

Denny E. Faust
DEPUTY OIL & GAS INSPECTOR

DEC 23 1997

Approved

Meter Number:75048

Location Name:HUERFANITO UNIT #79 MV

Location:TN-27 RG-09

SC-26 UL-H

2 - Federal

NMOCD Zone:OUTSIDE

Hazard Ranking Score:00

RECEIVED
APR 14 1997

OIL CON. DIST.
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

8 check operator

GENERAL

Meter: 75048 Location: Huerfano Unit No. 79 MV
 Operator #: _____ Operator Name: EPNG P/L District: Ballard
 Coordinates: Letter: H Section 26 Township: 27 Range: 9
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 6-15-94 Area: 11 Run: 71

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD Maps)

Inside

☐ (1)

Outside

☒ (2)

Land Type:

BLM

☒ (1)

State

☐ (2)

Fee

☐ (3)

Indian

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'

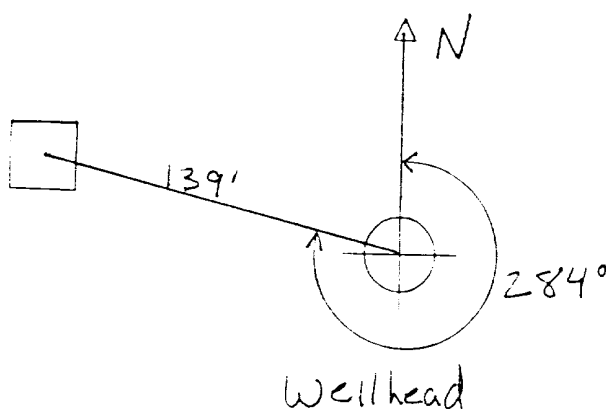
TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : Four pits on location. Dehy pit near
Meter house (75048)
outside VZ. Red Pine & Topo

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 284 Footage from Wellhead 139
b) Length : 12 Width : 12 Depth : 4



Remarks :

Photos - 1116 hrs

Bobtail

Completed By:

K. Watt

Signature

6-15-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>75048</u> Location: <u>Huerfano ^{unit} #79 MV</u></p> <p>Coordinates: Letter: <u>11</u> Section: <u>26</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>9-14-94</u> Run: <u>16</u> <u>21</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>VW285</u></p> <p>Sample Depth: <u>12</u> Feet <i>AS CAPED from sample jar 10/6/20/94</i></p> <p>Final PID Reading <u>344</u> PID Reading Depth <u>12</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 type="checkbox"/> Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>9-14-94</u> Pit Closed By: <u>BET</u></p>
REMARKS	<p>Remarks : <u>10x6's F-11</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>

FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 285	946173
MTR CODE SITE NAME:	75048	N/A
SAMPLE DATE TIME (Hrs):	9-14-94	1145
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	9-20-94	9-20-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Dark brown sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	3120	MG/KG			2.11	28
HEADSPACE PID	344	PPM				
PERCENT SOLIDS	91.2	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:



Date:

9/30/94

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

04/09/20 11:41

Sample identification
 040143

Initial mass of sample, g
 1.110

Volume of sample after extraction, ml
 10.000

Petroleum hydrocarbons, ppm
 1110.175

Net absorbance of hydrocarbons (1930 cm⁻¹)
 0.411

