

Dennys E. Frost
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Approved

Meter Number: 94994
Location Name: JICARILLA APACHE 361 #1JV
Location: TN-23 RG-04
SC-04 UL-A
6 - Jicarilla
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
APR 14 1997
OIL CON. DIV.
DIST. 4

**RATIONALE FOR RISK-BASED CLOSURE OF PRODUCTION PITS
LOCATED OUTSIDE OF THE VULNERABLE ZONE
IN THE SAN JUAN BASIN**

This production pit location was ranked according to the criteria in the New Mexico Oil Conservation Division's Unlined Surface Impoundment Closure Guidelines and received a ranking score of zero. The estimated depth to groundwater is greater than 100-feet beneath ground surface (bgs), the pit is not in a well head protection area, and there are no surface water bodies within 1,000 horizontal feet of the pit location.

The primary source, discharge to the pit has been removed. There has been no discharge to the pits for at least 4 years and the pits have been closed for at least one year.

Each pit was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Minimal infiltration of rainfall is expected. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching the residual hydrocarbons.

There is no source material at the ground surface, so direct contact of hydrocarbons with livestock and the populous is not likely.

In general, outside of the vulnerable area and alluvial valleys, bedrock material is generally encountered within 20 feet of the ground surface. Bedrock material in the San Juan Basin consists of interbedded sandstones, shales and clays. According to Freeze and Cherry, 1979, the hydraulic conductivity of the bedrock material are as follows:

Sandstone	10^{-9} to 10^{-13} cm/sec
Shale	10^{-12} to 10^{-16} cm/sec
Clay	10^{-12} to 10^{-15} cm/sec

Based on this information, the residual hydrocarbons should not migrate to groundwater.

Natural process (bioremediation) are degrading the residual hydrocarbon to carbon dioxide and water and will continue until the source is gone, therefore minimizing any impact to the environment.

Based on the above information, it is highly unlikely that any source material will impact groundwater or ever find an exposure pathway to affect human health and therefore El Paso Field Services Company (EPFS) requests closure of this pit location.

FIELD PIT SITE ASSESSMENT FORM

EL PASO FIELD SERVICES

GENERAL

Meter: 94994 Location: Jicarilla Apache 361 #1 JV
 Operator #: 1233 Operator Name: Chaceoil P/L District: Quito
 Coordinates: Letter: A Section 4 Township: 23N Range: 4W
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
 Site Assessment Date: 7-12-94 Area: 08 Run: 81

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

Land Type:

BLM ☐ (1)

State ☐ (2)

Fee ☐ (3)

Indian Jicarilla

Apache

Depth to Groundwater

Less Than 50 Feet (20 points) ☐ (1)

50 Ft to 99 Ft (10 points) ☐ (2)

Greater Than 100 Ft (0 points) ☒ (3)

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? ☐ (1) YES (20 points) ☒ (2) NO (0 points)

Horizontal Distance to Surface Water Body

Less Than 200 Ft (20 points) ☐ (1)

200 Ft to 1000 Ft (10 points) ☐ (2)

Greater Than 1000 Ft (0 points) ☒ (3)

Name of Surface Water Body _____

(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream ☐ (1) < 100' (Navajo Pits Only)
☒ (2) > 100'

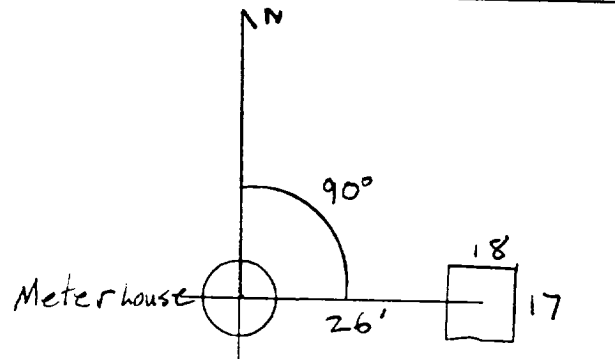
TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : Redline Book - outside Vulnerable Zone - outside
One pit on location

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 90 Footage from ^{Meter} ~~Wellhead~~ 26
 b) Length : 18 Width : 17 Depth : 4



REMARKS :

Pictures @ 1040 #2 Roll 1

cant find well. No dogleg in area, Measured from Meter house

Completed By:

[Signature]

Signature

7-12-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>94994</u> Location: <u>JUANILLA Apache 3u1#1 JV</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>4</u> Township: <u>23N</u> Range: <u>4W</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>10-9-95</u> Run: <u>08</u> <u>81</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>NS110</u></p> <p>Sample Depth: <u>5</u> Feet</p> <p>Final PID Reading <u>0.2</u> PID Reading Depth <u>5</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 <u>0</u> ^{10/14/95} LT</p> <p>Onsite Bioremediation <input type="checkbox"/> Keith From Lic E.P.D. Approved</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/> closure 10-16-95</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>10-17-95</u> Pit Closed By: <u>Philip</u></p>
REMARKS	<p>Remarks : <u>EXCAVATED PIT To 5' SAMPLED PID' READING 0.2</u></p> <p><u>NO DIRT HAWLED Pit is Listed outside W.U. 2006</u></p> <p><u>MORE THAN 100' FROM EPHEMERAL STREAM</u></p> <p>Fencing <u>28</u> X <u>28</u> X <u>3</u> Netting <u>X</u> — <u>NX</u></p> <p>Signature of Specialist: <u>Nicholas Schmalz</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	NS110	947609
MTR CODE SITE NAME:	94994	Jic. Apache 361 #1 J.V.
SAMPLE DATE TIME (Hrs):	10-09-95	1500
PROJECT:	Jic Pits	
DATE OF TPH EXT. ANAL.:	10/10/95	
DATE OF BTEX EXT. ANAL.:	10/10/95	10/10/95
TYPE DESCRIPTION:	VG	Light brown Sand

Field Remarks: (No wall PID readings)

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	< 0	MG/KG			1.96	28
HEADSPACE PID	0.2	PPM				
PERCENT SOLIDS	94	%				

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

The Surrogate Recovery was at 96% for this sample All QA/QC was acceptable.
Narrative:

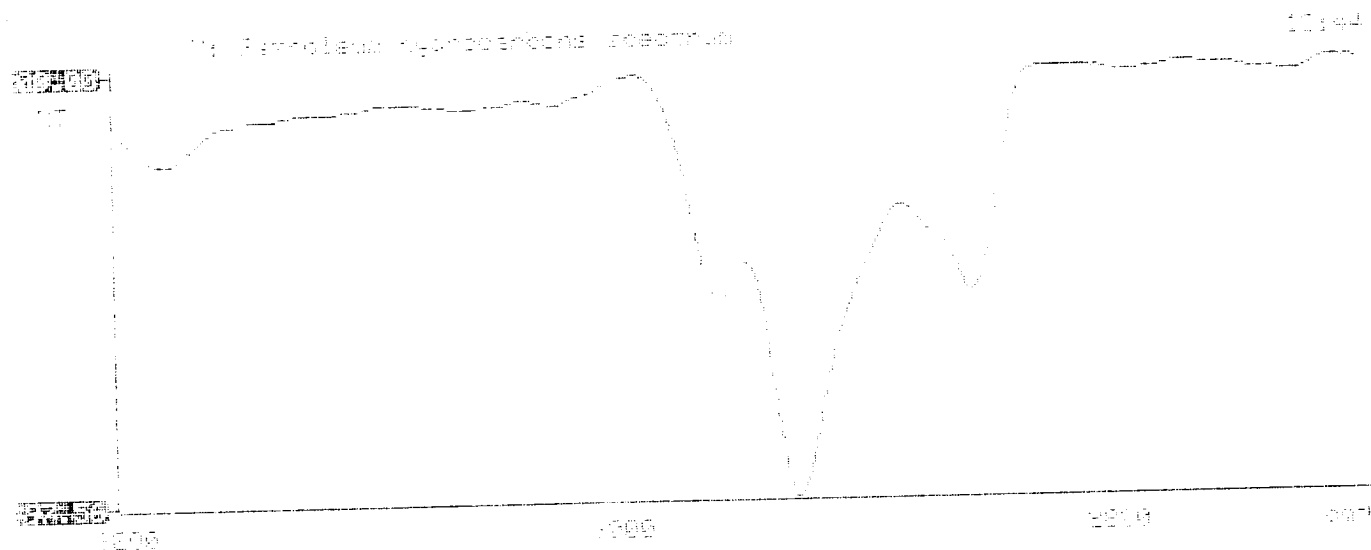
DF = Dilution Factor Used

Approved By: J.S.

Date: 10-13-95

Perkin-Elmer Model 1600 FT-IR
Analysis Report

Petroleum hydrocarbons. ppm
2.466
Net Abundance of Hydrocarbons (2930 ppm)



BTEX SOIL SAMPLE WORKSHEET

File	:	947609	Date Printed	:	10/11/95
Soil Mass (g)	:	5.07	Multiplier (L/g)	:	0.00099
Extraction vol. (mL)	:	10	DF (Analytical)	:	200
Shot Volume (uL)	:	50	DF (Report)	:	0.19724

			Det. Limit	
Benzene (ug/L)	:	0.19	Benzene (mg/Kg):	0.037 0.493
Toluene (ug/L)	:	0.31	Toluene (mg/Kg):	0.061 0.493
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000 0.493
p & m-xylene (ug/L)	:	0.46	p & m-xylene (mg/Kg):	0.091 0.986
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000 0.493
			Total xylenes (mg/Kg):	0.091 1.479
			Total BTEX (mg/Kg):	0.189

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\101095-0.010
 Method : C:\LABQUEST\METHODS\0-092095.MET
 Sample ID : 947609,5.07G,50U
 Acquired : Oct 10, 1995 17:57:41
 Printed : Oct 10, 1995 18:28:07
 User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.167	70498	0.1884
a,a,a-TFT	10.533	9380650	107.2248
TOLUENE	12.953	111628	0.3067
ETHYLBENZENE	17.170	0	0.0000
M,P-XYLENES	17.687	184473	0.4598
O-XYLENE	18.710	0	0.0000
BFB	19.903	52578592	96.4601

