

Denny S. [Signature]
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Approved

Meter Number: 89117
Location Name: HOLT #1
Location: TN-32 RG-11
SC-19 UL-G
4 - Fee
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

LEPFS

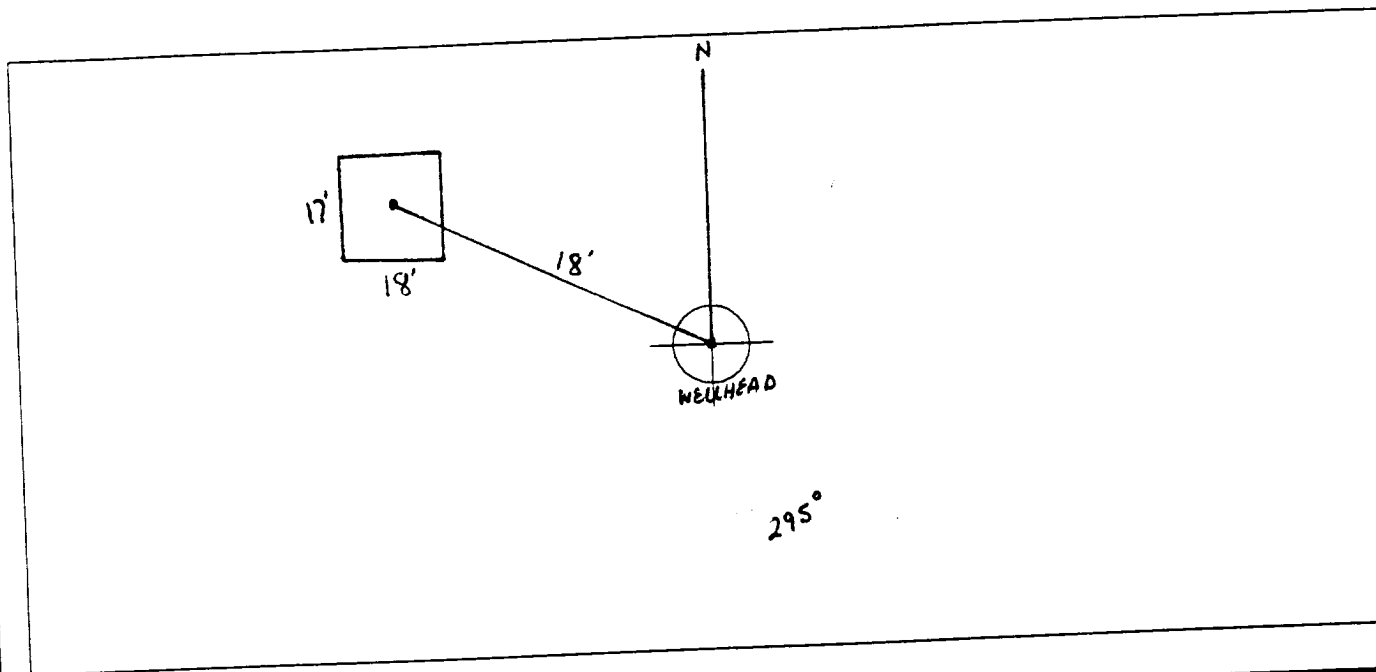
EL PASO FIELD SERVICE

GENERAL	Meter: <u>89112</u> Location: <u>HOLT #1</u> Operator #: <u>6500</u> Operator Name: <u>N.W.P.</u> P/L District: <u>KUTZ</u> Coordinates: Letter: <u>6</u> Section <u>19</u> Township: <u>32</u> Range: <u>11</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: _____ Other: <u>X</u> Site Visit Date: <u>3.29.94</u> Run: <u>02</u> <u>81</u>
SITE ASSESSMENT	NMOCD Zone: Inside _____ Land Type: BLM ☐ (From NMOCD Vulnerable _____ State ☐ Maps) Zone ☐ Fee ☒ Outside ☒ Indian _____ Depth to Groundwater Less Than 50 Feet (20 points) ☐ 50 Ft to 99 Ft (10 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? ☐ YES (20 points) ☒ 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) ☒ Name of Surface Water Body _____ (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS
REMARKS	Remarks : <u>ONLY PIT ON LOCATION. SEPERATOR STILL CONNECTED TO IT.</u> <u>PIT IS DRY.</u>

ORIGINAL PIT LOCATION

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Original Pit : a) Degrees from North 295° Footage to Wellhead 18'
b) Degrees from North _____ Footage to Dogleg _____
Dogleg Name _____
c) Length : 18' Width : 17' Depth : 3'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 1:38 P.M.

END DUMP

Completed By:

Robert Thompson
Signature

3.29.94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>89117</u> Location: <u>HOLT #1</u> Coordinates: Letter: <u>G</u> Section <u>19</u> Township: <u>32</u> Range: <u>11</u> Or Latitude _____ Longitude _____ Date Started : <u>4-21-94</u> Area: <u>02</u> Run: <u>81</u>
FIELD OBSERVATIONS	Sample Number(s): ⁷⁴⁰⁸⁶⁰ <u>KD24</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>286 ppm</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation ☐ (1) Approx. Cubic Yards <u>0</u> Onsite Bioremediation ☐ (2) Backfill Pit Without Excavation ☒ (3) Soil Disposition: Envirotech ☐ (1) ☒ (3) Tierra Other Facility ☐ (2) Name: _____ Pit Closure Date: <u>4-21-94</u> Pit Closed By: <u>BEI</u>
REMARKS	Remarks : <u>Dug test Hole to 12' TOOK PID Reading</u> <u>Closed Pit.</u>
	Signature of Specialist: <u>Kenny Deane</u>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD24	940860
MTR CODE SITE NAME:	89117	N/A
SAMPLE DATE TIME (Hrs):	4/21/94	1550
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	4-22-94	4-22-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Grey Clay/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)	4053 2730 9083	4/25/94 MG/KG			2.04	28
HEADSPACE PID	286	PPM				
PERCENT SOLIDS	90	%				

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

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

DF = Dilution Factor Used

Approved By:

John Paldi

Date:

5/17/94

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

04/04/22 13:54

Sample Identification
140860

Initial mass of sample, g
1.040

Volume of sample after extraction, ml
22.000

Petroleum hydrocarbons, ppm
1733.242

Net absorbance of hydrocarbons (2930 cm⁻¹)
0.752

