

Denny E. Foust
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

Approved

Meter Number:90468
Location Name:HUGHES B #6A
Location:TN-29 RG-08
SC-21 UL-J
2 - Federal
NMOCD Zone:OUTSIDE
Hazard Ranking Score:00

RECEIVED
APR 14 1997
OIL & GAS DIV.
EL PASO

**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.

GENERAL

Meter: 90468 Location: Hughes 3 No. 6A
 Operator #: 0203 Operator Name: Amoco P/L District: Blanco
 Coordinates: Letter: J Section 21 Township: 29N Range: 8W
 Or Latitude _____ Longitude _____
 Pit Type: Denydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 6-8-94 Area: 13 Run: 21

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

Land Type:

BLM ☒ (1)

State ☐ (2)

Fee ☐ (3)

Indian _____

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 _____

(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: 0 POINTS

REMARKS

Remarks : Three pits. Deny pit adjacent to Meter house
Dry

Outside V.Z. on Redline & Topo

Push in

ORIGINAL PIT LOCATION

A hand-drawn diagram showing a circle with a horizontal and vertical axis. A line segment extends from the center of the circle into the first quadrant, making an angle of 49° with the vertical axis and 48° with the horizontal axis. This line segment passes through a square. The top side of the square is labeled $z6$ and the right side is labeled $z5$.

REMARKS

Remarks : Photos @ 1553 hrs

Completed By: Tim Walth

68-94

Date _____

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>90468</u> Location: <u>HUGHES B # 6A</u> Coordinates: Letter: <u>T</u> Section <u>21</u> Township: <u>29</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Date Started : <u>8-3-94</u> Run: <u>13</u> <u>21</u>
FIELD OBSERVATIONS	Sample Number(s): <u>MK 214</u> Sample Depth: <u>5'</u> Feet Final PID Reading <u>175</u> PID Reading Depth <u>5'</u> Feet Yes No Groundwater Encountered ☐ ☒ Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation ☐ Approx. Cubic Yards _____ Onsite Bioremediation ☐ Backfill Pit Without Excavation ☒ Soil Disposition: Envirotech ☐ Tierra ☐ Other Facility ☐ Name: _____ Pit Closure Date: <u>8-3-94</u> Pit Closed By: <u>BEI</u>
REMARKS	Remarks : <u>EPNG lines marked soil Gray strong HYDROCARBON</u> <u>odor Hit Sandstone 5'</u>
	Signature of Specialist: <u>Morgan Killian</u>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 214	945829
MTR CODE SITE NAME:	90468	N/A
SAMPLE DATE TIME (Hrs):	8-3-94	0835
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8-4-94	8-4-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	grey sand + clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			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)	4550	MG/KG			0.50	28
HEADSPACE PID	175	PPM				
PERCENT SOLIDS	91.6	%				

– TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 –

The Surrogate Recovery was at N/A % for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By: AS

Date: 8/17/94

Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil
Perkin-Elmer Model 1600 FT-IR
Analysis Report

04/08/04 12:58

Sample identification
045629

Initial mass of sample, g
1.500

Volume of sample after extraction, ml
15.000

Petroleum hydrocarbons, ppm
1748.869
Net absorbance of hydrocarbons (253° cm-1)
1.01

