

*Denny L. Foust*  
DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

*Approved*

Meter Number: 73822

Location Name: FLORANCE GAS COM B#1

Location: TN-29 RG-12

SC-09 UL-H

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.

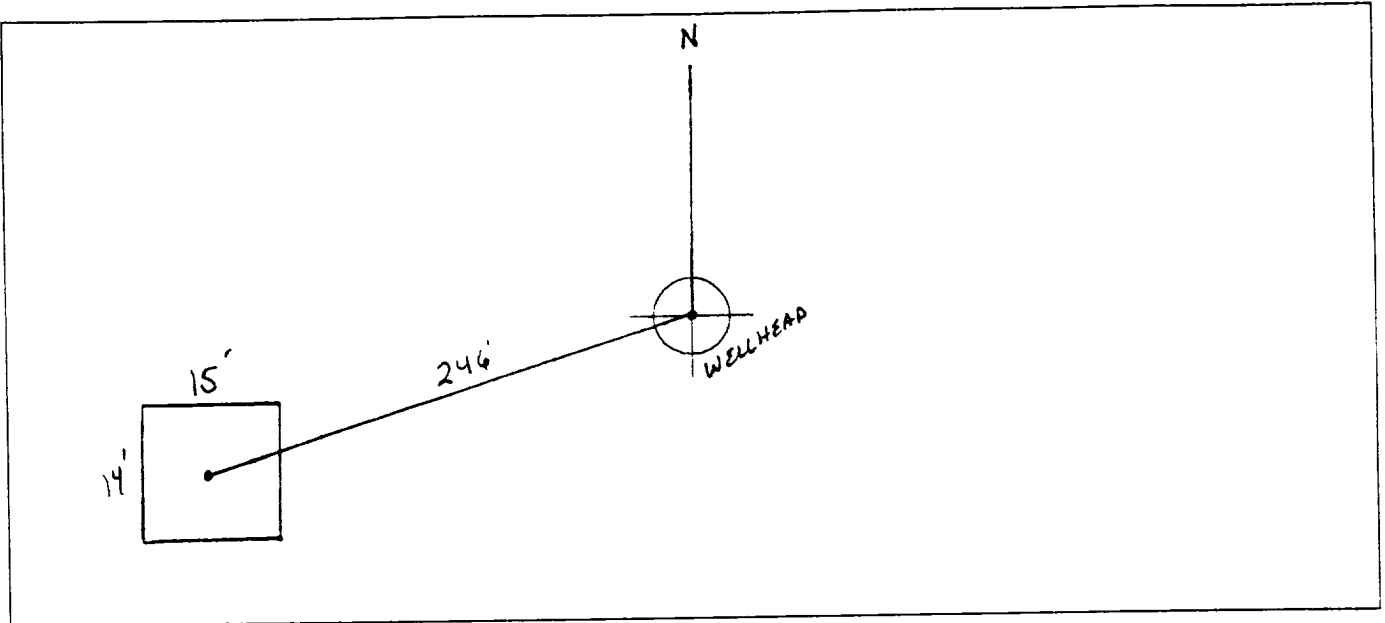
Based on the above information, it is highly unlikely that any source material will impact groundwater or ever find an exposure pathway to affect human health and therefore El Paso Field Services Company (EPFS) requests closure of this pit location.

## FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>73822</u> Location: <u>FLORENCE GAS COM B #1</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <u>H</u> Section <u>9</u> Township: <u>29</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>3.17.94</u> Run: <u>02</u> <u>02</u></p>
	SITE ASSESSMENT
REMARKS	

## ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 252° Footage to Wellhead 246'  
 b) Degrees from North \_\_\_\_\_ Footage to Dogleg \_\_\_\_\_  
 Dogleg Name \_\_\_\_\_  
 c) Length : 15' Width : 14' Depth : 3'



### REMARKS :

STARTED TAKING PICTURES AT 12:26 P.M.

Completed By:

*Paul Thompson*  
 Signature

3.17.94  
 Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 73822 Location: Florence Gas Com 3 #1  
 Coordinates: Letter: H Section 9 Township: 29 Range: 12  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Date Started : 5-13-94 Area: 02 Run: 02

FIELD OBSERVATIONS

Sample Number(s): VW 76  
 Sample Depth: 4' Feet  
 Final PID Reading 180 PID Reading Depth 4' Fe  
 Yes No  
 Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth \_\_\_\_\_ Fe

CLOSURE

Remediation Method :  
 Excavation ☐ (1) Approx. Cubic Yards \_\_\_\_\_  
 Onsite Bioremediation ☐ (2)  
 Backfill Pit Without Excavation ☒ (3)  
 Soil Disposition:  
 Envirotech ☐ (1) ☐ (3) Tierra  
 Other Facility ☐ (2) Name: \_\_\_\_\_  
 Pit Closure Date: 5-13-94 Pit Closed By: BEI

REMARKS

Remarks : Live Meters on location, 4 feet hit rock.

Signature of Specialist: Vale Wilson



## FIELD SERVICES LABORATORY

## ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil

## SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW 76	945167
MTR CODE   SITE NAME:	73822	N/A
SAMPLE DATE   TIME (Hrs):	5-13-94	1505
SAMPLED BY:	N/A	
DATE OF TPH EXT.   ANAL.:	5/17/94	5/17/94
DATE OF BTEX EXT.   ANAL.:	N/A	N/A
TYPE   DESCRIPTION:	UG	Brown/grey fine 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)	570	MG/KG			2.18	2.8
HEADSPACE PID	180	PPM				
PERCENT SOLIDS	91.7	%				

-- 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

Approved By:

John Swartz

Date:

6/15/94

ILLEGIBLE

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

24/05/17 15:35

Sample identification  
45167  
Initial mass of sample, g  
1.180  
Volume of sample after extraction, ml  
18.000  
Petroleum hydrocarbons, ppm  
169.95  
Net absorbance of hydrocarbons (2930 cm-1)  
0.076

Net Petroleum hydrocarbons spectrum

15:35

