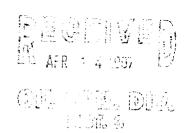
DEPUTY OIL & GAS INSPECTOR

DEC 2 9 1997

Approved

Meter Number:92659
Location Name:FILAN #9
Location:TN-27 RG-08
SC-05 UL-L
2 - Federal
NMOCD Zone:OUTSIDE
Hazard Ranking Score:00



#### 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: 92659 Location: _FILAN #9  Operator #: _2999
SITE ASSESSMENT	NMOCD Zone:  (From NMOCD  Maps)  Inside  Outside  Outside  Depth to Groundwater  Less Than 50 Feet (20 points)  Greater Than 100 Ft (0 points)  Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction?, or; ls it less than 200 ft from a private domestic water source?  (1) YES (20 points)  Materia Distance to Surface  Water Body  Less Than 200 Ft (10 points)  (1)  Coreater Than 1000 Ft (10 points)  Mare of Surface Water Body  (1)  (2)  (3)  Mare of Surface Water Body  (4)  (5)  Mare Depth to Groundwater  (1) YES (20 points)  (2)  (3)  Name of Surface Water Body  (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:O POINTS
REMARKS	Remarks: <u>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS ON A HILL</u> ON HOLLIS PASS, PEDLINE AND TOPO CONFIRMED LOCATION IS OUTSIDE V.Z.

\_ 1

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 92659 Location: Filan #9  Coordinates: Letter: L Section 5 Township: 27 Range: 8  Or Latitude Longitude  Date Started: 9-19-94 Run: 07 21
FIELD OBSERVATIONS	Sample Number(s): 12300  Sample Depth: 4 Feet  Final PID Reading 8 PID Reading Depth 4 Feet  Yes No  Groundwater Encountered
CLOSURE	Remediation Method :  Excavation
	Envirotech
REMARKS	Remarks: 4' sandsteine
	Signature of Specialist: Valu Wilson (5P3191) 03/16/94



#### FIELD SERVICES LABORATORY ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

	SAMPLE	IDENTIFICA	ION			
	Field	I ID		Lab ID		
SAMPLE NUMBER:	٧٤٠	√w 30 ∂		946160		
MTR CODE   SITE NAME:	92459 9-19-94		9/20/04			
SAMPLE DATE   TIME (Hrs):			40/20/94 9-1	<u> </u>		
SAMPLED BY:	N/A					
DATE OF TPH EXT.   ANAL.:	9.20-94 NA VG		9-2			
DATE OF BTEX EXT.   ANAL.:			2) /4			
TYPE   DESCRIPTION:			Brown			
REMARKS:		RESULTS				
PARAMETER	RESULT	UNITS	QUALIFIERS			
L VIIVIAIS 1511			DF	Q	M(g) V(ml)	
TPH (418.1)	76.3	MG/KG			2.08 28	
HEADSPACE PID	8	PPM				
PERCENT SOLIDS	92.1	%				
		TPH is by EPA Method	1 418.1			
larrative:						
F = Dilution Factor Used						
	,			Q1		
Approved By:	94		Date:	<u></u>		

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

Perkin-Elmer Model 1600 FT-IR

Analysis Report \*

94/09/20 13:17

Sample identification 746160

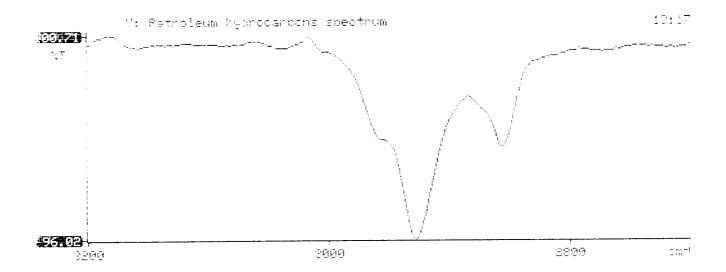
Initial mass of sample, g 2.080

Volume of sample after extraction, ml

 Petroleum hydrocarbons, ppm 78.305

Met absorbance of hydrocarbons (2930 cm-1)

0.020



\* \*