

Denny E. Faust
DEPUTY OIL & GAS INSPECTOR

DEC 29 1997

Approved

Meter Number: 73819
Location Name: STATE COM A #2
Location: TN-28 RG-09
SC-16 UL-N
1 - State
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.

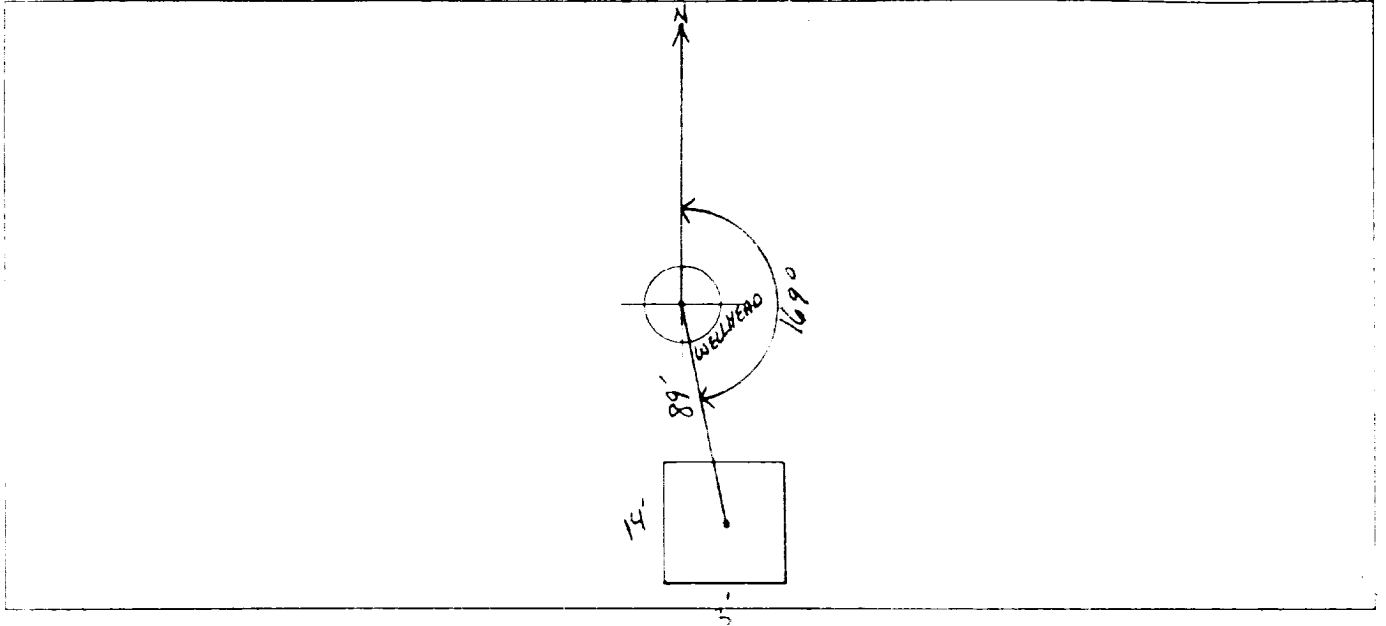
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>73819</u> Location: <u>STATE COM A #2</u> Operator #: <u>0128</u> Operator Name: <u>MERIDIAN P/L</u> District: <u>BLANCO</u> Coordinates: Letter: <u>N</u> Section <u>16</u> Township: <u>28</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____ Site Assessment Date: <u>5.15.94</u> Area: <u>03</u> Run: <u>42.31</u> <div style="text-align: right; font-size: small;">5.15.94 RT</div>
SITE ASSESSMENT	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> NMOCD Zone: (From NMOCD Maps) </div> <div style="width: 45%;"> Land Type: <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 45%;"> <input type="checkbox"/> (1) Inside <input checked="" type="checkbox"/> (2) Outside </div> <div style="width: 45%;"> BLM <input type="checkbox"/> (1) State <input checked="" type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ </div> </div> </div> </div> Depth to Groundwater <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Less Than 50 Feet (20 points) 50 Ft to 99 Ft (10 points) Greater Than 100 Ft (0 points) </div> <div style="width: 45%;"> <input type="checkbox"/> (1) <input type="checkbox"/> (2) <input checked="" type="checkbox"/> (3) </div> </div> 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? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points) Horizontal Distance to Surface Water Body <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Less Than 200 Ft (20 points) 200 Ft to 1000 Ft (10 points) Greater Than 1000 Ft (0 points) </div> <div style="width: 45%;"> <input type="checkbox"/> (1) <input type="checkbox"/> (2) <input checked="" type="checkbox"/> (3) </div> </div> Name of Surface Water Body _____ (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <div style="text-align: right; margin-right: 50px;"><input type="checkbox"/> (2) > 100'</div> TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS
REMARKS	Remarks : <u>TWO PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY.</u> <u>LOCATION IS UP ON TOP OF LITTLE HARRIS MESA. REDLINE AND TOPO</u> <u>CONFIRMED LOCATION IS OUTSIDE V.2.</u> <div style="text-align: right; margin-top: 10px;">PUSH IN</div>

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 169° Footage from Wellhead 89'
b) Length : 14' Width : 13' Depth : 1'



REMARKS

Remarks :

TOOK PICTURES AT 10:31 A.M.

DUMP TRUCK - BOBTAIL

Completed By:

Robert Thompson

Signature

5.15.94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>73819</u> Location: <u>State Com A #2</u></p> <p>Coordinates: Letter: <u>N</u> Section <u>16</u> Township: <u>28</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>7-21-94</u> Run: <u>03</u> <u>31</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK 175</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>110</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>7-21-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>EPNG lines NOT Marked Soil light Brown</u></p> <p><u>strong HYDROCARBON odor</u></p>
	<p>Signature of Specialist: <u>Morgan Kellion</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

SAMPLE NUMBER:

MTF CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

SAMPLED BY:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

Field ID	Lab ID
mk 175	945741
73819	N/A
7-21-94	1012
N/A	
7-26-94	7-26-94
N/A	N/A
VG	Fine Brown Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE		MG/KG				
TOLUENE		MG/KG				
ETHYL BENZENE		MG/KG				
TOTAL XYLENES		MG/KG				
TOTAL BTEX		MG/KG				
TPH (418.1)	2270	MG/KG			2.19	28
HEADSPACE PID	110	PPM				
PERCENT SOLIDS	90.1	%				

– TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 –

The Surrogate Recovery was at N/A % for this sample All QA/QC was acceptable.
Narrative:

F = Dilution Factor Used

1.0

Date: 8/16/11

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

Perkin-Elmer Model 1600 FT-IR
 Analysis Report

04/07/26 11:13

Sample identification
 045741

Initial mass of sample, g
 1.190

Volume of sample after extraction, ml
 15.000

Petroleum hydrocarbons, ppm
 174,164
 Net absorbance of hydrocarbons (1732 cm-1)
 0.117

