DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

Meter Number:14300 Location Name:CANDADO #17 Location:TN-26 RG-07 SC-10 UL-A 2 - Federal

NMOCD Zone: OUTSIDE Hazard Ranking Score: 00

PECETYER APR 1 4 1037 DEV.

# 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.



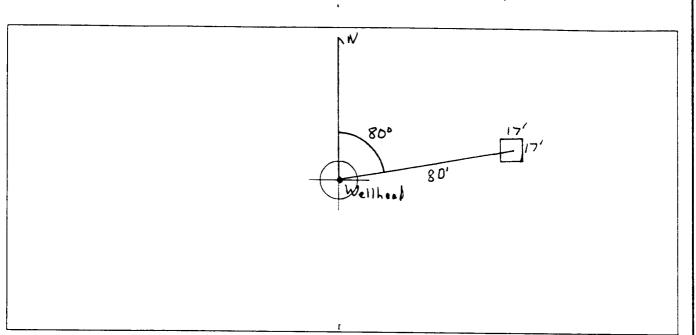
#### FIELD PIT SITE ASSESSMENT FORM

	Realine shows 89642					
GENERAL	Meter: [4300 Location: Candalo No 17 Operator #: 6311 Operator Name: P/L District: Blanco Coordinates: Letter: A Section 10 Township: 26 Range: 7  Or Latitude Longitude Pit Type: Dehydrator Location Drip: Line Drip: Other: Site Assessment Date: 5/19/14 Area: Run: 72					
	NMOCD Zone: Land Type: BLM 💢 (1)					
	(From NMOCD State (2)					
	Maps) Inside (1) Fee (3)					
	Outside (2) Indian					
	Depth to Groundwater					
	Less Than 50 Feet (20 points)					
	Greater Than 100 Ft (0 points) (3)					
ASSESSMENT	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)					
\SS.	Horizontal Distance to Surface Water Body					
TE #	Less Than 200 Ft (20 points) (1) 200 Ft to 1000 Ft (10 points) (2)					
SI	Greater Than 1000 Ft (0 points) $\square$ (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 $\square$ (1) < 100'(Navajo Pits Only)					
	$\square (2) > 100'$					
	TOTAL HAZARD RANKING SCORE: POINTS					
KS	Remarks: Redline + Vuln - Outside					
EMARKS	Rodling shops meter # as 89642. Next to 89643  Pits Will closel. Pit Ory. Oil stained soil					
<b>E</b>	DITE WITCHELLIA DIG. CITSTAINE SAIL					

Λ	DI	CINIAI	ייזם	IOC	ATION
U	ĸı	GINAI	111	LOU	ATIUN

Original Pit : a) Degrees from North 80° Footage from Wellhead 80'

b) Length : 17' Width : 17' Depth : 3'



	Remarks: Pictures (21527 (14-17)  Dump Truck
REMARKS	
,	

Completed By:

Cong Chang Signature

5/19/94)
Date

### FIELD PIT REMEDIATION/CLOST E FORM

GENERAL	Meter: 14300 Location: Candade 717  Coordinates: Letter: A Section 10 Township: A Range: 7  Or Latitude Longitude  Date Started: 3-11-94 Run: 03 72
FIELD OBSERVATIONS	Sample Number(s): MK 254  Sample Depth:
CLOSURE	Remediation Method:  Excavation
REMARKS	Pit Closure Date: 3-11-94  Pit Closed By: BEE  Remarks: EPNG 1125 Markee Soil Gray Slight Hydraussen  oder Hit Sand Gene 9'
	Signature of Specialist: Morgan Killion (SP3191) 03/16/94



## FIELD SERVICES LABORATORY ANALYTICAL REPORT

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

#### SAMPLE IDENTIFICATION

	SAMPLE	IDENTIFICA	HON			
	Field	ID		Lab iD		
SAMPLE NUMBER:	MK 25	945925				
MTR CODE   SITE NAME:	14300	N/A				
SAMPLE DATE   TIME (Hrs):	8-11-94	1025				
SAMPLED BY:		/A				
DATE OF TPH EXT.   ANAL.:	8.16.94	8-16-94				
DATE OF BTEX EXT.   ANAL.:	NIA		NIA			
TYPE   DESCRIPTION:	16		Whow Ton	Fine Some	con	
REMARKS:		RESULTS				
PARAMETER	RESULT UNITS		QUALIFIERS  DF Q M(		IERS M(g)	V(ml)
TPH (418.1)	6310	MG/KG			0.72	28
HEADSPACE PID	1042	PPM				
PERCENT SOLIDS	89.7	%				
Narrative:		TPH is by EPA Metho	d 418.1			
DF = Dilution Factor Used						
P			Date:	9/4	j GY	

Total State Total Area Total Ar