

DIRECTOR

DEC 23 1997

Approved

Meter Number: 72087
Location Name: SAN JUAN 28-6 #71
Location: TN-28 RG-06
SC-13 UL-B
4 - Fee
NMOCD Zone: OUTSIDE
Hazard Ranking Score: 00

RECEIVED
APR 14 1997
OIL CON. DIV.
DIST. 3

**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: 72087 Location: San Juan 28-6 #71
Operator #: _____ Operator Name: Meridian P/L District: Brown Field
Coordinates: Letter: B Section 13 Township: 28 Range: 06
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 3/8/95 Area: 10 Run: 91

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

☐ (1)

☒ (2)

Land Type:

BLM

State

Fee

Indian

☐ (1)

☐ (2)

☒ (3)

Depth to Groundwater

Less Than 50 Feet (20 points)

50 Ft to 99 Ft (10 points)

Greater Than 100 Ft (0 points)

☐ (1)

☐ (2)

☒ (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)

200 Ft to 1000 Ft (10 points)

Greater Than 1000 Ft (0 points)

☐ (1)

☐ (2)

☒ (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: _____ POINTS

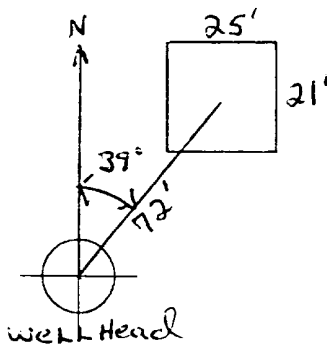
MARK

Remarks : Redline shows outside Topo shows outside VZ
2 pits on loc. One has Dehy in service Old Dehy pit
belong to EPNG with close old Dehy pit

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 39° Footage from Wellhead 72'
b) Length : 25' Width : 21' Depth : 3'



REMARKS

Remarks :

Photos: 1425

Completed By:

James F. Pears

Signature

3/8/95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>72087</u> Location: <u>SAN JUAN 28-6 #71</u> Coordinates: Letter: <u>B</u> Section <u>13</u> Township: <u>28</u> Range: <u>6</u> Or Latitude _____ Longitude _____ Date Started : <u>3/31/95</u> Run: <u>10</u> <u>91</u>
FIELD OBSERVATIONS	Sample Number(s): <u>KD 402</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>501 ppm</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered ☐ ☒ Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation ☐ Approx. Cubic Yards <u>0</u> Onsite Bioremediation ☐ Backfill Pit Without Excavation ☒ Soil Disposition: Envirotech ☐ Tierra ☐ Other Facility ☐ Name: _____ Pit Closure Date: <u>3/31/95</u> Pit Closed By: <u>BEI</u>
REMARKS	Remarks : <u>EXCAVATED test Hole to 12', TOOK p.i.D Sample,</u> <u>closed pit.</u>
	Signature of Specialist: <u><i>Kenny Damm</i></u>



**FIELD SERVICES LABORATORY
ANALYTICAL REPORT**

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KD 402	946-1008
MTR CODE SITE NAME:	72087	N/A
SAMPLE DATE TIME (Hrs):	3-31-95	0935
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	4-4-95	4-4-95
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VC	DARK Brown sand & cl.

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	844	MG/KG			2.03	28
HEADSPACE PID	501	PPM				
PERCENT SOLIDS	86.3	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

4/6/95

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

Perkin-Elmer Model 1600 FT-IR
Analysis Report

95/04/04 11:57

Sample identification
946768

Initial mass of sample, g
1.030

Volume of sample after extraction, ml
38.000

Petroleum hydrocarbons, ppm
344.028

Net absorbance of hydrocarbons (2930 cm⁻¹)
.114

