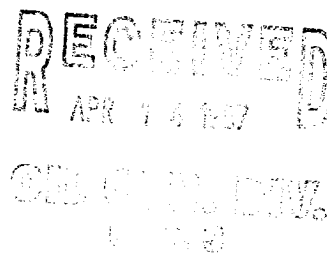


*Denny E. Faust*  
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

*Approved*

Meter Number: 93892  
Location Name: SIMMONS E #3R  
Location: TN-29 RG-09  
SC-24 UL-L  
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: 93892 Location: SIMMONS E #3R  
 Operator #: \_\_\_\_\_ Operator Name: DJ. SIMMONS P/L District: BLANCO  
 Coordinates: Letter: L Section 24 Township: 29 Range: 9  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Pit Type: Dehydrator ☒ Location Drip: \_\_\_\_\_ Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
 Site Assessment Date: 1.27.95 Area: 13 Run: 51

SITE ASSESSMENT

## NMOCD Zone:

(From NMOCD  
Maps)

Inside

Outside

## Land Type:

BLM

State

Fee

Indian

☒ (1)

☐ (2)

☐ (3)

☐ (1)

☒ (2)

## Depth to Groundwater

Less Than 50 Feet (20 points)

50 Ft to 99 Ft (10 points)

Greater Than 100 Ft (0 points)

☐ (1)

☐ (2)

☒ (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)

200 Ft to 1000 Ft (10 points)

Greater Than 1000 Ft (0 points)

☐ (1)

☐ (2)

☒ (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: 6 POINTS

REMARKS

Remarks : REDLINE : TOPO SHOW LOCATION OUTSIDE V.2. 3 PITS ON LOCATION.  
UNLINED DEHY PIT BELONGS TO EPAIG. MUST CONTACT OPERATOR TO  
HAVE THEM ON SITE BEFORE CLOSURE OF THIS PIT!!

PUSH IN

# ORIGINAL PIT LOCATION

A hand-drawn diagram showing a wellhead and a rectangular structure. The wellhead is represented by a circle with a horizontal line through its center, labeled "WELLHEAD" below it. A vertical line with an arrow pointing upwards is labeled "N" at the top. A line segment connects the center of the wellhead to a point inside a rectangle. This line segment is labeled "19'" near the wellhead and "21'" near the rectangle. An arc indicates an angle of  $322^\circ$  between the vertical "N" line and the line segment. The rectangle is labeled "21'" on its left side. The line segment is also labeled "19'" near the wellhead.

REMARKS

PHOTOS - 1191

  
Signature

(SP31908) 04/07/94

# FIELD PIT REMEDIATION/CLOSURE FORM

|                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>GENERAL</b>                                 | Meter: <u>93892</u> Location: <u>SW Simmons E# 3R</u><br>Coordinates: Letter: <u>L</u> Section <u>24</u> Township: <u>29</u> Range: <u>9</u><br>Or Latitude _____ Longitude _____<br>Date Started : <u>7-18-95</u> Run: <u>13</u> <u>51</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>FIELD OBSERVATIONS</b>                      | Sample Number(s): <u>MK 441</u> <sup>EX 44/95</sup><br>Sample Depth: <u>12</u> Feet<br>Final PID Reading <u>85 PPM</u> PID Reading Depth <u>12</u> Feet<br><div style="text-align: center;">Yes      No</div> Groundwater Encountered <input type="checkbox"/> <input type="checkbox"/> Approximate Depth _____ Feet                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>CLOSURE</b>                                 | Remediation Method :<br><div style="display: flex; justify-content: space-between;"> <div>           Excavation<br/>           Onsite Bioremediation<br/>           Backfill Pit Without Excavation         </div> <div style="text-align: right;"> <input type="checkbox"/> Approx. Cubic Yards _____<br/> <input type="checkbox"/><br/> <input checked="" type="checkbox"/> </div> </div> Soil Disposition:<br><div style="display: flex; justify-content: space-between;"> <div>           Envirotech<br/>           Other Facility         </div> <div style="text-align: right;"> <input type="checkbox"/> <input type="checkbox"/> Tierra<br/> <input type="checkbox"/> Name: _____         </div> </div> Pit Closure Date: <u>7-18-95</u> Pit Closed By: <u>PL/PS</u> |
| <b>REMARKS</b>                                 | Remarks : <u>Arrived took fence down dug sample hole</u><br><u>Soil was gray with strong hydrocarbon odor all the way through</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Signature of Specialist: <u>Morgan Killion</u> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |



## FIELD SERVICES LABORATORY

### ANALYTICAL REPORT

#### PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

#### SAMPLE IDENTIFICATION

|                            | Field ID | Lab ID                  |
|----------------------------|----------|-------------------------|
| SAMPLE NUMBER:             | mk 441   | 947029                  |
| MTR CODE   SITE NAME:      | 93892    | N/A                     |
| SAMPLE DATE   TIME (Hrs):  | 7-18-95  | 1530                    |
| SAMPLED BY:                | N/A      |                         |
| DATE OF TPH EXT.   ANAL.:  | 7-19-95  | 7-19-95                 |
| DATE OF BTEX EXT.   ANAL.: |          |                         |
| TYPE   DESCRIPTION:        | VG       | light brown sand + clay |

REMARKS:

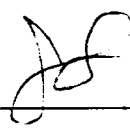
#### RESULTS

| PARAMETER      | RESULT | UNITS | QUALIFIERS |   |      |       |
|----------------|--------|-------|------------|---|------|-------|
|                |        |       | DF         | Q | M(g) | V(ml) |
| TPH (418.1)    | 4470   | MG/KG |            |   | 2.52 | 25    |
| HEADSPACE PID  | 2      | PPM   |            |   |      |       |
| PERCENT SOLIDS | 93.0   | %     |            |   |      |       |

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: 

Date: 8/1/95

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

Perkin-Elmer Model 1600 FT-IR  
 Analysis Report  
 \*\*\*\*\*

95/07/19 14:21

Sample identification  
 947029

Initial mass of sample, g  
 2.020

Volume of sample after extraction, ml  
 28.000

Petroleum hydrocarbons, ppm  
 4469.858

Net absorbance of hydrocarbons (2930  $\text{cm}^{-1}$ )  
 0.556

Y: Petroleum hydrocarbons spectrum

14:21

