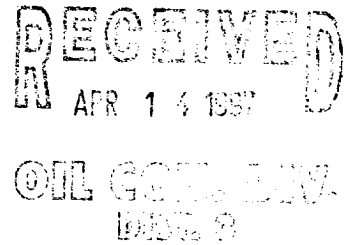


*Thompson & Co.*  
DEC 22 1987

**Meter Number:14080**  
**Location Name:Jicarilla L #11**  
**Location:TN-24 RG-05**  
**SC-03 UL-G**  
**6 - Jicarilla**  
**NMOCD Zone:OUTSIDE**  
**Hazard Ranking Score:00**



*Approved*

**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: 14080 Location: Picarilla L # 11  
 Operator #: 0128 Operator Name: Meridian P/L District: Ofito  
 Coordinates: Letter: 6 Section 03 Township: 24 Range: 05  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Pit Type: Dehydrator ☒ Location Drip: \_\_\_\_\_ Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
 Site Assessment Date: 9-11-95 Area: 06 Run: 51

**SITE ASSESSMENT**

**NMOCD Zone:** (From NMOCD Maps) Inside ☐ (1) Outside ☒ (2)

**Land Type:** BLM ☐ (1) State ☐ (2) Fee ☐ (3) Indian Picarilla Apache

**Depth to Groundwater**  
 Less Than 50 Feet (20 points) ☐ (1)  
 50 Ft to 99 Ft (10 points) ☐ (2)  
 Greater Than 100 Ft (0 points) ☒ (3)

**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'

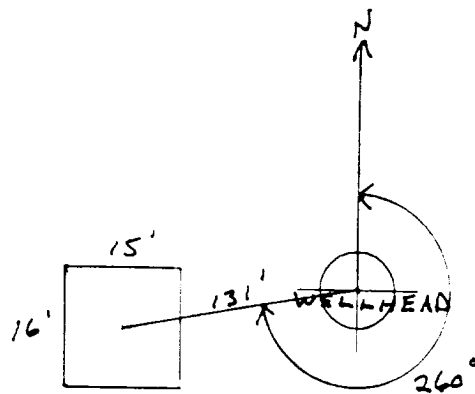
**TOTAL HAZARD RANKING SCORE:** 0 POINTS

**EMARK**

Remarks : Redline + Topo both show outside UZ, 3 pits on location. Rehy-Storage tank pit with liner, Rehy pit with liner, Old Rehy pit belongs to EPNG will close old

# ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 260° Footage from Wellhead 131'  
 b) Length : 15' Width : 16' Depth : 4'



## REMARKS :

photos: 4 pict 14:35

Lines from Dehy, go over old Dehy pit, to new pit with liner.

Completed By:

James E. Penson

Signature

9-11-95

Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>14080</u> Location: <u>Jicarilla C #11</u></p> <p>Coordinates: Letter: <u>6</u> Section <u>03</u> Township: <u>24</u> Range: <u>05</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9/19/95</u> Run: <u>06</u> <u>51</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>JK83</u></p> <p>Sample Depth: <u>6'</u> Feet</p> <p>Final PID Reading <u>151.0</u> PID Reading Depth <u>6'</u> Feet</p> <p>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 checked="" type="checkbox"/> Approx. Cubic Yards <u>70</u> <u>8</u> <u>9/25/95</u></p> <p>Onsite Bioremediation <input type="checkbox"/> <u>Gabriel Jicarilla E.P.O. Approved</u></p> <p>Backfill Pit Without Excavation <input type="checkbox"/> <u>Closure 9-21-95</u></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> <input type="checkbox"/> Tierra</p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>9-22-95</u> Pit Closed By: <u>Philip</u></p>
REMARKS	<p>Remarks : <u>Pit P.d Readings (N-36.2)(S-12.5)(E-89.1)(O-132.0)</u></p> <p><u>Pit size 17x14x6</u> <u>Hit Rock at 6' Foot</u></p> <p><u>Fence Size 18x19x3</u> <u>No Jet</u></p> <p><u>More Than 100' From Ephemeral Stream</u></p> <p><u>SPRAYED PIT WITH SOIL EMULSION 9-22-95</u></p> <p>Signature of Specialist: <u>[Signature]</u></p>



## FIELD SERVICES LABORATORY

## ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

## SAMPLE IDENTIFICATION

SAMPLE NUMBER:

MTR CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

PROJECT:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

Field ID

Lab ID

JK23	947492
14080	Aicarilla L#11
09-19-95	1230
Field #15	
9-20-95	
9/20/95	9/22/95
1/6	Dark brown sand and clay

Field Remarks: (N-36.2)(S-12.5)(E-89.1)(W-132.0)

## RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	63.5	MG/KG	10	D		
TOLUENE	258	MG/KG	10	D		
ETHYL BENZENE	19.8	MG/KG	10	D		
TOTAL XYLENES	221	MG/KG	10	D		
TOTAL BTEX	562	MG/KG	10	D		
TPH (418.1)	3860	MG/KG			2.16	28
HEADSPACE PID	151	PPM				
PERCENT SOLIDS	92.1	%				

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

The Surrogate Recovery was at  
Narrative:

101% for this sample All QA/QC was acceptable.

DF = Dilution Factor Used

Approved By:

Date:

9-26-95

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

Perkin-Elmer Model 1600 FT-IR  
 Analysis Report  
 \*\*\*\*\*

05/09/20 14:45

Sample Identification

111452

Initial mass of sample, g

100

Volume of sample after extraction, ml

15.000

Petroleum hydrocarbons, ppm

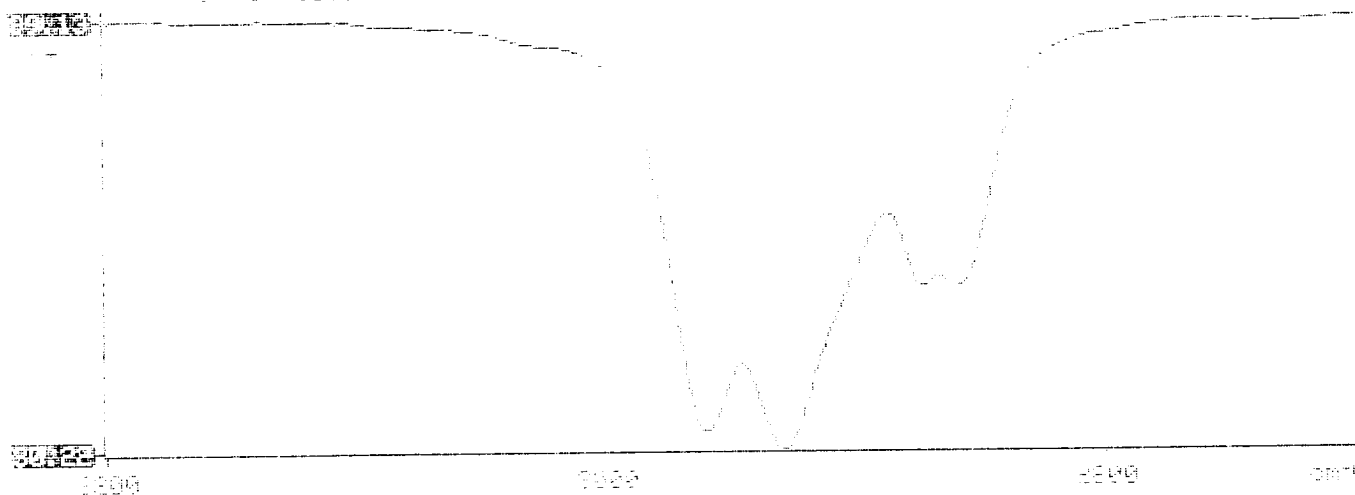
1544.681

% absorbance of hydrocarbons (2850 cm<sup>-1</sup>)

118

Petroleum hydrocarbons spectrum

14:45



## BTEX SOIL SAMPLE WORKSHEET

File	:	947492	Date Printed	:	9/25/95
Soil Mass (g)	:	5.04	Multiplier (L/g)	:	0.00099
Extraction vol. (mL)	:	10	DF (Analytical)	:	2000
Shot Volume (uL)	:	5	DF (Report)	:	1.98413

			Det. Limit
Benzene (ug/L)	:	32.00	Benzene (mg/Kg): 63.492 4.960
Toluene (ug/L)	:	130.00	Toluene (mg/Kg): 257.937 4.960
Ethylbenzene (ug/L)	:	10.00	Ethylbenzene (mg/Kg): 19.841 4.960
p & m-xylene (ug/L)	:	91.00	p & m-xylene (mg/Kg): 180.556 9.921
o-xylene (ug/L)	:	20.20	o-xylene (mg/Kg): 40.079 4.960
			Total xylenes (mg/Kg): 220.635 14.881
			Total BTEX (mg/Kg): 561.905

# EL PASO NATURAL GAS

## EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\092295-2.001  
 Method : C:\LABQUEST\METHODS\9001.MET  
 Sample ID : 947492,5.04G,5U  
 Acquired : Sep 22, 1995 13:46:09  
 Printed : Sep 22, 1995 14:12:36  
 User : MARLON

### Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	4.947	4824740	32.0108
a,a,a TFT	6.720	8230158	178.2681
TOLUENE	8.767	36403708	130.3598
ETHYLBENZENE	12.793	2620817	10.0252
M & P XYLENE	13.163	27864526	91.0047
O XYLENE	14.273	5165232	20.2419
BFB	15.823	73476864	101.3625

