

El Paso Field Services Company
Environmental Services

DEC 8 6 1997

Approved

Meter Number:75526
Location Name:Simmons #6 PC
Location:TN-29 RG-09
SC-24 UL-L
2 - Federal
NMOCD Zone:OUTSIDE
Hazard Ranking Score:00

RECEIVED
APR 14 1997
OIL CON. DIV.
EVAL 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: 75526 Location: Simmon's #6 PC
Operator #: 8043 Operator Name: J.A. Simmons P/L District: Blanco
Coordinates: Letter: L Section 24 Township: 29 Range: 09
Or Latitude _____ Longitude _____
Pit Type: Dehydrator _____ Location Drip: X Line Drip: _____ Other: _____
Site Assessment Date: 6-9-95 Area: 13 Run: 51

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps) Inside ☐ (1) Outside ☒ (2)
Land Type: BLM ☒ (1) State ☐ (2) Fee ☐ (3) Indian _____

Depth to Groundwater
Less Than 50 Feet (20 points) ☐ (1)
50 Ft to 99 Ft (10 points) ☐ (2)
Greater Than 100 Ft (0 points) ☒ (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? ☐ (1) YES (20 points) ☒ (2) NO (0 points)

Horizontal Distance to Surface Water Body
Less Than 200 Ft (20 points) ☐ (1)
200 Ft to 1000 Ft (10 points) ☐ (2)
Greater Than 1000 Ft (0 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: 0 POINTS

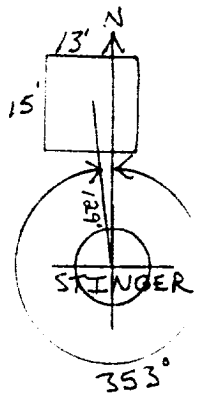
REMARKS

Remarks : P+ A Redline + Topo both show outside VZ.
With close Pit

Push In

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 353° Footage from Wellhead 129'b) Length : 13' Width : 15' Depth : 2'

REMARKS

Remarks :

Photos: 4 pict 10:40

Completed By:

James L. Penrose

Signature

6-9-95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>75526</u> Location: <u>Simmons #6 pc</u> Coordinates: Letter: <u>1</u> Section <u>24</u> Township: <u>29</u> Range: <u>09</u> Or Latitude _____ Longitude _____ Date Started : <u>7-5-95</u> Run: <u>13</u> <u>51</u>
FIELD OBSERVATIONS	Sample Number(s): <u>MK 420</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>224</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input type="checkbox"/> Approx. Cubic Yards _____ Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input checked="" type="checkbox"/> Soil Disposition: Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/> Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>7-5-95</u> Pit Closed By: <u>philips</u>
REMARKS	Remarks : <u>Arrived took fence down dug sample hole 1st</u> <u>8' appeared to be clean, next 2' Black soil and the last</u> <u>2' appeared to clean up again soil Brown strong Hydrocarbon</u> <u>odor</u>
	Signature of Specialist: <u>Morgan Killian</u>



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	m/s 420	7/1/95 946948 246948
MTR CODE SITE NAME:	75526	N/A
SAMPLE DATE TIME (Hrs):	7-5-95	1500
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	7-6-95	7-6-95
DATE OF BTEX EXT. ANAL.:		
TYPE DESCRIPTION:	VG	brown sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	2040 2044	MG/KG			1.97	28
HEADSPACE PID	224	PPM				
PERCENT SOLIDS	86.9	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

J.F.

Date:

7/7/95

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*****
Test Method for
Oil and Grease and Petroleum Hydrocarbons
in Water and Soil
Perkin-Elmer Model 1600 FT-IR
Analysis Report
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95/07/06 13:38

Sample identification
946948

Initial mass of sample, g
1.970

Volume of sample after extraction, ml
28.000

Petroleum hydrocarbons, ppm
2043.807

Net absorbance of hydrocarbons (2930 cm⁻¹)
0.254

