DEPUTY OIL & SASSIMEPERS OF

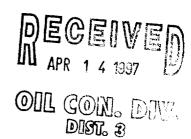
September 1985

DEC 2211997

Approved

Meter Number:72966 Lecation Name:SCHOEN LS #2 Location:TN-30 RG-10 SC-27 UL-L 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.



## FIELD PIT SITE ASSESSMENT FORM

| GENERAL         | Meter: 72966 Location: SCHOEN LS #2  Operator #: 0203 Operator Name: Amoro P/L District: BLOOMEIELD  Coordinates: Letter: L Section 27 Township: 30 Range: 10  Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: 5.3.94 Area: 10 Run: 73                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |  |  |  |  |  |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|
| SITE ASSESSMENT | NMOCD Zone:  (From NMOCD  Maps)  Inside  Outside  Outside  Depth to Groundwater  Less Than 50 Feet (20 points)  Greater Than 100 Ft (0 points)  Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction?, or; ls it less than 200 ft from a private domestic water source?  Horizontal Distance to Surface Water Body  Less Than 200 Ft (20 points)  Greater Than 1000 Ft (0 points)  Greater Than 200 Ft (20 points)  Greater Than 200 Ft (20 points)  Greater Than 1000 Ft (10 points)  Greater Than 1000 Ft (0 points)  Greater Than 1000 Ft (0 points)  State (2)  State (2)  Indian  1)  (2)  Greater Than 100 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 BANKING SCORD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |  |  |
| REMARKS         | Remarks : THREE PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY REDLINE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |  |  |
| MAI             | AND TOPO CONFIRMED LOCATION TO BE OUTSIDE THE V.Z.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |  |  |  |  |  |
| RE              | Push in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  |  |  |  |  |

| ORIGINAL PIT LOCATION | ORIGINAL PIT LOCATION  Original Pit: a) Degrees from North 73° Footage from Wellhead 34′ b) Length: 17′ Width: 16′ Depth: 3′ |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------|
| REMARKS               | Remarks: STAN PICTURES AT 1:06 P.M. END DUMP                                                                                 |
|                       | Completed By:                                                                                                                |

Date

Signature

## FIELD TREMEDIATION/CLOSUR FORM

| GENERAL ~          | Meter: 7396 Location: Show 15#2  Coordinates: Letter: L. Section 27 Township: 30 Range: 10  Or Latitude Longitude Longitude  Date Started: 6-9-94 Area: 10 Run: 73                                                                                                 |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FIELD OBSERVATIONS | Sample Number(s): \( \frac{1/29}{\lambda} \) Feet  Final PID Reading \( \frac{20}{\lambda} \) Feet  Yes No  Groundwater Encountered \( \begin{align*} \begin{align*} \frac{1}{\lambda} \end{align*} \) Approximate Depth \( \frac{1}{\lambda} \end{align*} \) Feet |
| CLOSURE            | Remediation Method:  Excavation                                                                                                                                                                                                                                    |
| REMARKS            | Remarks:                                                                                                                                                                                                                                                           |



# FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

### SAMPLE IDENTIFICATION

| _                           | Field                                 | ID               |                      | Lab ID     |            |       |
|-----------------------------|---------------------------------------|------------------|----------------------|------------|------------|-------|
| SAMPLE NUMBER:              | VW 189                                | 945421           |                      |            |            |       |
| MTR CODE   SITE NAME:       | 72946                                 | N/A              |                      |            |            |       |
| SAMPLE DATE   TIME (Hrs):   | 10-9-94                               |                  | 1530                 |            |            |       |
| SAMPLED BY:                 | · · · · · · · · · · · · · · · · · · · | N/A              |                      |            |            |       |
| DATE OF TPH EXT.   ANAL.:   | 10/10/94                              |                  | 6/10/94              |            |            |       |
| DATE OF BTEX EXT.   ANAL.:  | NIA                                   |                  | u /n                 |            |            |       |
| TYPE   DESCRIPTION:         | V G-                                  |                  | Light Grey Arre Sand |            |            | Clay  |
| REMARKS: _                  | F                                     | RESULTS          |                      |            |            |       |
|                             |                                       | ILOULIO          |                      |            |            |       |
| PARAMETER                   | RESULT                                | UNITS            |                      | QUALIF     | QUALIFIERS |       |
|                             |                                       |                  | DF                   | Q          | M(g)       | V(mi) |
| BENZENE                     |                                       | MG/KG            |                      |            |            |       |
| TOLUENE                     | :                                     | MG/KG            |                      |            |            |       |
| ETHYL BENZENE               |                                       | MG/KG            |                      |            |            |       |
| TOTAL XYLENES               | <u> </u>                              | MG/KG            |                      |            |            |       |
| TOTAL BTEX                  |                                       | MG/KG            |                      |            |            |       |
| TPH (418.1)                 | 8200                                  | MG/KG            |                      |            | 0.97       | 28    |
| HEADSPACE PID               | 201                                   | РРМ              |                      |            |            |       |
| PERCENT SOLIDS              | 88.5 %                                |                  |                      |            |            |       |
|                             | - TPH is by ERA Method 418            |                  |                      |            |            |       |
| e Surrogate Recovery was at | N/H 9                                 | % for this sampl | e All QA/QC          | was accept | able.      |       |

10/11/11/11

F = Dilution Factor Used

\*\*\*\*\*\*\*\*\*\* \*\*\*\*\*\*\*\*\* Test Method for Oil and Grease and Petroleum Hydrocarbons \* \* in Water and Soil Perkin-Elmer Model 1600 FT-IR Analysis Report 34/06/10 14:55 Sample identification 45421 Initial mass of sample, g Valume of sample after extraction, ml 13.000 . Huroleum hydrocarbons, ppm 8202.053 Het absorbance of hydrocarbons (2930 cm-1) 1,498

