

Denny E. Foust
DEPUTY OIL & GAS INSPECTOR

DEC 02 1997

Approved

Meter Number: 71936
Location Name: San Juan 32-8 #26
Location: TN-31 RG-08
SC-16 UL-M
1- State
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.

THE UNIVERSITY OF CHICAGO
LIBRARY

1934

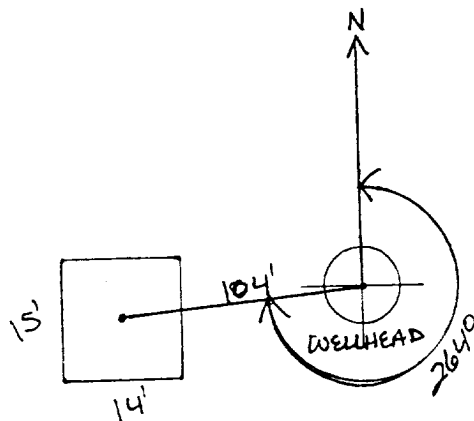
FIELD PIT SITE ASSESSMENT FORM

GENERAL	<p>Meter: <u>71936</u> Location: <u>SAN JUAN 32-8 #26</u></p> <p>Operator #: <u>7035</u> Operator Name: <u>PHILLIPS P/L</u> District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>16</u> Township: <u>31</u> Range: <u>8</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <input checked="" type="checkbox"/> Line Drip: _____ Other: _____</p> <p>Site Assessment Date: <u>8.9.95</u> Area: <u>10</u> Run: <u>11</u></p>																				
SITE ASSESSMENT	<p>NMOCD Zone: (From NMOCD Maps) Land Type:</p> <table style="width:100%; border: none;"> <tr> <td style="width:40%;">Inside</td> <td style="width:10%;"><input type="checkbox"/> (1)</td> <td style="width:20%;">BLM</td> <td style="width:10%;"><input type="checkbox"/> (1)</td> <td style="width:20%;"></td> </tr> <tr> <td>Outside</td> <td><input checked="" type="checkbox"/> (2)</td> <td>State</td> <td><input checked="" type="checkbox"/> (2)</td> <td></td> </tr> <tr> <td></td> <td></td> <td>Fee</td> <td><input type="checkbox"/> (3)</td> <td></td> </tr> <tr> <td></td> <td></td> <td>Indian</td> <td>_____</td> <td></td> </tr> </table> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> (1)</p> <p>50 Ft to 99 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/> (3)</p> <p>Wellhead Protection Area :</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"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> (1)</p> <p>200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2)</p> <p>Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)</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>Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only)</p> <p style="padding-left: 150px;"><input type="checkbox"/> (2) > 100'</p> <p>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p>	Inside	<input type="checkbox"/> (1)	BLM	<input type="checkbox"/> (1)		Outside	<input checked="" type="checkbox"/> (2)	State	<input checked="" type="checkbox"/> (2)				Fee	<input type="checkbox"/> (3)				Indian	_____	
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Outside	<input checked="" type="checkbox"/> (2)	State	<input checked="" type="checkbox"/> (2)																		
		Fee	<input type="checkbox"/> (3)																		
		Indian	_____																		
REMARKS	<p>Remarks : <u>REDLINE & TOPO SHOW LOCATION OUTSIDE V.Z.</u></p> <p><u>ONLY PIT ON THIS LOCATION. IT IS A LOCATION DRIP</u></p> <p><u>PIT AND BELONGS TO EPN6. WILL CLOSE PIT.</u></p> <p style="text-align: right;"><u>PUSH IN</u></p>																				

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 264° Footage from Wellhead 104'
b) Length : 15' Width : 14' Depth : 2'



REMARKS

Remarks :

PHOTOS - 1337

Completed By:

Paul Thompson

Signature

8.14.95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 71936 Location: SAN JUAN 32-8 #26

Coordinates: Letter: M Section 16 Township: 31 Range: 8

Or Latitude _____ Longitude _____

Date Started : 9-14-95 Run: 10 11

FIELD OBSERVATIONS

Sample Number(s): 11463

Sample Depth: 12' Feet

Final PID Reading 338 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: 9-14-95

Pit Closed By: Philip

REMARKS

Remarks : Arrived PUG Sample Hole Soil Dark Brown
Strong Hydrocarbon odor

Signature of Specialist: Morgan Lillian



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

SAMPLE NUMBER:

Field ID

Lab ID

MTR CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

Project SAMPLED BY:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

MK 463	94 7474
71936	San Juan 32.8#26 N/A
09-14-95	0950
Phase I	N/A
9-15-95	09-15-95
V6	Dark brown sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	99.7 99.7	MG/KG			2.5	2.5
HEADSPACE PID	338	PPM				
PERCENT SOLIDS	83.2	%				

-- TPH is by EPA Method 418.1 --

Narrative:

DF = Dilution Factor Used

Approved By:

John Lark

Date:

9-15-95

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

95/09/15 14:01

Sample identification
 947474

Initial mass of sample, g
 2.150

Volume of sample after extraction, ml
 28.000

Petroleum hydrocarbons, ppm
 99.706

Net absorbance of hydrocarbons (2930 cm⁻¹)
 1.023

