

Denny E. Foust
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Approved

Meter Number: 75857
Location Name: FLORANCE #80
Location: TN-30 RG-09
SC-13 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.

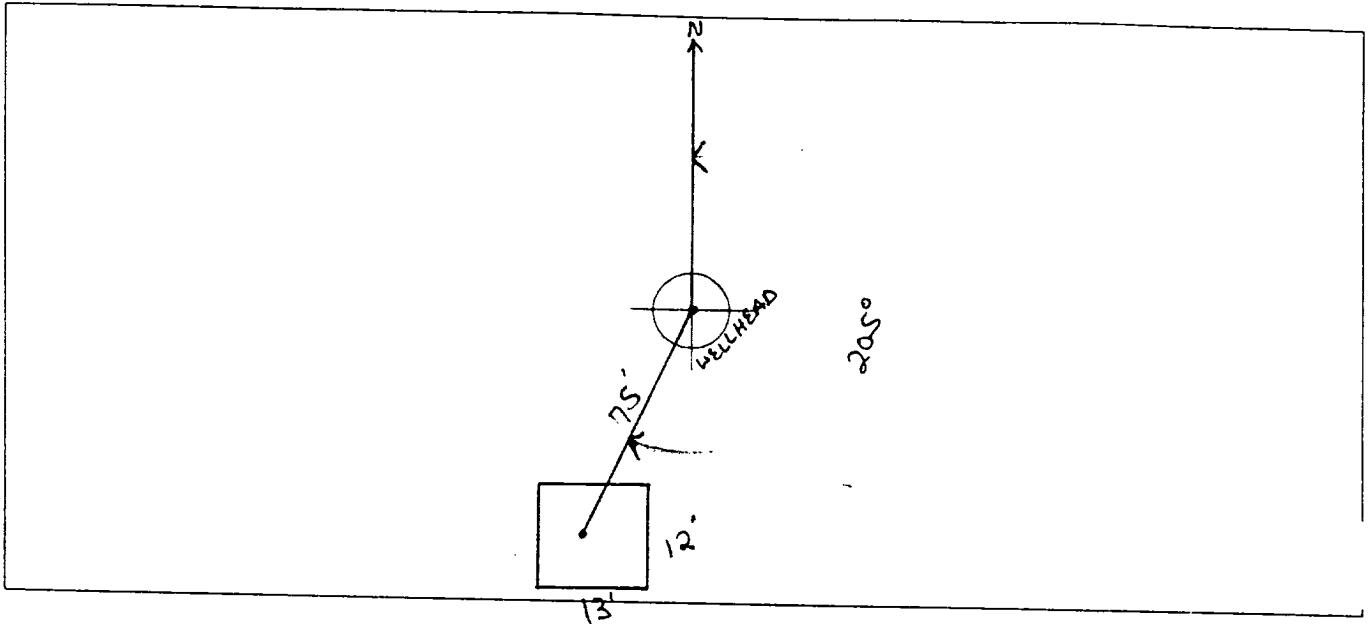
FIELD PIT SITE ASSESSMENT FORM **EL PASO FIELD SERVICES**

EPFS

| | |
|-----------------|--|
| GENERAL | <p>Meter: <u>75857</u> Location: <u>FLORENCE #80</u></p> <p>Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>BLOOMFIELD</u></p> <p>Coordinates: Letter: <u>M</u> Section <u>13</u> Township: <u>30</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Pit Type: Dehydrator _____ Location Drip: <u>X</u> Line Drip: _____ Other: _____</p> <p>Site Visit Date: <u>4.25.94</u> Run: <u>10</u> <u>33</u></p> |
| SITE ASSESSMENT | <p>NMOCD Zone: Inside _____ Land Type: BLM <input checked="" type="checkbox"/> (From NMOCD Vulnerable _____ State <input type="checkbox"/> Maps) Zone <input type="checkbox"/> Fee <input type="checkbox"/> Outside <input checked="" type="checkbox"/> Indian _____</p> <p>Depth to Groundwater</p> <p>Less Than 50 Feet (20 points) <input type="checkbox"/> 50 Ft to 99 Ft (10 points) <input type="checkbox"/> Greater Than 100 Ft (0 points) <input checked="" type="checkbox"/></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"/> YES (20 points) <input checked="" type="checkbox"/> NO (0 points)</p> <p>Horizontal Distance to Surface Water Body</p> <p>Less Than 200 Ft (20 points) <input type="checkbox"/> 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> 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>TOTAL HAZARD RANKING SCORE: <u>0</u> POINTS</p> |
| REMARKS | <p>Remarks : <u>SIX PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY. REDLINE AND TOPO CONFIRMED LOCATION TO BE OUTSIDE THE V.Z.</u></p> <p style="text-align: right;"><u>PUSH IN.</u></p> |

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 205° Footage to Wellhead 75'
 b) Degrees from North _____ Footage to Dogleg _____
 Dogleg Name _____
 c) Length : 13' Width : 12' Depth : 2'



REMARKS :

TOOK PICTURES AT 2:46 P.M.

END DUMP

Completed By:

Robert Thompson
 Signature

4.25.94
 Date

GENERAL

Meter: 75857 Location: Florida #80

Coordinates: Letter: M Section 13 Township: 30 Range: 9

Or Latitude _____ Longitude _____

Date Started : 5-18-94 Area: 10 Run: 33

FIELD OBSERVATIONS

Sample Number(s): VW106

Sample Depth: 12' Feet

Final PID Reading 260 PID Reading Depth 12' 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: 5-18-94 Pit Closed By: IBET

REMARKS

Remarks : EPN/6 line markers.

Signature of Specialist: Vale Wilgers



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

| | Field ID | Lab ID |
|----------------------------|----------|------------------------|
| SAMPLE NUMBER: | VW106 | 945227 |
| MTR CODE SITE NAME: | 75857 | N/A |
| SAMPLE DATE TIME (Hrs): | 5-18-94 | 1320 |
| SAMPLED BY: | N/A | |
| DATE OF TPH EXT. ANAL.: | 5-19-94 | 5/19/94 |
| DATE OF BTEX EXT. ANAL.: | N/A | N/A |
| TYPE DESCRIPTION: | VG | Brown/Grey 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) | 860 857 | MG/KG JUL 6/12/94 | | | 2.0 | 28 |
| HEADSPACE PID | 260 | PPM | | | | |
| PERCENT SOLIDS | 89.4 | % | | | | |

— 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 Linder

Date: 9/15/94

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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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04/05/19 13:53

Sample identification
045227

Initial mass of sample, g
0.000

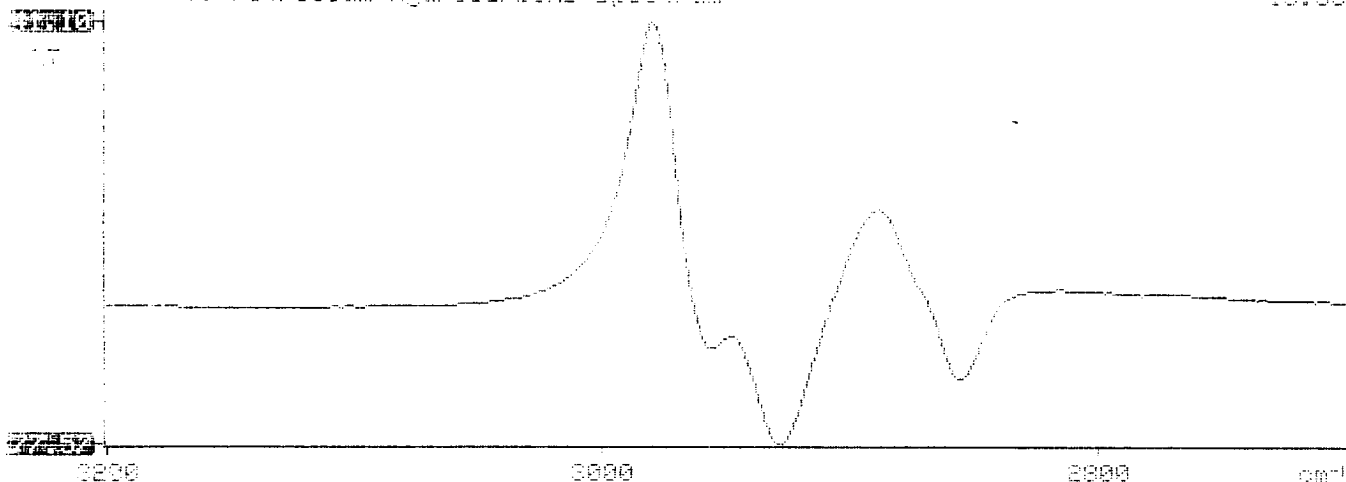
Volume of sample after extraction, ml
0.000

Petroleum hydrocarbons, ppm
056.796

Net absorbance of hydrocarbons (2930 cm⁻¹)
0.105

W: Petroleum hydrocarbons spectrum

13:53



ILLEGIBLE