

*Denny L. Best*  
**DEPUTY OIL & GAS INSPECTOR**

DEC 22 1997

*Approved*

**Meter Number: 70501**  
**Location Name: THOMPSON LS #2**  
**Location: TN-30 RG-08**  
**SC-34 UL-M**  
**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.

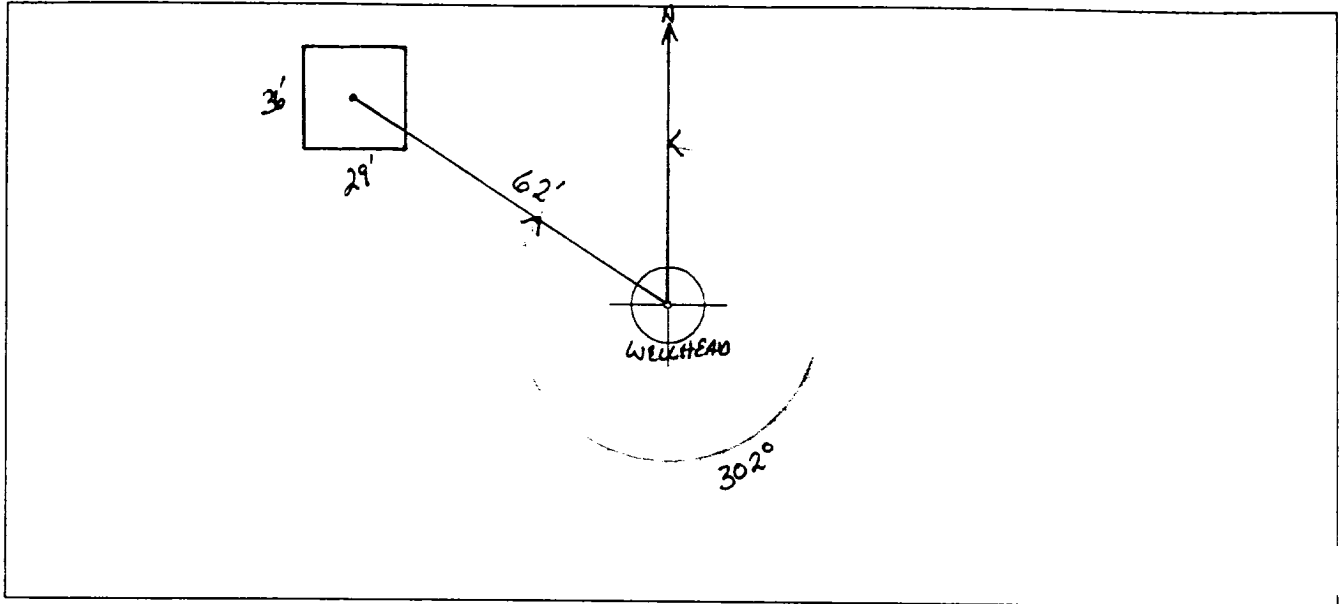
Natural process (bioremediation) are degrading the residual hydrocarbon to carbon dioxide and water and will continue until the source is gone, therefore minimizing any impact to the environment.

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.

PUSH IN

### ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 302° Footage from Wellhead 62'  
 b) Length : 36' Width : 29' Depth : 5'



### Remarks :

TOOK PICTURES AT 1:06 P.M.

DUMP TRUCK - BOBTAIL

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Completed By:

Robert Thompson

Signature

5.5.94

Date

# FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 70501 Location: Thompson LS#2

Coordinates: Letter: m Section 34 Township: 30 Range: 8

Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

Date Started : 5-23-94 Area: 10 Run: 41

FIELD OBSERVATIONS

Sample Number(s): VW135

Sample Depth: 10' Feet

Final PID Reading 177 PID Reading Depth 10' Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth \_\_\_\_\_ Feet

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: 5-23-94 Pit Closed By: BEI

REMARKS

Remarks : EPNG line markers. Disconnected flow line still in pit. RC  
said Bery if. 10' hit sandstone  
8 Endumps of fill soil

Signature of Specialist: Vale Wilson



# 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:

VW 135

945276

70501

N/A

5-23-94

1230

N/A

5-24-94

5/24/94

N/A

N/A

VG

Brown coarse 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)	2220	MG/KG			2.0	28
HEADSPACE PID	177	PPM				
PERCENT SOLIDS	94.7	%				

-- 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

Approved By:

*John Latta*

Date:

6/16/94

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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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74/05/24 12:52

Sample identification  
 045276

Initial mass of sample, g  
 1.000

Volume of sample after extraction, ml  
 28.000

Petroleum hydrocarbons, ppm  
 1212.336  
 Net absorbance of hydrocarbons (2930 cm-1)  
 0.271

