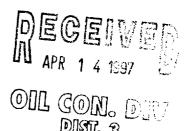
DEPUTY OIL & GAS MISPECTOR

DEC 22 1997

Meter Number:87207
Location Name:E.E. ELLIOTT A NO.3
Location:TN-30 RG-09
SC-15 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 FOR IL PASO FIELD SERVICES

GENERAL	Meter: 87-207 Location: <u>EE. ELLIDTT</u> "A" ND.J  Operator #: <u>O2DJ</u> Operator Name: <u>Amoco</u> P/L District: <u>Bloomfiell</u> Coordinates: Letter: <u>L</u> Section <u>IS</u> Township: <u>JD</u> Range: <u>9</u> Or Latitude Longitude  Pit Type: Dehydrator Location Drip: X Line Drip: Other:  Site Assessment Date: <u>Y/25/94</u> Area: <u>ID</u> Run: <u>JJ</u>			
	NMOCD Zone:       Land Type:       BLM       □ (1)         (From NMOCD       State       □ (2)         Maps)       Inside       □ (1)       Fee       □ (3)         Outside       □ (2)       Indian       □         Depth to Groundwater       □ (1)       □ (1)         Less Than 50 Feet (20 points)       □ (1)       □ (2)         So Ft to 99 Ft (10 points)       □ (2)         Greater Than 100 Ft (0 points)       □ (3)			
SITE ASSESSMENT	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: POINTS			
REMARKS	Remarks: 3 pits on site. Will close only one Redline book show site in vulnerable area. Vuln. area map shows it outside			
3MA	The same of the sa			
RI	Publo			

1	Meter: \$7207 Location: ELEII:04 A" # 3
GEL RAL	Coordinates: Letter: <u>L</u> Section <u>LS</u> Township: <u>30</u> Range: <u>9</u> Or Latitude Longitude  Date Started: <u>5-17-94</u> Area: <u>N</u> Run: <u>33</u>
FIELD OBSERVATIONS	Sample Number(s): VU98  Sample Depth: 12' Feet  Final PID Reading 169 PID Reading Depth 12' Feet  Yes No  Groundwater Encountered (1) (2) Approximate Depth Feet
OSURE	Remediation Method:  Excavation
SOTO	Soil Disposition:  Envirotech (1) (3) Tierra  Other Facility (2) Name:  Pit Closure Date: 5-17-94 Pit Closed By: 13ET
REMARKS	Remarks: Line Markers - 1ft. Paratin in hole. RC said stiv it up + sample.
, 1	Signature of Specialist: Vale Wulsey



# FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

### SAMPLE IDENTIFICATION

	Field ID	Lab ID		
SAMPLE NUMBER:	vw 98	945215		
MTR CODE   SITE NAME:	87207	N/A		
SAMPLE DATE   TIME (Hrs):	5-17-94	1515		
SAMPLED BY:	A/A			
DATE OF TPH EXT.   ANAL.:	5-18-94	5/18/94		
DATE OF BTEX EXT.   ANAL.:	NIA	NA		
TYPE   DESCRIPTION:	VG	Trey sand I Clay		
•		J		

REMARKS:	

#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
PAKAWETER			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)	405 <b>60</b>	MG/KG			.16	28
HEADSPACE PID	169	РРМ			_	
PERCENT SOLIDS	92.2	%			<u></u>	

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 -- % for this sample All QA/QC was acceptable.

Dilution	Eactor	l lead

Narrative:

The Surrogate Recovery was at

Approved By: John Jardin

Date: 5/21/94

