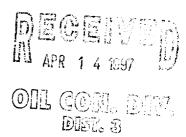
DEPUTY OF SING SOURCES

Meter Number:89308
Location Name:LIVELY #26
Location:TN-29 RG-08
SC-07 UL-M
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 PASOFIELD SERVICES

GENERAL	Meter: 89308 Location:
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside Outside Outside (2) Maps Depth to Groundwater Less Than 50 Feet (20 points) Greater Than 100 Ft (0 points) Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction?, or; ls it less than 200 ft from a private domestic water source? Horizontal Distance to Surface Water Body Less Than 1000 Ft (10 points) Greater Than 1000 Ft (0 points) (2) No (0 points) Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) (2) Greater Than 1000 Ft (10 points) (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 (1) < 100'(Navajo Pits Only) (2) > 100' TOTAL HAZARD RANKING SCORE: POINTS
REMARKS	Remarks: TWO PITS ON COCATION. ONE DEHY PIT TO BECCOSED PIT 15 DRY. REDUNE AND TOPO CONFIRM LOCATION IS OUTSIDE V.Z.
REN	PUSHIN

(SP3190) 04/08/94

FIEL PIT REMEDIATION/CLOS E FORM

GENERAL	Meter: 89308 Location: LiveLY 26 Coordinates: Letter: M Section 7 Township: 29 Range: 8 Or Latitude Longitude Date Started: 11-18-94 Run: 10 92
FIELD OBSERVATIONS	Sample Number(s): KP 346 Sample Depth: Feet Final PID Reading OOO
CLOSURE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation Soil Disposition: Envirotech Other Facility Name: Pit Closure Date: 11-18-94 Pit Closed By: 3.F.T.
REMARKS	Remarks: Some Line markers dug down 6' Hit SAND STONE Soil Rown Looking. Signature of Specialist: Kelly Pakele

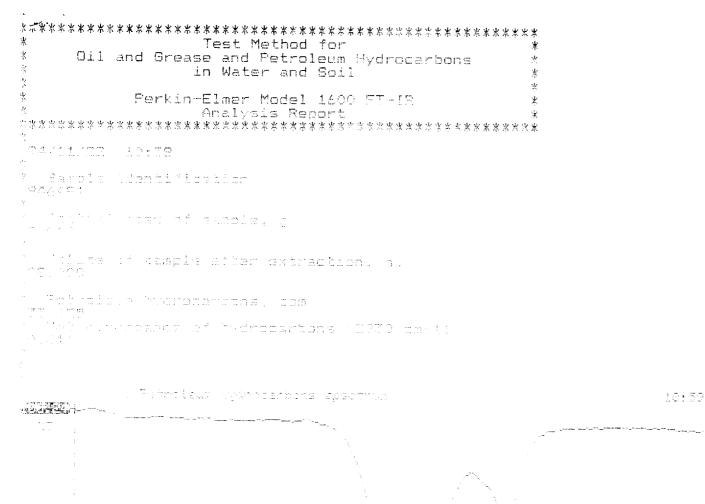


FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field	ID.		Lab ID		
SAMPLE NUMBER: KR 34/4			946491			
MTR CODE SITE NAME: 89.308			N/A			
SAMPLE DATE TIME (Hrs):	11-18-9-		0937			
SAMPLED BY:	N/A					
DATE OF TPH EXT. ANAL.:	11-22-94		11-22-94			
DATE OF BTEX EXT. ANAL.:	.: ~ \		NIA			
TYPE DESCRIPTION:	V G					
REMARKS:	r	RESULTS				
		1E3UL13				
PARAMETER	RESULT	UNITS	QUALIFIERS DF Q M(g) V(ml)			
TPH (418.1)	35.0	MG/KG			2.01	28
HEADSPACE PID	٥	РРМ				
PERCENT SOLIDS	91.8	%				- · · · · · · · · · · · · · · · · · · ·
	-	TPH is by EPA Method	d 418.1			
larrative:						
DF = Dilution Factor Used						
Approved By:			Date:	12-6	-4 <u>Y</u>	



X355