

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Risk
TPH

Moonlight Mesa #1
Meter/Line ID - 90177

Domestic
water
source

SITE DETAILS

Legals - Twn: 29N

Rng: 12W

Sec: 7

Unit: C

NMOCD Hazard Ranking: 20

Land Type: Fee

Operator: N/A

Pit Closure Date: 01/11/95

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 two feet 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 29 ppm; laboratory analysis indicated a TPH concentration of 491 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.
- 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. In addition, the estimated depth to groundwater is greater than 100 feet; therefore, impact to groundwater is unlikely.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Based on the Hazard Ranking Score, organic vapor concentrations were below required remediation levels.
- Bedrock was encountered at two feet below the ground surface making further remediation impractical; therefore, impact to groundwater is unlikely.

ATTACHMENT

Revised Field Pit Assessment Form
Field Pit Remediation/Closure Form

Field Pit Assessment Form
Laboratory Analytical Results

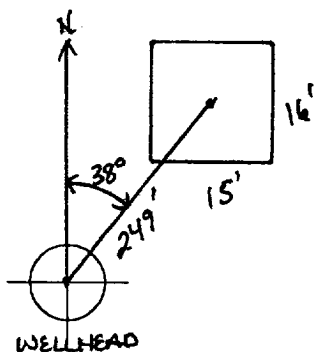
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>90177</u> Location: <u>MOONLIGHT MESA #1</u></p> <p>Operator #: _____ Operator Name: _____ P/L District: <u>Kurtz</u></p> <p>Coordinates: Letter: <u>C</u> Section <u>7</u> Township: <u>29</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Denhydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>1-3-94</u> Area: <u>02</u> Run: <u>22</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: _____ Land Type: BLM <input type="checkbox"/> (1)</p> <p>(From NMOCD Maps) Inside <input type="checkbox"/> (1) State <input type="checkbox"/> (2)</p> <p>Outside <input checked="" type="checkbox"/> (2) Fee <input checked="" type="checkbox"/> (3)</p> <p>Indian _____</p> <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 checked="" type="checkbox"/> (1) YES (20 points) <input 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 type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>20</u></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><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>20</u> POINTS</p>
REMARKS	<p>Remarks : <u>REDLINE & TOPO SHOW LOCATION OUTSIDE V.I.Z. ONLY PIT ON LOCATION</u></p> <p><u>PIT BELONGS TO EPNG. WILL CLOSE PIT.</u></p>

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 38° Footage from Wellhead 249'
b) Length : 16' Width : 15' Depth : 3'



REMARKS

Remarks :

PHOTOS 1049

Completed By:

Robert Thompson

Signature

1-3-95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>90177</u> Location: <u>Moon Light mess</u></p> <p>Coordinates: Letter: <u>C</u> Section <u>7</u> Township: <u>29</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>1-11-95</u> Run: <u>02</u> <u>22</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK 322</u></p> <p>Sample Depth: <u>2'</u> Feet</p> <p>Final PID Reading <u>29 PPM</u> PID Reading Depth <u>2'</u> Feet</p> <p>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>1-11-95</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Arrived took Fence down soil light ^{colored} clo no</u></p> <p><u>Hydrocarbon odor</u></p>
	<p>Signature of Specialist: <u>Morgan Killion</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 322	946569
MTR CODE SITE NAME:	90177	N/A
SAMPLE DATE TIME (Hrs):	1-11-95	1400
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	1-17-95	1-17-95
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown clay and sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	491	MG/KG			1.97	28
HEADSPACE PID	29	PPM				
PERCENT SOLIDS	89.7	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: J.S.

Date: 2-22-95



CHAIN OF CUSTODY RECORD

[illegible]