

**EL PASO FIELD SERVICES
PRODUCTION PIT CLOSURE**

Dehy
Bell Federal Gas Com B#1E
Meter/Line ID - 94720

Babak
RECEIVED
DEC 21 1994

SITE DETAILS

Legals - Twn: 30N
NMOCD Hazard Ranking: 0
Operator: Cross Timbers

Rng: 13W

Sec: 11

Unit: BLM

Land Type: BLM

Pit Closure Date: 4/19/94

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 5' where sandstone was encountered. The excavation was terminated at 5' and a soil sample was collected for field headspace analysis and laboratory analysis for TPH and BTEX. 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 205 ppm; laboratory analysis indicated a TPH concentration of 1370 mg/kg and a total BTEX concentration of 173 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 five 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

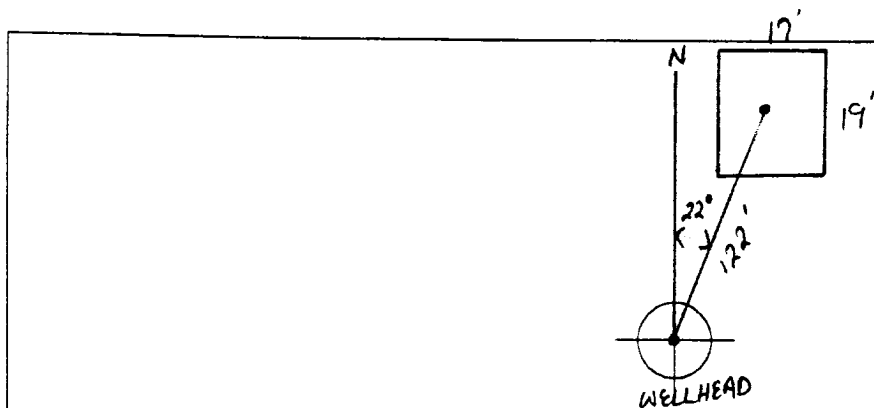
GENERAL	<p>Meter: <u>94720</u> Location: <u>BELL FEDERAL GAS COM B#1E</u></p> <p>Operator #: _____ Operator Name: <u>Cross Timbers</u> P/L District: _____</p> <p>Coordinates: Letter: <u>F</u> Section <u>11</u> Township: <u>30</u> Range: <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>4.23.98</u> Area: <u>02</u> Run: <u>31</u></p>																												
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps) Land Type:</p> <table style="width: 100%;"> <tr> <td style="width: 35%;">Inside</td> <td style="width: 15%;"><input type="checkbox"/> (1)</td> <td style="width: 35%;">BLM</td> <td style="width: 15%;"><input checked="" 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 type="checkbox"/> (3)</td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>_____</td> </tr> </table> <p>Depth to Groundwater</p> <table style="width: 100%;"> <tr> <td>Less Than 50 Feet (20 points)</td> <td><input type="checkbox"/> (1)</td> </tr> <tr> <td>50 Ft to 99 Ft (10 points)</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Greater Than 100 Ft (0 points)</td> <td><input checked="" type="checkbox"/> (3)</td> </tr> </table> <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?</p> <p style="text-align: right;"><input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <table style="width: 100%;"> <tr> <td>Less Than 200 Ft (20 points)</td> <td><input type="checkbox"/> (1)</td> </tr> <tr> <td>200 Ft to 1000 Ft (10 points)</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Greater Than 1000 Ft (0 points)</td> <td><input checked="" type="checkbox"/> (3)</td> </tr> </table> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body: Perennial Rivers, 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="text-align: right;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>	Inside	<input type="checkbox"/> (1)	BLM	<input checked="" type="checkbox"/> (1)	Outside	<input checked="" type="checkbox"/> (2)	State	<input type="checkbox"/> (2)			Fee	<input type="checkbox"/> (3)			Indian	_____	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)	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)
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REMARKS	<p>Remarks : <u>Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. LOCATION IS IN A REMOTE AREA ON TOP OF A MESA.</u></p>																												

FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>94720</u> Location: <u>BELL FEDERAL GAS COM B#1E</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>Amoco</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>11</u> Township: <u>30</u> Range: <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>3.23.94</u> Run: <u>02</u> <u>31</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: Inside _____ Land Type: BLM <input checked="" type="checkbox"/> (From NMOCD Vulnerable _____ State <input type="checkbox"/> Maps) Zone <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Outside <input type="checkbox"/> Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/></p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/></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"/> YES (20 points) <input checked="" type="checkbox"/> NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/></p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/></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>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>THREE PITS ON LOCATION. WILL CLOSE ONLY ONE.</u></p> <p>_____</p> <p>_____</p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 22° Footage to Wellhead 122'
 b) Degrees from North _____ Footage to Dogleg _____
 Dogleg Name _____
 c) Length : 19' Width 12' Depth : 3'



REMARKS :

STARTED TAKING PICTURES AT 2:28 P.M.
END DUMP

Completed By:

Robert Thompson
 Signature

3.23.74
 Date

4.22.94
RT

FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>94720</u> Location: <u>BELL FEDERAL GAS COM B #1E</u> Operator #: _____ Operator Name: _____ P/L District: _____ Coordinates: Letter: _____ Section: _____ Township: _____ Range: _____ Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: _____ Area: <u>02</u> Run: <u>31</u>
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REMARKS	Remarks : _____ _____ _____

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>94720</u> Location: <u>Bell Federal Gas Com B#1E</u></p> <p>Coordinates: Letter: <u>F</u> Section <u>11</u> Township: <u>30</u> Range: <u>13</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>4-19-94</u> Area: <u>0.3</u> Run: <u>31</u> <small>02 STP 4/21/94</small></p>
FIELD OBSERVATIONS	<p style="text-align: center;">940828</p> <p>Sample Number(s): <u>VW13</u></p> <p>Sample Depth: <u>5</u> Feet</p> <p>Final PID Reading <u>205</u> PID Reading Depth <u>5'</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth <u>5'</u> Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>15</u></p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>4-19-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Hit rock at 4-19-94 pulled sample</u></p> <p><u>R.C. said it wasn't in vulnerable zone. Alton said go ahead & excavate.</u></p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

changed to
value
5/22

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW13	940828
MTR CODE SITE NAME:	94720	NIA
SAMPLE DATE TIME (Hrs):	4/19/94	1545
SAMPLED BY:	NIA	
DATE OF TPH EXT. ANAL.:	4-22-94	4-22-94
DATE OF BTEX EXT. ANAL.:	4/25/94	4/26/94
TYPE DESCRIPTION:	VC	Grey Clay/Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	4.76	MG/KG	20			
TOLUENE	62.9	MG/KG	20	B		
ETHYL BENZENE	8.53	MG/KG	20			
TOTAL XYLENES	97.1	MG/KG	20			
TOTAL BTEX	173	MG/KG	0.0385		0.52	20
TPH (418.1)	13.68 70.88 13.68 4/26/94	MG/KG			2.02	28
HEADSPACE PID	205	PPM				
PERCENT SOLIDS	84.6	%				

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

The Surrogate Recovery was at 105.7 % for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By:

John Sander

Date:

5/17/94
5/16/94