

*Denny E. Focht*  
DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

*Approved*

Meter Number:71394

Location Name:HUERFANITO UNIT #52 PC

Location:TN-27 RG-09

SC-36 UL-0

3 - Navajo

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 $10^{-15}$ 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.

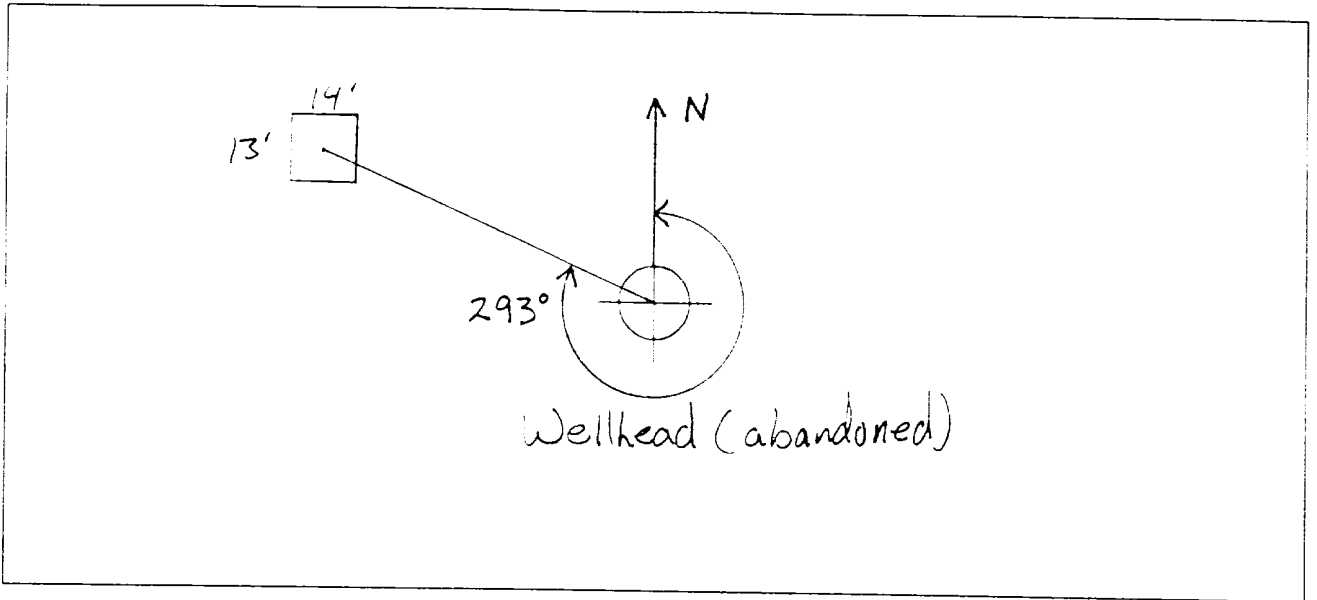
## FIELD PIT SITE ASSESSMENT FORM

|                        |   |
|------------------------|---|
| <b>GENERAL</b>         | <p style="text-align: center;"><i>No Meter house</i></p> <p>Meter: <u>71394</u> Location: <u>Huerfano No. 52 PC (Abandoned)</u><br/>         Operator #: <u>2999</u> Operator Name: <u>Meridian P/L</u> District: <u>Ballard</u><br/>         Coordinates: Letter: <u>0</u> Section <u>36</u> Township: <u>27</u> Range: <u>9</u><br/>         Or Latitude _____ Longitude _____<br/>         Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____<br/>         Site Assessment Date: <u>6-22-94</u> Area: <u>11</u> Run: <u>91</u></p>  |
| <b>SITE ASSESSMENT</b> | <p><b>NMOCD Zone:</b><br/>         (From NMOCD Maps)      Inside      <input type="checkbox"/> (1)<br/>            Outside      <input checked="" type="checkbox"/> (2)</p> <p><b>Land Type:</b>      BLM      <input type="checkbox"/> (1)<br/>            State      <input type="checkbox"/> (2)<br/>            Fee      <input type="checkbox"/> (3)<br/>            Indian <u>Eastern Navajo Agency</u></p> <p><b>Depth to Groundwater</b><br/>         Less Than 50 Feet (20 points)      <input type="checkbox"/> (1)<br/>         50 Ft to 99 Ft (10 points)      <input type="checkbox"/> (2)<br/>         Greater Than 100 Ft (0 points)      <input checked="" type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area :</b><br/>         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?      <input type="checkbox"/> (1) YES (20 points)      <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b><br/>         Less Than 200 Ft (20 points)      <input type="checkbox"/> (1)<br/>         200 Ft to 1000 Ft (10 points)      <input type="checkbox"/> (2)<br/>         Greater Than 1000 Ft (0 points)      <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____<br/>         (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream      <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)<br/>            <input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>0</u> POINTS</p> |
| <b>REMARKS</b>         | <p>Remarks : <u>one pit. Pit is <sup>new 6-22-94</sup> dry. Well has been abandoned</u><br/> <u>wet (Rainwater)</u></p> <p><u>Outside V.Z. on Redline &amp; Topo</u></p>  |

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 293 Footage from Wellhead 101  
b) Length : 14 Width : 13 Depth : 3

ORIGINAL PIT LOCATION



REMARKS

Remarks :

Photos - 1120 hrs

well is abandoned - no Meter house

Completed By:

Signature

6-22-94

Date

# FIELD PIT REMEDIATION/CLOSURE FORM

|                           |   |
|---------------------------|---|
| <b>GENERAL</b>            | Meter: <u>71394</u> Location: <u>Huerfano #52 PL</u><br>Coordinates: Letter: <u>10</u> Section <u>36</u> Township: <u>27</u> Range: <u>9</u><br>Or Latitude _____ Longitude _____<br>Date Started : <u>9-29-94</u> Run: <u>11</u> <u>91</u>   |
| <b>FIELD OBSERVATIONS</b> | Sample Number(s): <u>VW353</u><br>Sample Depth: <u>12'</u> Feet<br>Final PID Reading <u>2</u> PID Reading Depth <u>12'</u> Feet<br>Yes No<br>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet  |
| <b>CLOSURE</b>            | Remediation Method :<br>Excavation <input type="checkbox"/> Approx. Cubic Yards _____<br>Onsite Bioremediation <input type="checkbox"/><br>Backfill Pit Without Excavation <input checked="" type="checkbox"/><br>Soil Disposition:<br>Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/><br>Other Facility <input type="checkbox"/> Name: _____<br>Pit Closure Date: <u>9-29-94</u> Pit Closed By: <u>BEZ</u> |
| <b>REMARKS</b>            | Remarks : _____ <u>10 yds fill</u><br>_____<br>_____  |
|                           | Signature of Specialist: <u>Vale Wilson</u>   |



**FIELD SERVICES LABORATORY  
ANALYTICAL REPORT**

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

**SAMPLE IDENTIFICATION**

|                            | Field ID | Lab ID          |
|----------------------------|----------|-----------------|
| SAMPLE NUMBER:             | VW 353   | 926263          |
| MTR CODE   SITE NAME:      | 71394    | N/A             |
| SAMPLE DATE   TIME (Hrs):  | 9-29-94  | 1030            |
| SAMPLED BY:                | N/A      |                 |
| DATE OF TPH EXT.   ANAL.:  | 10-3-94  |                 |
| DATE OF BTEX EXT.   ANAL.: | N/A      | N/A             |
| TYPE   DESCRIPTION:        | VG       | Brown fine sand |

REMARKS:

**RESULTS**

| PARAMETER      | RESULT | UNITS | QUALIFIERS |   |      |       |
|----------------|--------|-------|------------|---|------|-------|
|                |        |       | DF         | Q | M(g) | V(ml) |
| TPH (418.1)    | 33.7   | MG/KG |            |   | 2.00 | 25    |
| HEADSPACE PID  | 2      | PPM   |            |   |      |       |
| PERCENT SOLIDS | 96.2   | %     |            |   |      |       |

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

Date:

10/6/94

\*\*\*\*\*  
Test Method for  
Oil and Grease and Petroleum Hydrocarbons  
in Water and Soil  
Perkin-Elmer Model 1600 FT-IR  
Analysis Report  
\*\*\*\*\*

94/10/03 14:48

Sample identification  
946263

Initial mass of sample, g  
2.090

Volume of sample after extraction, ml  
28.000

Petroleum hydrocarbons, ppm  
33.670  
Net absorbance of hydrocarbons (2930 cm<sup>-1</sup>)  
0.014

