

Denny E. Faust

DEPUTY OIL & GAS INSPECTOR ENVIRONMENTAL PROTECTION OFFICE

MAY 04 1998

JICARILLA APACHE TRIBE

P.O. BOX 507

DULCE, NEW MEXICO 87528

CA438

SUBMIT 1 COPY TO

NATURAL RESOURCE DEPT

AND OIL & GAS ADMINISTRATION

PIT REMEDIATION AND CLOSURE REPORT

Approved

Operator: CONOCO, INC. Telephone: (505) 324-5884

Address: 3315 Bloomfield Hwy., Farmington, NM 87401

Facility or Well Name: CHRIS #1A

Location: Unit or Qtr/Qtr Sec F Sec 15 T 27N R 3W County RIO ARriba

Pit Type: Separator Dehydrator Other PRODUCTION TANK

Land Type: RANGE

Pit Location:
(Attach diagram)

Pit dimensions: length 17', width 17', depth 6'

Reference: wellhead X, other

Footage from reference: 45'

Direction from reference: 53 Degrees East of North
X West of South X

Depth To Groundwater:

(Vertical distance from
contaminants to seasonal
high water elevation of
groundwater)

Less than 50 feet	(20 points)	
50 feet to 99 feet	(10 points)	<u>0</u>
Greater than 100 feet	(0 points)	<u> </u>

Distance to an Ephemeral Stream

(Downgradient dry wash greater than
ten feet in width)

Less than 100 feet	(10 points)	<u>0</u>
Greater than 100 feet	(0 points)	<u> </u>

Distance to Nearest Lake, Playa, or Watering Pond

(Downgradient lakes, playas and
livestock or wildlife watering ponds)

Less than 100 feet	(10 points)	<u>0</u>
Greater than 100 feet	(0 points)	<u> </u>

Wellhead Protection Area:

(Less than 200 feet from a private
domestic water source, or: less than
1000 feet from all other water sources)

Yes	(20 points)	<u>0</u>
No	(0 points)	<u> </u>

Distance To Surface Water:

(Horizontal distance to perennial
lakes, ponds, rivers, streams, creeks,
irrigation canals and ditches)

Less than 100 feet	(20 points)	<u>0</u>
100 feet to 1000 feet	(10 points)	<u> </u>
Greater than 1000 feet	(0 points)	<u> </u>

RANKING SCORE (TOTAL POINTS): 0

GA438

PROD. TANK PIT

Date Remediation Started: 9-20-96 Date Completed: 9/20/96

Remediation Method: Excavation ☒ Approx. cubic yards 40
(check all appropriate sections) Landfarmed ☒ Insitu Bioremediation _____
Other _____

Remediation Location: Onsite ☒ Offsite _____
(i.e. landfarmed onsite, name and location of offsite facility)

General Description of Remedial Action: Excavation. ENTIRE EXCAVATION CONSIST
MOSTLY OF BEDROCK, THEREFORE NO TPH ANALYSIS WAS CONDUCTED.

Groundwater Encountered: No ☒ Yes _____ Depth _____

Final Pit:
Closure Sampling:
(if multiple samples,
attach sample results
and diagram of sample
locations and depths)

Sample location see Attached Documents

Sample depth 3'

Sample date 9/20/96

Sample time 0920

Sample Results

Soil: Benzene (ppm) _____

Water: Benzene (ppb) _____

Total BTEX (ppm) _____

Toluene (ppb) _____

Field Headspace (ppm) 1227

Ethylbenzene (ppb) _____

TPH (ppm) _____

Total Xylenes (ppb) _____

Groundwater Sample: Yes _____ No ☒ (If yes, attach sample results)

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

DATE 9/20/96 PRINTED NAME Jeffrey C. Blagg, P.E. #11607

SIGNATURE Jeffrey C. Blagg AND TITLE President

AFTER REVIEW OF THE PIT CLOSURE INFORMATION, PIT CLOSURE IS APPROVED IN ACCORDANCE TO THE JICARILLA APACHE TRIBE PIT CLOSURE ORDINANCE.

APPROVED: YES ☒ NO _____ (REASON) spray + close

SIGNED: Kenn C. Mann DATE: 9-24-96

TRAVEL NOTES: CALLOUT: 9/19/96 AFTER. ONSITE: 9/20/96 MORN.

Well Name:**Well Site location:****Pit Type:****Producing Formation:****Pit Category:****Horizontal Distance to Surface Water:****Vicinity Groundwater Depth:****Chris #1A**

Unit F, Sec. 15, T27N, R3W

Production Tank pit

Mesaverde

Non Vulnerable

> 1000 ft.

> 100 ft.

RISK ASSESSMENT

Pit remediation activities were terminated when trackhoe encountered shale bedrock at 6 feet below grade.

No past or future threat to surface water or groundwater is likely based on the following considerations:

1. Past production fluids were contained locally by a relatively shallow shale bedrock located 6 feet below grade. Groundwater levels located on or close to the well pad are estimated to be at a much greater depth below the shale bedrock.
2. Topographic information does not indicate off site lateral fluid migration near the earthen pit.
3. Daily discharge into the earthen pit has been terminated (pit abandoned). Prior discharge into the pit is believed to be under 5 barrels per day.
4. Field headspace readings (OVM/PID) on Mesaverde type locations do not reflect direct correlation to total BTEX per USEPA Method 8020 concentrations. Listed below are a few typical AMOCO Mesaverde pit soil analyses comparing headspace to Benzene and total BTEX results.

LOCATION	HEADSPACE (ppm)	BENZENE (ppm)	TOTAL BTEX (ppm)
L.C. Kelly #6A	833	0.033	2.857
Johnston LS 7	998	0.017	24.985
Neil LS 7A	819	0.282	0.440

The comparisons listed above demonstrates that headspace testing is not an accurate measurement to Benzene or total BTEX concentrations when above standards for Mesaverde type pits.

Based upon the information given, we conclude that the subsurface lateral impact from the earthen pit is very limited and that the shale bottom creates enough of a impermeable barrier as to subdue impact to groundwater below it (please refer to AMOCO's report "Post Excavation Pit Closure Investigation Summary, July, 1995", with cover letter dated November 30, 1995). CONOCO requests pit closure approval on this location.