

Henry J. Frost
DEPUTY CHIEF OF POLICE

DEC 29 1997

Approved

Meter Number: 72311
Location Name: San Juan 28 - 7 Unit 93 PC
Location: TN-27 RG-07
SC-09 UL-N
2 - Federal
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
DEC 14 1997
SAN JUAN DIV.
L.A.S.

**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

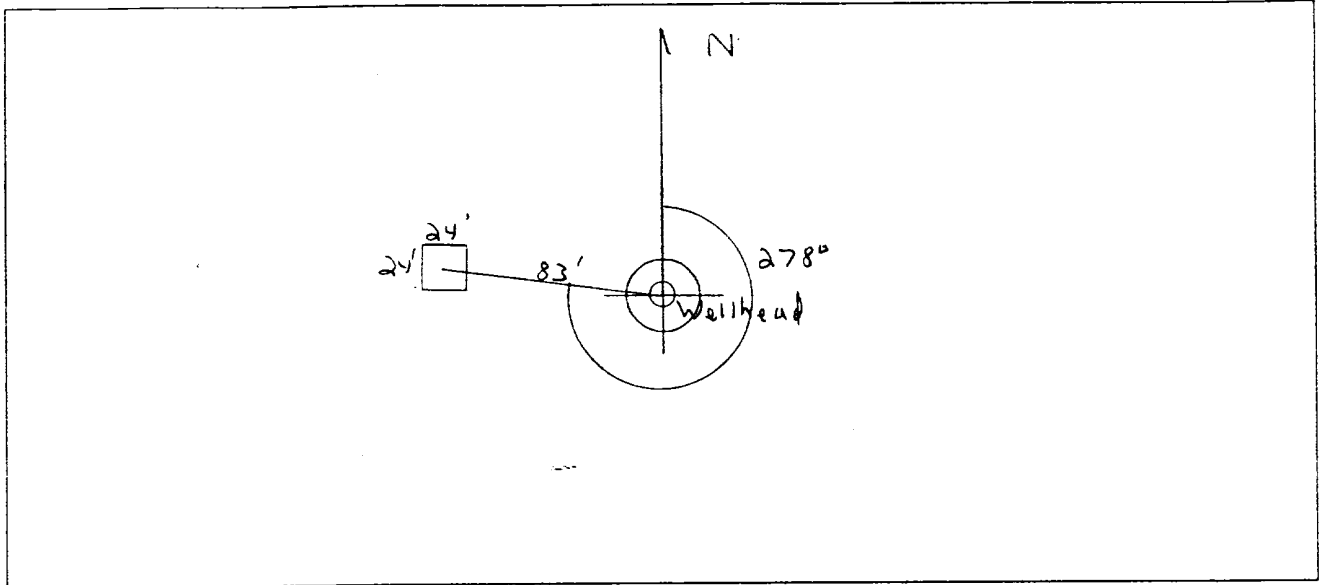
Based on this information, the residual hydrocarbons should not migrate to groundwater.

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.

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 278° Footage from Wellhead 83'
 b) Length : 24' Width : 24' Depth : 4'



ORIGINAL PIT LOCATION

REMARKS :

Pictures @ "4:48" hr 17-20

REMARKS

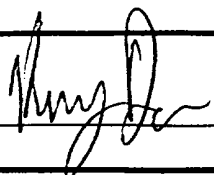
Completed By:

Cory Chase
 Signature

5/3/95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>72311</u> Location: <u>San Juan 28-7 unit #93 PC</u></p> <p>Coordinates: Letter: <u>N</u> Section <u>9</u> Township: <u>27</u> Range: <u>7</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6/5/95</u> Run: <u>03</u> <u>52</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KD 455</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>353 ppm</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> Approx. Cubic Yards <u>0</u></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>6/5/95</u> Pit Closed By: <u>PEF</u></p>
REMARKS	<p>Remarks : <u>Dug test hole to 12', took pid Reading & sample.</u></p> <p><u>Closed pit.</u></p>
	<p>Signature of Specialist: <u></u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 455	946875
MTR CODE SITE NAME:	72311	N/A
SAMPLE DATE TIME (Hrs):	6-5-95	1600
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:		
DATE OF BTEX EXT. ANAL.:		
TYPE DESCRIPTION:	VG	Brown sand and clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	4480	MG/KG			2.11	28
HEADSPACE PID	353	PPM				
PERCENT SOLIDS	78.7	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: J.P.

Date: 6/28/95

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

75/06/07 11:42

Sample identification
 746875

Initial mass of sample, g
 1.110

Volume of sample after extraction, ml
 23.000

Petroleum hydrocarbons, ppm
 1475.170

Net absorbance of hydrocarbons (2930 cm⁻¹)
 1.382

