Denny & FORT DEPUTY OIL & GAS INSPECTOR

DEC 2 9 1997

Meter Number: 94274
Location Name: JICARILLA CONT. 146 #36
Location: TN-25 RG-05

SC-04 UL-A

6 - Jicarilla NMOCD Zone:OUTSIDE Hazard Ranking Score:00 DEGEIVED

OIL COM. DAY DIST. 3

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 ELPAS

GENERAL	Meter: 94274 Location: Jicarille Contract 146 #36 Operator #: O203 Operator Name: American P/L District: OJITO Coordinates: Letter: A Section 4 Township: 25 Range: 5 Or Latitude Longitude Pit Type: Dehydrator Location Drip: Line Drip: Other: Site Assessment Date: 7/14/94 Area: Ob Run: 53					
KS SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside Outside (2) Depth to Groundwater Less Than 50 Feet (20 points) Greater Than 100 Ft (0 points) 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? Horizontal Distance to Surface Water Body Less Than 1000 Ft (10 points) Greater Than 1000 Ft (0 points) Greater Than 200 Ft (20 points) Greater Than 200 Ft (10 points) Greater Than 200 Ft (10 points) Greater Than 1000 Ft (0 points) Greater Than 1000 Ft (0 points) Greater Than 1000 Ft (0 points) Greater Than 1000 Ft (10 points) Greater Than 1000					
REMARKS	Remarks: Redline Book-Outside, Vulnerable Zone Topo-Outside 4pits-Will close 1. Pithas Liquid in it					
~	PUSH-IN					

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FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 94274 Location: Juanilla Contenut INL #36 Coordinates: Letter: A Section 4 Township: 25 Range: 5 Or Latitude Longitude Longitude Date Started: 9.20-95 Run: 06 53
FIELD OBSERVATIONS	Sample Number(s): NS90 Sample Depth: Feet Final PID Reading PID Reading Depth Feet Yes No Groundwater Encountered
CLOSURE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation Soil Disposition: Envirotech Other Facility Name: Pit Closure Date: 9-22-95 Pit Closed By: Philip
REMARKS	Remarks: Pro way REPOINTS: LN-43 (5.95) (E-18) (5-91) PIT SIZE 37X3IX 19 LISTED OUTSIDE W.V. ZONE EPNY (NORM) DNSITE MORE THAN 100' FROM EPHENZRAL STREAM FRAME SIZE 28X28X5 (NET) SPRAYED PIT WITH SOI/ Enhancer-9-22-95 Signature of Specialist: Nicholas Schmaltz



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

Field ID N590 SAMPLE NUMBER: JIL CONTRACT 146 #36 94274 MTR CODE | SITE NAME: 09-20-95 SAMPLE DATE | TIME (Hrs): PiTS PROJECT: DATE OF TPH EXT. ANAL.: 9/21/95 DATE OF BTEX EXT. ANAL.: TYPE | DESCRIPTION:

> (N-43X5-25)(E-18)(w-91) Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	7.8	MG/KG	10	N		
TOLUENE	144	MG/KG	10	U.		
ETHYL BENZENE	324	MG/KG	10	D		
TOTAL XYLENES	481	MG/KG	10	D		
TOTAL BTEX	665	MG/KG	10	D		
TPH (418.1)	22,800	MG/KG				
HEADSPACE PID	105	PPM				
PERCENT SOLIDS	94.7	%				

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

The	Surrogate	Recovery	was	at
	. •			

for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By:



9-29-95 Date:

************************************ Test Method for Oil and Grease and Petroleum Hydrocarbons in Water and Soil

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

75/09/22 14:58

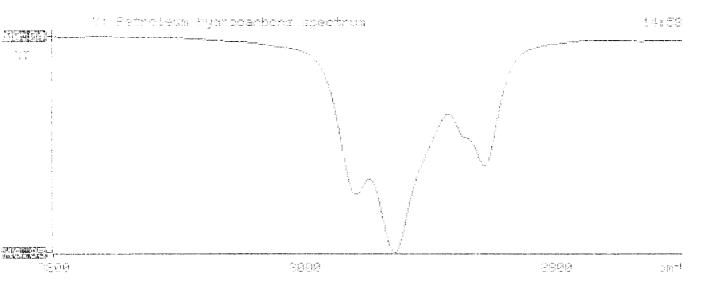
Bample identification 947505

Initial mass of sample, \mathfrak{g}

Volume of sample after extraction, ml IB.000

Retroleum hvarocerbons, ppm

12796.712 Vet absorbance of hydrocarbons (2930 cm-i)



BTEX SOIL SAMPLE WORKSHEET

File	:	947505	Date Printed	:	9/26/95
Soil Mass	(g):	5.09	Multiplier (L/g)	:	0.00098
Extraction vol.	(mL):	10	DF (Analytical)	:	2000
Shot Volume	(uL) :	5	DF (Report)	:	1.96464

					1	Det. Limit
Benzene	(ug/L) :	3.99	Benzene	(mg/Kg):	7.839	4.912
Toluene	(ug/L) :	73.20	Toluene	(mg/Kg):	143.811	4.912
Ethylbenzene	(ug/L) :	16.50	Ethylbenzene	(mg/Kg):	32.417	4.912
p & m-xylene	(ug/L) :	191.00	p & m-xylene	(mg/Kg):	375.246	9.823
o-xylene	(ug/L) :	54.00	o-xylene	(mg/Kg):	106.090	4.912
			Total xylenes	(mg/Kg):	481.336	14.735

Total BTEX (mg/Kg): 665.403

EL PASO NATURAL GAS EPA METHOD 8020 - BTEX SOILS

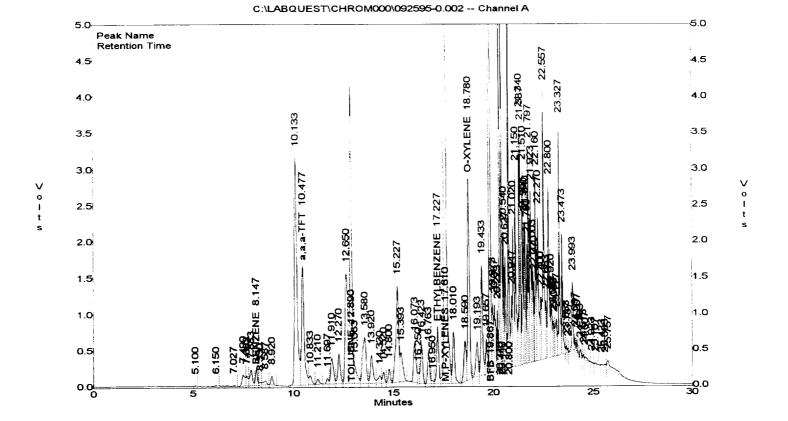
File : C:\LABQUEST\CHROM000\092595-0.002 Method : C:\LABQUEST\METHODS\9000.MET

Sample ID : 947505,5.09G,5U Acquired : Sep 25, 1995 12:06:17 Printed : Sep 25, 1995 12:36:49

User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.147	1480465	3.9918
a,a,a-TFT	10.477	14563311	166.4649
TOLUENE	12.890	26927682	73.1867
ETHYLBENZENE	17.227	5636467	16.4799
M,P-XYLENES	17.610	69339280	190.5354
O-XYLENE	18.780	17949742	54.0039
BFB	19.867	53108988	97.4332



EL PASO NATURAL GAS EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\092295-2.007 Method : C:\LABQUEST\METHODS\9001.MET

Sample ID : 947505,5.09G,25U Acquired : Sep 22, 1995 17:20:52 Printed : Sep 25, 1995 07:56:39

User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	4.900	3291984	21.5515
a,a,a TFT	6.687	16391988	355.0562
TOLUENE	8.743	41667476	150.0013
ETHYLBENZENE	12.793	17602790	65.0864
M & P XYLENE	13.250	132754912	494.8241
O XYLENE	14.287	69363624	291.0608
BFB	15.823	75315152	103.8984

