIT BELONGS TO EPNG. WILL CLOSE PIT.</u>
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PUSH IN

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 20° Footage from Wellhead 81'
b) Length : 19' Width : 18' Depth : 1'

ORIGINAL PIT LOCATION



REMARKS

Remarks :

~~PHOTOS - 1058~~

Completed By:

Robert Thompson

Signature

1.10.95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>89899</u> Location: <u>Hammond #47 R</u> Coordinates: Letter: <u>L</u> Section: <u>35</u> Township: <u>27</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Date Started : <u>6/6/95</u> Run: _____
FIELD OBSERVATIONS	Sample Number(s): <u>KD 458</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>374 ppm</u> PID Reading Depth <u>12'</u> Feet Groundwater Encountered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input type="checkbox"/> Approx. Cubic Yards <u>0</u> Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input checked="" type="checkbox"/> Soil Disposition: Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/> Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>6/6/95</u> Pit Closed By: <u>PEI</u>
REMARKS	Remarks : <u>Dug test hole to 12', TOOK PID Sample, Closed pit.</u>
	Signature of Specialist: <u>[Signature]</u>



CHAIN OF CUSTODY RECORD

PROJECT NUMBER # 24324		PROJECT NAME Pit Closure Project		DATE 6/6/95		FIELD ID		CONTRACT LABORATORY P. O. NUMBER			
SAMPLERS: (Signature) <i>Humm Deau</i>		DATE	TIME	MATRIX	TOTAL NUMBERS OF CONTAINERS	SAMPLE TYPE	TPH EPA 418.1	BTEX EPA 8020	LAB PID	SEQUENCE #	REMARKS
946878	6/6/95	1000	Soil	KD 456	1	VG X				416	
946879	6/6/95	1122	Soil	KD 457	1	VG X				417	
946880	6/6/95	1315	Soil	KD 458	1	VG X				418	Pit had water in it, Soil is very moist.

RELINQUISHED BY: (Signature) <i>Humm Deau</i>		DATE/TIME 6/6/95 1540	RECEIVED BY: (Signature) <i>Dynna Casabe</i>	DATE/TIME 6/6/95 1100	RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)					
RELINQUISHED BY: (Signature)		DATE/TIME	RECEIVED BY: (Signature)	DATE/TIME	RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)					
REQUESTED TURNAROUND TIME: <input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH		SAMPLE RECEIPT REMARKS		RESULTS & INVOICES TO:		FIELD SERVICES LABORATORY EL PASO NATURAL GAS COMPANY P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499					
CARRIER CO.		CHARGE CODE		505-599-2144		FAX: 505-599-2261					
BILL NO.:											



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 458	9216880
MTR CODE SITE NAME:	89899	N/A
SAMPLE DATE TIME (Hrs):	6-6-95	1315
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:		
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown fine sand + clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	54300	MG/KG			0.13	28
HEADSPACE PID	372	PPM				
PERCENT SOLIDS	91.4	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: J.P.

Date: 6/28/95