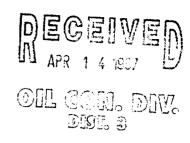
DEPUTY OIL & GAS INSPECTOR
DEC 3 0 1997

Meter Number:70321
Location Name:HUGHES B #6
Location:TN-29 RG-08
SC-21 UL-G
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

Meter: 70321 Location: Hughes B No. 6 Operator #: 0203 Operator Name: AMAGO P/L District: Blanco Coordinates: Letter: G Section Z/ Township: Z9 Range: 8 Latitude _____ Longitude _____ Pit Type: Dehydrator 🗶 Location Drip: ___ Line Drip: ___ Other: ____ Site Assessment Date: 6-8-94 Area: 13 Run: 21 NMOCD Zone: Land Type: BLM \boxtimes (1) (From NMOCD State (2)Maps) Inside _] (1) Fee (3)Outside \boxtimes (2) Indian Depth to Groundwater Less Than 50 Feet (20 points) 50 Ft to 99 Ft (10 points) Greater Than 100 Ft (0 points) Wellhead Protection Area: SITE ASSESSMENT 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) 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) \Box (2) > 100' TOTAL HAZARD RANKING SCORE: REMARKS Remarks: Two pits on location. location outside V.Z. on Relline & Topo

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 70321 Location: Mogles B #6 Coordinates: Letter: & Section 21 Township: 29 Range: 8 Or Latitude Longitude Date Started: 2-2-94 Run: 13 21
FIELD OBSERVATIONS	Sample Number(s): MK2/3 Sample Depth: _lo' Feet Final PID Reading _248 PID Reading Depth _/o` Feet Yes No Groundwater Encountered
CLOSURE	Remediation Method: Excavation
REMARKS	Remarks: FPNE lives marker Soil Gray strong Hyprocarbon zdor Hit Sand Stone 10' Signature of Specialist: Margan Killian (SP3181) 03/16/84



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

_	0	Lab ID					
SAMPLE NUMBER:	MK 213		945824				
MTR CODE SITE NAME:	7032		N/A				
SAMPLE DATE TIME (Hrs):	9-2-94	1505					
SAMPLED BY:	SAMPLED BY:						
DATE OF TPH EXT. ANAL.:	90/4/94	8 4 94					
DATE OF BTEX EXT. ANAL.:	NIA	Fine grey sand					
TYPE DESCRIPTION:	Y G-						
REMARKS:	R	ESULTS					
PARAMETER	RESULT	UNITS	QUALIFIERS				
TAILAINETEN			DF	Q	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)	14,500	MG/KG			0,53	28	
HEADSPACE PID	248	PPM					
PERCENT SOLIDS	94,6	%		<u></u> x			
he Surrogate Recovery was at larrative:	- TPH is by EPA Method 418	8.1 and BTEX is by EPA % for this sampl		was accep	otable.		
OF = Dilution Factor Used					,		
Approved By:			Date:	8/12/0	gy		

Test Method for a control of the con

