DEPUTY OF LAGE LAGE LATTOR

Meter Number: 70667 70667-2

DEC 2 9 1997 Location Name: OXNARD B WN FEDERAL COM#1(Pit #2)

Location:TN-27 RG-08 SC-14 UL-M 2 - Federal NMOCD Zone:OUTSIDE Hazard Ranking Score:00 RECEIVED APR 1 4 1897

OIL CON. DIV. Divi. 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:

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: 70667 Location: OXNARD B WN FEDERAL COM #1 Operator #: Operator Name: MERINIAN P/L District: BLANCO Coordinates: Letter: M_ Section_14 Township: _27 Range: _8 Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: _1:10.95				
	NMOCD Zone:Land Type:BLM \boxtimes (1)(From NMOCDState \square (2)Maps)Inside \square (1)Fee \square (3)Outside \boxtimes (2)Indian				
SITE ASSESSMENT	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				
The state of the s	(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'				
10	TOTAL HAZARD RANKING SCORE: POINTS				
EMARKS	Remarks: REPLINE & TOPO SHOW LOCATION DUTSIDE V.Z. ONLY PIT ON LOCATION BELONGS TO EPING, WILL CLOSE PIT.				
EMA					

ORIGINAL PIT LOCATION
Original Pit : a) Degrees from North <u>232°</u> Footage from Wellhead <u>76′</u> b) Length : <u>13′</u> Width : <u>11′</u> Depth : <u>2′</u>
N WELLHEAD 73°C
Remarks : PHOTOS- 1344
Completed By:
Signature Date

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GENERAL	Meter: 70667 Location: OXNARD B WN F.). COM No.] Operator #: 1987 Operator Name: MOJ P/L District: Blanco Coordinates: Letter: M Section 14 Township: 27 Range: 8 Or Latitude Longitude Pit Type: Dehydrator Location Drip: Line Drip: Other: Site Assessment Date: 5/24/44 Area: Area: 3 Run: 3
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Insice Outside Outside Depth to Groundwater Less Than 50 Feet (20 points) Greater Than 100 Ft (0 points) 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) Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) Coreater Than 1000 Ft (10 points) (2) Greater Than 1000 Ft (10 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: D POINTS
REMARKS	Remarks: Rolling & Vuln - Dutside 3 pits. Clase 2. Pits Dry. (1 PCpit & IMV pit)
R	PU.(H-IN)

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 70667 Location: OX Nard B WN Fed com #1 Coordinates: Letter: M Section 14 Township: 27 Range: 8 Or Latitude Longitude Date Started: 7-20-94 Run: 13 31
FIELD OBSERVATIONS	Sample Number(s): MK/66 Sample Depth: 4 Feet Final PID Reading 226 PID Reading Depth 4 Feet Yes No Groundwater Encountered Approximate Depth Feet
CLOSURE	Remediation Method: Excavation
REMARKS	Remarks: FAME live Not Marked Soil Gray Strong HYDRO CAIDON ODOR Hit SAND STONE 4' Signature of Specialist: Morgan Xillian



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

	Field ID			Lab ID		
SAMPLE NUMBER:	MK 166	945	945727			
MTR CODE SITE NAME:	70667		N/A 1059			
SA MPLE DATE ! TIME (Hrs):						
SAMPLED BY:		I/A				
DATE OF TPH EXT. ANAL.:	7-21-94		7/2494			
DATE OF BTEX EXT. ANAL.:	V (+		N / A	DX Grey Garsa Sund Cl		
TYPE DESCRIPTION:			DK Gren			
	F	RESULTS				
PARAMETER	RESULT UNITS					
			DF	<u>Q</u>	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	4190	MG/KG			1.98	24
HEADSPACE PID	226	РРМ		<u></u>		
PERCENT SOLIDS	89.9 Markin	%				
e Surpgate Recovery was at rrative:	— TPH is by EPA Method 41:	8.1 and 8TEX is by EPA $\%$ for this samp		was accep	table.	

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Oil and Grease and Petroleum Hydrocarbons in Water and Soil Perkin-Elmer Model 1600 FT-IR 04/07/21 14:39 Sample identification Initial mass of tample, g -olume of eample ofter extraction, il To college by directables, pro-. - Nigo - Sicobrece - Porvioniantone (1776 feel) า กระทาง (ค.ศ. กรูห์กระวะพระกร) สหลวร์ท.ศ 1::80 1.323