

Denny E. Foust
DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

Approved

Meter Number: 94860
Location Name: JOHN S. DASHKO CPD
Location: TN-24 RG-07
SC-11 UL-I
2 - Federal
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
APR 14 1997

OIL CON. DIV.
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

EPFS
EL PASO FIELD SERVICES

GENERAL

Meter: 94-860 Location: John S. Dashko CPD
Operator #: 0538 Operator Name: Bayless R.L. P/L District: Ballard
Coordinates: Letter: I Section 11 Township: 24 Range: 7
Or Latitude _____ Longitude _____
Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
Site Assessment Date: 07/07/94 Area: 07 Run: 62

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

Land Type:

BLM

State

Fee

Indian

☒ (1)

☐ (2)

☐ (3)

☐ (1)

☒ (2)

Depth to Groundwater

Less Than 50 Feet (20 points)

50 Ft to 99 Ft (10 points)

Greater Than 100 Ft (0 points)

☐ (1)

☐ (2)

☒ (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)

200 Ft to 1000 Ft (10 points)

Greater Than 1000 Ft (0 points)

☐ (1)

☐ (2)

☒ (3)

Name of Surface Water Body Rockhouse Canyon

(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

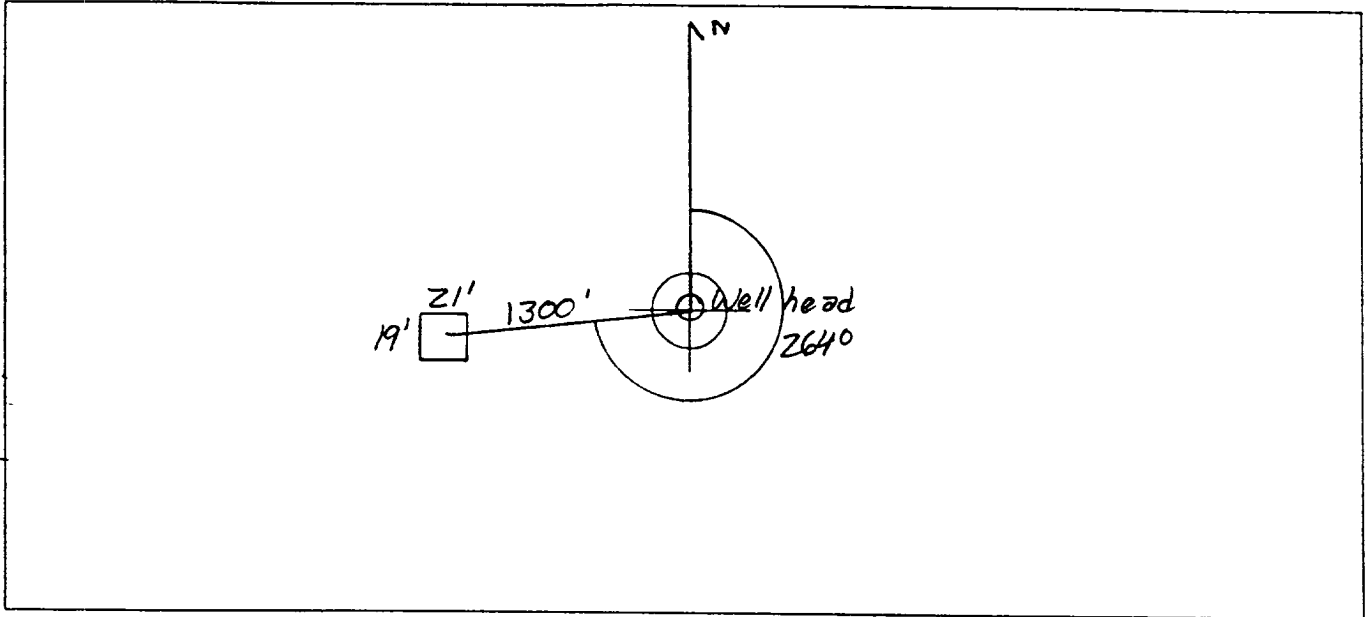
REMARKS

Remarks : Redline Book - Outside Vulnerable Zone Type - Outside
One pit, pit is dry, will close one pit.

PUSH IN

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 264° Footage from Wellhead 1300'
 b) Length : 19' Width : 21' Depth : 4'



Remarks :

Pictures @ 11:54 (19-21, Roll 2) Only 3 pictures, no location sign.
Dump Truck. Wellhead is not in the site picture.
No location sign. Bearing and distance to wellhead
are approximate.

Completed By:

Sarah Kelly
 Signature

7/7/94
 Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>94860</u> Location: <u>John S. DASHKO CPO</u> Coordinates: Letter: <u>I</u> Section <u>11</u> Township: <u>24</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Date Started : <u>8-26-94</u> Area: <u>07</u> Run: <u>62</u>
FIELD OBSERVATIONS	Sample Number(s): <u>NK 296</u> Sample Depth: <u>3'</u> Feet Final PID Reading <u>235</u> PID Reading Depth <u>3'</u> Feet Yes No Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation ☐ (1) Approx. Cubic Yards _____ Onsite Bioremediation ☐ (2) Backfill Pit Without Excavation ☒ (3) Soil Disposition: Envirotech ☐ (1) ☐ (3) Tierra Other Facility ☐ (2) Name: _____ Pit Closure Date: <u>8-26-94</u> Pit Closed By: <u>BEI</u>
REMARKS	Remarks : <u>EPNG line marked soil Gray strong HYDROCARBON</u> <u>odor Hit Sandstone 3'</u> <u>Abandon line in center of pit</u>
	Signature of Specialist: <u>Morgan Killian</u>



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

SAMPLE NUMBER:

mk 296

Lab ID

946022

MTR CODE | SITE NAME:

94860

N/A

SAMPLE DATE | TIME (Hrs):

8/26/94

1205

SAMPLED BY:

N/A

DATE OF TPH EXT. | ANAL.:

8-30-94

8/30/94

DATE OF BTEX EXT. | ANAL.:

N/A

N/A

TYPE | DESCRIPTION:

VG

Brown fine sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1) <i>July 31/94</i>	5235 5240	MG/KG			2.04	28
HEADSPACE PID	235	PPM				
PERCENT SOLIDS	89.5	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

9/2/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

04/09/30 13:59

Sample Identification
000000

Initial name of sample, y
000

Volume of sample after extraction, ml
0.000

Sample type hydrocarbon, ppm
0.000

For more information, see: 000000
0.000

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ILLEGIBLE