Risk-based

EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE Do by

Houck #1
Meter/Line ID – 73706

SITE DETAILS

Legals - Twn: 29N **Rng: 10W** **Sec: 11** **Unit: P**
NMOCD Hazard Ranking: 0 **Land Type: BLM**
Operator: Meridian **Pit Closure Date: 6/8/94**

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 4' where sandstone was encountered. The excavation was terminated at 4' 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 213 ppm; laboratory analysis indicated a TPH concentration of 100 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 four 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

Meter: 73706 Location: Houck #1

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: P Section 11 Township: 29 Range: 10

Or Latitude _____ Longitude _____

Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____

Site Assessment Date: 4/8/98 Area: _____ Run: _____

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)

Inside ☐ (1)

Outside ☒ (2)

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, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

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

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is > 100' vertical From center of Wright Canyon

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 73706 Location: HOUCK #1

Operator #: 2999 Operator Name: MERIDIAN P/L District: BLOOMFIELD

Coordinates: Letter: P Section 11 Township: 29 Range: 10

Or Latitude _____ Longitude _____

Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____

Site Assessment Date: 5.4.94 Area: 10 Run: 73

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)

Inside ☐ (1)

Outside ☒ (2)

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

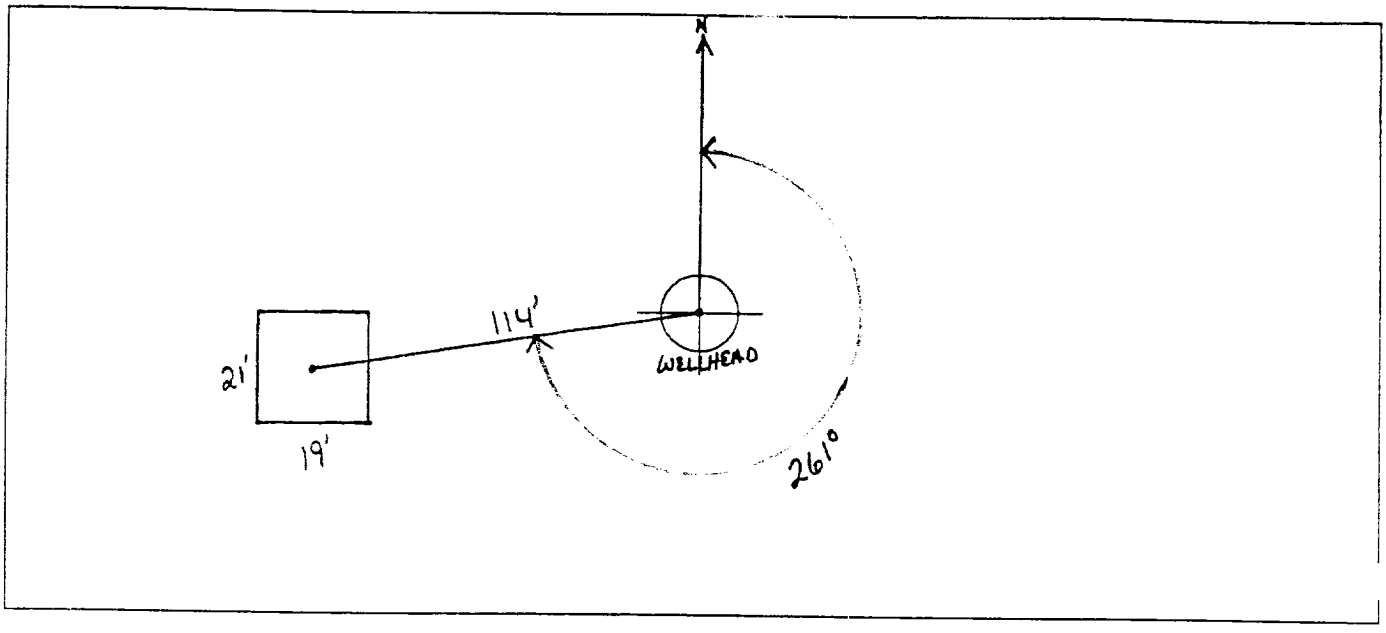
Remarks : TWO PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY. THERE ARE TWO PITS ENCLOSED BY THE SAME FENCE. WILL CLOSE ONLY THE ONE CLOSEST TO THE METER HOUSE. DO NOT COVER THE THE SEPERATOR IS DUMPING INTO. REDLINE AND TOPO CONFIRMED LOCATION TO BE OUTSIDE THE V.Z. PUSH IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North [illegible]° Footage from Wellhead 114'

b) Length : 21' Width : 19' Depth : 2'



REMARKS

Remarks :

TOOK PICTURES AT 1:44 P.M.

END DUMP

Completed By:

Robert Thompson
Signature

5.4.94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73706 Location: Houck #1

Coordinates: Letter: P Section 11 Township: 29 Range: 10

Or Latitude _____ Longitude _____

Date Started : 6-8-94 Area: 10 Run: 73

FIELD OBSERVATIONS

Sample Number(s): KD106 _____ _____ _____

Sample Depth: 4' Feet

Final PID Reading 213 ppm PID Reading Depth 4' Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☐ (1) Approx. Cubic Yards 0

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☒ (3)

Soil Disposition:

Envirotech ☐ (1) ☒ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: 6-8-94 Pit Closed By: BEI

REMARKS

Remarks : Test Hole went to 4', Hit Sandstone, took PID Sample, Closed pit

Signature of Specialist: Kelly Dean

(SP3191) 04/07/9

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 106	94540 4
MTR CODE | SITE NAME:	73706	N/A
SAMPLE DATE | TIME (Hrs):	6-8-94	1530
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	6/10/94	6/10/94
DATE OF BTEX EXT. | ANAL.:	N/A	N/A
TYPE | DESCRIPTION:	V G	Brown Coarse Sand

REMARKS: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	100	MG/KG			2.13	28
HEADSPACE PID	213	PPM				
PERCENT SOLIDS	91.00	%				

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

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

DF = Dilution Factor Used

Approved By: _____ Date: 6/14/94