Jennifer A. Dust
DEPUTY OIL & GAS INSPECTOR

DEC 2 9 1997

Approved

Meter Number:93316
Location Name:Jicarilla 35 #8
Location:TN-25 RG-05
SC-36 UL-I
6 - Jicarilla
NMOCD Zone:OUTSIDE
Hazard Ranking Score:00

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: 93316 Location: Jicarilla 35 #8
Operator #: 1987 Operator Name: Meridian P/L District: Ojito
Coordinates: Letter: I Section 36 Township: 25 Range: 05
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____
Site Assessment Date: 9-11-95 Area: 06 Run: 51

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps) Inside ☐ (1) Outside ☒ (2)

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**

REMARK

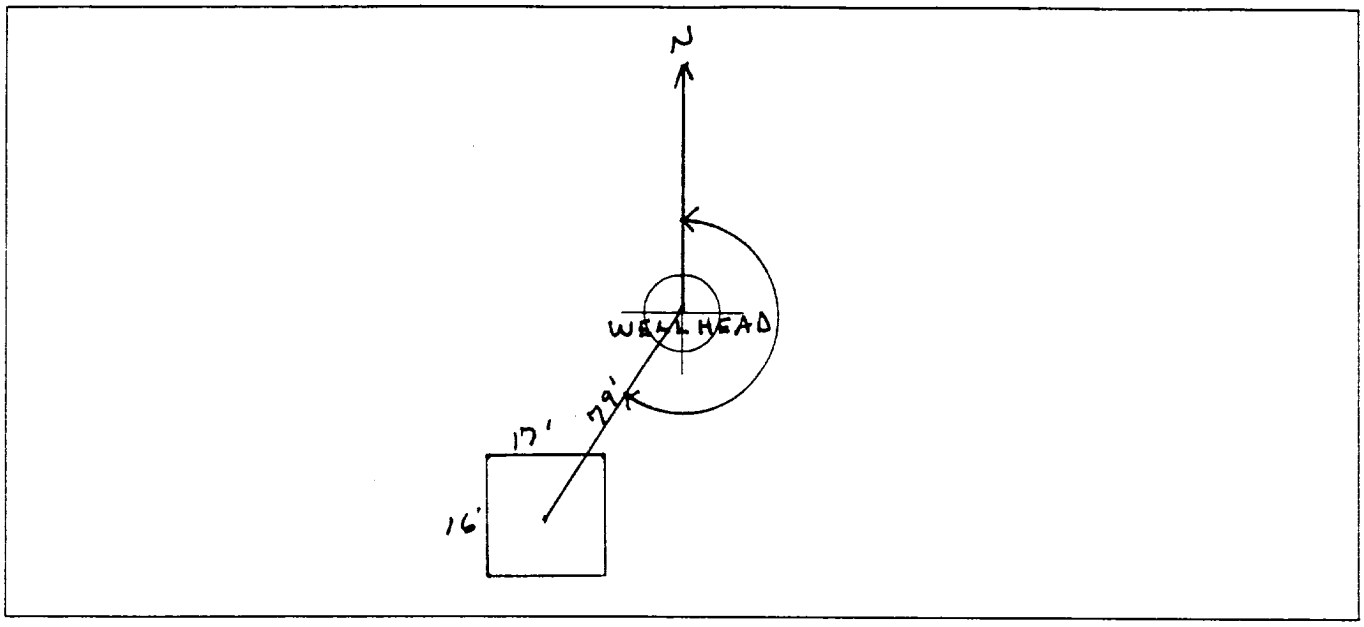
Remarks : Redline + Topo Both show outside VZ. 2 pits on Location Seperator Storage Tank pit with Liner, and Old Dehy pit belongs to Epng Will close old Dehy pit.

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 213° Footage from Wellhead 79'

b) Length : 17' Width : 16' Depth : 3'



REMARKS

Remarks :

photos - 4 pict 15:15

Completed By:

James L Pence

Signature

9-11-95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 9336 Location: Jicarilla 35 #8

Coordinates: Letter: I Section 36 Township: 25 Range: 05

Or Latitude _____ Longitude _____

Date Started : 9/19/95 Run: 06 51

FIELD OBSERVATIONS

Sample Number(s): JK84 _____ _____ _____

Sample Depth: 6' Feet

Final PID Reading 139.0 PID Reading Depth 6' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

- ☒ Excavation — Approx. Cubic Yards 100 LT 9/27/95
- ☐ Onsite Bioremediation — Gabriel Jicarilla E. P.O. approved closure 9-21-95
- ☐ Backfill Pit Without Excavation

Soil Disposition:

- ☒ Envirotech
- ☐ Tierra
- ☐ Other Facility — Name: _____

Pit Closure Date: 9-22-95 Pit Closed By: Philip

REMARKS

Remarks : Pit Pid Readings (N-29.5) (S-0) (E-16.2) (W-7.8) Pit Rock at 6'
Pit Site 24X17XC
Fence Site 20X19X3 No Net
More Than 100 from Ephemral Stream
SPRAY PIT WITH SOIL ENHANCER 9-27-95

Signature of Specialist: Jr K. Kuhn

(SP3191) 03/16/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	AK84	947493
MTR CODE | SITE NAME:	93316	Jicarilla 35 #8
SAMPLE DATE | TIME (Hrs):	09-19-95	1430
PROJECT:	Jic Pits	
DATE OF TPH EXT. | ANAL.:	9-20-95	
DATE OF BTEX EXT. | ANAL.:	9/20/95	9/22/95 / ~~9/26/95~~ 9/24/95
TYPE | DESCRIPTION:	VG	Light grey Sand and clay

Field Remarks: (N-29.5)(S-0)(E-16.2)(W-7.8)

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	2.5	MG/KG				
TOTAL BTEX	2.5	MG/KG				
TPH (418.1)	502	MG/KG			2.04	28
HEADSPACE PID	139	PPM				
PERCENT SOLIDS	92.5	%				

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

The Surrogate Recovery was at 97% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: Date: 9-29-95

****
Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soi.

Perkin-Elmer Model 1600 FT-IR
Analysis Report
****

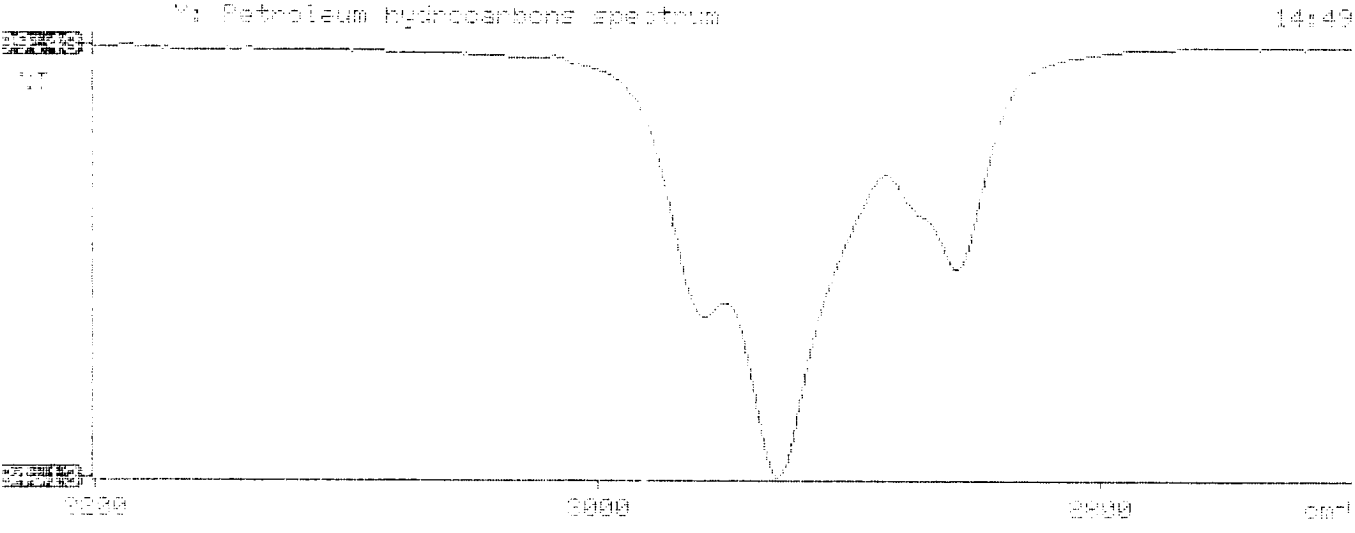
?5/09/20 14:49

Sample identification
?47493

Initial mass of sample, g
1.040

Volume of sample after extraction, ml
?2.000

Petroleum hydrocarbons, ppm
?01.761
Net absorbance of hydrocarbons (2930 cm-1)
.072



BTEX SOIL SAMPLE WORKSHEET

File :	947493	**Date Printed** :	9/26/95
Soil Mass (g) :	5.00	**Multiplier (L/g)** :	0.00100
Extraction vol. (mL) :	10	**DF (Analytical)** :	200
Shot Volume (uL) :	50	**DF (Report)** :	0.20000

				Det. Limit
Benzene (ug/L) :	0.20	**Benzene (mg/Kg):**	**0.040**	0.500
Toluene (ug/L) :	0.45	**Toluene (mg/Kg):**	**0.090**	0.500
Ethylbenzene (ug/L) :	0.94	**Ethylbenzene (mg/Kg):**	**0.188**	0.500
p & m-xylene (ug/L) :	9.47	p & m-xylene (mg/Kg):	1.894	1.000
o-xylene (ug/L) :	2.84	o-xylene (mg/Kg):	0.568	0.500
		Total xylenes (mg/Kg):	**2.462**	1.500
		Total BTEX (mg/Kg):	**2.780**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\947493
Method : C:\LABQUEST\METHODS\9000.MET
Sample ID : 947493,5.00G,50U
Acquired : Sep 26, 1995 09:51:09
Printed : Sep 26, 1995 10:30:13
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.150	75291	0.2012
a,a,a-TFT	10.463	8442813	96.5050
TOLUENE	12.867	162410	0.4462
ETHYLBENZENE	17.187	316388	0.9398
M,P-XYLENES	17.567	3689809	9.4656
O-XYLENE	18.737	925323	2.8445
BFB	19.807	52646108	96.5840