

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

*Risk
Bedrock*

**Hammond 93
Meter/Line ID – 90872**

SITE DETAILS

Legals - Twn: 27N	Rng: 8W	Sec: 26	Unit: I
NMOCD Hazard Ranking: 10		Land Type: BLM	
Operator: R&G Drilling		Pit Closure Date: 09/26/94	

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 four feet and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. 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 214 ppm; laboratory analysis indicated a TPH concentration of 388 mg/kg. This site was re-assessed on April 14, 1998, 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.
- 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.
- Bedrock was encountered at four feet below ground surface; therefore, impact to groundwater is unlikely.

ATTACHMENT

Field Pit Assessment Form
Field Pit Remediation/Closure Form

Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>90872</u> Location: <u>Hammond 93</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>I</u> Section <u>26</u> Township: <u>27</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/14/98</u> Area: _____ Run: _____
SITE ASSESSMENT	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> NMOCD Zone: (From NMOCD Maps) </div> <div style="width: 45%;"> Land Type: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> <input type="checkbox"/> (1) Inside <input checked="" type="checkbox"/> (2) Outside </div> <div style="width: 45%;"> BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ </div> </div> </div> </div> <div style="margin-top: 10px;"> Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3) </div> <div style="margin-top: 10px;"> 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? <div style="display: flex; justify-content: center; margin-top: 5px;"> <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) </div> </div> <div style="margin-top: 10px;"> Horizontal Distance to Surface Water Body 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) </div> <div style="margin-top: 10px;"> Name of Surface Water Body _____ (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) </div> <div style="margin-top: 10px;"> Distance to Nearest Ephemeral Stream <div style="display: flex; justify-content: center; margin-left: 20px;"> <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100' </div> </div> <div style="margin-top: 10px;"> TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS </div>
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is < 100' vertical from center of Largo Canyon.</u>

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 90872 Location: Hammond 93
 Operator #: 7335 Operator Name: Rt 6 Drilling P/L District: Ballard
 Coordinates: Letter: F Section 26 Township: 27 Range: 8
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: / Line Drip: _____ Other: _____
 Site Assessment Date: 6/13/94 Area: 07 Run: 32

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 Large Canyon

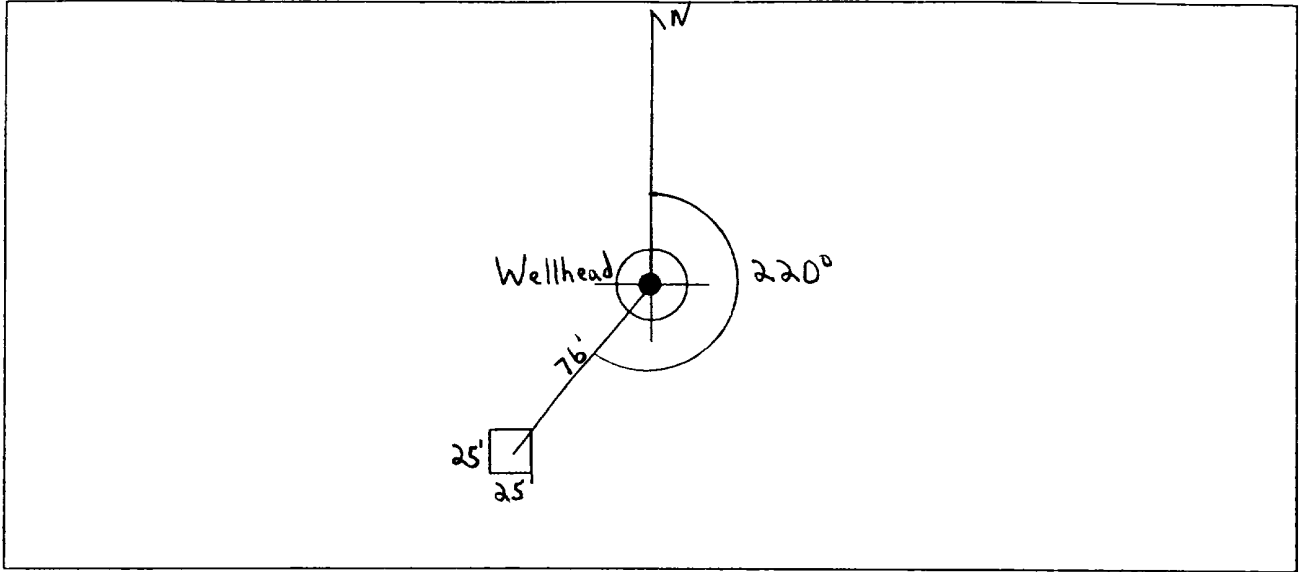
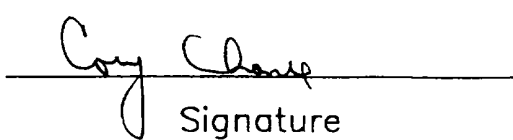
(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

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

TOTAL HAZARD RANKING SCORE: 40 POINTS

Remarks : Redline Book - Inside , Vulnerable Zone Topo - Outside
1 pit will close. Pit dry

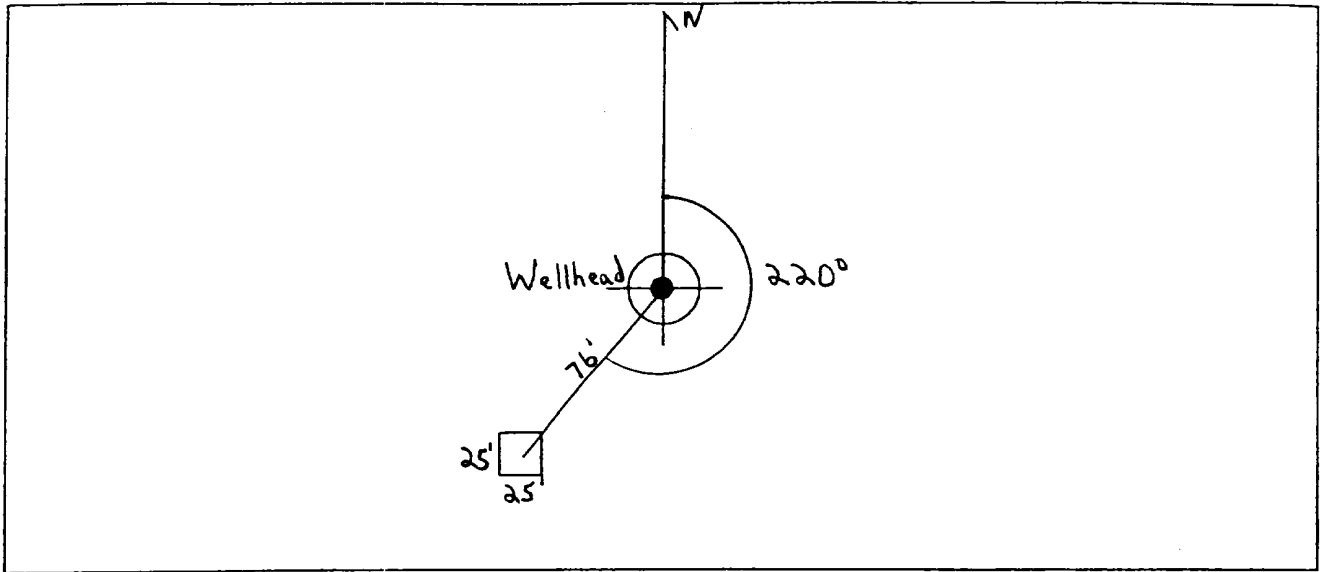
PUSH-IN

ORIGINAL PIT LOCATION	<p style="text-align: center;">ORIGINAL PIT LOCATION</p> <p>Original Pit : a) Degrees from North <u>220°</u> Footage from Wellhead <u>76'</u> b) Length : <u>25'</u> Width : <u>25'</u> Depth : <u>4'</u></p> <div style="text-align: center;">  </div>
REMARKS	<p>Remarks : <u>Pictures@ 1054 (16-19)</u> <u>Dump Truck</u></p>
	<p>Completed By:</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;">  Signature </div> <div style="text-align: center;"> <u>6/13/94</u> Date </div> </div>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 220° Footage from Wellhead 76'
b) Length : 25' Width : 25' Depth : 4'

ORIGINAL PIT LOCATION



REMARKS :

Pictures @ 10.54 (16-19)
Dump Truck

REMARKS

Completed By:

Cory Chase
Signature

6/13/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>90872</u> Location: <u>Hammond 93</u></p> <p>Coordinates: Letter: <u>I</u> Section <u>26</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>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW331</u></p> <p>Sample Depth: <u>^{VW}12 4'</u> Feet</p> <p>Final PID Reading <u>214</u> PID Reading Depth <u>^{VW}72 4'</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>
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>9-26-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>4' sandstone</u> <u>20yds (11)</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 331	946216
MTR CODE SITE NAME:	90872	N/A
SAMPLE DATE TIME (Hrs):	9/26/94	1000
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	fine coarse sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	388	MG/KG			2.12	28
HEADSPACE PID	214	PPM				
PERCENT SOLIDS	93.9	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: JS.

Date: 10/6/94



Page _____ of _____.