

*Denny E. Foust*  
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

*Approved*

Meter Number:89315

Location Name:SAN JUAN 29-6 UNIT #57A

Location:TN-29 RG-06

SC-33 UL-P

2 - Federal

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.

# EPFS

## FIELD PIT SITE ASSESSMENT FORM EL PASO FIELD SERVICES

2

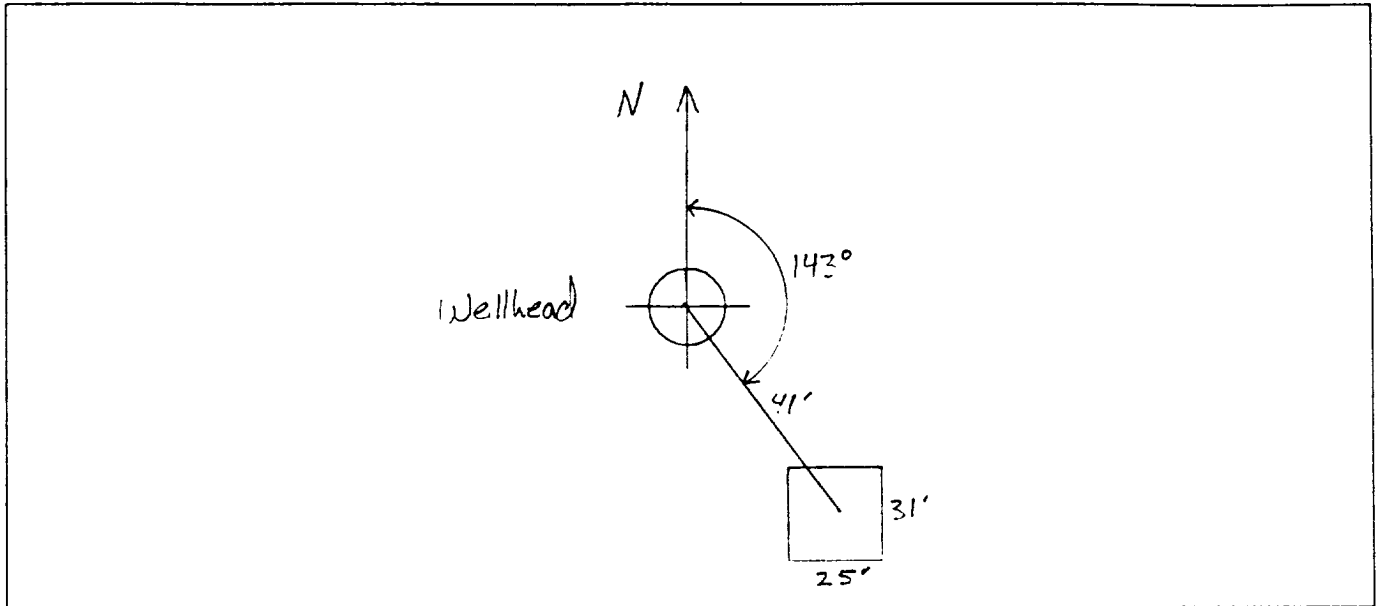
<b>GENERAL</b>	<p>Meter: <u>89315</u> Location: <u>San Juan 29-6 unit 57A</u></p> <p>Operator #: <u>7035</u> Operator Name: <u>Phillips</u> P/L District: <u>Bloomfield</u></p> <p>Coordinates: Letter: <u>P</u> Section <u>33</u> Township: <u>29</u> Range: <u>6</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>6-4-94</u> Area: <u>10</u> Run: <u>91</u></p>								
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> (From NMOCD Maps)</p> <p style="margin-left: 150px;">Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> <p><b>Land Type:</b></p> <table style="width: 100%;"> <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> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p><b>Wellhead Protection Area :</b></p> <p>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)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) &lt; 100' (Navajo Pits Only)</p> <p style="margin-left: 350px;"><input type="checkbox"/> (2) &gt; 100'</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>0</u> POINTS</p>	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>REMARKS</b>	<p>Remarks : <u>Two pits on location. one is in use with tank in it, other is dry.</u></p> <p><u>location outside V.Z. on Redline &amp; Topo</u></p>								

PUSH IN

ORIGINAL PIT LOCATION

## ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 143 Footage from Wellhead 41  
b) Length : 31 Width : 25 Depth : 4



REMARKS

Remarks :

Photos 12/12 hrs  
dump truck - poss End dump

Completed By:

Ken Walter  
Ken Walter Signature

6-4-94  
Date

## FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>89315</u> Location: <u>SAN Juan 29-6 unit #57A</u>
	Coordinates: Letter: <u>P</u> Section <u>33</u> Township: <u>29</u> Range: <u>6</u> Or Latitude _____ Longitude _____ Date Started : <u>7-5-94</u> Area: <u>10</u> Run: <u>91</u>
FIELD OBSERVATIONS	Sample Number(s): <u>MK 83</u>
	Sample Depth: <u>6'</u> Feet Final PID Reading <u>174</u> PID Reading Depth <u>6'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input type="checkbox"/> (1) Approx. Cubic Yards _____ Onsite Bioremediation <input type="checkbox"/> (2) Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3) Soil Disposition: Envirotech <input type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra Other Facility <input type="checkbox"/> (2) Name: _____ Pit Closure Date: <u>7-5-94</u> Pit Closed By: <u>BEI</u>
	REMARKS : <u>EPNG lines marked soil grayish brown slight</u> <u>Hydro carbon odor Hit Sandstone 6'</u>
Signature of Specialist: <u>Morgan Killian</u>	



# FIELD SERVICES LABORATORY

## ANALYTICAL REPORT

### PIT CLOSURE PROJECT - Soil

#### SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 83	945585
MTR CODE   SITE NAME:	89315	N/A
SAMPLE DATE   TIME (Hrs):	7-5-94	1412
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	7/7/94	7/7/94
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	VG	Tan 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)	1220	MG/KG			2.03	28
HEADSPACE PID	174	PPM				
PERCENT SOLIDS	9.7	%				

— 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

A.P.

7/14/94

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

24/07/97 17:05

Sample identification  
 43365 ~~---~~ Jul 7/7/94

Initial mass of sample, g  
 1.51

Volume of sample after extraction, ml  
 15.12

Concentration hydrocarbons, ppm  
 211404

Cal. abundance of hydrocarbons (1000 ppm)  
 1.51

