

*Denny E. Foust*  
**DEPUTY OIL & GAS INSPECTOR**

**DEC 29 1997**

*Approved*

**Meter Number:89087**

**Location Name:MARRON FED #5**

**Location:TN-27 RG-08**

**SC-27 UL-H**

**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.



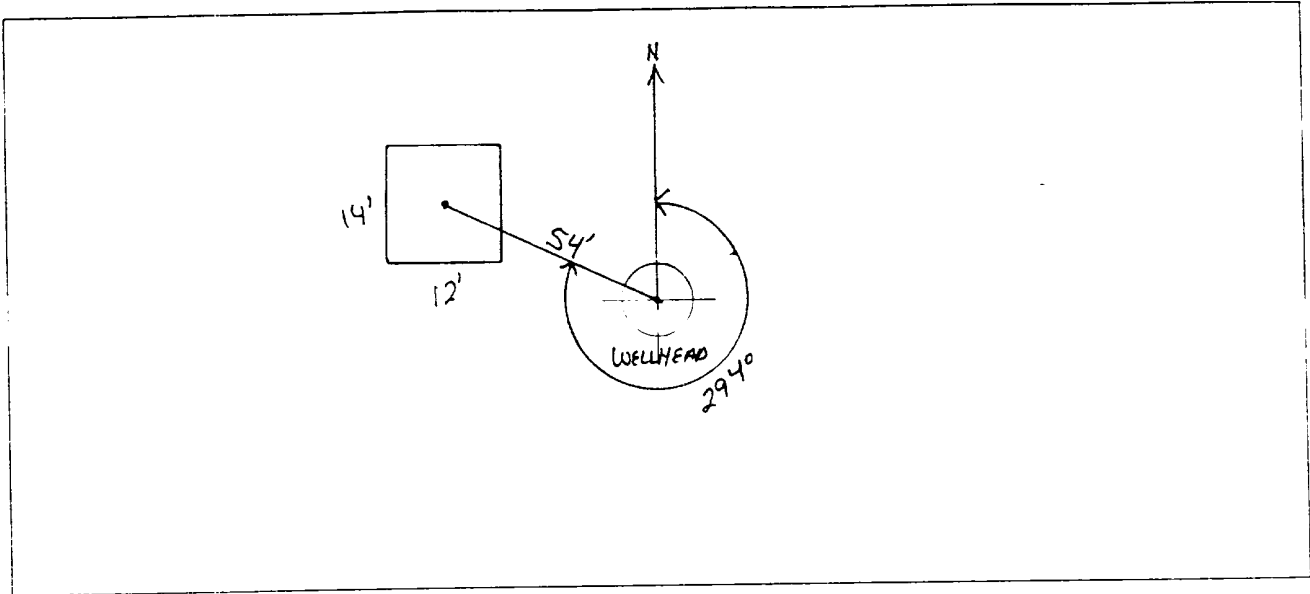
# FIELD PIT SITE ASSESSMENT FORM **EL PASO FIELD SERVICES**

GENERAL	Meter: <u>89087</u> Location: <u>MARRON FED. #5</u> Operator #: _____ Operator Name: <u>WESTERN OIL &amp; MINERALS</u> P/L District: <u>BALLAEP</u> Coordinates: Letter: <u>H</u> Section <u>27</u> Township: <u>27</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>1.25.95</u> Area: <u>07</u> Run: <u>32</u>								
SITE ASSESSMENT	<b>NMOCD Zone:</b> (From NMOCD Maps)								
	<b>Land Type:</b> <table border="0"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td></td> </tr> </table>		BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian									
<b>Depth to Groundwater</b> Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)									
<b>Wellhead Protection Area :</b> 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)									
<b>Horizontal Distance to Surface Water Body</b> Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (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 <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'									
<b>TOTAL HAZARD RANKING SCORE:</b> <u>0</u> POINTS									
REMARKS	Remarks : <u>REDUNE &amp; TOPO SHOW LOCATION OUTSIDE U.Z. 2 PITS ON LOCATION.</u> <u>DEHY PIT BELONGS TO EPNG. WILL CLOSE PIT.</u> <div style="text-align: right;">PUSH IN</div>								

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 294° Footage from Wellhead 54'  
b) Length : 14' Width : 12' Depth : 2'

ORIGINAL PIT LOCATION



Remarks :

PHOTOS - 1449

REMARKS

Completed By:

Robert Thompson

Signature

1.25.95

Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	Meter: <u>89087</u> Location: <u>marron Fed #5</u> Coordinates: Letter: <u>H</u> Section <u>27</u> Township: <u>27</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Date Started : <u>2-8-95</u> Run: <u>07</u> <u>32</u>
<b>FIELD OBSERVATIONS</b>	Sample Number(s): <u>MK 366</u> Sample Depth: <u>3'</u> Feet Final PID Reading <u>314</u> PID Reading Depth <u>3'</u> Feet <div style="text-align: center;">Yes      No</div> Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
<b>CLOSURE</b>	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div>           Excavation            Onsite Bioremediation            Backfill Pit Without Excavation         </div> <div style="text-align: right;"> <input type="checkbox"/> Approx. Cubic Yards _____  <input type="checkbox"/>  <input checked="" type="checkbox"/> </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div>           Envirotech <input type="checkbox"/>            Other Facility <input type="checkbox"/> </div> <div> <input type="checkbox"/> Tierra            Name: _____         </div> </div> Pit Closure Date: <u>2-8-95</u> Pit Closed By: <u>BET</u>
<b>REMARKS</b>	Remarks : <u>Arrived Dug sample Hole soil was black with</u> <u>strong Hydrocarbon odor Hit sandstone 4' 3'</u> _____ _____
	Signature of Specialist: <u>Morgan Kileion</u>



**FIELD SERVICES LABORATORY  
ANALYTICAL REPORT**

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

**SAMPLE IDENTIFICATION**

	Field ID	Lab ID
SAMPLE NUMBER:	mk 366	946651
MTR CODE   SITE NAME:	89087	N/A
SAMPLE DATE   TIME (Hrs):	2-8-95	1205
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL:	2-10-95	2-10-95
DATE OF BTEX EXT.   ANAL:	N/A	N/A
TYPE   DESCRIPTION:	VG	Dark Gray w/Brown sand clay

REMARKS:

**RESULTS**

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	3780	MG/KG			.98	28
HEADSPACE PID	312	PPM				
PERCENT SOLIDS	88.6	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:                     

Date: 2-22-95

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

95/02/10 10:30

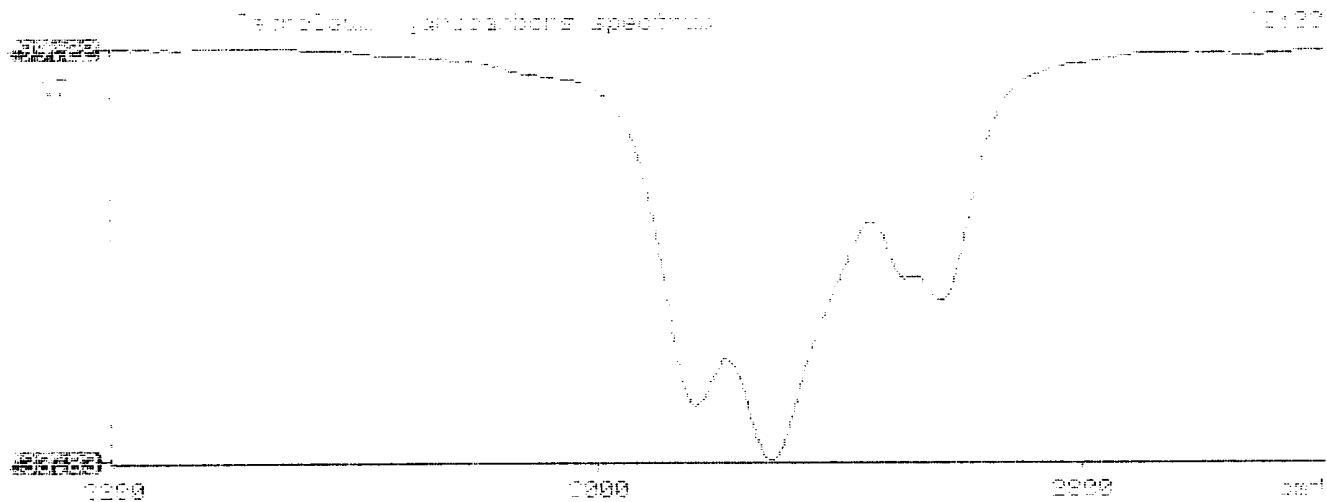
% Sample identification  
 946651

% Initial mass of sample, g  
 1.090

% Volume of sample after extraction, ml  
 20.000

% Petroleum hydrocarbons, ppm  
 3738.644

% Net absorbance of hydrocarbons (2930 cm-1)  
 1.446



**ILLEGIBLE**