

*Denny A. Fife*  
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

*Approved*

Meter Number:03870

Location Name:COX CANYON UNIT COM #19

Location:TN-32 RG-11

SC-28 UL-C

2 - Federal

NMOCD Zone:OUTSIDE

Hazard Ranking Score:00

RECEIVED  
APR 14 1997

OIL CON. DIV.  
PAGE 8

**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: 03870 Location: Cox Canyon Unit Com #19  
 Operator #: 6491 Operator Name: NWP P/L District: Aztec  
 Coordinates: Letter: C Section 28 Township: 32 Range: 11  
 Or Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
 Pit Type: Dehydrator \_\_\_\_\_ Location Drip: X Line Drip: \_\_\_\_\_ Other: \_\_\_\_\_  
 Site Assessment Date: \_\_\_\_\_ Area: 04 Run: 42

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**

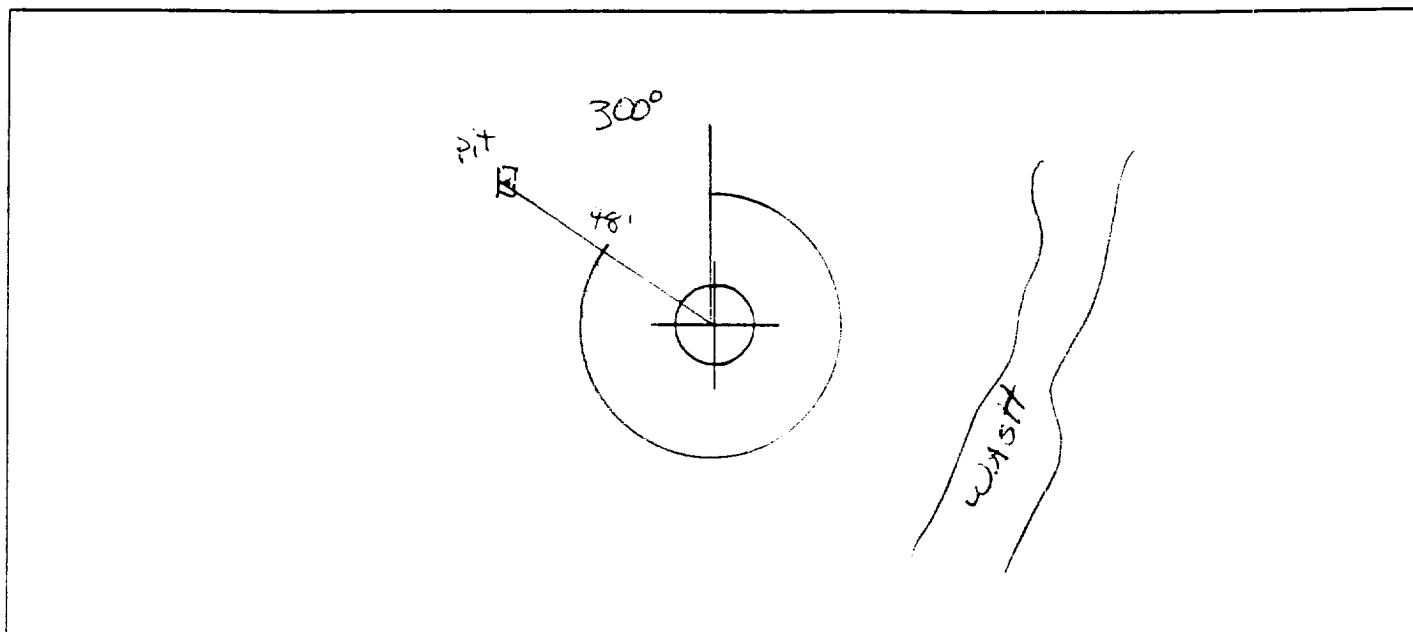
MARKS

Remarks : \_\_\_\_\_

ORIGINAL PIT LOCATION

## ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 300° Footage from Wellhead 48  
b) Length : 15 Width : 15 Depth : 3



REMARKS

## Remarks :

Dry wash 150' due east of pit, No camera to have picture of  
pit.

Completed By:

Lambert Garris  
Signature

7/20/94  
Date

# FIELD PIT REMEDIATION/CLOSURE FORM

<b>GENERAL</b>	<p>Meter: <u>03 870</u> Location: <u>Cox Canyon Unit Com #19</u></p> <p>Coordinates: Letter: <u>C</u> Section <u>28</u> Township: <u>32</u> Range: <u>11</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>7/20/94</u> Area: <u>04</u> Run: <u>42</u></p>
<b>FIELD OBSERVATIONS</b>	<p>Sample Number(s): <sup>34</sup> <u>L. 4. 7</u> <u>L. 4. 5</u></p> <p>Sample Depth: _____ Feet</p> <p>Final PID Reading _____ PID Reading Depth _____ Feet</p> <p style="text-align: center;">Yes      No</p> <p>Groundwater Encountered <input type="checkbox"/> (1) <input type="checkbox"/> (2) Approximate Depth _____ Feet</p>
<b>CLOSURE</b>	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards _____</p> <p>Onsite Bioremediation <input type="checkbox"/> (2)</p> <p>Backfill Pit Without Excavation <input 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>7/20/94</u> Pit Closed By: <u>J. P. 180</u></p>
<b>REMARKS</b>	<p><b>Remarks :</b> <u>No camera - No picture of pit</u></p> <p>_____</p> <p>_____</p>
	<p>Signature of Specialist: <u>Lambert Gassner</u></p>



## FIELD SERVICES LABORATORY

### ANALYTICAL REPORT

### PIT CLOSURE PROJECT - Soil

#### SAMPLE IDENTIFICATION

SAMPLE NUMBER:

Field ID

Lab ID

247	945735
03870	N/A
7/20/94	1400
N/A	N/A
7/21/94	7/21/94
N/A	N/A
VG	Grey/Blk sand/clay

MTR CODE | SITE NAME:

SAMPLE DATE | TIME (Hrs):

SAMPLED BY:

DATE OF TPH EXT. | ANAL.:

DATE OF BTEX EXT. | ANAL.:

TYPE | DESCRIPTION:

REMARKS: Needs PID

#### 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)	2160	MG/KG			1.99	28
HEADSPACE PID	1020	PPM				
PERCENT SOLIDS	90.04	90.0 %				

— 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:

Date:

8/1/94

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Test Method for  
Oil and Grease and Petroleum Hydrocarbons  
in Water and Soil  
Perkin-Elmer Model 1400 FT-IR  
Analysis Report  
\*\*\*\*\*

4/07/01 14:57

Sample Identification  
AGTTE

Initial Name of Sample  
AGT

Flow rate (mL/min) for analysis of  
Sample

Flow rate (mL/min) for analysis of  
Sample

Flow rate (mL/min) for analysis of  
Sample

Flow rate (mL/min) for analysis of  
Sample

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Sample

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