

Denny E. Foster
DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

Approved

Meter Number:LD108

Location Name:CM MORRIS COM 1 LINE DRIP

Location:TN-27 RG-10

SC-15 UL-A

2 - Federal

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.

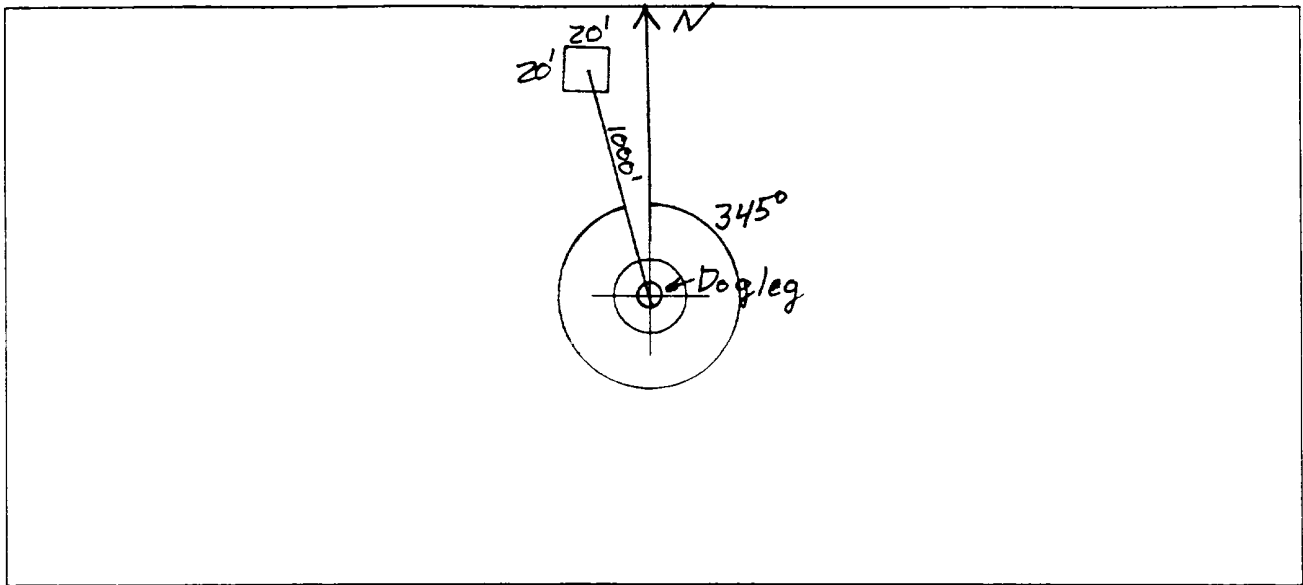
FIELD PIT SITE ASSESSMENT FORM



GENERAL	LD 108 Meter: <u>N/A</u> Location: <u>CM Morris Com 7 Line Drip</u> Operator #: <u>N/A</u> Operator Name: <u>EPNG</u> P/L District: <u>Angel Peak</u> Coordinates: Letter: <u>A</u> Section <u>15</u> Township: <u>27</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: _____ Line Drip: <u>X</u> Other: _____ Site Assessment Date: <u>9/28/94</u> Area: <u>01</u> Run: <u>52</u>
	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 <u>East Fk. Kutz Canyon</u> (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: <u>0</u> POINTS
REMARKS	Remarks : <u>Redline book: Outside, Vulnerable Zone Top: Outside</u> <u>One pit, pit is dry, will close one pit.</u> <u>PUSH IN</u>

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 345° Footage from ^{Dogleg} Wellhead 1000'
 b) Length : 20' Width : 20' Depth : 3'



REMARKS :

Pictures at 1341, (17-19, Roll 12)
Dump Truck
Measurement to dogleg is approximate.

Completed By:

Sam Helly
 Signature

9/28/94
 Date

FIELD PIT REMEDIATION/CLOSURE FORM

LD102

GENERAL

Meter: N/A Location: CM Merri's Cam 1 Live d.i.s

Coordinates: Letter: A Section 15 Township: 27 Range: 10

Or Latitude _____ Longitude _____

Date Started : 10-14-94 Run: 01 52

FIELD OBSERVATIONS

Sample Number(s): VW413 L

Sample Depth: 4' Feet

Final PID Reading 0

PID Reading Depth 4' Feet

Yes No

Groundwater Encountered ☐ ☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation

☐

Approx. Cubic Yards _____

Onsite Bioremediation

☐

Backfill Pit Without Excavation ☒

Soil Disposition:

Envirotech ☐

☐

Tierra

Other Facility ☐

Name: _____

Pit Closure Date: 10-14-94

Pit Closed By: BEZ

REMARKS

Remarks : 4' sandstone

Signature of Specialist: Vale Wilson



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 413	9404 26
MTR CODE SITE NAME:	con Morris conl line Drig	N/A
SAMPLE DATE TIME (Hrs):	10-14-94	1030
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	10-17-94	10-17-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Light brown sand JCR

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	99.4	MG/KG			2.12	28
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	91.4	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By: JR

Date: 10/23/94

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

04/10/17 13:27

Sample Identification
 136426

Initial mass of sample, g
 0.100

Volume of sample after extraction, ml
 10.000

Petroleum hydrocarbons, ppm
 0.100

Net absorbance of hydrocarbons .0910 cm-1

