

Denny E. Faust
DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

Approved

Meter Number:72402

Location Name:SAN JUAN 28-7 UNIT #97

Location:TN-27 RG-07

SC-21 UL-A

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.

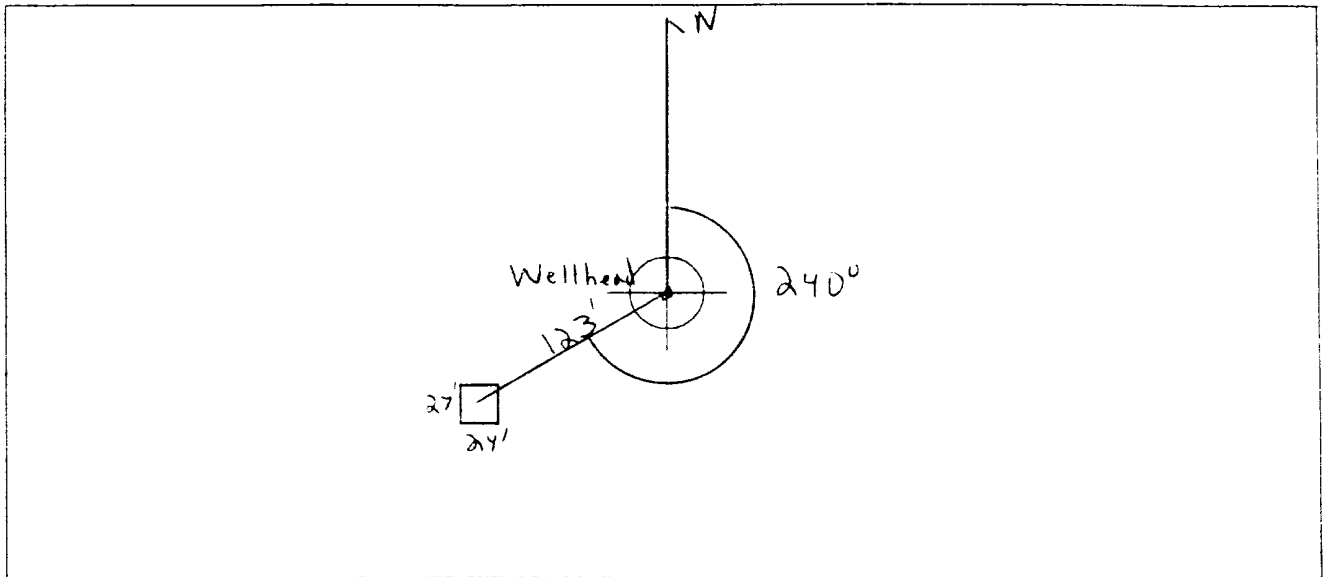
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>72402</u> Location: <u>San Juan 28-7 Unit 47</u> Operator #: <u>0203</u> Operator Name: <u>Ameco</u> P/L District: <u>Blanco</u> Coordinates: Letter: <u>A</u> Section <u>21</u> Township: <u>27</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____ Site Assessment Date: <u>6/7/94</u> Area: <u>03</u> Run: <u>22</u></p>
	<p>NMOCD Zone: (From NMOCD Maps) Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p>Land Type: BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> <p>Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____ (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>Redline + Vol - Outside</u> <u>3 pits. Close. Pit Dry. Liquid in Pit. (called Blanco)</u></p> <p style="text-align: right;"><u>PUSH-IN</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 240° Footage from Wellhead 123'
b) Length : 27' Width : 24' Depth : 4'

ORIGINAL PIT LOCATION



Remarks :

Pictures @ 1120 (18-22)
Dump Truck

REMARKS

Completed By:

Cory Chase
Signature

6/7/94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>72402</u> Location: <u>SAN JUAN 28-7 # 97</u> Coordinates: Letter: <u>A</u> Section <u>21</u> Township: <u>27</u> Range: <u>7</u> Or Latitude _____ Longitude _____ Date Started : <u>8-11-94</u> Run: <u>63</u> <u>32</u>
FIELD OBSERVATIONS	Sample Number(s): <u>MK 258</u> Sample Depth: <u>4'</u> Feet Final PID Reading <u>221</u> <small>XDV 8/16/94 as copied off of sample jar.</small> PID Reading Depth <u>4'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input type="checkbox"/> Approx. Cubic Yards _____ Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input checked="" type="checkbox"/> Soil Disposition: Envirotech <input type="checkbox"/> <input type="checkbox"/> Tierra Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>8-11-94</u> Pit Closed By: <u>BEI</u>
REMARKS	Remarks : <u>PEPNO LINES marked. Gray Soil strong</u> <u>Hydrocarbon odor H.4 Sand Stone 4'</u>
	Signature of Specialist: <u>Morgan Killion</u>



**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 258	945929
MTR CODE SITE NAME:	1517 72402	N/A
SAMPLE DATE TIME (Hrs):	8-11-94	72402 1517
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-16-94	8-16-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	H. Grey Fine Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	25,600	MG/KG			0.12	28
HEADSPACE PID	221	PPM				
PERCENT SOLIDS	91.4	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

J. J.

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

4/23/16 16:04

Sample Identification

18774

Weight of sample, g

1.00

Weight of residue after extraction, g

0.10

Weight of residue after extraction, g

0.10

Weight of residue after extraction, g

0.10

Sample name and location

18774

18774

ILLEGIBLE

