

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

San Juan 32-8 Unit #15
Meter/Line ID – 72375

SITE DETAILS

Legals - Twn: 31N
NMOCD Hazard Ranking: 20
Operator: Phillips

Rng: 8W

Sec: 24 Unit: M
Land Type: FEE
Pit Closure Date: 07/24/95

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 10 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 10 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 0 ppm; laboratory analysis indicated a TPH concentration of <10 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 almost 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.
- Bedrock was encountered at 10 feet below ground surface; 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, TPH concentrations were below required remediation levels.

ATTACHMENT

Field Pit Assessment Form
Field Pit Remediation/Closure Form



Laboratory Analytical Results

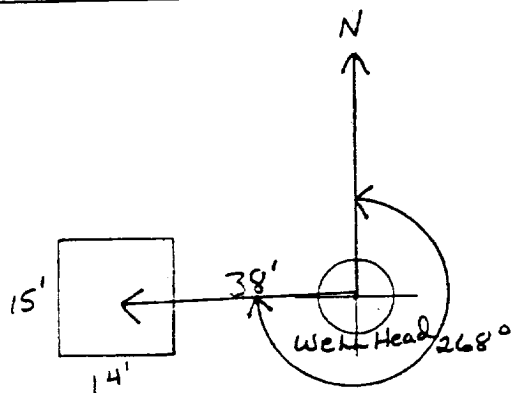
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>72375</u> Location: <u>Sanduan 32-8 Unit #15</u></p> <p>Operator #: _____ Operator Name: <u>Phillips P/L</u> District: <u>Bloomfield</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>24</u> Township: <u>31</u> Range: <u>08</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>3/2/95</u> Area: <u>10</u> Run: <u>63</u></p>																
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps)</p> <p>Land Type:</p> <table border="0"> <tr> <td>Inside</td> <td><input type="checkbox"/> (1)</td> <td>BLM</td> <td><input type="checkbox"/> (1)</td> </tr> <tr> <td>Outside</td> <td><input checked="" type="checkbox"/> (2)</td> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td></td> <td></td> <td>Fee</td> <td><input checked="" type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>_____</td> </tr> </table> <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><i>mobile Home with water well</i></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 _____</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>	Inside	<input type="checkbox"/> (1)	BLM	<input type="checkbox"/> (1)	Outside	<input checked="" type="checkbox"/> (2)	State	<input type="checkbox"/> (2)			Fee	<input checked="" type="checkbox"/> (3)			Indian	_____
Inside	<input type="checkbox"/> (1)	BLM	<input type="checkbox"/> (1)														
Outside	<input checked="" type="checkbox"/> (2)	State	<input type="checkbox"/> (2)														
		Fee	<input checked="" type="checkbox"/> (3)														
		Indian	_____														
REMARKS	<p>Remarks : <u>Redline shows inside but Topo shows loc. outside</u></p> <p><u>U2. 2 pits on loc. loc. Drip belongs to EPNG</u></p> <p><u>With close pit</u></p> <p><u>Push In</u></p>																

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 268° Footage from Wellhead 38'
b) Length : 15' Width : 14' Depth : 3'



REMARKS

Remarks :

Photos: 1212

Completed By:

James L. Penrose
Signature

3/2/95
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>72375</u> Location: <u>SAN JUAN 32-8 UNIT #15</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>24</u> Township: <u>31</u> Range: <u>08</u></p> <p>Or Latitude <u>7-55</u> Longitude _____</p> <p>Date Started : <u>7-24-95</u> Run: <u>10</u> <u>63</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK443</u></p> <p>Sample Depth: <u>10</u> Feet</p> <p>Final PID Reading <u>0 PPM</u> PID Reading Depth <u>10</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> <div style="display: flex; justify-content: space-between;"> <div> <p>Excavation</p> <p>Onsite Bioremediation</p> <p>Backfill Pit Without Excavation</p> </div> <div style="text-align: right;"> <p><input type="checkbox"/> Approx. Cubic Yards _____</p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> </div> </div> <p>Soil Disposition:</p> <div style="display: flex; justify-content: space-between;"> <div> <p>Envirotech <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/></p> </div> <div style="text-align: right;"> <p><input type="checkbox"/> Tierra</p> <p>Name: _____</p> </div> </div> <p>Pit Closure Date: <u>7-24-95</u> Pit Closed By: <u>Philip</u></p>
REMARKS	<p>Remarks : <u>Arrived TOOK FENCE down Dug sample</u> <u>Hole pit appeared to be clean all the way through</u> <u>Hit Rock 10'</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:	MX 443	947058
MTR CODE SITE NAME:	72375	N/A
SAMPLE DATE TIME (Hrs):	07-24-95	11:05
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	7-25-95	
DATE OF BTEX EXT. ANAL.:		
TYPE DESCRIPTION:	VG	Dark brown clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	< 10	MG/KG			2.01	28
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	89.3	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: _____

Date: _____

8/1/95

CHAIN OF CUSTODY RECORD

PROJECT NUMBER # 24324		PROJECT NAME Pit Closure Project		DATE 7-24-95		FIELD ID		TOTAL NUMBERS OF CONTAINERS		SAMPLE TYPE		REQUESTED ANALYSIS				CONTRACT LABORATORY P. O. NUMBER	
LAB ID		DATE	TIME	MATRIX								TPH EPA 418.1	BTEX EPA 8020	LAB PID	SEQUENCE #	REMARKS	
947057	7-24-95	10:15	50:1	soil	AK442	1	VG	X	1	1	1	398	72373	BROWN soil NO HYDROCARBON odor			
947058	7-24-95	11:05	50:1	soil	AK443	1	VG	X	1	1	399	72375	GRAY soil NO HYDROCARBON odor				
947059	7-24-95	12:45	50:1	soil	AK444	1	VG	X	1	1	400	72380	BROWN soil NO HYDROCARBON odor				
947060	7-24-95	12:45	50:1	soil	AK445	1	O	X	1	1							
947061	7-24-95	12:50	50:1	soil	AK446	1	B	X	1	1							
947062	7-24-95	14:40	50:1	soil	AK447	1	VG	X	1	219	401	89535	GRAY soil strong HYDROCARBON odor				

RELINQUISHED BY: (Signature) Morgan Keller		DATE/TIME 7-24-95 17:30		RECEIVED BY: (Signature) Kelly Stwall		DATE/TIME 7/25/95 11:00		RELINQUISHED BY: (Signature)		DATE/TIME		RECEIVED BY: (Signature)		DATE/TIME		RECEIVED OF LABORATORY BY: (Signature)	
REQUESTED TURNAROUND TIME: <input type="checkbox"/> ROUTINE <input type="checkbox"/> RUSH		CARRIER CO.		SAMPLE RECEIPT REMARKS No red integrity seals, jars were tagged shut. Seals were put on by lab 7/25/95		CHARGE CODE		RESULTS & INVOICES TO:		FIELD SERVICES LABORATORY EL PASO NATURAL GAS COMPANY P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499							
BILL NO.:						505-599-2144				FAX: 505-599-2261							