

# EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Risk  
10-1-94

Ludwick LS 21  
Meter/Line ID - 73145

## SITE DETAILS

Legals - Twn: 30N	Rng: 10W	Sec: 31	Unit: N
NMOCD Hazard Ranking: 0		Land Type: BLM	
Operator: Amoco		Pit Closure Date: 09/29/94	

## 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. Groundwater was not encountered in the test pit and bedrock was encountered at four feet below 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 805 ppm; laboratory analysis indicated a TPH concentration of 3570 mg/kg. This site was re-assessed on August 15, 1994, 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. In addition, the estimated depth to groundwater is greater than 100 feet.
- Bedrock was encountered at four feet below ground surface, making further remediation impractical.
- 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 the required remediation levels.

## ATTACHMENT

Field Pit Assessment Form  
Laboratory Analytical Results



Field Pit Remediation/Closure Form

# FIELD PIT SITE ASSESSMENT FORM

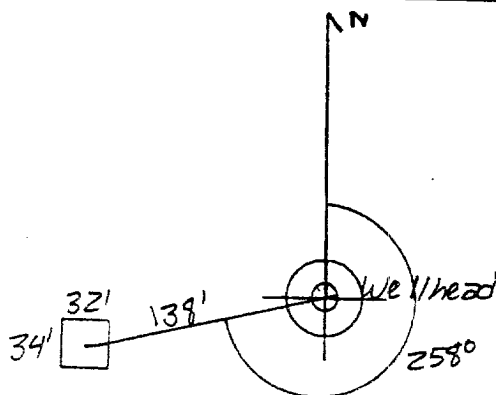
GENERAL	<p>Meter: <u>7345</u> Location: <u>Ludwick 65 21</u>          Operator #: <u>0203</u> Operator Name: <u>NMOCO Production</u> P/L District: <u>Aztec</u>          Coordinates: Letter: <u>N</u> Section <u>31</u> Township: <u>30</u> Range: <u>10</u>          Or Latitude _____ Longitude _____          Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____          Site Assessment Date: <u>8/15/94</u> Area: <u>04</u> Run: <u>21</u></p>							
	<p><b>NMOCD Zone:</b>          (From NMOCD Maps)</p> <p><b>Land Type:</b></p> <table border="0"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table> <p>Inside <input type="checkbox"/> (1)          Outside <input checked="" type="checkbox"/> (2)</p> <p><b>Depth to Groundwater</b></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><b>Wellhead Protection Area :</b>          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><b>Horizontal Distance to Surface Water Body</b></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>Potter Canyon</u>          (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)          Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)  <input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>10</u> POINTS</p>	BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian
BLM	<input checked="" type="checkbox"/> (1)							
State	<input type="checkbox"/> (2)							
Fee	<input type="checkbox"/> (3)							
Indian	_____							
REMARKS	<p>Remarks : <u>Redline Book - Inside</u> <u>Vulnerable Zone - Outside</u>  <u>Three pits, location drip pit is dry, will close one pit.</u></p>							

0854 IN

# ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 258° Footage from Wellhead 138'  
 b) Length : 34' Width : 32' Depth : 4'

ORIGINAL PIT LOCATION



## REMARKS :

Pictures @ 1145 (13-16, Roll I)  
Dump Truck  
 There is one 55 gallon drum standing next to the pit.

REMARKS

Completed By:

Sarah Kelly  
 Signature

8/15/94  
 Date



# REVISED PRODUCTION PIT ASSESSMENT FORM

GENERAL

WELL NAME: LUDWICK LS 21

WELL NUMBER:

DP/METER NO.: 73145

OPERATOR NAME: Amoco

PIL DISTRICT: AZTEC

COORDINATES: TOWNSHIP 30 RANGE 10 SECTION 31 LETTER N

PIT TYPE: DEHYDRATOR ☐

SEPARATOR ☐

BLOW PIT ☐

OTHER:

CATHODIC PROTECTION WELL: ☐ YES ☐ NO

LOCATION Drip

SITE ASSESSMENT DATE: 8/15/94

FOREMAN/RUN NO. 21

AREA: 04

NMOCD ZONE: (from NMOCD Maps):

Inside ☐

Outside ☒

LAND TYPE: BLM ☒ (1)

STATE ☐ (2)

FEE ☐ (3)

INDIAN:

DEPTH TO GROUNDWATER:

LESS THAN 50 FT (1) ☐ (20 POINTS)

50 FT TO 99 FT (2) ☐ (10 POINTS)

GREATER THAN 100 FT (3) ☒ (0 POINTS)

WELLHEAD PROTECTION AREA: Is it less than 1,000 feet from wells, springs, or other sources of fresh water extraction? or; is it less than 200 ft from a private domestic water source (or 1,000' on Navajo surface)?

YES ☐ (20 POINTS)

NO ☒ (0 POINTS)

HORIZONTAL DISTANCE TO SURFACE WATER BODY:

LESS THAN 200 FT (1) ☐ (20 POINTS)

200 FT TO 1,000 FT (2) ☐ (10 POINTS)

GREATER THAN 1,000 FT (3) ☒ (0 POINTS)

NAME OF SURFACE WATER BODY \_\_\_\_\_

SURFACE WATER BODY: PERENNIAL RIVERS, STREAMS, CREEKS, IRRIGATION CANALS, DITCHES, LAKES, PONDS

DISTANCE TO NEAREST EPHEMERAL STREAM

(1) ☐ <100 FEET (NAVAJO PITS ONLY)

(2) ☐ >100 FEET

TOTAL HAZARD RANKING SCORE: 0 POINTS

SITE ASSESSMENT

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	Meter: <u>73195</u> Location: <u>Ludwick LS 21</u> Coordinates: Letter: <u>N</u> Section <u>31</u> Township: <u>30</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Date Started : <u>9/29/94</u> Run: <u>04</u> <u>21</u>
<b>FIELD OBSERVATIONS</b>	Sample Number(s): <u>KD 289</u> Sample Depth: <u>4'</u> Feet Final PID Reading <u>305ppm</u> PID Reading Depth <u>4'</u> Feet <div style="text-align: center;">Yes      No</div> Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
<b>CLOSURE</b>	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div>           Excavation            Onsite Bioremediation            Backfill Pit Without Excavation <input checked="" type="checkbox"/> </div> <div> <input type="checkbox"/> Approx. Cubic Yards <u>0</u>  <input type="checkbox"/>  <input checked="" type="checkbox"/> </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div>           Envirotech <input type="checkbox"/>            Other Facility <input type="checkbox"/> </div> <div> <input type="checkbox"/> Tierra            Name: _____         </div> </div> Pit Closure Date: <u>9/29/94</u> Pit Closed By: <u>BEI</u>
<b>REMARKS</b>	Remarks : <u>Dug test Hole to 4', Hit Sandstone, took p.i.d. Sample, closed p.f.</u>
	Signature of Specialist: <u>[Signature]</u>



## CHAIN OF CUSTODY RECORD

Page \_\_\_\_\_ of \_\_\_\_\_

[illegible]

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

FM-08-0565 A (Rev. 05-94)



FIELD SERVICES LABORATORY  
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	USD 289	946254
MTR CODE   SITE NAME:	73145	N/A
SAMPLE DATE   TIME (Hrs):	9-29-94	0930
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	10-3-94	
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Brown coarse sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	3570	MG/KG			2.03	28
HEADSPACE PID	805	PPM				
PERCENT SOLIDS	90.0	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

10/6/94