DEL S (last

Meter Number:95592

Location Name: PRICHARD FEDERAL #4

Location:TN-29 RG-08 SC-06 UL-K 2 - Federal

NMOCD Zone:OUTSIDE

Hazard Ranking Score:00

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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 ELPASOFIELDS

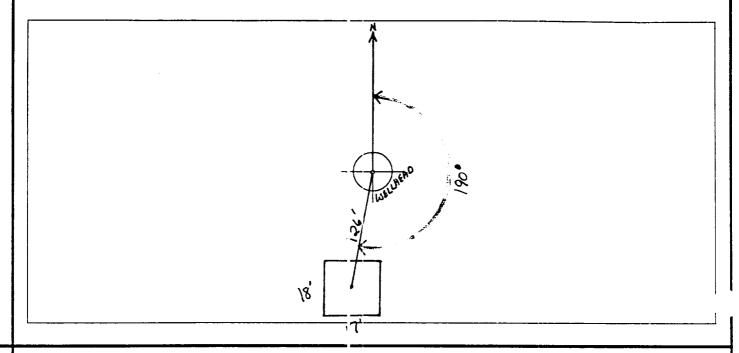
GENERAL	Meter: 95592 Location: PRICHARD FEDERAL #4 Operator #: 2999 Operator Name: MERIDIAN P/L District: Bloomfield Coordinates: Letter: K Section 6 Township: 29 Range: 8 Or Latitude Longitude Pit Type: Dehydrator Location Drip: X Line Drip: Other: Site Assessment Date: 5.8.94 Area: 10 Run: 31
SITE ASSESSMENT	NMOCD Zone: (From NMOCD (From NMOCD Maps) Inside Outside 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? Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) Horizontal Distance to Surface Water Body Less Than 200 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: Description Distance Description Outside (1) State (2) Indian (1) Fee (3) Notion State (2) For a the indian (1) (2) NO (0 points) (2) NO (0 points) (3) Nome of Surface Water Body (5) Coreater Than 1000 Ft (10 points) (5) Coreater Than 1000 Ft (10 points) (1) Coreater Than 1000 Ft (10 points) (2) Coreater Than 1000 Ft (10 points) (3) Name of Surface Water Body (5) For a the indian (1) < 100'(Navajo Pits Only) (2) > 100' TOTAL HAZARD RANKING SCORE: Description
REMARAS	Remarks: ONLY PIT ON LOCATION PIT IS DRY, LOCATION IS ON TOP OF MANZANARES MESA. REDLINE AND TOPO CONFIRMED LOCATION TO RE OUTSIDE THE V.Z. (SP3190) 04/08/94

REMARKS

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 190° Footage from Wellhead 124'

b) Length: _____3'____



Remarks	:
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TOOK PICTURES AT 1:37 P.M.

END DUMP

Completed By:

Signature

5.8.94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 95592 Location: PRickars Federal #4 Coordinates: Letter: K Section 6 Township: 29 Range: 8 Or Latitude Longitude Date Started: 6-28-94 Area: 10 Run: 31
FIELD OBSERVATIONS	Sample Number(s): MK 55 Sample Depth: Feet Final PID Reading PID Reading Depth Feet Yes No Groundwater Encountered [(1) [(2) Approximate Depth Feet
CLOSURE	Remediation Method: Excavation
REMARKS	Remarks: FNG lives Marked Soil light Brown Strong HY Dro Carbon Jor Hit Sand Stone 3' Signature of Specialist: Morgan Xillian



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

SAMPLE NUMBER: MTR CODE SITE NAME: SAMPLE DATE TIME (Hrs): SAMPLED BY: DATE OF TPH EXT. ANAL.: TYPE DESCRIPTION: REMARKS: RESULTS R		Field	I ID		Lab ID		
SAMPLE DATE TIME (Hrs): SAMPLED BY: DATE OF TPH EXT. ANAL.: DATE OF BTEX EXT. ANAL.: TYPE DESCRIPTION: REMARKS: RESULTS RESULTS RESULTS RESULTS RESULTS RESULTS RESULTS RESULTS RESULT UNITS QUALIFIERS DF Q M(g) V(ml) BENZENE MG/KG TOLUENE MG/KG ETHYL BENZENE MG/KG TOTAL XYLENES MG/KG TOTAL XYLENES MG/KG TOTAL BTEX MG/KG TOTAL BTEX MG/KG TPH (418.1) 2090 MG/KG PPM PERCENT SOLIDS 72.0 % 1 TPH is by EPA Method 418.1 and STEX is by EPA Method 8020 – TPH is by EPA Method 418.1 and STEX is by EPA Method 8020 – TOPH is by EPA Method 418.1 and STEX is by EPA Method 8020 – N A for this sample All QA/QC was acceptable.	SAMPLE NUMBER:	IPLE NUMBER: m1455			945546		
SAMPLED BY: DATE OF TPH EXT. ANAL.: DATE OF BTEX EXT. ANAL.: TYPE DESCRIPTION: REMARKS: RESULTS RESULT UNITS DF Q M(g) V(ml) RESULTS	MTR CODE SITE NAME:	95592					
DATE OF TPH EXT. ANAL.: DATE OF BTEX EXT. ANAL.: TYPE DESCRIPTION: REMARKS: RESULTS RESULTS RESULTS RESULTS RESULTS RESULTS RESULTS OUALIFIERS DF Q M(g) V(m) BENZENE MG/KG TOLUENE MG/KG ETHYL BENZENE MG/KG TOTAL XYLENES MG/KG TOTAL XYLENES MG/KG TOTAL BTEX MG/KG TOTAL BTEX MG/KG PPM PERCENT SOLIDS 72.0 % for this sample All QA/QC was acceptable.	SAMPLE DATE TIME (Hrs):	6-28-e	1		1321		
DATE OF BTEX EXT. ANAL.: TYPE DESCRIPTION: REMARKS: RESULTS RESULTS RESULTS RESULTS RESULTS OUALIFIERS DF Q M(g) V(ml) BENZENE MG/KG TOLUENE MG/KG ETHYL BENZENE MG/KG TOTAL XYLENES MG/KG TOTAL STEX MG/KG TOTAL BTEX MG/KG TOTAL BTEX MG/KG TOTAL BTEX MG/KG TOTAL BTEX MG/KG PPM PERCENT SOLIDS 72.0 6 for this sample All QA/QC was acceptable.	SAMPLED BY:	············	N/A				
RESULTS RESULTS RESULTS RESULT UNITS QUALIFIERS DF Q M(g) V(ml) BENZENE MG/KG TOLUENE ETHYL BENZENE MG/KG TOTAL XYLENES MG/KG TOTAL BTEX MG/KG TOTAL BTEX MG/KG HEADSPACE PID PERCENT SOLIDS 72.0 "TOPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 — TOPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 — TOPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 — TOPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 — TOPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 — TOPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 — A) A for this sample All QA/QC was acceptable.	DATE OF TPH EXT. ANAL.:			6/30/94			
RESULTS	DATE OF BTEX EXT. ANAL.:						
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 TOTAL BTEX MG/KG TPH (418.1) 2090 MG/KG PPM PERCENT SOLIDS 72.0 4 for this sample All QA/QC was acceptable.	TYPE DESCRIPTION:	V G-		Lourse al	(1) ionor)	Tand/Clary	
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DF Q M(g) V(ml) BENZENE			RESULTS				
BENZENE MG/KG TOLUENE MG/KG ETHYL BENZENE MG/KG TOTAL XYLENES MG/KG TOTAL BTEX MG/KG TPH (418.1) 2090 MG/KG HEADSPACE PID 156 PPM PERCENT SOLIDS 72.0 % -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.	PARAMETER	RESULT UNITS			QUALIFIERS		
TOLUENE MG/KG ETHYL BENZENE MG/KG TOTAL XYLENES MG/KG TOTAL BTEX MG/KG TPH (418.1) 2090 MG/KG HEADSPACE PID 156 PPM PERCENT SOLIDS 72.0 % - TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 - The Surrogate Recovery was at NA 6 for this sample All QA/QC was acceptable.			· · · · · · · · · · · · · · · · · · ·	DF	Q	M(g)	V(ml)
ETHYL BENZENE MG/KG MG/KG TOTAL BTEX MG/KG MG/KG TPH (418.1) 2090 MG/KG PPM PERCENT SOLIDS 72.0 A TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 – The Surrogate Recovery was at NAME AND A STEX Sample All QA/QC was acceptable.	BENZENE		MG/KG				
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HEADSPACE PID 156 PPM PERCENT SOLIDS 72.0 % - 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.	TOTAL BTEX		MG/KG				
PERCENT SOLIDS 72.0 % - 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.	TPH (418.1)	2090	MG/KG			2.01	28
he Surrogate Recovery was at \(\bigcap \) \	HEADSPACE PID	156	PPM				
he Surrogate Recovery was at $\frac{\mathcal{N}\mathcal{H}}{\mathcal{H}}$ % for this sample All QA/QC was acceptable.	PERCENT SOLIDS	92.0	%				
	he Surrogate Recovery was at	11.0			was accep	table.	

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

94/06/30 14:10

Sample identification 945546

Initial mass of sample, g 2.010

Volume of sample after extraction, ml 28.000

Petroleum hydrocarbons, ppm 2093.071

Net absorbance of hydrocarbons (2930 cm-1) .264



