HAMPYGGETTOR

Meter Number:70101 Location Name:JONES #1 Location:TN-29 RG-11 SC-13 UL-A 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.

COPY FOR STATE OF NEW MEXICO OIL CONSERVATION **COMMISSION** SUBI

## **UNITED STATES DEPARTMENT OF THE INTERIOR**

Land Office_	New	Mexico
ooso No	0373	17

Unit Jones #1

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W will be cemented to surface. Well will be shot with approximately 300 ats. nitro glycerin.

I understand that this plan of work must receive approval in writing by the Geological Survey before operations may be commenced.

Company	Francis L. Harvey	4-4-4-4
Address	% Wichital Engineering Co.	
	Wichita Falls, Texas	By MM Gon &
***************************************		Title R. D. Young - Agent

## Elevation Survey

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