

Denny & Faust

DEPUTY OIL & GAS INSPECTOR

DEC 30 1997

Approved

Meter Number: 93155

Location Name: MARSROW GAS COM #1E

Location: TN-29 RG-12

SC-15 UL-L

2 - Federal

NMOCD Zone: OUTSIDE

Hazard Ranking Score: 00

RECEIVED
APR 14 1997

OIL CONSERV
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

Meter: 93155 Location: MARSROW GAS COM #1E
 Operator #: 0203 Operator Name: AMOCO P/L District: KUTZ
 Coordinates: Letter: L Section 15 Township: 29 Range: 12
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Visit Date: 3.17.94 Run: 02 02

SITE ASSESSMENT

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

Depth to Groundwater

Less Than 50 Feet (20 points) ☐
 50 Ft to 99 Ft (10 points) ☐
 Greater Than 100 Ft (0 points) ☒

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? ☐ YES (20 points) ☒ NO (0 points)

Horizontal Distance to Surface Water Body

Less Than 200 Ft (20 points) ☐
 200 Ft to 1000 Ft (10 points) ☐
 Greater Than 1000 Ft (0 points) ☒

Name of Surface Water Body _____

(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : LOCATION IS ON TOP OF A HILL. DEHYDRATOR HAS NOT BEEN DISCONNECTED. PIT IS DRY.

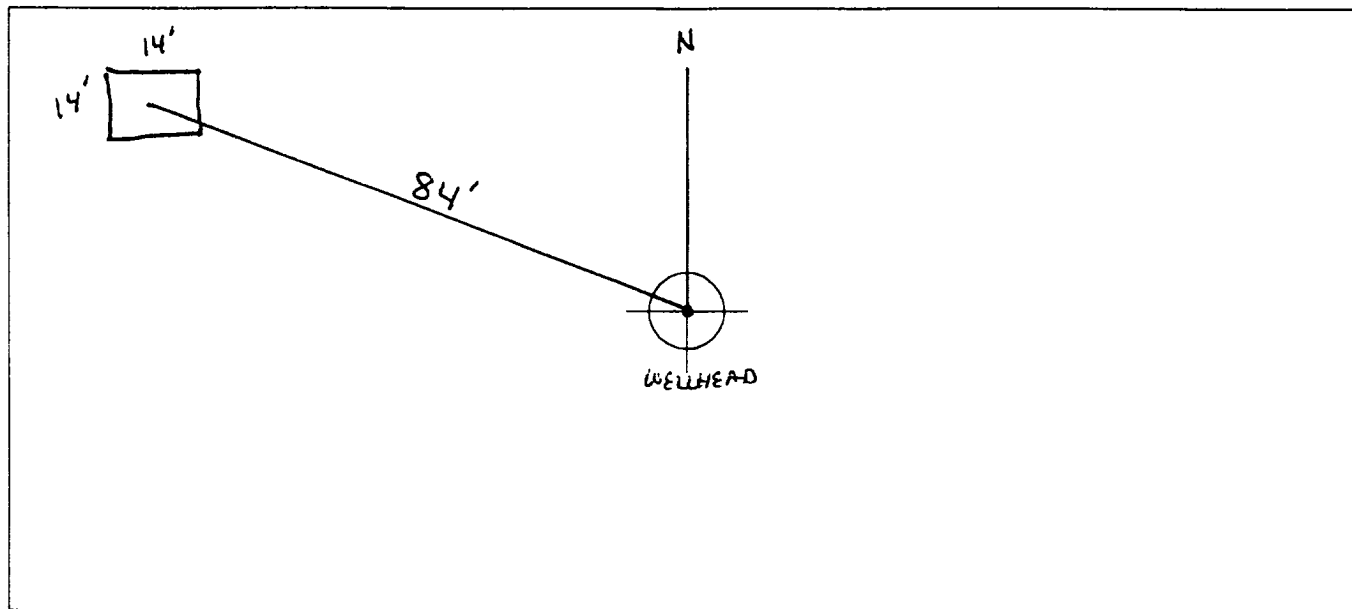
ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 290° Footage to Wellhead 84'

b) Degrees from North _____ Footage to Dogleg _____

Dogleg Name _____

c) Length : 14' Width : 14' Depth : 2'



Remarks :

STARTED TAKING PICTURES AT 8:46 A.M.

END DUMP

Completed By:

Robert Thompson
Signature

3.17.94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>93155</u> Location: <u>Margrow Gas Cam #1E</u> Coordinates: Letter: <u>L</u> Section <u>15</u> Township: <u>29</u> Range: <u>12</u> Or Latitude _____ Longitude _____ Date Started : <u>5-16-94</u> Area: <u>02</u> Run: <u>02</u>
FIELD OBSERVATIONS	Sample Number(s): <u>11W78</u> Sample Depth: <u>4'</u> Feet Final PID Reading <u>244</u> PID Reading Depth <u>4'</u> 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: <u>5-16-94</u> Pit Closed By: <u>BEZ</u>
REMARKS	Remarks : <u>no line markers. Hit sandstone at 4'</u>
	Signature of Specialist: <u>Vale Wilson</u>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

SAMPLE NUMBER:

VW-78

Lab ID

945177

MTR CODE | SITE NAME:

93155

N/A

SAMPLE DATE | TIME (Hrs):

5-16-94

0815

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:

VG

Brown 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	26,700	MG/KG				
TPH (418.1)	26720 26720	MG/KG			0.25	2.8
HEADSPACE PID	244	PPM				
PERCENT SOLIDS	85.2	%				

-- 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 Ladd

Date:

6/15/94

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

04/05/17 16:25

Sample Identification
 145177

Initial mass of sample, g
 1.000

Volume of sample after extraction, ml
 10.00

Petroleum hydrocarbons, ppm
 16700.715

Wavelength of hydrocarbons (2930 cm-1)
 1637

