

Denny & Fort
DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

Approved

Meter Number: 95922
Location Name: Jicarilla Contract 148 #40
Location: TN-25 RG-05
SC-13 UL-A
6 - Jicarilla
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
APR 14 1997
OIL FIELD DIV
DIST. 6

**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: 95922 Location: JICARILLA CONTRACT 148 #40
 Operator #: 0203 Operator Name: AMOCO P/L District: OSITO
 Coordinates: Letter: A Section 13 Township: 25 Range: S
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator _____ Location Drip: ☒ Line Drip: _____ Other: _____
 Site Assessment Date: 9.27.95 Area: 08 Run: 63

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

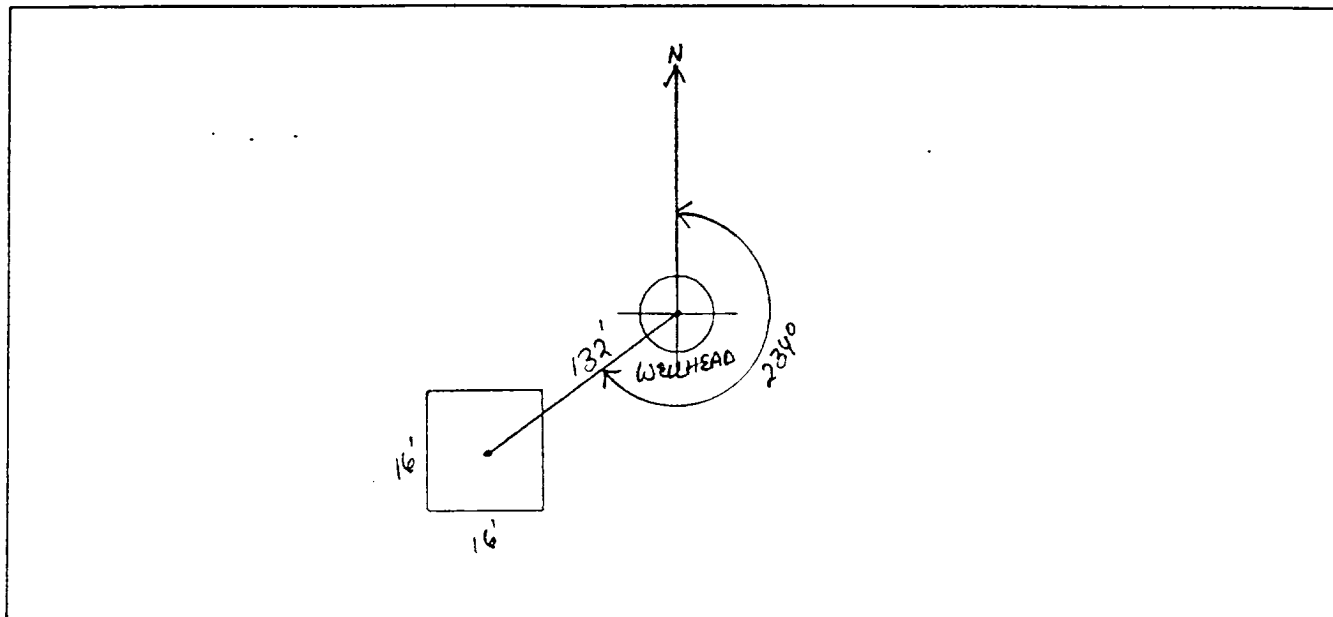
REMARKS

Remarks : REDLINE & TOPO SHOW LOCATION OUTSIDE V.Z. THERE ARE FOUR PITS ON THIS LOCATION. THE LOCATION DRIP PIT BELONGS TO EPNG. THE THREE OTHER PITS BELONG TO THE OPERATOR. WILL CLOSE EPNG'S PIT. PUSH IN.

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 234° Footage from Wellhead 132'
b) Length : 16' Width : 16' Depth : 2'



REMARKS

Remarks :

PHOTOS - 1200

Completed By:

Robert Thompson

Signature

9.27.95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>95922</u> Location: <u>Jicarilla contract 148 #40</u></p> <p>Coordinates: Letter: <u>A</u> Section <u>13</u> Township: <u>25</u> Range: <u>5</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>10/5/95</u> Run: <u>08</u> <u>63</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>JK94</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>53.0</u> PID Reading Depth <u>12'</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 checked="" type="checkbox"/> Approx. Cubic Yards <u>320 LT</u> ^{10/18/95}</p> <p>Onsite Bioremediation <input type="checkbox"/> <u>Gabriel Lic. E.P.O. approved</u></p> <p>Backfill Pit Without Excavation <input type="checkbox"/> <u>closure 10-9-95</u></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>10-11-95</u> Pit Closed By: <u>Philips</u></p>
REMARKS	<p>Remarks : <u>Pit Pit Readings (1-11.0)(5-22.1)(E-65.3)(W-25.6)</u></p> <p><u>Pit size 20x22x12</u></p> <p><u>more than 100' From Ephemeral stream</u></p> <p>Fencing <u>20 X 22 X 3</u> Netting <u>Y</u> <u>N</u> <u>X</u></p>
	<p>Signature of Specialist: <u>Joe K King</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JK 94	947590
MTR CODE SITE NAME:	95922	Jic. Contract 148 #40
SAMPLE DATE TIME (Hrs):	10-05-95	0948
PROJECT:	Aic Pits	
DATE OF TPH EXT. ANAL.:	10-6-95	
DATE OF BTEX EXT. ANAL.:	10/6/95	10/6/95
TYPE DESCRIPTION:	VG	Light Grey DARK BROWN SILTY CLAY

Field Remarks: (N-11.0)(S-22.1)(E-65.3)(W-25.6)

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	3.7	MG/KG				
TOTAL BTEX	3.7	MG/KG				
TPH (418.1)	207	MG/KG			2.00	2.5
HEADSPACE PID	53.0	PPM				
PERCENT SOLIDS	90.5	%				

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

The Surrogate Recovery was at
Narrative:

97%

for this sample All QA/QC was acceptable.

DF = Dilution Factor Used

Date:

10-11-95

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Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil
Perkin-Elmer Model 1600 FT-IR
Analysis Report
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7/5/10/06 15:47

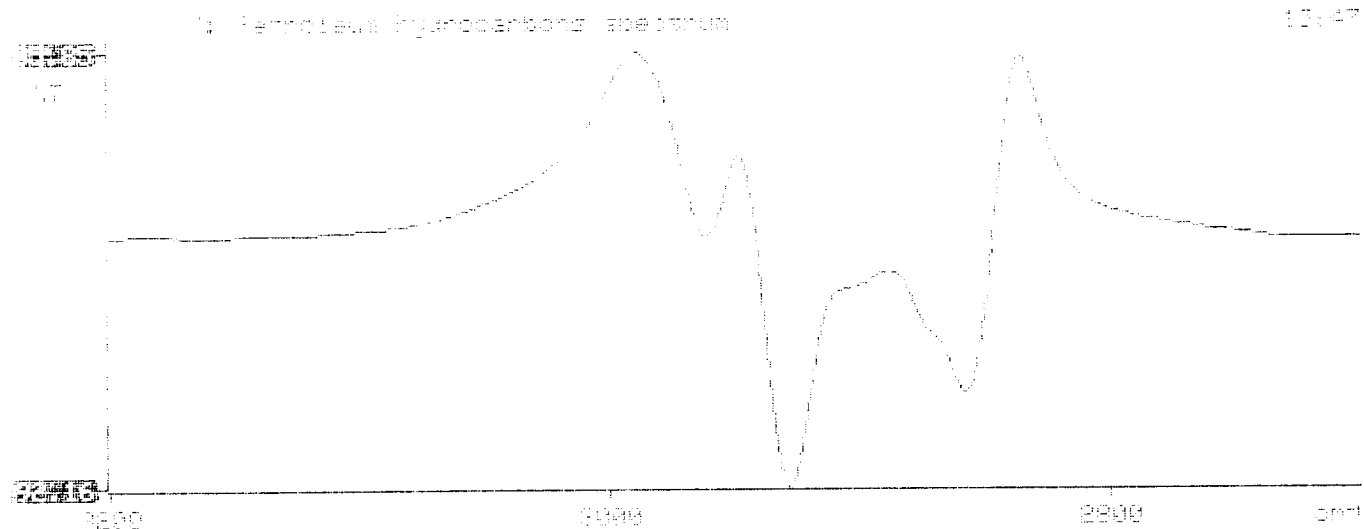
Sample identification
47590

Initial mass of sample, g
0.000

Volume of sample after extraction, ml
0.000

Petroleum hydrocarbons, ppm
20.472

Net absorbance of hydrocarbons (2930 cm-1)
0.000



BTEX SOIL SAMPLE WORKSHEET

File	:	947590	Date Printed	:	10/7/95
Soil Mass (g)	:	5.04	Multiplier (L/g)	:	0.00099
Extraction vol. (mL)	:	10	DF (Analytical)	:	200
Shot Volume (uL)	:	50	DF (Report)	:	0.19841

				Det. Limit
Benzene (ug/L)	:	0.67	Benzene (mg/Kg):	0.133 0.496
Toluene (ug/L)	:	1.39	Toluene (mg/Kg):	0.276 0.496
Ethylbenzene (ug/L)	:	1.78	Ethylbenzene (mg/Kg):	0.353 0.496
p & m-xylene (ug/L)	:	14.80	p & m-xylene (mg/Kg):	2.937 0.992
o-xylene (ug/L)	:	3.73	o-xylene (mg/Kg):	0.740 0.496
			Total xylenes (mg/Kg):	3.677 1.488
			Total BTEX (mg/Kg):	4.438

EL PASO NATURAL GAS

EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM000\100695-0.002
 Method : C:\LABQUEST\METHODS\0-092095.MET
 Sample ID : 947590,5.04G,50U
 Acquired : Oct 06, 1995 16:11:48
 Printed : Oct 06, 1995 16:42:16
 User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	8.173	248871	0.6651
a,a,a-TFT	10.517	9195275	105.1059
TOLUENE	12.933	504167	1.3853
ETHYLBENZENE	17.257	598667	1.7784
M,P-XYLENES	17.640	5756391	14.7524
O-XYLENE	18.810	1198731	3.7272
BFB	19.877	53027912	97.2845

