

Lenny E. Foust
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Approved

Location Name: SAN JUAN 31-6 MESA #6-1

Location: TN-30 RG-07

SC-01 UL-L

2 - Federal

NMOCD Zone: OUTSIDE

Hazard Ranking Score: 00

Meter Number: 71081

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.

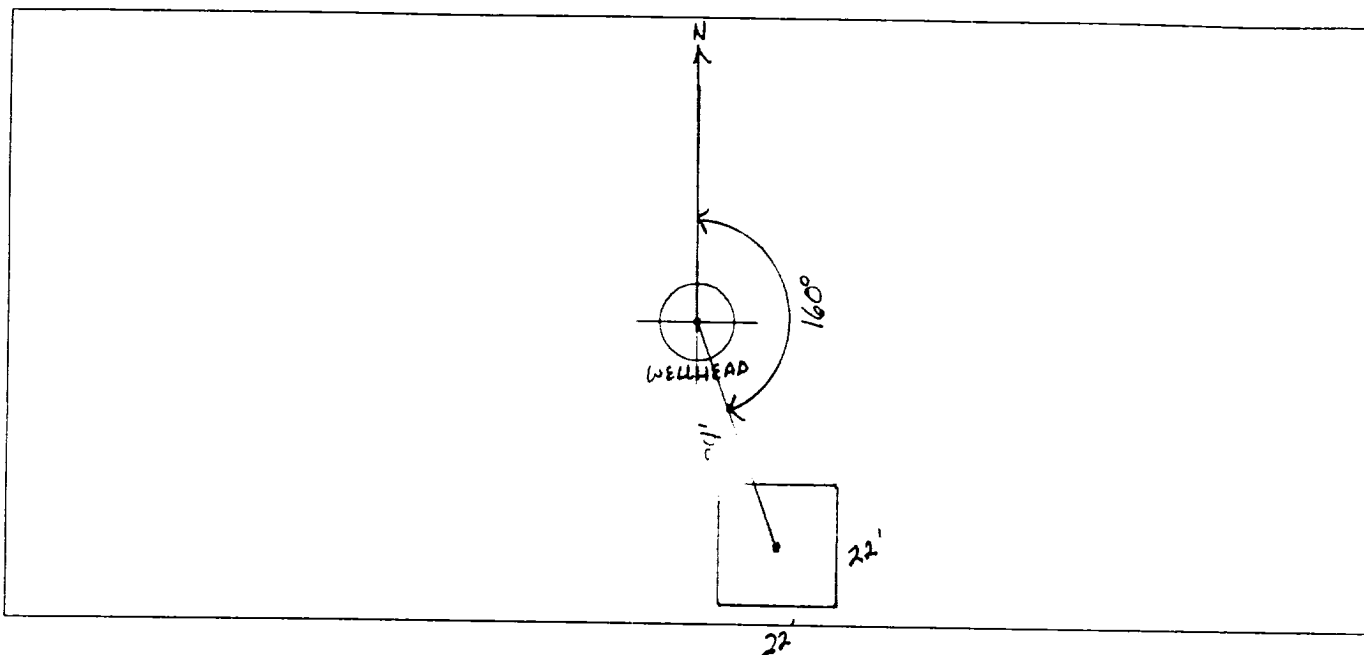
Based on the above information, it is highly unlikely that any source material will impact groundwater or ever find an exposure pathway to affect human health and therefore El Paso Field Services Company (EPFS) requests closure of this pit location.

FIELD PIT SITE ASSESSMENT FORM

| | |
|------------------------|---|
| GENERAL | <p>Meter: <u>71081</u> Location: <u>SAN JUAN 31-6 MESA #6-1</u></p> <p>Operator #: <u>7035</u> Operator Name: <u>PHILLIPS P/L</u> District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>1</u> Township: <u>30</u> Range: <u>7</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>6-6-94</u> Area: <u>10</u> Run: <u>82</u></p> |
| SITE ASSESSMENT | <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>NMOCD Zone: (From NMOCD Maps)</p> <p>Inside <input type="checkbox"/> (1) Outside <input checked="" type="checkbox"/> (2)</p> </div> <div style="width: 45%;"> <p>Land Type:</p> <p>BLM <input checked="" type="checkbox"/> (1) State <input type="checkbox"/> (2) Fee <input type="checkbox"/> (3) Indian _____</p> </div> </div> <p>Depth to Groundwater</p> <p>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)</p> <p>Wellhead Protection Area :</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>Horizontal Distance to Surface Water Body</p> <p>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)</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) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p> |
| REMARKS | <p>Remarks : <u>ONLY PIT ON LOCATION. PIT IS DRY. LOCATION IS ON A MESA NORTH OF THE SIMS HWY. REDLINE AND TOPO CONFIRMED LOCATION OUTSIDE V.Z.</u></p> <p style="text-align: right;"><u>PUSH IN</u></p> |

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 160° Footage from Wellhead 84'
b) Length : 22' Width : 22' Depth : 2'



REMARKS :

TOOK PICTURES AT
END DUMP

Completed By:

Robert Thompson

Signature

6.6.94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

| | |
|---------------------------|--|
| GENERAL | <p>Meter: <u>71081</u> Location: <u>SAN JUAN 31-6 MESA #6-1</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>1</u> Township: <u>30</u> Range: <u>7</u> 7/13/94 BR</p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>7-12-94</u> Area: <u>10</u> Run: <u>82</u></p> |
| FIELD OBSERVATIONS | <p>Sample Number(s): <u>MK122</u></p> <p>Sample Depth: <u>4'</u> Feet</p> <p>Final PID Reading <u>312</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>7-12-94</u> Pit Closed By: <u>BEI</u></p> |
| REMARKS | <p>Remarks : <u>EPNG lines marked soil grayish brown strong</u></p> <p><u>Hydrocarbon odor Hit sand stone 4'</u></p> |
| | <p>Signature of Specialist: <u>Morgan Hillier</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:

mk 122

71081

7-12-94

N/A

7-14-94

N/A

VG

945646

N/A

1331

7/14/94

N/A

Grey Fine 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) | 495 | MG/KG | | | 2.03 | 28 |
| HEADSPACE PID | 312 | PPM | | | | |
| PERCENT SOLIDS | 92.1 | % | | | | |

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

The Surrogate Recovery was at
Narrative:

N/A

% for this sample All QA/QC was acceptable.

DF = Dilution Factor Used

ND

7/14/94

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

74/07/14 10:45

Sample identification
345646

Initial mass of sample, g
1.530

Volume of sample after extraction, ml
10.000

Petroleum hydrocarbons, ppm
175.466

Net absorbance of hydrocarbons (2930 cm⁻¹)
1.063

ILLEGIBLE

IR: Petroleum hydrocarbons spectrum

10:45

