3R - 054 - 06PIT CLOSURE

02/23/1995

3R-0546

30-045-22442

 OHL & GAS INSPECTOR Name: VALENCIA CANYON UNIT #43

 DEC 2 9 1997

 Location: TN-28 RG-04 SC-27 UL-N 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 ⁻¹³ 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.

372-0546



FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 93766 Location: VALENCIA CANYON UNIT #43 Operator #: 0203 Operator Name: Amoco P/L District: BLOOMFIELA Coordinates: Letter: #! Section 27 Township: 28 Range: 4 Or Latitude Longitude					
SITE ASSESSMENT	Fit Type: Derivation Location Dip Line Dip Other: Site Assessment Date: 2:23 .95 Area:IO Run: NMOCD Zone: Land Type: BLM (1) (From NMOCD State (2) Maps) Inside (1) Fee Outside (2) Indian Depth to Groundwater Forestar (5) Less Than 50 Feet (20 points) (1) 50 Ft to 99 Ft (10 points) (2) Greater Than 100 Ft (0 points) (2) Greater 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) (2) Greater Than 1000 Ft (0 points) Mapsition of Surface Water Body					
AARI.	REMARKS : REPUNE ; TOPO SHOW LOCATION GLITSIDE V.Z. THREE PITS ON LOCATION. DEHY PIT BELONGS TO EPNG, WILL CLASS PLT.					
REI	PLISH IN (SP3190) 04/08/94					



FIELD PIT REMEDIATION/CLOSURE FORM

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GENERAL	Meter: <u>93766</u> Location: <u>Unleacin</u> <u>Compon unif</u> <u>43</u> Coordinates: Letter: <u>N</u> Section <u>27</u> Township: <u>28</u> Range: <u>4</u> Or Latitude Longitude Date Started : <u>3/16/95</u> Run: <u>10</u> <u>62</u>							
FIELD ()BSERVATIONS	Sample Number(s): <u>KD 394</u> Sample Depth: <u>6</u> Feet Final PID Reading <u>410 ppm</u> PID Reading Depth <u>6</u> Feet Yes No Groundwater Encountered 2 Approximate Depth Feet							
CLOSURE	Remediation Method							
REMARKS	Remarks: Dug test Hole to 6' Hit Hard Bentonite Lityer, stop Excavating, TOOK piD Sample, Closed pit.							
	Signature of Specialist: http://www.law							

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ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

_	Field ID	Lab iD		
SAMPLE NUMBER:	KD 394	946736		
MTR CODE SITE NAME:	93760	N/A		
SAMPLE DATE ! TIME (Hrs):	3-16-95	- <i>19</i> 0		
SAMPLED BY:	N/A			
DATE OF TPH EXT. ANAL.:	3/23/95	= 1/2 × 1/45 - +++		
DATE OF BTEX EXT. ANAL.:	NIA	NIA		
TYPE DESCRIPTION:	<u>v</u> _6	Park Brown sand and chan		

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	<u> </u>	M(g)	V(mi)
TPH (418.1)	136	MG/KG		 	193	28
HEADSPACE PID	410	PPM		. ·		
PERCENT SOLIDS	86.1	%				

- TPH is by EPA Method 418.1 -

Varrative:

DF = Dilution Factor Used

____ Approved By: _

Date: <u>3-24-95</u>

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