

Denny E. Fort
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

Approved

Meter Number:70031
Location Name:DAY #1
Location:TN-29 RG-08
SC-17 UL-K
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.

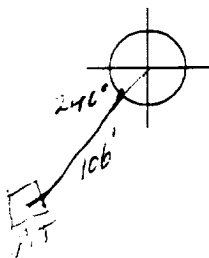
FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: <u>70031</u> Location: <u>DAY #1</u> Operator #: <u>2999</u> Operator Name: <u>Meridian</u> P/L District: <u>Bloomfield</u> Coordinates: Letter: <u>K</u> Section <u>17</u> Township: <u>29</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>4-19-94</u> Area: <u>10</u> Run: <u>92</u>	
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)	
	Land Type: BLM <input type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____ Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)	
	Depth to Groundwater 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)	
	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 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'	
REMARKS	TOTAL HAZARD RANKING SCORE: _____ POINTS	
	Remarks : <u>Pit was dry</u>	

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 240° Footage from Wellhead 106'
b) Length : 20' Width : 20' Depth : 36''

ORIGINAL PIT LOCATION



Remarks :

PIT IS DRY

REMARKS

Completed By:

Eugene Truby
Signature

4-19-94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>70031</u> Location: <u>DAY #1</u> Coordinates: Letter: <u>K</u> Section <u>17</u> Township: <u>29</u> Range: <u>8</u> Or Latitude _____ Longitude _____ Date Started : <u>4-19-94</u> Area: <u>10</u> Run: <u>92</u>
FIELD OBSERVATIONS	<u>940761</u> Sample Number(s): <u>ET 2 ET 4</u> <u>ADD 4/20/94 per telecom w/ET.</u> Sample Depth: _____ Feet Final PID Reading _____ PID Reading Depth _____ 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>4-19-94</u> Pit Closed By: <u>E.P.N.R.</u>
REMARKS	Remarks : <u>PIT WAS DRY</u> _____ _____
	Signature of Specialist: <u>Eugene Truly</u>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	ET4	940761
MTR CODE SITE NAME:	70031	N/A
SAMPLE DATE TIME (Hrs):	4/19/94	1030
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	4-21-94	4-21-94
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	TAN Coarse 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)	5775	MG/KG			2.0	28
HEADSPACE PID	1130	PPM				
PERCENT SOLIDS	85	%				

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

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

DF = Dilution Factor Used

Approved By: John F. Smith

Date: 4/20/94

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

1/04/21 10:46

Sample Identification
00761

Initial mass of sample g
0.00

Volume of sample after extraction, ml
0.000

Petroleum hydrocarbons, ppm
10,000
Net absorbance of hydrocarbons (2700 cm-1)
0.00

