District I PO Box 1988, Hobbs, NM 88241-1980 District II 811 South First, Artesia, NM 88210 District III 1000 Rie Brasse Rd., Aziec, NM 87410 District IV

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION 2040 South Pacheco

Form C-102 Revised October 18, 1994 Instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

☐ AMENDED REPORT

#### Santa Fe, NM 87505 204? South Pacheco, Santa Fe, NM 87505

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Ari Number				¹ Pool Code				3 Pool N	lame	<del></del>		
30-039-21589			1 96425 WILDCAT;				LDCAT; ZYN	YNV HWZG-DAKOTA CO)				
1 Property 666			Property Name							' Well Nun	nher	
OGRID			MILLER B Operator Name									
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DEPUTY OIL & GAS INSPECTOR

DEC 2 9 1997

Meter Number:03501
Location Name:MILLER B #6
Location:TN-24 RG-07
SC-12 UL-G
2 - Federal
NMOCD Zone:OUTSIDE
Hazard Ranking Score:00

DECEIVED

APR 1 4 1997

OIL GOW. DIV.

# 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

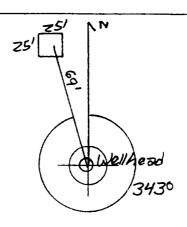
GENERAL	Meter: 03-50/Location: Miller "B" #6  Operator #: 5935 Operator Name: McElvein T.H. District: Ballard.  Coordinates: Letter: G Section 12 Township: 24 Range: 7  Or Latitude Longitude  Pit Type: Dehydrator Location Drip: X Line Drip: Other:  Site Assessment Date: 07/06/94 Area: 07 Run: 62							
	NMOCD Zone:							
	(From NMOCD Land Type: BLM 💹 (1)							
	Maps) Inside (1) State (2)							
	Outside (2)							
	Depth to Groundwater							
	Less Than 50 Feet (20 points) (1)							
	50 Ft to 99 Ft (10 points) (2)  Greater Than 100 Ft (0)							
	Greater Than 100 Ft (0 points) (3) Wellhead Protection							
LNE	Wellhead Protection Area:							
SMI	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?							
ASSESSMENT	domestic water source? (1) YES (20 points) (2) NO (0 points)							
ASS	I notizontal distance to Surface Weter D.							
图	2000 (11d) 200 ( (7) Doints)   1 / 1)							
SITE	200 Ft to 1000 Ft (10 points) (2)							
	Greater Than 1000 Ft (0 points) (3)  Name of Surface Water Day (3)							
	Name of Surface Water Body Rockhouse Canyon  (Surface Water Body: Paraniel B:							
	(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)							
	Distance to Nearest Ephemeral Stream (1) < 100'(Navajo Pits Only)							
	$\sqcup$ (2) > 100'							
	TOTAL HAZARD RANKING SCORE: POINTS							
REMARKS	Remarks · Redling Roy & Jacoba Land							
MAI	Three pits, location drip pit is dry, will close one pit.							
REI								
	Pus i In							

REMARKS

#### ORIGINAL PIT LOCATION

Original Pit: a) Degrees from North 343° Footage from Wellhead 69'

b) Length : <u>Z5'</u> Width : <u>Z5'</u> Depth : <u>5'</u>



Remarks	:
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DEPOSITE OF THE POSITION OF THE

Pictures (213:38 (9-12, Roll Z)
Dump Truck

This meter isn't shown in the redline book.

Completed By:

Signature

## FIELT 'IT REMEDIATION/CLOSUT FORM

GENERAL	Meter: 0350/ Location: Miller B " #6  Coordinates: Letter: 6 Section 12 Township: 24 Range: 7  Or Latitude Longitude Longitude Date Started: 3-26-94 Area: 07 Run: 62							
FIELD OBSERVATIONS	Sample Number(s): MK)95  Sample Depth: 5' Feet  Final PID Reading 124 PID Reading Depth 5 Feet  Yes No  Groundwater Encountered (1) (2) Approximate Depth Feet							
CLOSURE	Remediation Method:  Excavation							
REMARKS	Remarks: FANG IN & SMARKED SOIL GRAY Slight HYDrocarbon  Odor Hit Sandstones!  Signature of Specialist: Morgan Xillian							

-2-



## FIELD SERVICES LABORATORY ANALYTICAL REPORT

### PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

### SAMPLE IDENTIFICATION

Г	Field	Τ	Lab ID				
SAMPLE NUMBER:	MK 295		946	946021			
MTR CODE   SITE NAME:	03501			N/A			
SAMPLE DATE   TIME (Hrs):	8/24/94	· · · · · · · · · · · · · · · · · · ·	112	1125			
SAMPLED BY:	·		/A	Α			
DATE OF TPH EXT.   ANAL.:	8-30-	94	8 3	8 30194			
DATE OF BTEX EXT.   ANAL.:	NIA			NIN			
TYPE   DESCRIPTION:	V G		Frown 1 h	From Well Sand & Sands-			
•			/	i			
REMARKS:							
		RESULTS		· . <del></del>			
					<del> </del>		
PARAMETER	RESULT	UNITS		QUALIFIERS			
			DF	Q	M(g)	V(ml)	
TPH (418.1)	3510	MG/KG			2.05	28	
HEADSPACE PID	124	PPM					
PERCENT SOLIDS	70.8	%					
		TPH is by EPA Metho	od 418.1 ··				
arrative:							
= Dilution Factor Used							
. (				$\alpha$			
	* _		•	9/2/4	i Til		
oproved By:		<del></del>	Date:	1 - 1 1	<del>-</del>	<del></del>	

Test Method for Stand Grease and Petroleum Mydrodarbone shin Water and Coil and Grease and Petroleum Mydrodarbone shin Water and Coil and Grease and Formal Stand Stand Model 1600 FTHIR Great Petroleum Stand Sta