Denny G. Foust
DEPUTY OIL & GAS INSPECTOR

DEC 0 2 1997

Approved

Meter Number:72378
Location Name:SAN JUAN 32-8 UNIT #8-22
Location:TN-31 RG-08
SC-22 UL-H
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
EL PASO FIELD SERVICES

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 72378 Location: San Juan 32-8 Unit 8-22
Operator #: 7035 Operator Name: Phillips P/L District: Bloomfield
Coordinates: Letter: H Section 22 Township: 31 Range: 8
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: ✓ Line Drip: ___ Other: _____
Site Assessment Date: 1/17/95 Area: 10 Run: 63

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 : Redline Book: Outside Vulnerable Zone Topo: Outside
1 pit. Will close

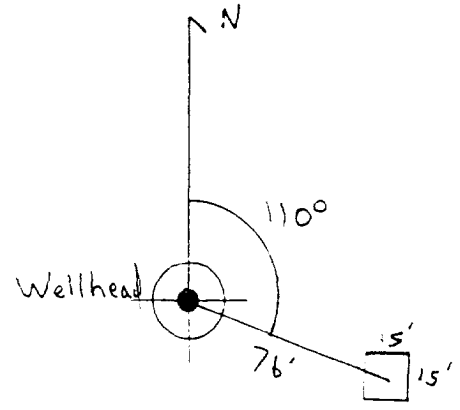
PUSH-IN

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 110° Footage from Wellhead 76'

b) Length : 15' Width : 15' Depth : 4'



REMARKS

Remarks :

Pictures @ 1221 hr 17 ~ 19 roll 1

Completed By:

Signature

1/17/95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 72378 Location: SAN Juan 32-8 Unit 8-22

Coordinates: Letter: H Section 22 Township: 31 Range: 8

Or Latitude _____ Longitude _____

Date Started : 2-13-95 Run: 10 63

FIELD OBSERVATIONS

Sample Number(s): MK 383 _____ _____ _____

Sample Depth: 12' Feet

Final PID Reading 0 ppm PID Reading Depth 12' Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

- Excavation ☐ Approx. Cubic Yards _____
- Onsite Bioremediation ☐
- Backfill Pit Without Excavation ☒

Soil Disposition:

- Envirotech ☐ ☐ Tierra
- Other Facility ☐ Name: _____

Pit Closure Date: ~~Arrived~~ MK 2-13-95 2-13-95 Pit Closed By: BE

REMARKS

Remarks : Arrived Dug sample Hole Pit appeared to be clean all the way Throug soil Brown NO Hydrocarbon odor

Signature of Specialist: Morgan Killion

(SP3191) 03/16/94

Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	MK 383	216676
MTR CODE | SITE NAME:	72378	N/A
SAMPLE DATE | TIME (Hrs):	2-13-95	1325
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	2/17/95	2/17/95
DATE OF BTEX EXT. | ANAL.:	N/A	N/A
TYPE | DESCRIPTION:	VG	Brown clay and sand

REMARKS: TPH done at ATI

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	<20	MG/KG				
HEADSPACE PID	0	PPM				
PERCENT SOLIDS	86.7	%				

-- TPH is by EPA Method 418.1 --

Narrative:
ATI Results attached

DF = Dilution Factor Used

Approved By: _____ Date: 3-20-95

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

CLIENT	: EL PASO NATURAL GAS CO.	ATI I.D.	: 502381
PROJECT #	: 24324	DATE RECEIVED	: 02/17/95
PROJECT NAME	: PIT CLOSURE	DATE ANALYZED	: 02/17/95

PARAMETER	UNITS	17	18	19	20
PETROLEUM HYDROCARBONS, IR	MG/KG	550	5100	<20	1200

94667b

Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **502381**

February 23, 1995

El Paso Natural Gas Co.
P. O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **02/17/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA Method 8020 analyses were added on February 21, 1995 for samples 946659, 946660, 946661, 946662, 946663, 946664, 94666, 946667, 946668, 946669, 946680, 946682 per John Lambdin.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure