

Denny E. Faust
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Meter Number: 75109
Location Name: STATE #32
Location: TN-30 RG-11
SC-36 UL-O
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.

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 75109 Location: STATE #32
Operator #: _____ Operator Name: CONOCO P/L District: KUTZ
Coordinates: Letter: O Section 36 Township: 30 Range: 11
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 12.13.94 Area: 62 Run: 33

SITE ASSESSMENT

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

☐ (1)

☒ (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'

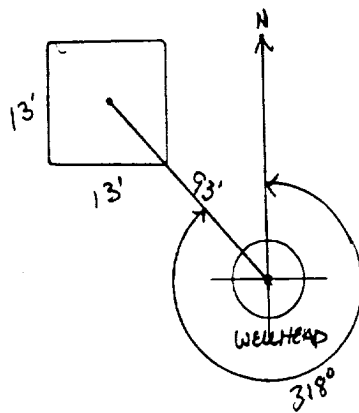
TOTAL HAZARD RANKING SCORE: 0 POINTS

Remarks : REDLINE : TOPO SHOW LOCATION OUTSIDE U.Z. THREE PITS ON
LOCATION - TWO BELONG TO THE OPERATOR. WILL CLOSE EPNG'S DEHY PIT.

REMARKS

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 318° Footage from Wellhead 93'
b) Length : 13' Width : 13' Depth : 1'



Remarks :

PHOTOS - 0958

Completed By:

Robert Thompson
Signature

12.13.94
Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>75109</u> Location: <u>STATE #32</u> Coordinates: Letter: <u>0</u> Section <u>36</u> Township: <u>30</u> Range: <u>11</u> Or Latitude _____ Longitude _____ Date Started : <u>1-4-95</u> Run: <u>02</u> <u>33</u>
FIELD OBSERVATIONS	Sample Number(s): <u>MK 317</u> Sample Depth: <u>10'</u> Feet Final PID Reading <u>512</u> PID Reading Depth <u>10'</u> Feet <div style="text-align: center;">Yes No</div> Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : <div style="display: flex; justify-content: space-between;"> <div> Excavation Onsite Bioremediation Backfill Pit Without Excavation </div> <div style="text-align: right;"> <input type="checkbox"/> Approx. Cubic Yards _____ <input type="checkbox"/> <input checked="" type="checkbox"/> </div> </div> Soil Disposition: <div style="display: flex; justify-content: space-between;"> <div> Envirotech <input type="checkbox"/> Other Facility <input type="checkbox"/> </div> <div> <input type="checkbox"/> Tierra Name: _____ </div> </div> Pit Closure Date: <u>1-4-95</u> Pit Closed By: <u>BEI</u>
REMARKS	Remarks : <u>1-3 Feet Brown sand 4-10 black sand strong</u> <u>HYDROcarbon odor</u> _____ _____
	Signature of Specialist: <u>Morgan Killion</u>



FIELD SERVICES LABORATORY

ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	mk 317	946556
MTR CODE SITE NAME:	75109	N/A
SAMPLE DATE TIME (Hrs):	1-4-95	0930
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	1-12-95	1-12-95
DATE OF BTEX EXT. ANAL.:	N/A	N/A
TYPE DESCRIPTION:	VG	Brown/Gray sand and clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
TPH (418.1)	2180	MG/KG			2.00	28
HEADSPACE PID	512	PPM				
PERCENT SOLIDS	83.7	%				

-- TPH is by EPA Method 418.1 --

Narrative:

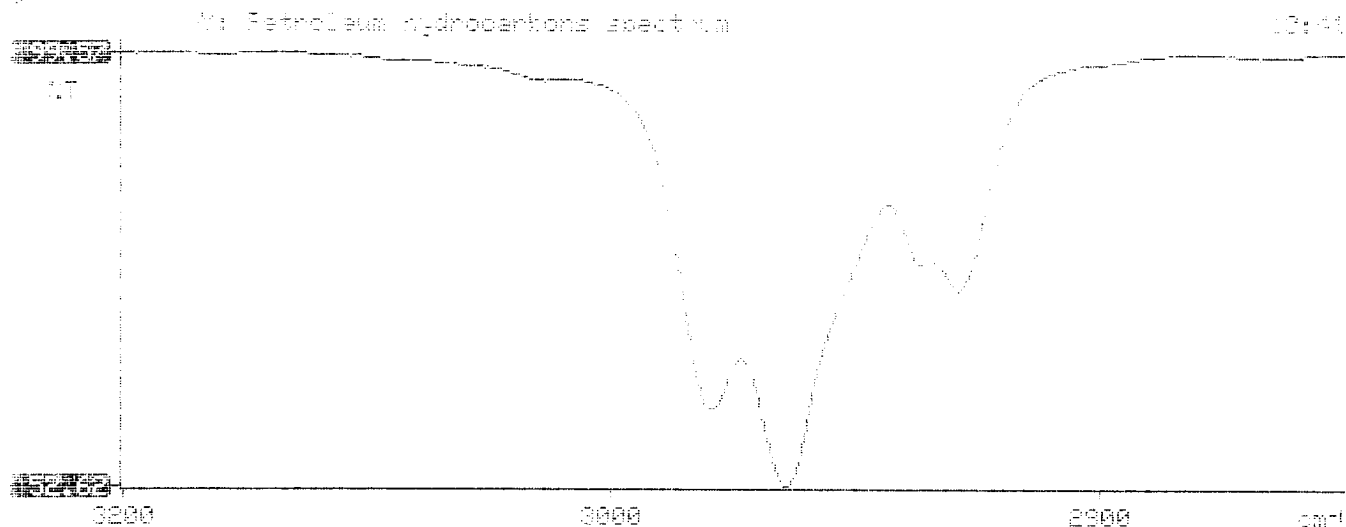
DF = Dilution Factor Used

Approved By: J. J.

Date: 2-22-95

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

* 95/01/12 10:41
 *
 * Sample identification
 946556
 *
 * Initial mass of sample, g
 2.000
 *
 * Volume of sample after extraction, ml
 28.000
 *
 * Petroleum hydrocarbons, ppm
 2183.680
 * Net absorbance of hydrocarbons (2930 cm-1)
 0.276
 *
 *
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ILLEGIBLE