

Denny E. Faust
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

Approved

Meter Number: 93310
Location Name: DUDLEY CORNELL A #1E
Location: TN-29 RG-12
SC-01 UL-G
2 - Federal
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
APR 14 1997

OIL CON. DIV.
DITL 3

**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



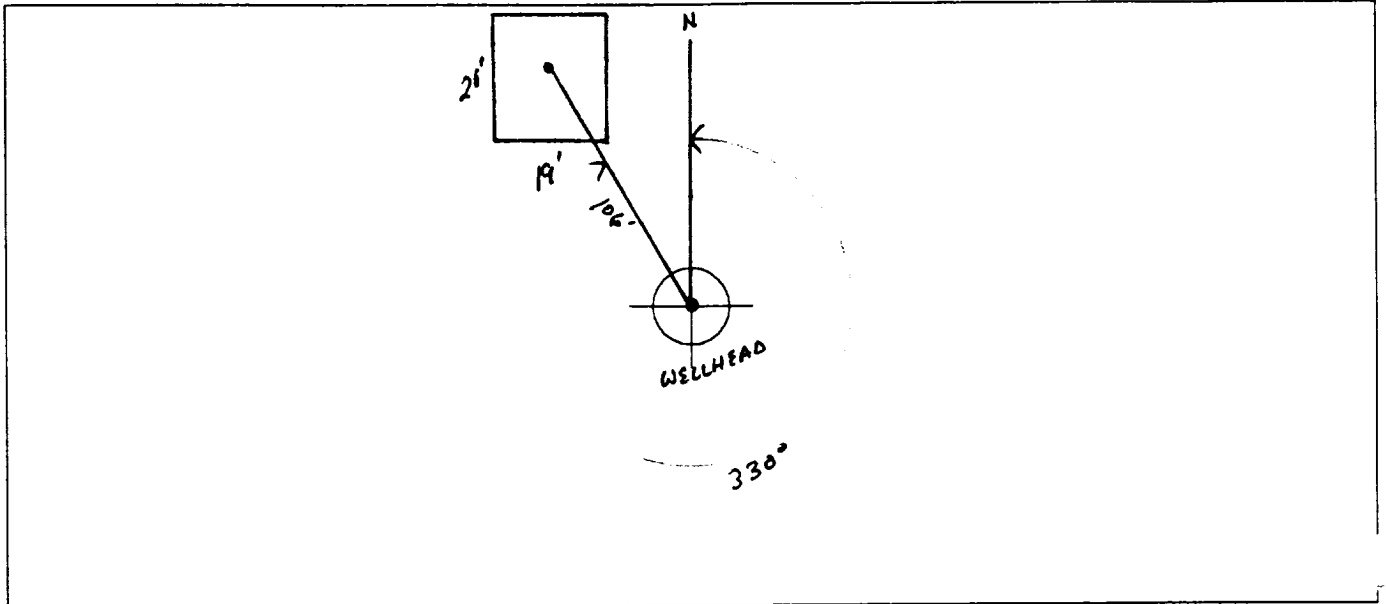
EL PASO FIELD SERVICES

GENERAL	<p>Meter: <u>93310</u> Location: <u>DUDLEY CORNELL A #1E</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>1</u> Township: <u>29</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <u>X</u> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>3.21.94</u> Run: <u>02</u> <u>41</u></p>
	SITE ASSESSMENT
REMARKS	

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 330° Footage to Wellhead 106'
b) Degrees from North _____ Footage to Dogleg _____
Dogleg Name _____
c) Length : 21' Width : 19' Depth : 4'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 11:42 A.M.

END DUMP

Completed By:

Paul Thompson
Signature

3.21.94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 933D Location: Dudley Cornell A#1E
 Coordinates: Letter: G Section 1 Township: 29 Range: 12
 Or Latitude _____ Longitude _____
 Date Started : 5-13-94 Area: 02 Run: 41

FIELD OBSERVATIONS

Sample Number(s): VW72
 Sample Depth: 5' Feet
 Final PID Reading 189 PID Reading Depth 5' Feet
 Yes No
 Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :
 Excavation ☐ (1) Approx. Cubic Yards _____
 Onsite Bioremediation ☐ (2)
 Backfill Pit Without Excavation ☒ (3)
 Soil Disposition:
 Envirotech ☐ (1) ☐ (3) Tierra
 Other Facility ☐ (2) Name: _____
 Pit Closure Date: 5-13-94 Pit Closed By: BEI

REMARKS

Remarks : No line markers. Hit sandstone at 5'

Signature of Specialist: Vale Wilson



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 72	945163
MTR CODE SITE NAME:	93310	W/A
SAMPLE DATE TIME (Hrs):	5-13-94	1230
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	5/17/94	5/17/94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/gray sand

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)	6990	MG/KG			1648	28
HEADSPACE PID	189	PPM				
PERCENT SOLIDS	89.7	%				

-- 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:

Jon Lulder

Date:

6/15/94

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

74/05/17 16:02

Sample Identification
245163

Initial mass of sample, g
0.480

Volume of sample after extraction, ml
10.00

Petroleum hydrocarbons, ppm
988.527
Net absorbance of hydrocarbons (2930 cm-1)
0.650

