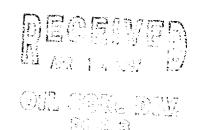
DEC 3 C BIL

Meter Number: 70225
Location Name: ROELOFS A #3
Location: TN-29 RG-08
SC-09 UL-A
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: Nolls Location: Rescors A #3 Operator #: 0203 Operator Name: Amoro P/L District: BloomFisip Coordinates: Letter: A Section G Township: 29 Range: 8 Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: 5:10:94 Area: 10 Run: 41
SITE ASSESSMENT	NMOCD Zone: (From NMOCD (From NMOCD Maps) Inside Outside Outside (I) Fee (3) Outside (2) Indian 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) (2) Greater Than 1000 Ft (10 points) (3) Name of Surface Water Body (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: THREE PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY. LOCATION IS ON MANZANAPER MESA. REDLINE AND TOPO CONFIRMED LOCATION TO BE OUTSIDE THE V.Z. PIISH IN

FIELD PIT REMEDIATION/ CLUSURE FURM

GENERAI	Meter: 70225 Location: Roelofs A#3 Coordinates: Letter: A Section 9 Township: 29 Range: 8 Or Latitude Longitude Date Started: 5-23-94 Area: 10 Run: 41
FIELD OBSERVATIONS	Sample Number(s): \(\frac{\sqrt{W \sqrt{\syn}}}}}\sqrt{\sint{\sint{\sint{\sq}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}
CLOSURE	Remediation Method : Excavation
	Soil Disposition: Envirotech
REMARKS	Remarks: No line malkers. Signature of Specialist: Val Wilan



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

VW I	40	■ 7.33 k			
	10	4-2494 945- 945281		181	
70225 5-23-94		N/A			}
N/A					:
5. 24-94 N/A VG		Stave one Sand			
					:
	RESULTS				
RESULT	UNITS		QUALIFIERS		
		DF	Q	M(g)	V(mi
	MG/KG				
	MG/KG				
	MG/KG				
	MG/KG		···		
	MG/KG				
3640	MG/KG			2.61	2.8
274 	PPM				
93.6	%				
- TPH is by EPA Method 4					
<u> </u>	_% for this sampl	e All QA/QC	was accep	table.	
	8.24- M/A VG RESULT	RESULTS RESULT UNITS MG/KG MG/KG	RESULTS RESULT UNITS MG/KG MG/KG	RESULTS RESULT UNITS OUALIF DF O MG/KG All OA/OC was acception.	N/A

Test Method for A Oil and Grease and Petroloum Hydrocarbons A in Water and Ecil Perkin-Elmen Model 1800 FT-IR Analysis Report Tampile Campiticalism The production of the second control of the in the second of THE SHAPE