

Denny & [unclear]
DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Approved

Meter Number:71372
Location Name:ATLANTIC LS #A9
Location:TN-31 RG-10
SC-27 UL-N
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

GENERAL

Meter: 71372 Location: ATLANTIC LS # A9
Operator #: 0203 Operator Name: AMOCO P/L District: AZTEC
Coordinates: Letter: N Section 27 Township: 31 Range: 10
Or Latitude Longitude
Pit Type: Dehydrator X Location Drip: Line Drip: Other:
Site Assessment Date: 2.1.95 Area: 04 Run: 63

SITE ASSESSMENT

NMOCD Zone: Land Type: BLM X (1)
(From NMOCD State O (2)
Maps) Inside O (1) Fee O (3)
Outside X (2) Indian

Depth to Groundwater
Less Than 50 Feet (20 points) O (1)
50 Ft to 99 Ft (10 points) O (2)
Greater Than 100 Ft (0 points) X (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? O (1) YES (20 points) X (2) NO (0 points)

Horizontal Distance to Surface Water Body
Less Than 200 Ft (20 points) O (1)
200 Ft to 1000 Ft (10 points) O (2)
Greater Than 1000 Ft (0 points) X (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 O (1) < 100' (Navajo Pits Only)
O (2) > 100'

TOTAL HAZARD RANKING SCORE: 0 POINTS

REMARKS

Remarks : REDLINE SHOWS INSIDE BUT TOPO SHOWS LOCATION OUTSIDE
V.2.4 PITS ON LOCATION. UNLINED DEHY PIT BELONGS TO EPNG. WILL
CLOSE PIT.

PUSH IN

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: <u>71372</u> Location: <u>ATLANTIC LS #19</u> Coordinates: Letter: <u>N</u> Section <u>27</u> Township: <u>31</u> Range: <u>10</u> Or Latitude _____ Longitude _____ Date Started : <u>2-28-95</u> Run: <u>04</u> <u>63</u>
FIELD OBSERVATIONS	Sample Number(s): <u>KP435</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>417</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> <input type="checkbox"/> Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input type="checkbox"/> Approx. Cubic Yards _____ Onsite Bioremediation <input type="checkbox"/> Backfill Pit Without Excavation <input checked="" type="checkbox"/> Soil Disposition: Envirotech <input type="checkbox"/> Tierra <input type="checkbox"/> Other Facility <input type="checkbox"/> Name: _____ Pit Closure Date: <u>2-28-95</u> Pit Closed By: <u>B.E.I</u>
REMARKS	Remarks : <u>Some line markers dug A Test hole To 12'</u> <u>Soil dark gray with A H.C older. closed lid</u>
	Signature of Specialist: <u>KP Kelly Padilla</u>

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

95/03/03 15:27

Sample identification
#46719

Initial mass of sample, g
30

Volume of sample after extraction, ml
29.000

Petroleum hydrocarbons, ppm
3316.031

Net absorbance of hydrocarbons (2930 cm⁻¹)
0.439

