

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Risk Based

**Gallegos Canyon Unit No. 33
Meter/Line ID - 97590**

Navajo

SITE DETAILS

Legals - Twn: 28N	Rng: 12W	Sec: 21	Unit: M
NMOCD Hazard Ranking: 10		Land Type: Navajo	
Operator: BHP Petroleum		Pit Closure Date: 10/20/94	

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 nine feet and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit and bedrock was encountered at nine feet below the ground surface. 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 277 ppm; laboratory analysis indicated a TPH concentration of 201 mg/kg. This site was re-assessed on April 21, 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 nine feet below the ground surface; therefore, impact to groundwater is unlikely.

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	Meter: <u>97590</u> Location: <u>Gallegos Canyon Unit #33</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: <u>M</u> Section <u>21</u> Township: <u>28</u> Range: <u>12</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4/21/98</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 type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Navajo</u> </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 <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100' </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 Gallegos Canyon.</u>

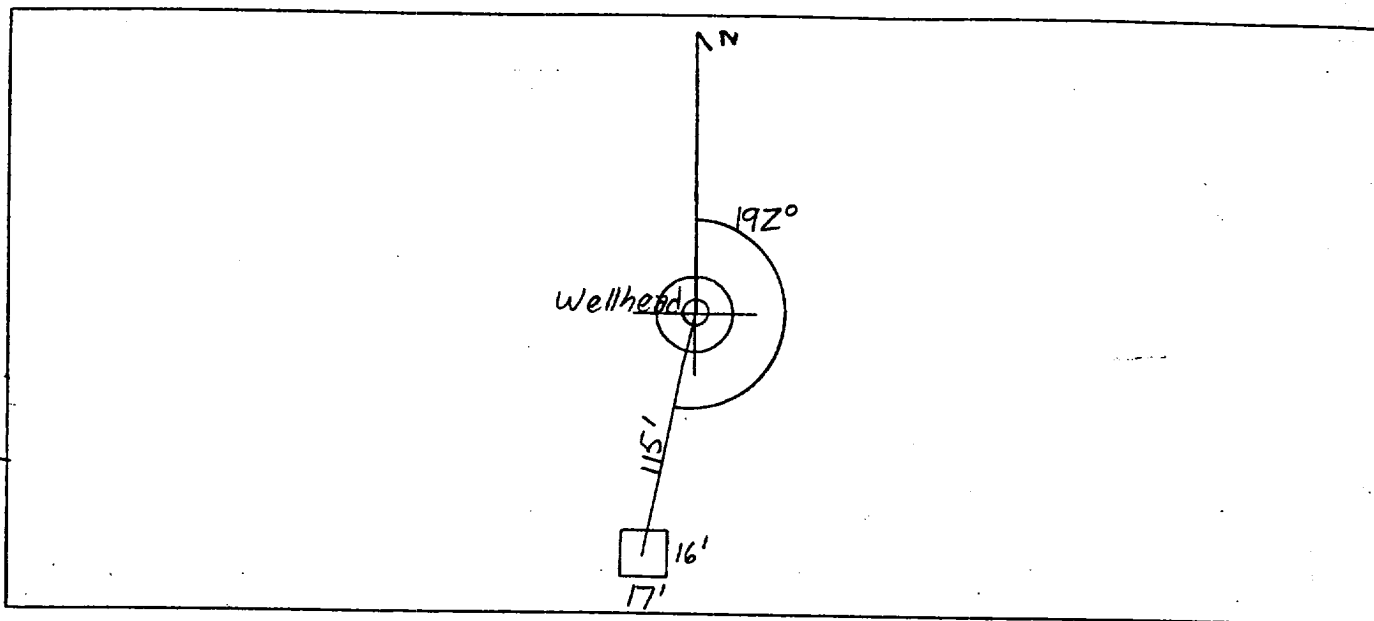
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>97-590</u> Location: <u>Gallegos Canyon Unit Well No. 33</u> Operator #: <u>0641</u> Operator Name: <u>BHP Petroleum</u> P/L District: <u>Angel Peak</u> Coordinates: Letter: <u>M</u> Section <u>21</u> Township: <u>28</u> Range: <u>12</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____ Site Assessment Date: <u>9/13/94</u> Area: <u>01</u> Run: <u>32</u></p>								
	<table border="0"> <tr> <td data-bbox="94 697 198 1868" rowspan="4">SITE ASSESSMENT</td> <td data-bbox="198 697 860 932"> <p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> </td> <td data-bbox="860 697 1594 932"> <p>Land Type:</p> <p>BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Navajo</u></p> </td> </tr> <tr> <td colspan="2" data-bbox="198 932 1594 1144"> <p>Depth to Groundwater</p> <p>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> </td> </tr> <tr> <td colspan="2" data-bbox="198 1144 1594 1378"> <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> </td> </tr> <tr> <td colspan="2" data-bbox="198 1378 1594 1868"> <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 checked="" type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>Gallegos Canyon</u> (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) <input checked="" type="checkbox"/> (2) > 100'</p> </td> </tr> </table>	SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p>	<p>Land Type:</p> <p>BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian <u>Navajo</u></p>	<p>Depth to Groundwater</p> <p>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>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) 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>Gallegos Canyon</u> (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) <input checked="" type="checkbox"/> (2) > 100'</p>
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REMARKS	<p>TOTAL HAZARD RANKING SCORE: <u>30</u> POINTS</p> <p>Remarks : <u>Redline Book - Inside Vulnerable Zone Type - Outside</u> <u>Two pits, location drip pit is dry. Will close one pit.</u></p> <p style="text-align: right;"><u>PUSH T 11</u></p>								

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 192° Footage from Wellhead 115'
b) Length : 17' Width : 16' Depth : 3'



REMARKS

Remarks :

Pictures @ 1517 Roll 17
Dump Truck

Completed By:

Samuel Kelly
Signature

9/13/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>97590</u> Location: <u>Gallegos Canyon Unit # 33</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>21</u> Township: <u>28</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>10/20/94</u> Run: <u>01</u> <u>32</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD344</u></p> <p>Sample Depth: ^{KD 10/20/94} <u>12' 9'</u> Feet</p> <p>Final PID Reading <u>277 ppm</u> PID Reading Depth ^{KD 10/20/94} <u>12' 9'</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"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>10/20/94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Dug test hole to 9', hit sandstone, Took PID sample, closed pit</u></p>
	<p>Signature of Specialist: <u><i>Harry Dean</i></u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KS 244	946431
MTR CODE SITE NAME:	97590	N/A
SAMPLE DATE TIME (Hrs):	10-20-94	1430
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL:	10-26-93	
DATE OF BTEX EXT. ANAL:	N/A	N/A
TYPE DESCRIPTION:	VL	Dark brown sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	201	MG/KG			2.03	28
HEADSPACE PID	277	PPM				
PERCENT SOLIDS	94.1	%				

-- TPH is by EPA Method 418.1 --

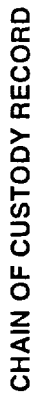
Narrative:

DF = Dilution Factor Used

Approved By:

Date:

11/3/04



CHAIN OF CUSTODY RECORD

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