Denny & Tout DEPUTY OIL & GAS INSTRUCTION

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Meter Number: 75852
.ocation Name: FLORANCE D #1
Location: TN-30 RG-09
SC-23 UL-G
2 - Federal
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

PECEIVED APR 1 4 1897 OIL GOING DEST

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: 75852 Location: Florance D#1 Operator #: 6203 Operator Name: Amoco P/L District: Bloomered Coordinates: Letter: 6 Section 23 Township: 30 Range: 9 Or Latitude Longitude Pit Type: Dehydrator Location Drip: X Line Drip: Other: Site Assessment Date: 4.26.94 Area: 10 Run: 33					
	NMOCD Zone: (From NMOCD Maps) Inside Outside Land Type: BLM					
SITE ASSESSMENT	Depth to Groundwater Less Than 50 Feet (20 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? ☐ (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.					
REMARKS	Remarks: ONLY PIT ON LOCATION. TIT IS DATE TO BE OUTSIDE V.Z.					
M						
된	(PUSH IN)					

Signature

4.26.94

Date

GE, RAL	Meter: 75852 Location: Florance D#1 Coordinates: Letter: 6 Section 23 Township: 30 Range: 9 Or Latitude Longitude Date Started: 5-19-94 Area: 10 Run: 33
FIELD OBSERVATIONS	Sample Number(s): \(\forall \widetilde{\psi} \) Feet Sample Depth: \(\forall \widetilde{\psi} \) Feet Final PID Reading \(\forall \omega \) PID Reading Depth \(\forall \widetilde{\psi} \) Feet Yes No Groundwater Encountered \(\begin{align*} (1) \widetilde{\psi} \ext{(2)} \) Approximate Depth \(\begin{align*}
CLOSURE	Remediation Method: Excavation
REMARKS	Remarks: No line Markers, 4 Hit sandsfare Signature of Specialist: Walk Whom

(SP3191) 04/07/94



FIELD SERVICES LABORATORY **ANALYTICAL REPORT** PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VWIIO	945237
MTR CODE SITE NAME:	75852	N/A
SAMPLE DATE TIME (Hrs):	5-19-94	0830
SAMPLED BY:		NIA
DATE OF TPH EXT. ANAL.:	5/20/94	5-20-94
DATE OF BTEX EXT. ANAL.:	Ola	AIA
TYPE DESCRIPTION:	V 6	Trey sand & clay
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REMARKS:

PARAMETER	RESULT	UNITS	QUALIFIERS			
FARMILILIT			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) 3.900	13870 JW	MG/KG			0.53	28
HEADSPACE PID	160	PPM				
PERCENT SOLIDS	91.0	%				·

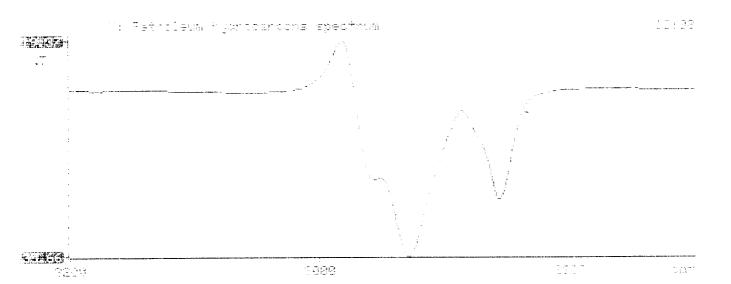
-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 -le.

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

OF = Dilution Factor Used

		:

Patrolaum hydrocarbons, ppm 13866.844 Met absorbance of hydrocarbons (2770 cm-1) 248



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