

Henry B. [Signature]
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Approved

Meter Number: 87632
Location Name: UTE MOUNTAIN TRIBAL J-#2
Location: TN-31 RG-14
SC-11 UL-L
7 - Mtn. Ute
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
APR 14 1997

OIL CON. DIV.
DIST. 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

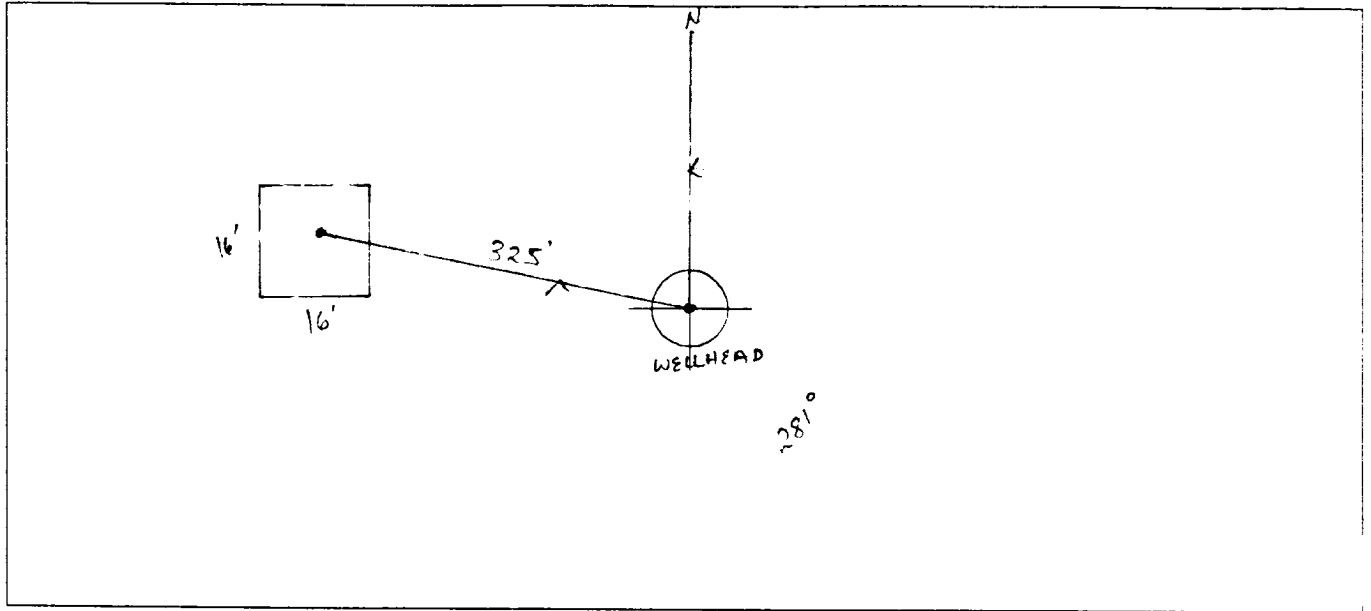


EL PASO FIELD SERVICES

GENERAL	<p>Meter: <u>87632</u> Location: <u>UTE MOUNTAIN TRIBAL J-#2</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>FMOCO</u> P/L District: <u>LUTZ</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>11</u> Township: <u>31</u> Range: <u>14</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>3.30.94</u> Run: <u>02</u> <u>42</u></p>
SITE ASSESSMENT	<p>NMOCD Zone: Inside <input type="checkbox"/> Land Type: BLM <input type="checkbox"/> (From NMOCD Vulnerable <input type="checkbox"/> State <input type="checkbox"/> Maps) Zone <input type="checkbox"/> Fee <input type="checkbox"/> Outside <input checked="" type="checkbox"/> Indian <u>UTE RESERV.</u></p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> 50 Ft to 99 Ft (10 points) <input type="checkbox"/> Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/></p> <p>Wellhead Protection Area :</p> <p>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? <input type="checkbox"/> YES (20 points) <input checked="" type="checkbox"/> NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/></p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>
REMARKS	<p>Remarks : <u>TWO PITS ON LOCATION. WILL CLOSE ONLY ONE.</u> <u>PIT IS DRY. LOCATION IS NOT EASILY ACCESSIBLE. TAKE CAUTION</u> <u>WITH EQUIPMENT.</u></p>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 281° Footage to Wellhead 325'
 b) Degrees from North _____ Footage to Dogleg _____
 Dogleg Name _____
 c) Length : 16' Width : 16' Depth : 3'



REMARKS :

STARTED TAKING PICTURES AT 9:45 A.M.
DUMP TRUCK - BOBTAIL

Completed By:

Robert Thompson
 Signature

3.30.94
 Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 87632 Location: Ute Mountain Tribek #2
 Coordinates: Letter: L Section 11 Township: 31 Range: 14
 Or Latitude _____ Longitude _____
 Date Started : 10-19-95 Run: 02 42

FIELD OBSERVATIONS

Sample Number(s): 1P61
 Sample Depth: 5 Feet
 Final PID Reading 2 ppm PID Reading Depth 5 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: 10-19-95 Pit Closed By: Philip Env.

REMARKS

Remarks : Dug down to 5 Ft, hit sandstone, Took PID
Reading it was 2 ppm, Back Filled with 10 yds.

Signature of Specialist: James J. Penrose



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JP61	947681
MTR CODE SITE NAME:	87632	Ute Mountain Tribal J #2
SAMPLE DATE TIME (Hrs):	10-19-95	1130
PROJECT:	Phase I	
DATE OF TPH EXT. ANAL.:	10/20/95	
DATE OF BTEX EXT. ANAL.:	10/20/95	10/20/95
TYPE DESCRIPTION:	V6	Light Brown Sand & Clay

Field Remarks:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	128	MG/KG			2.03	28
HEADSPACE PID	2	PPM				
PERCENT SOLIDS	95.1	%				

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

The Surrogate Recovery was at 105% for this sample All QA/QC was acceptable.
Narrative:

DF = Dilution Factor Used

Approved By:

John L. Ladd

Date:

10-24-95

BTEX SOIL SAMPLE WORKSHEET

File	:	947681	Date Printed	:	10/23/95
Soil Mass (g)	:	4.99	Multiplier (L/g)	:	0.00100
Extraction vol. (mL)	:	10	CAL FACTOR (Analytical):		200
Shot Volume (uL)	:	50	CAL FACTOR (Report):		0.20040

			DILUTION FACTOR:	1	Det. Limit
Benzene (ug/L)	:	0.00	Benzene (mg/Kg):	0.000	0.501
Toluene (ug/L)	:	0.20	Toluene (mg/Kg):	0.040	0.501
Ethylbenzene (ug/L)	:	0.00	Ethylbenzene (mg/Kg):	0.000	0.501
p & m-xylene (ug/L)	:	0.20	p & m-xylene (mg/Kg):	0.040	1.002
o-xylene (ug/L)	:	0.00	o-xylene (mg/Kg):	0.000	0.501
			Total xylenes (mg/Kg):	0.040	1.503
			Total BTEX (mg/Kg):	0.080	

EL PASO NATURAL GAS

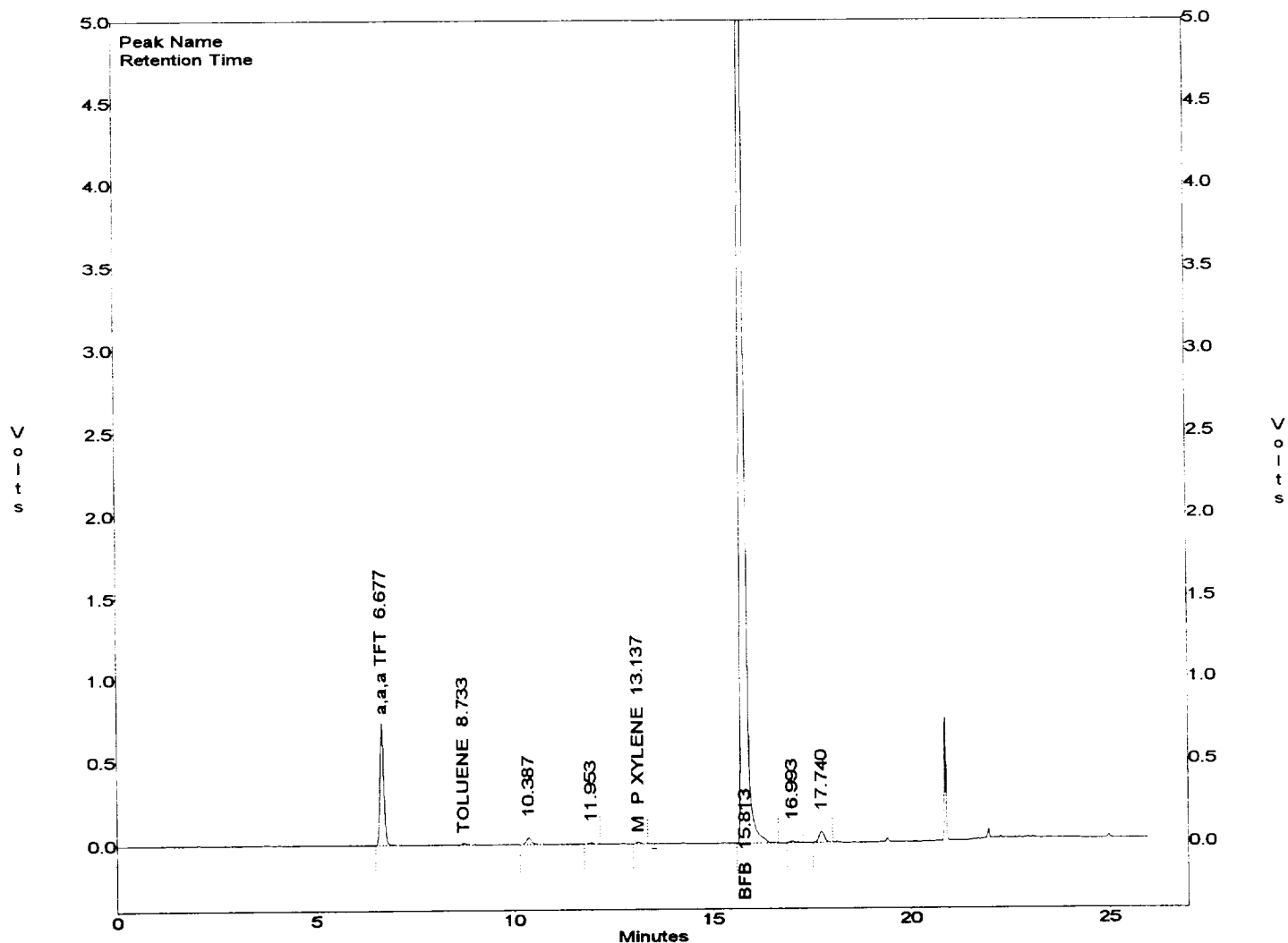
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\102095-1.009
 Method : C:\LABQUEST\METHODS\1-101395.MET
 Sample ID : 947681,4.99G,50U
 Acquired : Oct 20, 1995 18:41:20
 Printed : Oct 20, 1995 19:07:41
 User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	4.873	0	0.0000
a,a,a TFT	6.677	4859257	108.4808
TOLUENE	8.733	70484	0.1959
ETHYLBENZENE	12.740	0	0.0000
M & P XYLENE	13.137	79812	0.1971
O XYLENE	14.223	0	0.0000
BFB	15.813	72484256	105.1690

C:\LABQUEST\CHROM001\102095-1.009 -- Channel A



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

95/10/20 14:48

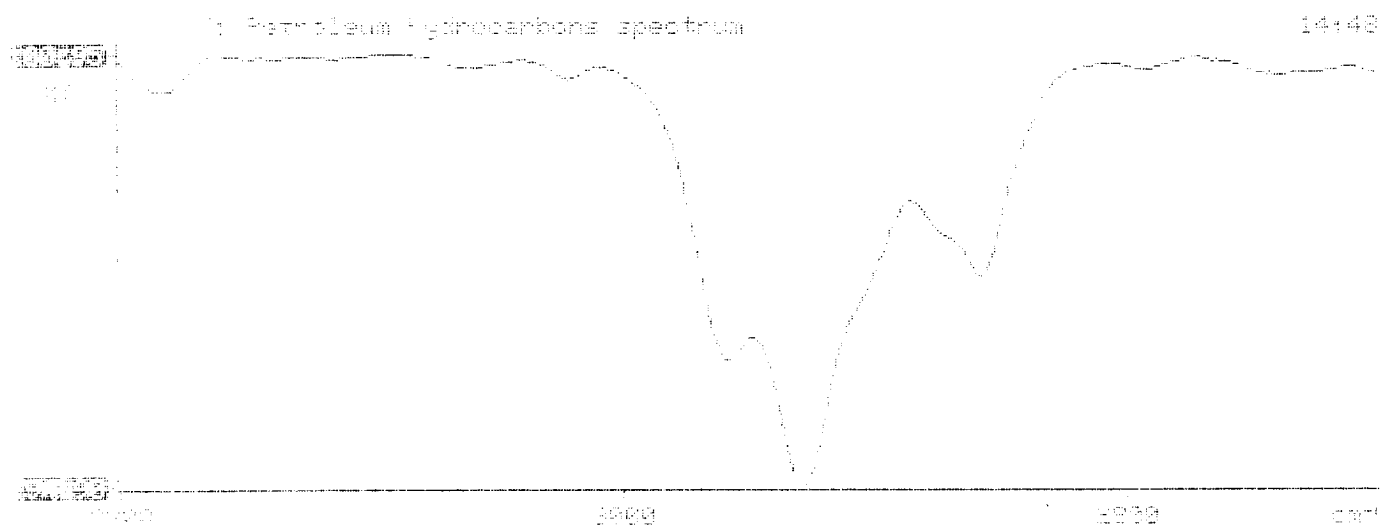
Sample identification
 947481

Initial mass of sample, g
 11.730

Volume of sample after extraction, ml
 20.000

Petroleum hydrocarbons, ppm
 1.844

Net absorbance of hydrocarbons (2930 cm-1)
 0.024



ILLEGIBLE