Kenny L. Towell
DEPUTY OIL & GAS INSPECTOR
DEC 22 1997
Approved

Meter Number:94708
Location Name:L.C. KELLY #3E
Location:TN-30 RG-12
SC-04 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.

FIELD PIT SITE ASSESSMENT FORM

EPFS
EL PASO FIELD SERVIC

GENERAL

Meter: 94708 Location: L.C. KELLY #3E

Operator #: 0203 Operator Name: Amoco P/L District: KUTZ

Coordinates: Letter: H Section 4 Township: 30 Range: 12

Or Latitude _____ Longitude _____

Pit Type: Dehydrator X Location Drip: ___ Line Drip: ___ Other: _____

Site Visit Date: 4.1.94 Run: 02 63

SITE ASSESSMENT

NMOCD Zone: (From NMOCD Maps)
Inside Vulnerable Zone ☒
Outside ☐

Land Type:
BLM ☒
State ☐
Fee ☐
Indian _____

Depth to Groundwater
Less Than 50 Feet (20 points) ☐
50 Ft to 99 Ft (10 points) ☐
Greater Than 100 Ft (0 points) ☒

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? ☐ YES (20 points) ☒ NO (0 points)

Horizontal Distance to Surface Water Body
Less Than 200 Ft (20 points) ☐
200 Ft to 1000 Ft (10 points) ☐
Greater Than 1000 Ft (0 points) ☒
Name of Surface Water Body _____
(Surface Water Body : Perennial Rivers,Major Wash,Streams,Creeks, Irrigation Canals,Ditches,Lakes,Ponds)

TOTAL HAZARD RANKING SCORE: 0 **POINTS**

REMARKS

Remarks : THREE PITS ON LOCATION. WILL CLOSE ONLY ONE. PIT IS DRY.

ORIGINAL PIT LOCATION

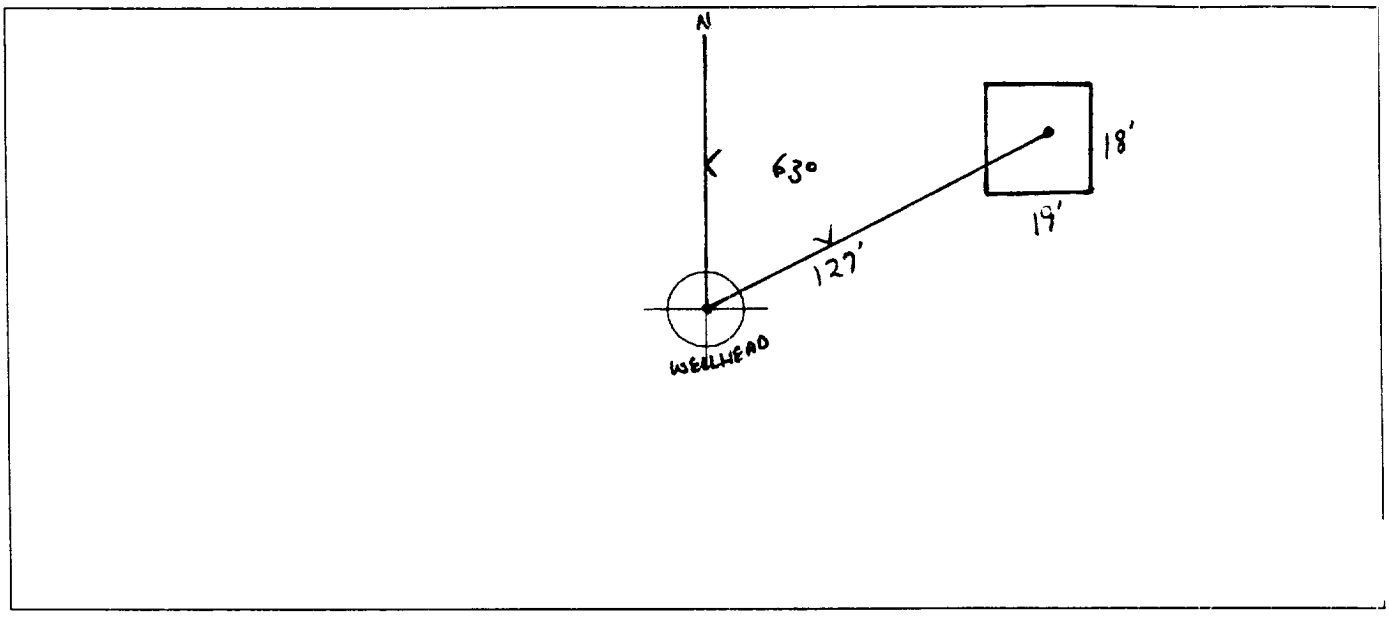
ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 63° Footage to Wellhead 127'

b) Degrees from North _____ Footage to Dogleg _____

Dogleg Name _____

c) Length : 19' Width : 18' Depth : 4'



REMARKS

Remarks :

STARTED TAKING PICTURES AT 9:39 A.M.

END DUMP

Completed By:

Signature

4.1.94

Date

GENERAL

Operator #: _____ Operator Name: _____ P/L District: _____

Coordinates: Letter: ___ Section ___ Township: ___ Range: ___

Or: Latitude _____ Longitude _____

Pit Type: Dehydrator ___ Location Drip: ___ Line Drip: ___ Other: _____

Site Assessment Date: _____ Area: 02 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 _____

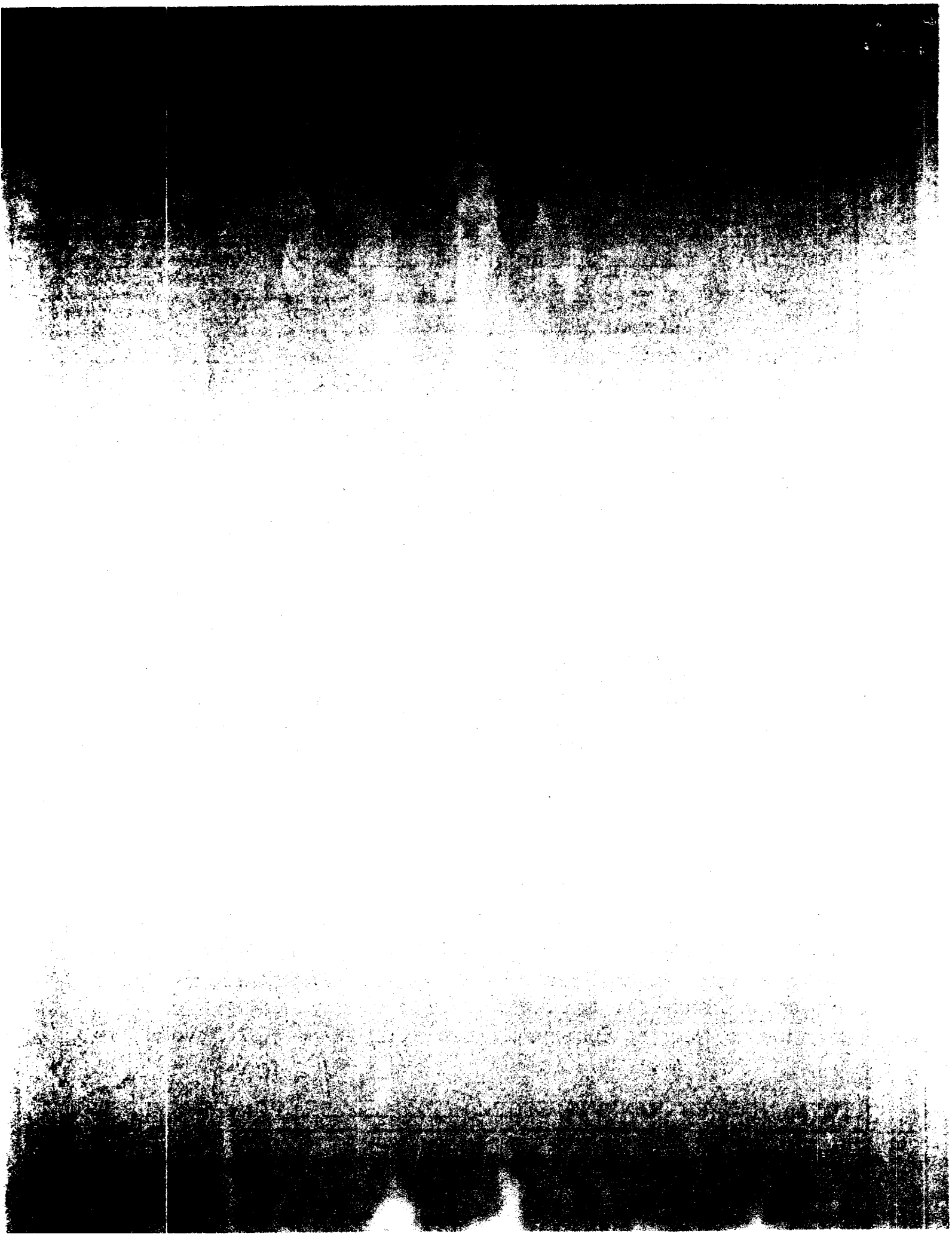
(Surface Water Body : Perennial Rivers,Major Wash,Streams,Creeks, Irrigation Canals,Ditches,Lakes,Ponds)

Distance to Nearest Ephemeral Stream ☐ (1) < 100'(Navajo Pits Only)

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: _____ POINTS

REMARKS



FIEL PIT REMEDIATION/CLOSU E FORM

GENERAL

Meter: 94708 Location: L.C. Kelly #3E

Coordinates: Letter: H Section 4 Township: 30 Range: 12

Or Latitude _____ Longitude _____

Date Started : 5-10-94 Area: 02 Run: 63

FIELD OBSERVATIONS

Sample Number(s): VW52 _____ _____ _____

Sample Depth: 5' Feet

Final PID Reading 184 PID Reading Depth 5' Feet

Yes No

Groundwater Encountered ☐ (1) ☒ (2) Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☐ (1) Approx. Cubic Yards 0

Onsite Bioremediation ☐ (2)

Backfill Pit Without Excavation ☒ (3)

Soil Disposition:

Envirotech ☐ (1) ☐ (3) Tierra

Other Facility ☐ (2) Name: _____

Pit Closure Date: 5-10-94 Pit Closed By: BEI

REMARKS

Remarks : EPNG Line Marker - 5' Hit Sandstone

Signature of Specialist: Vale Wilson

(SP3191) 04/07/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	VW52	9515.0
MTR CODE | SITE NAME:	94708	N/A
SAMPLE DATE | TIME (Hrs):	5/10/94	1355
SAMPLED BY:	N/A	
DATE OF TPH EXT. | ANAL.:	5/12/94	5/12/94
DATE OF BTEX EXT. | ANAL.:	N/A	N/A
TYPE | DESCRIPTION:	VG	Coarse Light Brown 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)	42.0	MG/KG			2.1	28
HEADSPACE PID	184	PPM				
PERCENT SOLIDS	89.2	%				

– TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 –

he Surrogate Recovery was at N/A % for this sample All QA/QC was acceptable.
arrative:

F = Dilution Factor Used

pproved By: John Labadie Date: 6/15/94

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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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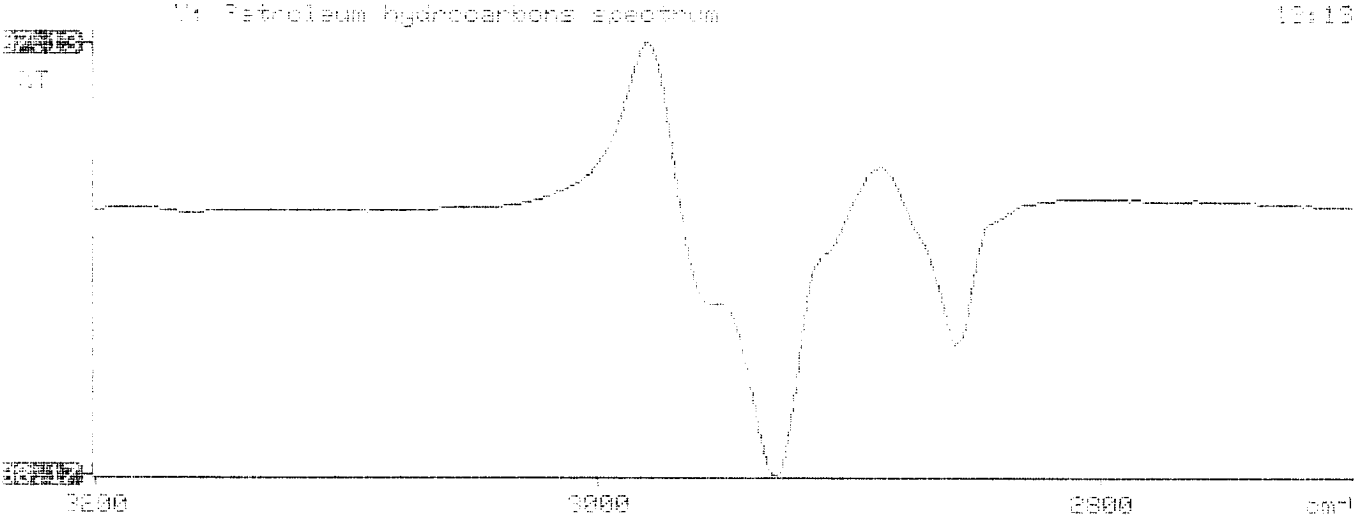
74/05/12 13:13

Sample identification
745120

Initial mass of sample, g
1.100

Volume of sample after extraction, ml
23.000

Petroleum hydrocarbons, ppm
19.134
Net absorbance of hydrocarbons (2930 cm-1)
1.054



ILLEGIBLE