

*Denny S. Faust*  
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

*Approved*

Meter Number: 73935  
Location Name: L.C. KELLY #4  
Location: TN-30 RG-12  
SC-03 UL-L  
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.

# EPFS

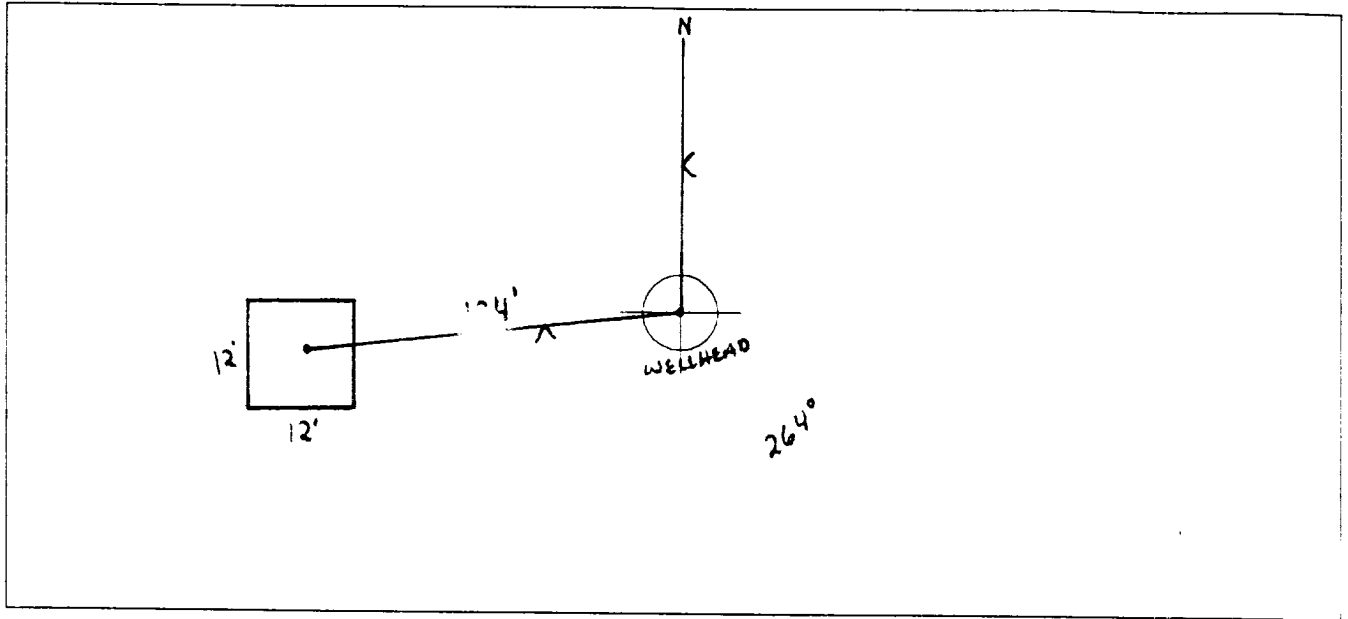
## FIELD PIT SITE ASSESSMENT FORM

**EL PASO FIELD SERVICE**

<b>GENERAL</b>	<p>Meter: <u>73935</u> Location: <u>L.C. KELLY #4</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>Amoco</u> P/L District: <u>KUTZ</u></p> <p>Coordinates: Letter: <sup>41-94 L</sup><del>M</del> Section <u>3</u> Township: <u>30</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>4.1.94</u> Run: <u>02</u> <u>63</u></p>
<b>SITE ASSESSMENT</b>	<p><b>NMOCD Zone:</b> Inside <input type="checkbox"/> (From NMOCD Maps) Vulnerable Zone <input type="checkbox"/> Outside <input checked="" type="checkbox"/></p> <p><b>Land Type:</b> BLM <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Indian _____</p> <p><b>Depth to Groundwater</b></p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/></p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/></p> <p><b>Wellhead Protection Area :</b></p> <p>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? <input type="checkbox"/> YES (20 points) <input checked="" type="checkbox"/> NO (0 points)</p> <p><b>Horizontal Distance to Surface Water Body</b></p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/></p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/></p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/></p> <p>Name of Surface Water Body _____</p> <p>(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)</p> <p><b>TOTAL HAZARD RANKING SCORE:</b> <u>0</u> POINTS</p>
<b>REMARKS</b>	<p>Remarks : <u>TWO PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY.</u></p>

# ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 264° Footage to Wellhead 124'  
 b) Degrees from North \_\_\_\_\_ Footage to Dogleg \_\_\_\_\_  
 Dogleg Name \_\_\_\_\_  
 c) Length : 12' Width : 12' Depth : 3'



## REMARKS :

STARTED TAKING PICTURES AT 10:25 A.M.  
END DUMP

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Completed By:

Robert Thompson  
 Signature

4.1.94  
 Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>73935</u> Location: <u>L.C. Kelly #4</u></p> <p>Coordinates: Letter: <u>L</u> Section <u>3</u> Township: <u>30</u> Range: <u>12</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <sup>slightly</sup> <u>5-10-94</u> Area: <u>02</u> Run: <u>63</u></p>
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <u>1W50</u></p> <p>Sample Depth: <u>12'</u> Feet</p> <p>Final PID Reading <u>176</u> PID Reading Depth <u>12'</u> Feet</p> <p style="text-align: center;">Yes      No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet</p>
<b>CLOSURE</b>	<p>Remediation Method :</p> <p>Excavation <input type="checkbox"/> (1) Approx. Cubic Yards <u>0</u></p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input checked="" type="checkbox"/> (3)</p> <p>Soil Disposition:</p> <p>Envirotech <input type="checkbox"/> (1) <input type="checkbox"/> (3) Tierra</p> <p>Other Facility <input type="checkbox"/> (2) Name: _____</p> <p>Pit Closure Date: <u>5-10-94</u> Pit Closed By: <u>BEI</u></p>
<b>REMARKS</b>	<p>Remarks : <u>EPNG line markers. H.Y Rock at 12'</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Vale Wilson</u></p>



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:

VW50

945118

73935

N/A

5-10-94

1230

N/A

5-12-94

5-12-94

N/A

N/A

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		MG/KG				
TPH (418.1)	2000	MG/KG			2.0	28
HEADSPACE PID	176	PPM				
PERCENT SOLIDS	88.0	%				

— 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 Sarda*

Date:

6/15/94

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Test Method for  
Oil and Grease and Petroleum Hydrocarbons  
in Water and Soil  
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Perkin-Elmer Model 1600 FT-IR  
Analysis Report  
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94/05/12 13:07

Sample identification  
945118

Initial mass of sample, g  
1.000

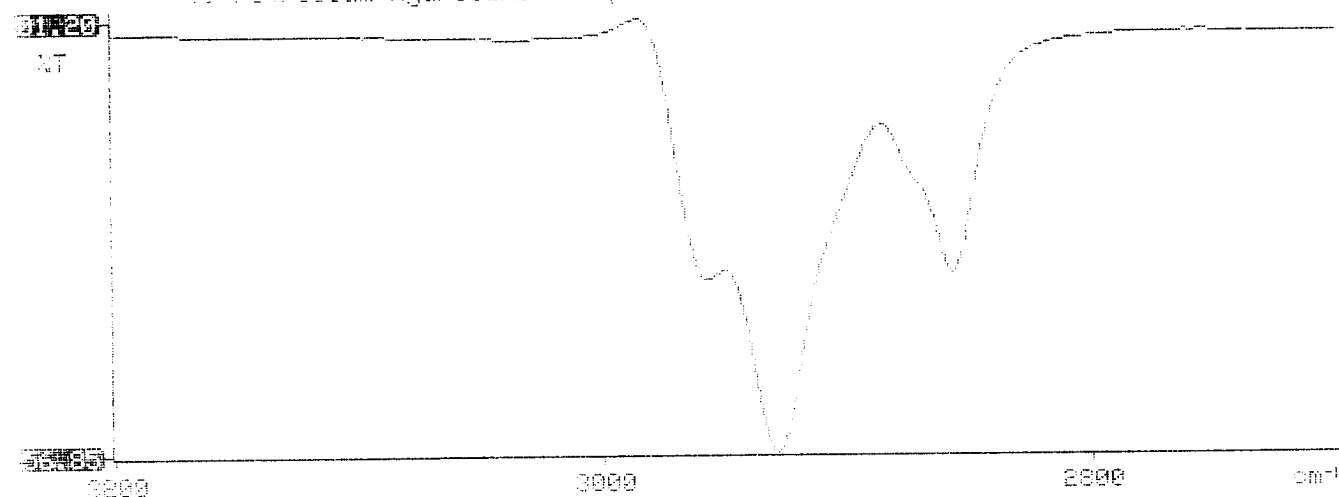
Volume of sample after extraction, ml  
28.000

Petroleum hydrocarbons, ppm  
1996.427

Net absorbance of hydrocarbons (2930  $\text{cm}^{-1}$ )  
0.244

Y: Petroleum hydrocarbons spectrum

13:07



**ILLEGIBLE**