

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

outside Risk
Bedrock

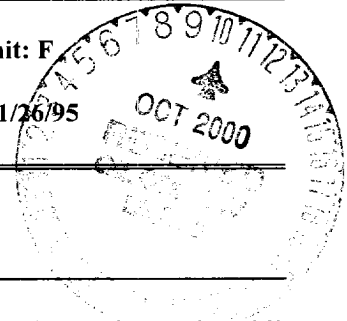
Carpenter #1 E
Meter/Line ID – 93070

SITE DETAILS

Legals - Twn: 30N
NMOCD Hazard Ranking: 20
Operator: Dugan Production

Rng: 14W

Sec: 25 Unit: F
Land Type: BLM
Pit Closure Date: 01/26/95



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 eight feet below ground surface where bedrock was encountered and a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the 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 581 ppm; laboratory analysis indicated TPH concentration of 175 mg/kg. TPH was above required remediation levels for the Hazard Ranking Score. The site was re-assessed on April 23, 1998, due to the original assessment that 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 over five years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the excavation or the borehole.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of site.

ATTACHMENT

Field Pit Assessment Form
Field Pit Remediation/Closure Form Phase I

Revised Field Pit Assessment Form
Laboratory Analytical Results

REVISED
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>93070</u> Location: <u>CARPENTER #1E</u> Operator #: _____ Operator Name: <u>DUGAN PRODUCTIONS</u> P/L District: _____ Coordinates: Letter: <u>F</u> Section <u>2S</u> Township: <u>30</u> Range: <u>14</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4-23-98</u> Area: <u>02</u> Run: <u>23</u>
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> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2) </div> <div style="width: 45%;"> BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ </div> </div> <div style="margin-top: 10px;"> Depth to Groundwater 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) </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>20</u> POINTS </div>
REMARKS	Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS IN A SECLUDED REMOTE AREA.</u>

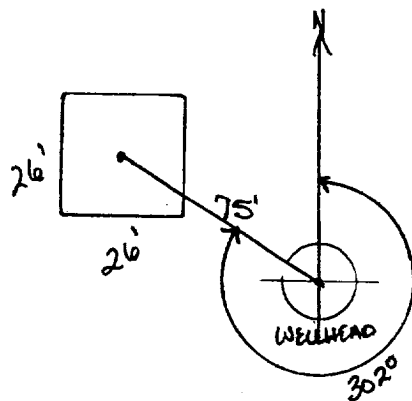
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>93070</u> Location: <u>CARPENTER #1 E</u></p> <p>Operator #: _____ Operator Name: <u>DUCAN PRO.</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>25</u> Township: <u>30</u> Range: <u>14</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>1-11-95</u> Area: <u>02</u> Run: <u>23</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) 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 checked="" type="checkbox"/> (2)</p> <p>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 checked="" 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 type="checkbox"/> (3)</p> <p>Name of Surface Water Body <u>EPHEMERAL DRAINAGE TO COTTONWOOD ARROYO</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 style="padding-left: 400px;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>30</u> POINTS</p>
REMARKS	<p>Remarks : <u>REDLINE & TOPO SHOW LOCATION OUTSIDE V.Z. 2 PITS ON LOCATION.</u></p> <p><u>DEHY PIT BELONGS TO EPNG. WILL CLOSE PIT.</u></p>

ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 302° Footage from Wellhead 75'
b) Length : 26' Width : 26' Depth : 3'



REMARKS

Remarks :

PHOTOS - 1/21

Completed By:

Robert Thompson
Signature

1-11-95
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>93070</u> Location: <u>Carpenter #1E</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>25</u> Township: <u>30</u> Range: <u>14</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>1-26-95</u> Run: <u>02</u> <u>23</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK378</u></p> <p>Sample Depth: <u>8'</u> Feet</p> <p>Final PID Reading <u>581</u> PID Reading Depth <u>8'</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>1-26-95</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Arrived Took Fence down Dug sample Hole HFT Sandstone</u></p> <p><u>8' Soil Brown Strong Hydrocarbon odor</u></p>
	<p>Signature of Specialist: <u>Morgan Killian</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 338	946605
MTR CODE SITE NAME:	93070	N/A
SAMPLE DATE TIME (Hrs):	1-26-95	0841
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	1-28-95	1-28-95
DATE OF BTEX EXT. ANAL.:		
TYPE DESCRIPTION:	NG	Brown clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	175	MG/KG			1.89	28
HEADSPACE PID	581	PPM				
PERCENT SOLIDS	83.4	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

2-22-95



CHAIN OF CUSTODY RECORD

[illegible]