

Denny E. Faust
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

Approved

Meter Number: 89624
Location Name: SAN JUAN 29-5 UNIT #71
Location: TN-29 RG-05
SC-16 UL-M
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:

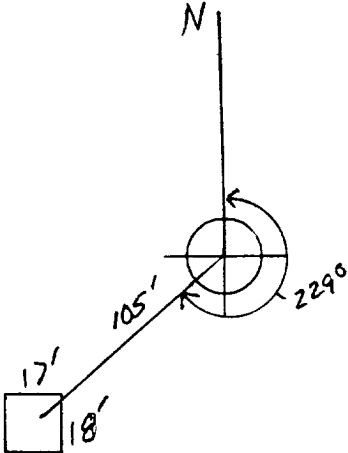
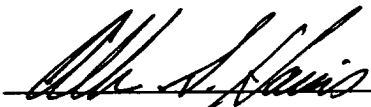
Sandstone	10^{-9} to 10^{-13} cm/sec
Shale	10^{-12} to 10^{-16} cm/sec
Clay	10^{-12} to 10^{-15} cm/sec

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.

- 1 -

ORIGINAL PIT LOCATION	<p style="text-align: center;">ORIGINAL PIT LOCATION</p> <p>Original Pit : a) Degrees from North <u>229°</u> Footage from Wellhead <u>105'</u> b) Length : <u>18'</u> Width : <u>17'</u> Depth : <u>3'</u></p> <div style="text-align: center;">  </div>
	<p>Remarks : <u>PHOTOGRAPHS AH-5 (1-4)</u></p> <p><u>DIRECTION: APPROXIMATELY 1.4 MILES FROM 527 PAVEMENT, TURN</u> <u>RIGHT ON LOCATION ROAD.</u></p>
REMARKS	<p>Completed By: <u></u></p> <p style="text-align: center;">Signature</p> <p style="text-align: right;"><u>5-14-94</u></p> <p style="text-align: right;">Date</p>

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>89624</u> Location: <u>San Juan 29-5 unit #71</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>16</u> Township: <u>29</u> Range: <u>5</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>6-22-94</u> Area: <u>10</u> Run: <u>61</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>MK 22</u></p> <p>Sample Depth: <u>4</u> Feet</p> <p>Final PID Reading <u>7</u> PID Reading Depth <u>4</u> Feet</p> <p style="text-align: center;">Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> (1) Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>6-22-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>EPNE lines were marked soil was gray</u></p> <p><u>gt scale ^{MK 6-22-94} sample depth 4' H. + sandstone rock</u></p>
	<p>Signature of Specialist: <u>Morgan Killion</u></p>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

SAMPLE NUMBER:

Field ID

Lab ID

MTR CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

SAMPLED BY:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

N/A

6/23/94

N/A

VG

445499

N/A

1128

6/23/94

N/A

Brown sand & clay

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)	<10	MG/KG			2.12	28
HEADSPACE PID	7	PPM				
PERCENT SOLIDS	89.4	%				

— 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:

DF = Dilution Factor Used

Approved By:

John Ladd

Date:

7/14/94

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

24/06/23 14:01

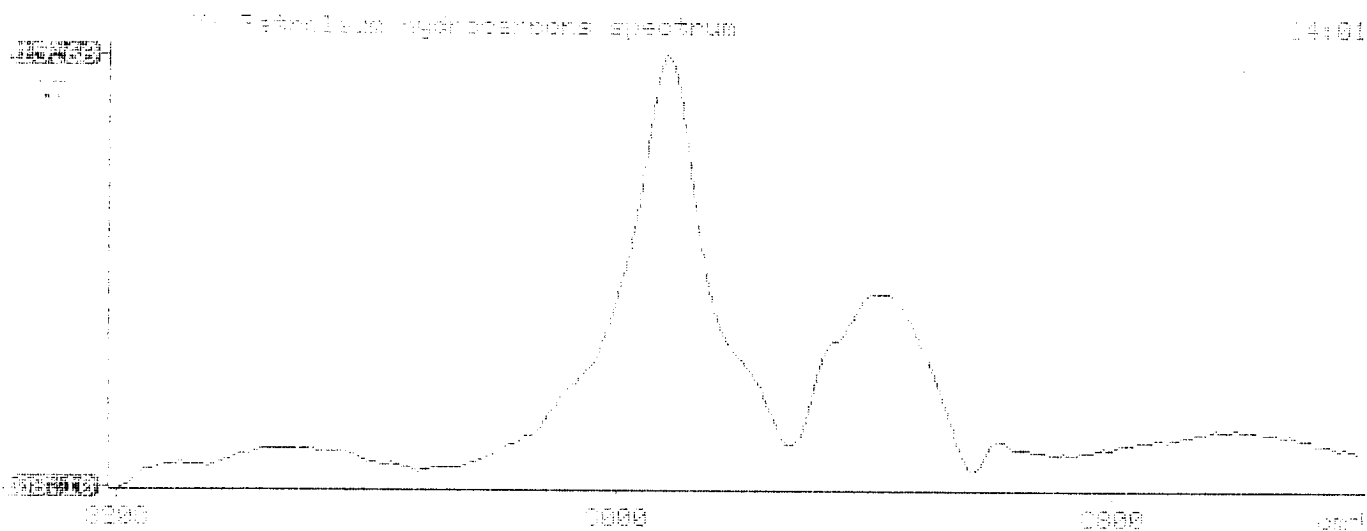
Sample Identification
 648499

Initial mass of sample, g
 1.125

Volume of sample after extraction, ml
 10.000

Petroleum hydrocarbons, ppm
 33.253

Net absorbance of hydrocarbons (2930 cm^{-1})
 0.005



ILLEGIBLE