Denny E. Foust
DEPUTY OIL & GAS INSPECTOR
DEC 0 2 1997

Meter Number:94924
Location Name:Mesa Twin Mounds #1 - 30 GL
Location:TN-30 RG-14
SC-30 UL-D
2 - Federal
NMOCD Zone:OUTSIDE
Hazard Ranking Score:00

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.

EPFS
EL PASO FIELD SERVICES

FIELD PIT SITE ASSESSMENT FORM

GENERAL

Meter: 94924 Location: Mesa Twin Mounds #1-30 GL
Operator #: 9391 Operator Name: Conoco (Walsh Engineering) P/L District: Kutz
Coordinates: Letter: Q Section 30 Township: 30 Range: 14
Or Latitude _____ Longitude _____
Pit Type: Dehydrator ___ Location Drip: X Line Drip: ___ Other: _____
Site Assessment Date: 10-17-95 Area: 02 Run: 23

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**

REMARKS

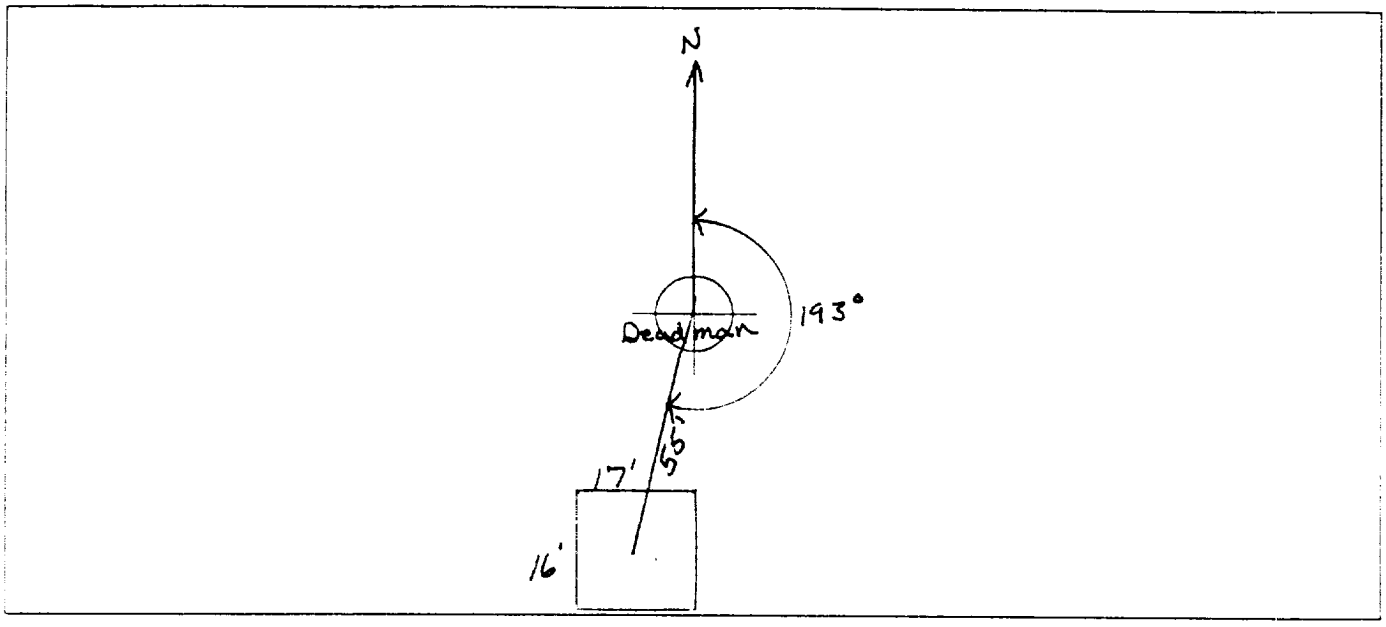
Remarks : Pit A Loc. Topo shows outside UL. Not in my Redline
4 pits on Loc. 1.) Rig Blow pit 2.) Seperator pit 3. Loc Drip
4.) ☆ Loc Drip's both belong to EPNG will close both
Loc. Drip's.

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 193° Footage from Wellhead 55'

b) Length : 17' Width : 16' Depth : 5'



REMARKS

Remarks :

photo's 10:05 4 pict.

P & A Loc.

Completed By:

James L Powers

Signature

10-17-95

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL

Meter: 94924 Location: Mesa Twin Mounds #1-306L

Coordinates: Letter: D Section 30 Township: 30 Range: 14

Or Latitude _____ Longitude _____

Date Started : 10-23-95 Run: 02 23

FIELD OBSERVATIONS

Sample Number(s): 1P66 _____ _____ _____

Sample Depth: 7 Feet

Final PID Reading 4 ppm PID Reading Depth 7 Feet

	Yes	No
Groundwater Encountered	☐	☒

Approximate Depth _____ Feet

CLOSURE

Remediation Method :

Excavation ☐ Approx. Cubic Yards 0

Onsite Bioremediation ☐

Backfill Pit Without Excavation ☒

Soil Disposition:

Envirotech ☐ ☒ Tierra

Other Facility ☐ Name: _____

Pit Closure Date: 10-23-95 Pit Closed By: Philip Env

REMARKS

Remarks : Dug 2 ft below bottom of pit & hit sandstone, Took PID it was 4 ppm. Used 10 cuyd backfill.

Fencing: 25 x 25 Netting: No

Signature of Specialist: James F Lewis

(SP3191) 03/16/94

El Paso Natural Gas Company

FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	JP66	947690
MTR CODE | SITE NAME:	94924	Mesa Twin Mounds #1-30 6L
SAMPLE DATE | TIME (Hrs):	10-23-95	1700
PROJECT:	Phase I	
DATE OF TPH EXT. | ANAL.:	10/25/95	
DATE OF BTEX EXT. | ANAL.:	10/24/95	10/24/95
TYPE | DESCRIPTION:	VG	Light brown Sand ; Dry Stone

Field Remarks: _____

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	< 0.5	MG/KG				
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	< 0.5	MG/KG				
TOTAL XYLENES	< 1.5	MG/KG				
TOTAL BTEX	< 3	MG/KG				
TPH (418.1)	149	MG/KG			2.01	25
HEADSPACE PID	4	PPM				
PERCENT SOLIDS	91.8	%				

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

The Surrogate Recovery was at 98% for this sample All QA/QC was acceptable.

Narrative:

DF = Dilution Factor Used

Approved By: _____ Date: 10-26-95

BTEX SOIL SAMPLE WORKSHEET

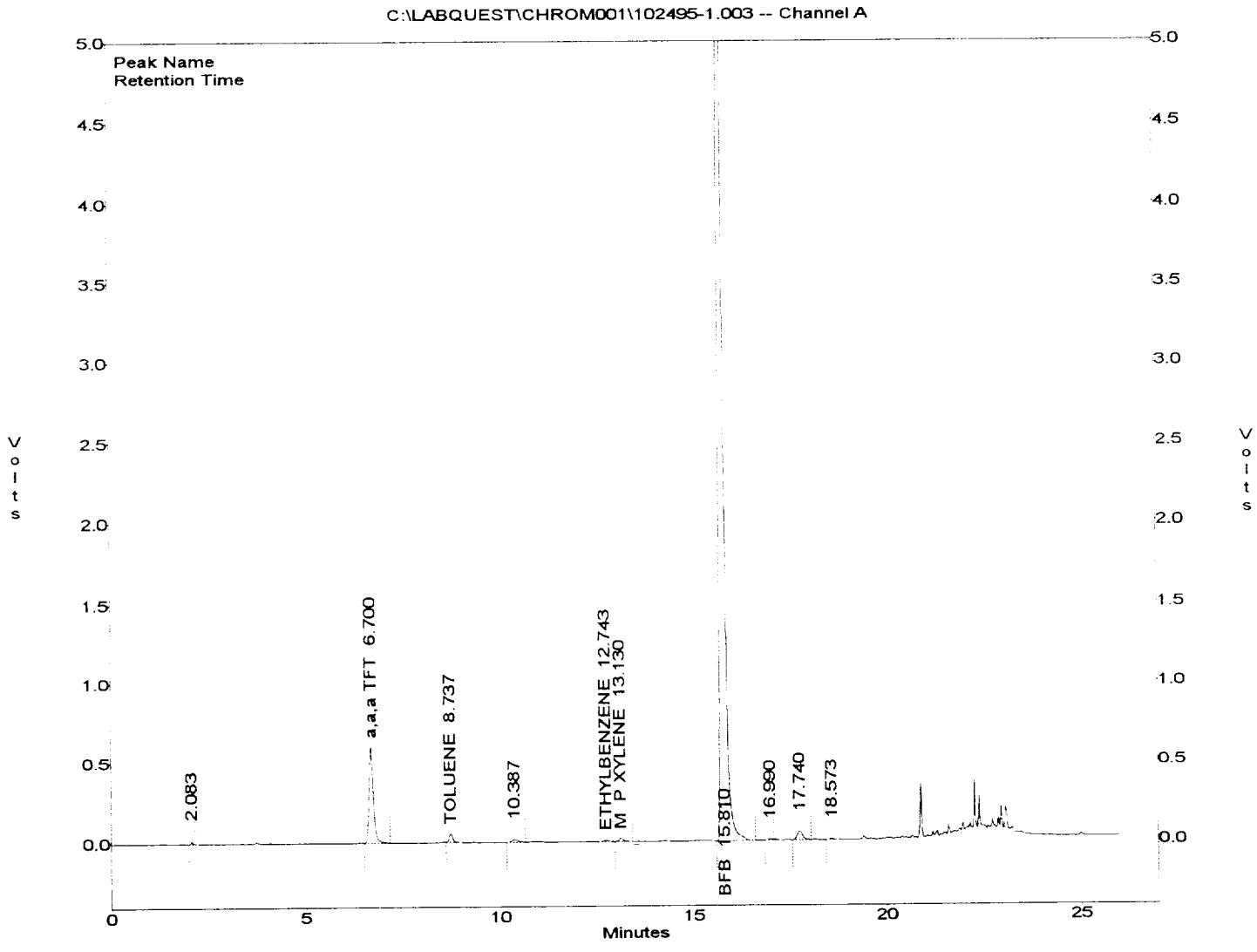
File :	947690	**Date Printed** :	10/25/95	
Soil Mass (g) :	5.01	**Multiplier (L/g)** :	0.00100	
Extraction vol. (mL) :	10	**CAL FACTOR (Analytical):**	200	
Shot Volume (uL) :	50	**CAL FACTOR (Report):**	0.19960	
		DILUTION FACTOR:	**1**	**Det. Limit**
Benzene (ug/L) :	0.00	**Benzene (mg/Kg):**	**0.000**	0.499
Toluene (ug/L) :	0.97	**Toluene (mg/Kg):**	**0.194**	0.499
Ethylbenzene (ug/L) :	0.17	**Ethylbenzene (mg/Kg):**	**0.034**	0.499
p & m-xylene (ug/L) :	0.36	p & m-xylene (mg/Kg):	0.072	0.998
o-xylene (ug/L) :	0.00	o-xylene (mg/Kg):	0.000	0.499
		Total xylenes (mg/Kg):	**0.072**	1.497
		Total BTEX (mg/Kg):	**0.299**	

EL PASO NATURAL GAS
EPA METHOD 8020 - BTEX SOILS

File : C:\LABQUEST\CHROM001\102495-1.003
Method : C:\LABQUEST\METHODS\1-101395.MET
Sample ID : 947690,5.01G,50U
Acquired : Oct 24, 1995 14:40:50
Printed : Oct 24, 1995 15:07:11
User : MARLON

Channel A Results

COMPONENT	RET TIME	AREA	CONC (ug/L)
BENZENE	4.873	0	0.0000
a,a,a TFT	6.700	4503441	100.5374
TOLUENE	8.737	350301	0.9737
ETHYLBENZENE	12.743	57441	0.1735
M & P XYLENE	13.130	147530	0.3644
O XYLENE	14.223	0	0.0000
BFB	15.810	67832840	98.4202



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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                     *
**********************************************************

 95/10/25  14:59

   Sample identification
 947690

   Initial mass of sample, g
 2.010

   Volume of sample after extraction, ml
 28.000

   Petroleum hydrocarbons, ppm
 148.549
   Net absorbance of hydrocarbons (2930 cm-1)
 0.028
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