

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-144
June 1, 2004

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☒ No ☐

WFS CLOSURE

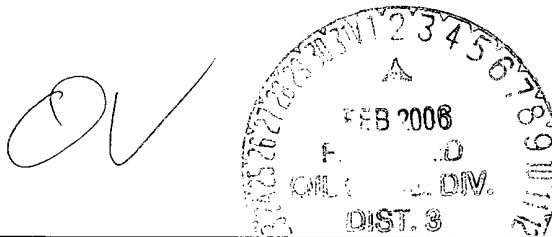
Type of action: Registration of a pit or below-grade tank ☐ Closure of a pit or below-grade tank ☒

Operator: <u>CONOCOPHILLIPS COMPANY</u>		Telephone:		e-mail address:	
Address: <u>PO BOX 2197 HOUSTON, TX 77252</u>					
Facility or well name: <u>SAN JUAN 29 6 UNIT #037A</u>		API #: <u>30-039-21225</u>		U/L or Qtr/Qtr <u>P</u> SEC <u>16</u> T <u>29N</u> R <u>6W</u>	
County: <u>RIO ARRIBA</u>		Latitude <u>36.72118</u>		Longitude <u>-107.46304</u> NAD: 1927 <input checked="" type="checkbox"/> 1983 <input type="checkbox"/>	
Surface Owner: Federal <input type="checkbox"/> State <input checked="" type="checkbox"/> Private <input type="checkbox"/> Indian <input type="checkbox"/>					
Pit Type: Drilling <input type="checkbox"/> Production <input checked="" type="checkbox"/> Disposal <input type="checkbox"/> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Lined <input type="checkbox"/> Unlined <input checked="" type="checkbox"/> Liner Type: Synthetic <input checked="" type="checkbox"/> Thickness _____ mil Clay <input type="checkbox"/> Pit Volume <u>180</u> bbl			Below-grade tank Volume: _____ bbl Type of fluid: _____ Construction Material: _____ Double-walled, with leak detection? Yes <input type="checkbox"/> If not, explain why not.		
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)			Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more		(20 points) (10 points) (0 points) <u>0</u>
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)			Yes No		(20 points) (0 points) <u>0</u>
Distance to surface water: (Horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)			Less than 200 feet 200 feet to 1,000 feet Greater than 1,000 feet		(20 points) (10 points) (0 points) <u>0</u>
			Ranking Score (TOTAL POINTS):		<u>0</u>

If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if you are burying in place) onsite ☒ offsite ☐ If offsite, name of facility _____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☒ Yes ☐ If yes, show depth below ground surface _____ ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

Meter: 86891



I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐ , a general permit ☒ , or an (attached) alternative OCD-approved plan ☒

Date: 10/3/05

Printed Name/Title Mark Harvey for Williams Field Services Signature Mark Harvey

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval: DEPUTY OIL & GAS INSPECTOR, DIST. 3 Signature Wendy Date: FEB 02 2006

ADDENDUM TO OCD FORM C-144

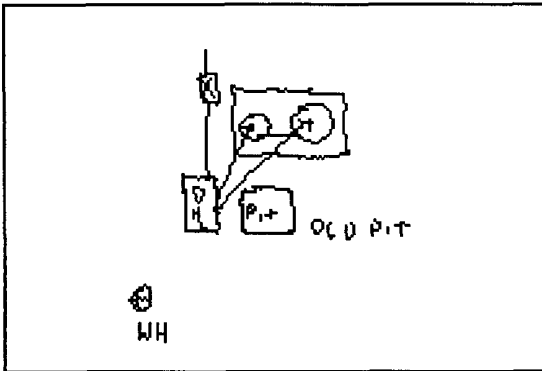
Operator: CONOCOPHILLIPS COMPANY

API 30-039-21225

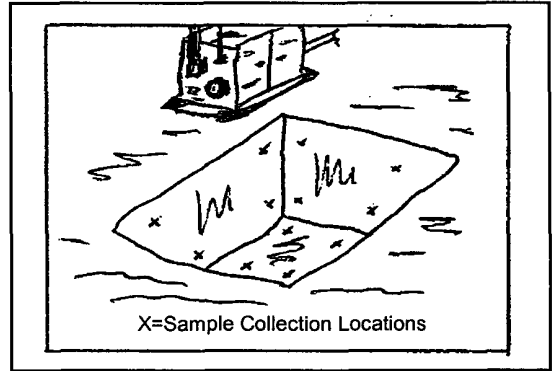
Well Name: SAN JUAN 29 6 UNIT #037A

Meter: 86891

Facility Diagram:



Sampling Diagram:



Pit Dimensions

Length 27 Ft.
Width 15 Ft.
Depth 2.5 Ft.

Location of Pit Center

Latitude 36.72133
Longitude -107.4631
(NAD 1927)

Pit ID

868911

Pit Type

Glycol Dehydrator

Date Closure Started: 9/13/05

Date Closure Completed: 9/13/05

Closure Method: Excavated, Blended, Treated Soil Returned

Bedrock Encountered ? ☐

Cubic Yards Excavated: 149

Vertical Extent of Equipment Reached ? ☒

Description Of Closure Action:

Contaminated soil was removed and treated then returned to the excavation following sampling of the walls and floor.

Vertical extent of excavation limited by equipment

Pit Closure Sampling:

Sample ID	Sample Date	Head Space	BTEX Total (mg/kg)	Benzene (mg/kg)	TPH DRO (mg/kg)	Purpose	Location	Depth
101913MAY04	5/13/04		349.8	4.8	1300	ASSESS		3.5
172213SEP05	9/13/05	61			47	EX Confirm	Walls	10
172513SEP05	9/13/05		131.1	0	460	EX Confirm	Flr	12

See Risk Analysis

Lab Project Number: 60100341
Client Project ID: N MEX PIT PROGRAM

Lab Sample No: 608585246 Project Sample Number: 60100341-004 Date Collected: 09/13/05 17:22
Client Sample ID: 172213SEP05 Matrix: Soil Date Received: 09/22/05 09:35

Parameters	Results	Units	Report Limit	DF	Analyzed	By	CAS No.	Qual	ReqLmt
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GC Semivolatiles

Total Extractable Hydrocarbons	Prep/Method: OA2 / OA2								
Mineral Spirits	ND	mg/kg	12.		1.2 09/28/05 04:07 CPR				
Jet Fuel	ND	mg/kg	12.		1.2 09/28/05 04:07 CPR		94114-58-6		
Kerosene	ND	mg/kg	12.		1.2 09/28/05 04:07 CPR				
Diesel Fuel	ND	mg/kg	12.		1.2 09/28/05 04:07 CPR		68553-00-4		
Fuel Oil	ND	mg/kg	12.		1.2 09/28/05 04:07 CPR		68553-00-4		
Motor Oil	ND	mg/kg	12.		1.2 09/28/05 04:07 CPR				
Total Petroleum Hydrocarbons	47.	mg/kg	12.		1.2 09/28/05 04:07 CPR			1	
n-Tetracosane (S)	101	%			1.0 09/28/05 04:07 CPR		646-31-1		
p-Terphenyl (S)	93	%			1.0 09/28/05 04:07 CPR		92-94-4		
Date Extracted	09/26/05				09/26/05				

Organics Prep

Percent Moisture	Method: SM 2540G								
Percent Moisture	17.7	%			1.0 09/23/05	AJA			

REPORT OF LABORATORY ANALYSIS

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Lab Project Number: 60100341
Client Project ID: N MEX PIT PROGRAM

Lab Sample No: 608585253 Project Sample Number: 60100341-005 Date Collected: 09/13/05 17:25
Client Sample ID: 172513SEP05 Matrix: Soil Date Received: 09/22/05 09:35

Parameters	Results	Units	Report Limit	DF	Analyzed	By	CAS No.	Qual	RegLmt
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GC Semivolatiles

Total Extractable Hydrocarbons Prep/Method: OA2 / OA2									
Mineral Spirits	ND	mg/kg	11.	1.1	09/28/05 04:28 CPR				
Jet Fuel	ND	mg/kg	11.	1.1	09/28/05 04:28 CPR		94114-58-6		
Kerosene	ND	mg/kg	11.	1.1	09/28/05 04:28 CPR				
Diesel Fuel	ND	mg/kg	11.	1.1	09/28/05 04:28 CPR		68553-00-4		
Fuel Oil	ND	mg/kg	11.	1.1	09/28/05 04:28 CPR		68553-00-4		
Motor Oil	ND	mg/kg	11.	1.1	09/28/05 04:28 CPR				
Total Petroleum Hydrocarbons	460	mg/kg	11.	1.1	09/28/05 04:28 CPR			1	
n-Tetracosane (S)	114	%		1.0	09/28/05 04:28 CPR		646-31-1		
p-Terphenyl (S)	97	%		1.0	09/28/05 04:28 CPR		92-94-4		
Date Extracted	09/26/05				09/26/05				

Organics Prep

Percent Moisture	Method: SM 2540G								
Percent Moisture	8.7	%		1.0	09/23/05	AJA			

GC Volatiles

Aromatic Volatile Organics Prep/Method: EPA 5030 Medium Soil / EPA 8021									
Benzene	ND	ug/kg	1600	31.3	09/23/05 14:17 SHF		71-43-2		
Ethylbenzene	7100	ug/kg	1600	31.3	09/23/05 14:17 SHF		100-41-4		
Toluene	24000	ug/kg	1600	31.3	09/23/05 14:17 SHF		108-88-3		
Xylene (Total)	100000	ug/kg	4100	31.3	09/23/05 14:17 SHF		1330-20-7		
a,a,a-Trifluorotoluene (S)	103	%		1.0	09/23/05 14:17 SHF		98-08-8		

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Lab Project Number: 6082624
Client Project ID: N.M. Pit Program

Lab Sample No: 607121431 Project Sample Number: 6082624-025 Date Collected: 05/13/04 10:19
Client Sample ID: 101913MAY04 Matrix: Soil Date Received: 05/18/04 09:05

Parameters	Results	Units	Report Limit	DF	Analyzed	By	CAS No.	Qual	RegLmt
GC Semivolatiles									
Total Extractable Hydrocarbons	Prep/Method: OA2 / OA2								
Mineral Spirits	ND	mg/kg	12.	1.2	05/21/04 23:50	DCKI			
Jet Fuel	ND	mg/kg	12.	1.2	05/21/04 23:50	DCKI			
Kerosene	ND	mg/kg	12.	1.2	05/21/04 23:50	DCKI			
Diesel Fuel	ND	mg/kg	12.	1.2	05/21/04 23:50	DCKI	68334-30-5		
Fuel Oil	ND	mg/kg	12.	1.2	05/21/04 23:50	DCKI	68334-30-5		
Motor Oil	ND	mg/kg	12.	1.2	05/21/04 23:50	DCKI			
Total Petroleum Hydrocarbons	1300	mg/kg	12.	1.2	05/21/04 23:50	DCKI		6	
n-Tetracosane (S)	70	%		1.0	05/21/04 23:50	DCKI	646-31-1		
p-Terphenyl (S)	108	%		1.0	05/21/04 23:50	DCKI	92-94-4		
Date Extracted	05/21/04				05/21/04				

Organics Prep

Percent Moisture	Method: SM 2540G								
Percent Moisture	17.6	%		1.0	05/21/04	DPB			

GC Volatiles

Aromatic Volatile Organics	Prep/Method: EPA 5030 Medium Soil / EPA 8021								
Benzene	4800	ug/kg	2900	58.9	05/21/04 12:18	ARF	71-43-2		
Ethylbenzene	15000	ug/kg	2900	58.9	05/21/04 12:18	ARF	100-41-4		
Toluene	ND	ug/kg	2900	58.9	05/21/04 12:18	ARF	108-88-3		
Xylene (Total)	330000	ug/kg	7400	58.9	05/21/04 12:18	ARF	1330-20-7		
a,a,a-Trifluorotoluene (S)	517	%		1.0	05/21/04 12:18	ARF	98-08-8	9	

REPORT OF LABORATORY ANALYSIS

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Environmental Services
188 CR 4900
Bloomfield, NM 8413

Pit Closure and Retirement Addendum- Risk Assessment

This site is located in the NMOCD / USBLM defined "Non Vulnerable Area". These agencies have predetermined that historical use of unlined pits in this area have limited potential to adversely affect ground water. This is primarily due to the depth to ground water, lack of vertical migration of contaminants, and distant proximity to river drainages.

The sample analyzed for confirmation at this site exhibited elevated levels of total petroleum hydrocarbons (TPH) and / or BTEX. Toxicity information indicates that the measured levels pose little risk to human health and the environment. This conclusion is based in part on the information below:

Toxicity Information

Toxicity values for TPH have not been established due to the variability of the chemical makeup of TPH. Normally, the toxicity is based on the toxicity of particular constituents of concern that may be present and which are evaluated based on health-based standards. The most common constituents examined include benzene, ethylbenzene, toluene, and xylene.

In the absence of constituents of concern or when the concentrations of the constituents of concern are low, the acceptable level of TPH is established by considering the following:

- No liquid product should remain in the soil
- The TPH should not harm vegetation
- The TPH concentrations should not create an odor nuisance
- Hydrocarbon vapors which may emanate from the impacted soil should not generate harmful or explosive vapors
- Site monitoring should indicate that TPH levels are stable or declining

Environmental and Site Conditions

Based on an evaluation of site topography and available well data, this site is believed to have ground water greater than 100' below ground surface. The absence of continuous transport mechanisms limits continued migration of contaminants in soil. Notwithstanding, bedrock was discovered at the pit (i.e. excavation) bottom. This condition retards vertical migration of contaminants and serves to significantly limit potential groundwater impact.

While residual TPH and/or BTEX exists at this site, closure of this site is warranted for the following reasons:

1. The majority of soils that exhibited high levels of TPH and BTEX have been treated to enhance degradation in-situ.
2. Residual TPH concentrations are below levels considered problematic based on the criteria above.
3. Discharge at the site has been eliminated to prevent any future impacts to soils.
4. Depth to groundwater is estimated at greater than 100'.
5. Vertical migration of contamination is limited due to bedrock.
6. TPH / BTEX concentrations will not increase and will degrade over time from natural and enhanced processes occurring in-situ.
7. Further excavation at the site is not practicable due to bedrock.

Since there are no nearby receptors or domestic water sources, this site poses little risk to human health and the environment. Closure is justified based on the relatively low total petroleum hydrocarbon (TPH) concentration and the fact that all closure criteria cannot be practically attained. Additional information may be found in the Technical Background Document titled: *Risk Based Closure of Unlined Surface Impoundment Sites, San Juan Basin, New Mexico.*